
EPA Oil and Gas Rules

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UTAH DEPARTMENT of
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OOOO Timeline

- April 2012 first New Source Performance Standards issued for the Crude Oil and Natural Gas Production source category to regulate VOC emissions (affected facilities Aug 2011) - OOOO
- May 2016 updates to the current NSPS and new standards for both VOCs and GHG - specifically methane citing the 2009 endangerment finding (affected facilities Sept 2015) - OOOOOa
- March 2018 amendments to two narrow parts of OOOOa regarding fugitive emissions due to industry concerns



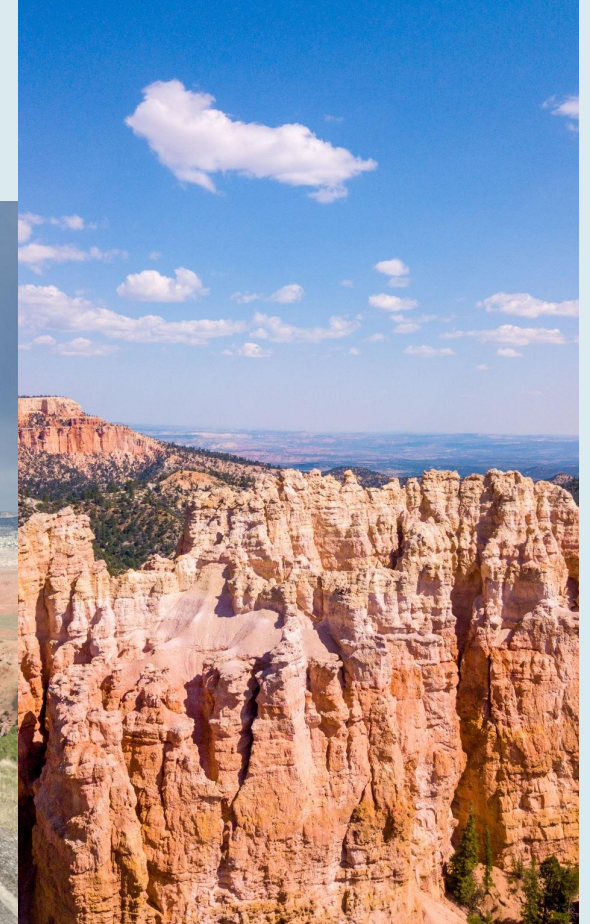


OOOO Timeline Con't

- December 2023 issued new NSPS for this source category regulating both VOCs and methane from new sources (affected facilities December 2022) - OOOOb
- Also for first time this rule required states to develop plans to meet emissions guidelines provided in the rule - OOOOc (important to note only to regulate methane emissions)
- State plans were due March 2026 with compliance by March 2029

— 0000 Timeline Con't

- Petitions for reconsideration of aspects of the 0000b rule were quickly filed
- May 2024 EPA agreed to reconsider two narrow and discrete aspects of the final rule
 - temporary flaring provisions for associated gas
 - vent gas net heat value (NHV) continuous monitoring requirements and performance testing on flares and combustion devices
- December 2024 proposed rule issued on these two issues
 - extending temporary flaring of associated gas from 24 hours to 48 (taking comment on 72 hrs)
 - expanding streams exempt from NHV monitoring and more flexibility in time of collection and location for performance testing





OOOO Timeline Con't

- March 2025 new administration announced reconsideration of OOOOb/OOOOc
- July 2025 Interim Final Rule to extend certain deadlines in the March 2024 rule (finalized Nov 26, 2025)
- Extended many but not all compliance deadlines for OOOOb affected facilities to January 22, 2027
- Extended the deadline for submittal of OOOOc state plans to January 22, 2027

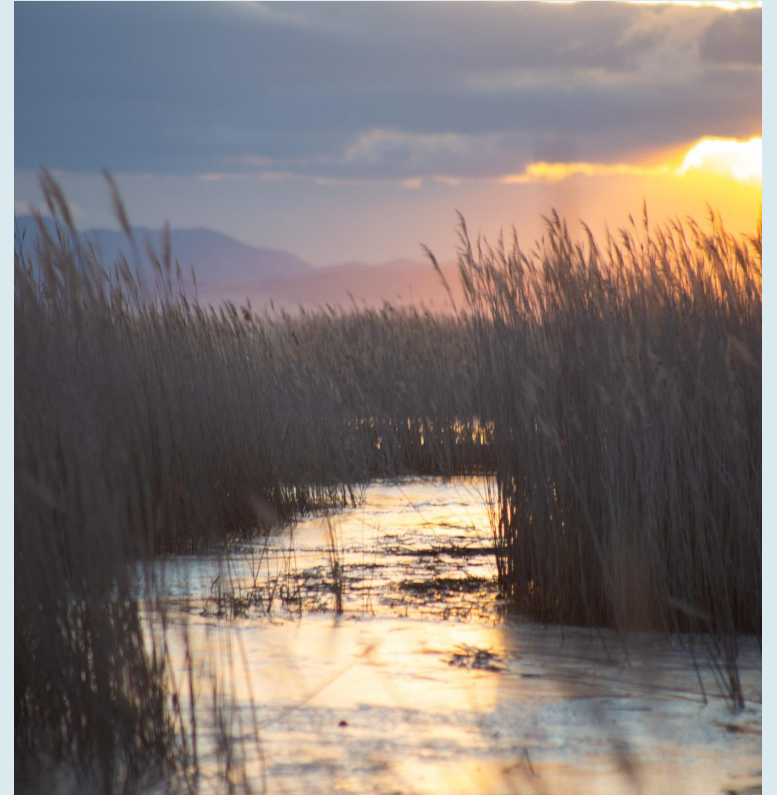
OOOO Timeline Con't

- EPA cited that 2024 rule contained problematic language preventing compliance and requirements that were not workable
 - Extended deadline to November 28, 2025, for continuous monitoring of the vent gas net heating value of flares and enclosed combustion control devices.
 - Extended deadline to January 22, 2027, to meet certain requirements related to control devices, equipment leaks, storage vessels, process controllers, and covers/closed vent systems.
 - Delayed deadline for implementation of the Super Emitter Program to January 22, 2027, and extended time for EPA to act on requests for approval of methane detection technologies



Current Status

- EPA hoping to have the December 2024 reconsideration of the flaring and heat net value proposal final before end of year
- Working on holistic reconsideration of OOOOb and OOOOc rules
- Goal is end of year for new OOOOb and OOOOc reconsideration proposed rule
- Region 8 goal is Q1 or Q2 for Uinta Basin NAA reconsideration





Potential Future Rulemaking

- As EPA is completely reconsidering OOOOb and OOOOc, UDAQ is awaiting proposal before any further public engagement or drafting of rules
- Goal would still be to have advanced notice of any proposal prior to taking rules to AQB
- Working with Permitting on potential addition of compressor stations to PBR
- Potential of using state rules for legally and practicably enforceable limits for tanks
- Pumpjack engines are still a concern; data indicates engines are about 37% of oil and gas VOCs of which pumpjack engines are 93%

Thank you



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