

**WRAP – Oil and Gas Work Group
Call Agenda**

Tuesday, October 9, 2018 (90 minutes)
10:00 am (AK), 11:00 am (PT), Noon (MT), 2:00 pm (ET)

1. Welcome/Introductions (*Amanda Brimmer*)

- a. Rotating Call Note Taker – Thank You Debbie Miller for Volunteering!
- b. Roll Call

Amanda Brimmer, Stephanie Huber, Eileen Steilman, Adam Rookey, Mark Jones, Darla Potter, Melissa Hovey, Jill McMurray, Leslie Vaculik, Ann Mebane, Debbie Miller, Tom Moore, John Grant, Amnon Bar-Ilan, Julie Simpson, Frank Forsgren, Gail Tonnesen, Kevin Briggs, Bill Auberle, Charlie Schlinger, Mark Daniels

2. Review Agenda (*Amanda Brimmer*)

3. Announcements

- a. MJO 2016 Modeling Platform Effort (*Tom Moore*)

This is the first collaboration among EPA and MJOs to develop a 2016 modeling platform. Workgroups have been meeting to work on emissions work needed for modeling. The Alpha version have been put together and soon the Beta version of the emissions files will be available. Some projections into the future for 2023 and 2028 will be developed. There is a sister oil and gas work group for this national effort that is working on the O&G emissions—let Tom Moore know if you want to participate.

There will be a Version 1 (final effort), as opposed to the Alpha/Beta versions, that will be available early next year.

- b. WESTAR/WRAP Fall Business Meeting (*Tom Moore*)

This was held in September in Bismarck, ND. This was the first time WESTAR/WRAP met in ND. There was an extensive update in regard to progress on tasks in the WRAP work plan, and the materials are posted on the WESTAR/WRAP website.

<http://www.westar.org/Docs/Business%20Meetings/Fall18/fall2018final.pdf>

They did highlight to state air directors the need for state assistance with upcoming oil and gas survey efforts.

- c. WRAP Workplan Implementation Guidance – Completion, Dissemination and Sharing of Work Products and Deliverables (*Darla Potter*)

Mark, Darla, and Amanda, in coordination with Julie Simpson and Tom Moore, have been developing and getting some consistency for implementation guidance for WRAP work plan for the workgroups. The small subgroup has been working on implementation guidance including completion and sharing of workgroup deliverables. Products are adopted by consensus. To make sure there is appropriate dissemination, the second part of the document indicates that completed products will be provided with the technical steering committee and logged into a docket. This will allow other groups to review and identify whether there are additional questions to be addressed. Once guidance is

finalized this will be communicated to work group members.

- d. Health Effects Institute – Research Planning Workshop: *Understanding Population-Level Exposures Associated with Onshore Development of Oil and Natural Gas from Unconventional Resources* (Tom Moore)

The Health Effects Institute is a research group in Boston funded by EPA, non-profits, industry, etc., and they do all sorts of air pollution-related health effects research. They provide information for use in EPA reviews of standards under the Clean Air Act. They have held a series of research planning workshops recently. They are working on a new study (see title at D). This will focus on unconventional oil and gas. John Grant and Tom made a presentation to the group to explain the work being done by states on emissions and how information is used. Tom can provide a link to the presentation and can answer any questions; feel free to email him.

https://www.wrapair2.org/pdf/HEI_Grant_and_Moore_final13Sep2018.pdf

- e. Other announcements from work group members / advisors from Darla: she has been made aware of a few things to highlight to people.
- There has been a lot of attention on emissions from flaring at O&G sites. GTUIT, a private company, recently received an award for their flare capture technology, which is being used in the Bakken.
https://myemail.constantcontact.com/PRESS-RELEASE--GTUIT-RECEIVES-NORTH-DAKOTA-PETROLEUM-COUNCIL-2018-AWARD-FOR-ENVIRONMENTAL-STEWARDSHIP.html?soid=1121289817508&aid=Q_jcyf-e4Gk
 - EPA has formed a state-tribal natural gas group that is holding calls bi-monthly. They recently talked about new source performance standards and source determination rule (aka source aggregation). The October call will be next week, but will have more of a water focus than air.
 - Periodically we see information on reasonably available control technology (RACT) for oil and gas, specifically using control technique guidelines (CTG). The California Air Resources Board (CARB) is having a public meeting October 25th regarding an Oil and Gas state plan submission.

