## Operators await changes to U.S. emissions rules

By Mella McEwen MMCEWEN@HEARSTNP.COM



Jonah M. Kessel / New York Times

Permian Basin oil and gas operators are awaiting the text of proposed changes to 'Quad O' and 'Quad O' rules governing emissions.

Permian Basin oil and gas operators seeking to achieve the goals of deepening emissions reductions are trying to consider what new regulations could mean for those efforts.

"How do you make decisions when you don't know what the rules will be?" asked Grant Swartz-welder, president of OTA Environmental Services during a recent session to discuss what are known as the Quad O and Quad Oa rules, and proposed changes to those rules, known as Quad Ob and Quad Oc.

Luis Vasquez, vice president, environmental services at OTA, said some changes came with the change in administration. For example, methane emissions have been added back into the Quad Oa rules. Under proposed rules, compressor station surveys

would again be required quarterly and there would be no exemption for low-producing wells. Transmission and storage have also been added back under the rules, he added.

The Environmental Protection Agency has not issued texts of the proposed rules, he said, as the agency awaits public comments first. He said the agency will then utilize that feedback to construct formal rules. The new rules are expected by the end of the year.

He did list some proposals offered by EPA.

Under Quad Ob, LDAR – Leak Detection and Repair – surveys and plans would be required. There would be two options for companies: Complete a baseline survey and if a facility emits less than three tons per year of methane, the initial survey and repairs would be acceptable. For more than three tons per year, LDAR surveys would be required quarterly and. Under the second option, emissions of less than three tons per year would require only the initial survey and repair, while emissions between three and eight tons per year would require semiannual surveys and repairs and greater than eight tons per year would require quarterly surveys. Compressor sites would require quarterly surveys.

That would offer greater flexibility, he said.

Proposed rules under Quad Oc are similar but incorporate existing sites, he said. The deadline for initial surveys would be on or before Nov. 15, 2021.

Storage tanks with the potential to emit less than six tons per year per tank that have been constructed, modified or reconstructed between Aug. 23, 2011 and Sept. 18, 2015 fall under Quad O rules. For tanks constructed, modified or reconstructed after Sept. 18, 2015 fall under Quad Oa rules. Under both, storage tanks with potential emissions equal to or greater than six tons per year of volatile organic compounds must reduce their emissions by at least 95 percent per tank or battery.

Those rules would be unchanged under Quad Ob but under Quad Oc, exiting tanks with the potential to emit 20 tons per year must reduce their emissions by at least 95 percent.

Vasquez said the proposed rules not only target storage banks but pneumatic controllers, proposing a zero emissions standard for both new and existing pneumatic controllers.