

CARB's Oil and Gas Methane Regulation

BACKGROUND

- Adopted by the Board in March 2017.
- Reduces fugitive and vented emissions of methane from both new and existing oil and gas facilities, including:
 - Oil and Gas Production, Processing, and Storage Facilities;
 - Natural Gas Gathering and Boosting Stations;
 - Natural Gas Underground Storage Facilities, and
 - Natural Gas Transmission Compressor Stations.
- Regulation includes standards for:
 - Separator and tank systems;
 - Circulation tanks;
 - Leak Detection and Repair (LDAR);
 - Underground natural gas storage monitoring;
 - Natural gas compressors;
 - Pneumatic devices and pumps; and
 - Reporting requirements.

REGULATION STANDARDS

- **Separator and tank systems:**
 - Requires flash testing to determine annual methane emissions.
 - Requires systems with annual emissions above 10 MT methane to install vapor collection.
- **Circulation tanks used in Well Stimulation Treatments:**
 - Operators institute a Best Practices Management Plan, followed by a control equipment technical assessment by January 1, 2019.
 - If technical assessment proves out, tanks controlled for emissions by January 1, 2020.
- **Leak Detection and Repair (LDAR):**
 - Requires daily audio/visual inspections and quarterly leak measurements of components.
 - Builds on current requirements by many districts to control VOCs.
 - Regulation extends testing to methane at natural gas facilities.
- **Underground gas storage monitoring program:**
 - Ambient air monitoring.
 - Daily or continuous leak monitoring at injection/withdrawal wellheads.
 - Operators submit monitoring plans to CARB for approval.
- **Natural gas compressors:**
 - Emission standards for reciprocating compressor rod packings and centrifugal compressor wet seals.
 - Requires either (1) replacement of high-emitting rod packing or wet seal, or (2) collection of leaking gas.
 - All compressors subject to LDAR.

- **Pneumatic devices and pumps:**
 - Continuous bleed to be changed to no-bleed.
 - Air or electricity to operate, or controlled with a vapor collection system.
- **Reporting requirements:**
 - Facility and equipment information;
 - Flash test results;
 - Annual LDAR results;
 - Underground natural gas storage monitoring plan reporting;
 - Annual concentrations or flow rates for compressors and pneumatics; and
 - Additional annual reporting for liquids unloading of natural gas wells, and for well casing vents.

REGULATION IMPACTS

- Overall estimated annualized cost, with natural gas savings, of \$27,300,000.
- Estimated continuing reductions of more than 1.4 million MT of CO₂ equivalent per year, using a 20 year Global Warming Potential for methane.
- Estimated overall cost-effectiveness of \$19 per MT of CO₂ equivalent reduced.
- Over 3,600 tons per year (TPY) of VOC reductions statewide.
- Over 100 TPY of reductions statewide of Toxic Air Contaminants, such as Benzene, Toluene, Ethyl-Benzene, and Xylenes.
- Neutral statewide Oxides of Nitrogen (NO_x) impact.

IMPLEMENTATION

- Regulation allows both CARB and the districts to implement; district implementation is preferred.
- For most districts, CARB is handling the one-time facility and equipment reporting; districts handling “on the ground” enforcement. For district-specific responsibilities, see [Memoranda of Agreements page](#).
- **January 1, 2018**
 - Leak Detection and Repair (LDAR) begins;
 - Underground natural gas storage facilities’ monitoring plans due; and
 - Equipment reporting and flash testing data due.
- **July 1, 2018**
 - CARB staff will decide to approve or request modifications of underground natural gas storage facilities’ monitoring plans.
- **January 1, 2019**
 - Vapor collection on separator and tank systems installed;
 - Pneumatic devices and compressor seal change-outs required; and
 - Circulation tank technology assessment complete.
- **July 1, 2019**
 - Annual reporting of LDAR results, compressor and pneumatic concentrations or flow rates, and liquids unloading and well casing vent reporting all due.
 - CARB is working with a contractor to develop a web-based tool for this reporting.
- **January 1, 2020**
 - Circulation tank vapor collection installed, pending technology assessment.