4. BLM Waste Prevention, Production Subject to Royalties, and Resource Conservation; Rescission or Revision of Certain Requirements - Overview of Changes (Melissa Hovey)

On Sept 28th BLM issued its revised rule (referred to earlier as BLM methane rule or BLM venting and flaring rule). Prior to rule, BLM operated under a 35 year old Notice to Lessees policy that provided guidance on what gas was considered waste, not waste, or beneficial use and when royalties would be charged. This was put initially into a rule in November 2016, but was rescinded and replaced with the new rule. The intent of the 2016 rule was to reduce waste from flaring and leaks. The new rule rescinded most of what was in 2016 rule, including a requirement for operators to create a waste minimization rule along with other requirements, including leak detection and repair. The new rule is more similar to the policy that was in place prior to the 2016 rule. It retains a part of the 2016 rule that allows gas used for operation and production to remain royalty

free. It does include some requirements from the 2016 rule. 43 CFR 179 contains the new regulations, which don't go into effect until November 27th. The BLM is already being sued by two states and several environmental groups. The premise of the new rule is that a new method was devised to estimate the costs associated with the 2016 rule, and it has now been determined that the costs of controls would exceed the benefits. It also found that the old rule created unnecessary administrative burdens for operators. Some limits that are still in effect include some venting limitations. Other aspects of rule allow for beneficial use to be royalty free.

<https://www.govinfo.gov/content/pkg/FR-2018-09-28/pdf/2018-20689.pdf>

5. OGWG Road Map Phase II (John Grant & Amnon Bar-Ilan – Ramboll Environ)

a. Emission Inventory Technical Improvements

A pdf with some slides (WRAP OGWG OGEI_status_09oct2018.pdf) and a brief memorandum were circulated with the meeting materials.

There is a typo in the date on the update PDF—the slides are current as of today.

Please look at the synthesis memorandum which has more information on the survey. There are two phases for the survey. In phase I, agencies fill out based on internal data sets. In Phase II operators will fill out the survey. Individual agencies are responsible for Phase I, as well as making decisions as to which operators to send the survey to in Phase II and which components they want the operators to provide data for. Agencies will send the surveys to operators and follow up with operators as necessary. Ramboll will provide assistance to the agencies. Ramboll can provide basin-level oil and gas operator lists that will include prioritization based on activity levels to help agencies decide which 3-5 operators to request specific data. Data requested in survey will include information on upstream exploration, upstream production, gas composition, and upstream point source data. This includes information on drill rigs, fracking engines, condensate tanks, oil tanks, and wellhead engines.

b. Status, Schedule, And Looking Ahead

The schedule for the survey and incorporation into base year inventory will run from late October 2018 through April 2019. Agencies (state will be the focus, may include tribal agencies) will receive surveys in late October and respond in November. Operators will receive surveys and respond in December and January. Results will be incorporated into the base year inventory around mid-March, followed by oil and gas work group member review.

The survey schedule is longer than what was originally planned and will delay base and future year inventories. Focus is on survey work at the moment.

The surveys in basins with tribal and nontribal components will likely focus on state lands, but this is unclear. Good to think carefully about how best to distribute the surveys and take into account the extent to which emissions are likely to be different between states and tribes. Operators are likely to respond considering how their current operations are structured and not go back to 2014.

Darla: WESTAR council meeting tomorrow of state air directors and administrators. Darla will present an update to the council and speak to them about the need for air director

support and assistance with the survey effort, in terms of state resource support for Phase I and assistance in getting operator support to complete surveys. Darla encouraged Institute for Tribal Environmental Professionals (ITEP) through their contract for the Tribal Data Work Group to provide any suggestions regarding survey distribution and tribal organizations to include.

There is a significant amount of information that parses out wells among tribes and states that may be helpful in reaching out to tribes.

c. Project Management Team (*Darla Potter*)

Update—two calls were held in September. The group focused on the survey and worked with Ramboll on their work on the survey. The results were presented today. The Project Management Team has attempted outreach to states not on the management team. The project management team is not scheduled to meet again at this time. The next call will be determined later when Ramboll is ready. These calls are not on a specific schedule and take more detailed look at the work being done by Ramboll. Let Darla know if you want to participate.

6. Next Steps & Planning for Next Calls (*Mark Jones*)

a. Next Call December 11, 2018

10:00 am (AK), 11:00 am (PT), Noon (MT), 2:00 pm (ET) – 90 minutes

Documents will be posted on O&G workgroup site on WRAP/WESTAR page.

b. Volunteer Call Note Taker – state agency volunteer needed

Will follow up with a targeted solicitation for the next note taker.

c. Website Posting OGWG Materials – www.wrapair2.org/OGWG.aspx