Shale and Fugitive Emissions: Impacts on Non-Attainment and Growth

Air Emissions Permitting Issues

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April 17, 2012 Issues regulations to reduce emissions from oil & gas wells

Two-phase Transition period for “green completions” at fractured and re-fractured wells

During Transition until January 1, 2015 emissions must be reduced through combustion devices
> Phase I - VOC emissions must be reduced either by flaring using completion combustion device or by capturing the gas using green completions with a completion combustion device

> Phase II - Operators must capture the gas and make it available for use or sale, through the use of green completions
> **Exceptions**

> Green completions are not required for new exploratory ("wildcat") wells or delineation wells, or

> Hydraulically fractured low-pressure wells

> Combustion must be used to reduce emissions during well-completion process
> Other Equipment at Well Sites
> New and modified pneumatic controllers - high-bleed, gas-driven controllers have one year to reduce bleed rate to > 6 cf/hr
> Storage tanks with > 6 ton/year VOC emissions must reduce emissions by at least 95%
NESHAP Requirement

> Glycol dehydrators at well sites are subject to the NESHAP for oil & gas production
> Large dehydrators - retains existing 1-ton/year benzene compliance option (reduce benzene emissions to >1 ton/year as alternative to reducing total air toxics emissions by 95%)
> Small dehydrators - unit-specific limits
Ohio Air Permitting Requirements

> General Permit - Let’s play “21 Questions”
> “Qualifying Criteria Document”
> Covers a variety of emissions sources found at most well sites, including: internal combustion engines, generators, dehydration systems, storage tanks, and flares
> No “major” sources or major modifications
Permitting Considerations

> What sources are on you well site?
> What are your future plans for the well site?
> What is the attainment designation for the county in which the well site is located?
> What is the proximity of other commonly-owned well-sites?
> Neighbors?
Other Considerations

> GHG emissions studies
> GHG litigation
> Bell v. Cheswick Generating Station
> Neighbors
> Other regulatory requirements
>Questions ?