

# STRONGER State Air Quality Guidelines

---

- *Meeting the Challenges of U.S. Oil & Gas Development*
- *Collaboration to Improve the Regulatory Environment*

Interstate Oil and Gas Compact Commission  
State Review Committee  
Monday, May 20, 2013



# Background - Federal Actions

- January 14, 2009 – WildEarth Guardians and San Juan Citizens Alliance sued EPA for not fulfilling obligation under Clean Air Act
- February 5, 2010 – Court consent decree that required EPA to propose standards or determine not to issue standards by July 28, 2011
- April 3, 2012 – Consent decree modified to change date for final action to April 17, 2012



# Background - Federal Actions

- August 16, 2012 – final rule published in Federal Register
- 40 CFR Part 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Distribution – includes emissions from well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, and storage vessels

# Background - Federal Actions

- 40 CFR Part 63, Subpart HH – Oil and Natural Gas Production NESHAP – standards for emissions from small glycol dehydration unit vents and storage vessels
- 40 CFR Part 63, Subpart HHH – Natural Gas Transmission and Storage NESHAP – standards for glycol dehydration units vents and control devices

# Guidelines Background

- Original 1990 IOGCC Guidelines included a recommendation for future work to include a review of air issues.
- The same recommendation was included in subsequent Guidelines – 1995, 2000, 2005, 2010
- April 2012 – STRONGER Board formed an Air Discussion Group

# Air Discussion Group

- Stakeholder representation – federal (EPA, DOE, BLM), state (CO, OK(2)), industry (BP, Devon, COOGA, IPAA) & environmental (Subra Company, Earthworks, Clean Air Task Force).
- Met by phone (7 times) and once face-to-face
- February 2013 – Air Discussion Group made recommendations to STRONGER Board

# Air Discussion Group

## Recommendations

- Form Air Workgroup to:
  - Survey state air programs
  - Develop state air program guidelines
- Capture opportunities states are using for emission reductions
- Conduct several reviews and review adequacy of the guidelines
- Promote education and outreach to industry, other state programs, and the public

# STRONGER Board Action

- STRONGER Board approved recommendations
- Formed Air Workgroup to implement recommendations – federal (EPA, DOE, BLM), state (CO, PA), industry (BP, Devon, IPAA) and environmental (Subra Company, Earthworks, Clean Air Task Force)



# Air Workgroup Activities

- February 27, 2013 – conference call
- April 4-5, 2013 – fact-to-face meeting
  - Developed list of issues
  - Assigned stakeholder subgroups to develop initial draft guidelines
  - Developed survey of state air programs
- Survey distributed – responses coming in
- Draft guidelines to be prepared by June 1