PASS THE STEAK: PERSPECTIVES ON COLORADO’S RECENT OIL & GAS STAKEHOLDER PROCESSES

WILL MARSHALL
ROADMAP

- Storage Tank Guidelines
- SHER Task Force
- Pneumatic Controller Task Force
- Expectations for the Next Year
- Unknowns
Guidelines stem from several “general duty” provisions of Colorado’s AQCC Regulation 7

Goals of the Workgroup and Guidelines:
- Improve VCS performance
- Address ‘over-pressurization’
- Create regulatory transparency for ‘Design, Operation and Maintenance’ of tank batteries and VCS
STORAGE TANK GUIDELINES

- Over 50 pages of technical guidance and recommendations in two areas
  - Design: how can operators adequately design tank batteries?
  - Operation and Maintenance (O&M): ongoing measures to reduce facility emissions
STORAGE TANK GUIDELINES

- Implications—what do the Guidelines mean and where are they going?
- Guidelines are a *voluntary* compliance tool.
- Guidelines are NOT rules or regulations, nor do they modify, limit or expand existing regulatory requirements.
- Implementation is intended to be flexible from operator to operator.
STORAGE TANK GUIDELINES

- COC and CD compliance—a stand in for following the Guidelines?
- How will the Division treat the Guidelines during an enforcement action?
- Will the Guidelines (or something similar) move into other jurisdictions or be adopted by the EPA?
SHER TASK FORCE

- Emission reductions are not necessarily emission controls

Accomplishments
- Understanding a wide variety of topics
- Innovative ideas
- Collaboration that drives towards emission reductions
SHER TASK FORCE

- Monthly stakeholder-wide meetings
- Hundreds of hours of detailed, important evaluation and consideration
- SHER’s pneumatic strategies are expected to be informed by the PCTF
PNEUMATIC CONTROLLER TASK FORCE

- Field Data Collection Effort
  - 179 facilities
  - 3,838 controllers
  - Goal was to evaluate the extent of improperly operating PC’s

- Evaluation of the data and implications is ongoing
PNEUMATIC CONTROLLER TASK FORCE

- Expect continued discussion and understanding of PC operation and definitions
- Additional data from the Find and Fix program data results
- Additional evaluation of cost effectiveness and repair techniques
TASK FORCES NEXT STEPS

- Over the next year or so, SHER and PCTF will finalize recommendations and reports for the AQCC
- Both task forces and stakeholders will present findings at the AQCC
- SHER in early 2020
- PCTF in mid 2020
EXPECTATIONS

- Voluntary Programs
- More task forces?
- Regulatory Requirements
- Potential Rulemaking
(A) A requirement that leak detection and repair inspections occur at all well production facilities on, at a minimum, a semiannual basis or that an alternative approved instrument monitoring method is in place pursuant to existing rules;

(D) A requirement to reduce emissions from pneumatic devices. The commission shall consider requiring oil and gas operators, under appropriate circumstances, to use pneumatic devices that do not vent natural gas.
March 26, 2019

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Re: Withdrawal of Colorado’s Request to Extend the 2008 Ozone National Ambient Air Quality Standard Attainment Date for the Denver Metropolitan/North Front Range Nonattainment Area
QUESTIONS?