NTAA's Informational Webinar on EPA's Oil & Natural Gas Rule

EPA-HQ-OAR-2021-0317 January 19, 2022



- Welcome and Opening Remarks, Carol Kriebs, NTAA Chairwoman
- Review of Webinar Agenda and Logistics, Andy Bessler, NTAA Director & Webinar Moderator
- Methane/Oil & Gas 101 and Overview of the Proposed Rule, Laura McKelvey & Ian Fisher, NTAA
- Panel Discussion: Each round of questions allows 15 minutes for each organization to introduce themselves and respond to these questions:
 - Question 1: What are Health/Climate/Tribal/Other impacts that most concern you?
 - Question 2: What are your recommendations for EPA?
 - Question 3: How can Tribes engage with your organization?

Panelists include:

- Ian Fisher & Laura McKelvey, NTAA PAC Members
- Laura Kate Bender, American Lung Association (ALA)
- Shaina Oliver & Celerah Hewes, Moms Clean Air Force (Moms)
- Eric Kills a Hundred & Edwin LaMair, Environmental Defense Fund (EDF)

Open Discussion with attendees for Q&A



- NTAA is funded through a grant from the EPA Office of Air and Radon (OAR)
- NTAA partners with 153 Federally Recognized Tribes
 throughout Indian
 Country and Alaskan
 Native Villages

NTAA's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of Indian Tribes.

- Supports all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions.
- Seeks to represent consensus perspectives, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes.
- Since this rule is so impactful, each Tribe may have varied opinions. For example, an oil and gas producing Tribe may have view this rule from a different perspective of a Tribe that does not produce oil and gas.
- Interactions with the NTAA does not substitute for Nation-to-Nation consultation.

Schematic of the oil and gas Industry

Crude Oil and Natural Gas Industry: Where EPA's Proposed Methane Rules Would Apply

Production & Processing

EPA's methane proposal covers equipment & processes at:

- 1. Onshore well sites
- 2. Storage tank batteries
- Gathering & boosting compressor stations
- Natural gas processing plants

Natural Gas Transmission & Storage

EPA's methane proposal covers equipment & processes at:

- 5. Compressor stations
- 6. Storage tank batteries

Distribution

(not covered by EPA rules)

- 7. Distribution mains/services
- 8. City gate
- 9. Regulators and meters for customers



Figure: Adapted from American Gas Association and EPA Natural Gas STAR Program













COMPRESSOR STATIONS













- Finding and Repairing Methane Leaks from Well Sites and Compressor Stations.
- Advance Methane Detection.
- Transitioning to Zero-Emitting Technologies for Pneumatic Controllers.
- Eliminating Venting of Associated Gas from Oil Wells.
- **Strengthening Requirements** for Storage Tanks.
- **Broadening the Types** of Pneumatic Pumps Covered by the Rule.
- Reducing Additional Methane and VOC Emissions Through New and Stronger Requirements.
- Seeking Additional Information to Inform a Supplemental Proposal.



- Supportive of the improvements over the 2012 and 2016 standards.
- Appreciates the improved recognition that Climate Change and oil and gas operations disproportionately impact near source low wealth, minority communities, particularly Tribal communities.
- Agrees states should be required to include community engagement for accepting program delegation and as part of the program approval for State Plans.
- However, more importantly to include consultation and coordination with neighboring Tribal Governments.
- EPA should use its review authority under NEPA and Section 309 to actively review new oil and gas leasing.
- EPA should use this authority to help coordinate and facilitate safe and responsible oil and gas production, particularly in Indian Country.
- NTAA is concerned that Alaska Native Villagers are not being protected equally or sufficiently.

- Where appropriate, implement a FIP for sources in Indian Country as soon as possible to protect public health in Indian Country.
 - Don't delay a FIP until there is a failure to submit finding resulting in delayed implementation.
- EPA should provide adequate resources:
 - Tribes to develop Tribal Plans or take delegation to implement the rule
 - To participate in monitoring, and other surveillance activities
 - To participate in state plan development
- The frequency between monitoring should be as short as possible to prevent uncontrolled emissions from leaks and malfunctions.
- The use of **Optical Gas Imaging (OGI) technologies** should be emphasized over method 21 for monitoring. We believe OGI is more efficient and effective identify leaks and fugitive emissions.

SUPPLEMENTAL PROPOSAL

- A Supplemental Proposal should include requirements for identifying and addressing abandoned and orphaned wells.
- NTAA believes that empowering communities impacted by oil and gas development is important, of which includes:
 - The need to provide communities resources, training, and support to use sensor technology and monitors as a screening tool for potential leaks or malfunctions.
 - We also believe that an anonymous emissions/malfunction hotline should be made available to workers and community members to report issues when the occur.
 - NTAA would also advocate for an interactive emissions mapping tool for community members to understand the location and potential emissions from the oil and gas industry, as well as the location for abandoned and orphaned wells.

ABANDONED & ORPHANED WELLS



HOW TO ENGAGE WITH

- NTAA is supported by staff from the Institute for Tribal Environmental Professionals (ITEP) and works with a Policy Advisory Committee (PAC) to assist with air quality policy and climate change policy support to advance NTAA's mission.
- Go to <u>https://www.ntaatribalair.org/policy-resource-kits/</u>
 - Share the NTAA Fact Sheet on the rule
 - Use Talking Points from public hearing
 - Review NTAA slides from EPA Training held in 2021
 - Download the Template Letter for Tribes to use to comment
- Comment Deadline is January 31.
- NTAA will be submitting comments. Feel free to reach out!



ANY QUESTIONS/COMMENTS?

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- Driving Down Methane Leaks from the Oil and Gas Industry Jan 2021. Technology Report.
- * As Abandoned Oil Wells Climb Regulators Consider Ways To Stop Problem from Worsening Bismarck Tribune
- Methane emissions from abandoned oil and gas wells underestimated 20 Jan 2021. Bubbles of methane gas in water around an unplugged oil/gas well in Pennsylvania. CREDIT: Mary Kang.
- Well Head Gas Storage. 30 June 2008. Wellhead gas storage, Etzel Germany
- Oil & Natural Gas Production Corken.
- Natural Gas Compressor Station Flow Control SAGE.
- EPA's Air Rules, Oil & Gas 20 Feb 2017. EPA's Actions to Reduce Methane Emissions from the Oil and Natural Gas Industry
- * <u>Natural Gas Compression Station Starting Systems</u> United States Energy Corporation.
- Terminals, Tank Farms & Storage
- Oil and Gas Industries Spectrex Floating Roof Tanks
- Regulatory Standards for Shop-Welded Oilfield Tanks Aspire Energy Resources
- Methane Emission Controls: Redesigning EPA Regulations for Greater Efficacy 4 Oct 2021. Columbia Center on Global Energy Policy