





TCEQ Oil and Gas Industry Emissions Events (EE) Workshop

November 5, 2020





40 CFR Part 60, Subparts
0000 and 0000a Well
Completion/Flowback
Notification



Notification Requirement

60.5420a(2)(i) If you own or operate a well affected facility, you must submit a notification to the Administrator no later than 2 days prior to the commencement of each well completion operation listing the anticipated date of the well completion operation. The notification shall include contact information for the owner or operator; the United States Well Number (API well number); the latitude and longitude coordinates for each well...; and the planned date of the beginning of flowback. You may submit the notification in writing or in electronic format.



Change to the Notification



For TCEQ use only.

Receive Date

40 CFR Part 60 NSPS Subpart OOOO/OOOOa Well Completion/Flowback Notification Texas Commission on Environmental Quality (TCEQ)

I. General Information		
A. Submittal Date:		
B. Company Name:		
Contact Name for Owner or Operator:		
Title:		
Mailing Address:		
City:	State:	ZIP Code:
Telephone:	Fax:	E-mail:
C. TCEQ Regulated Entity Number (if available):		
D. County where the well is located:		
E. American Petroleum Institute (API) well number:		
F. Well Latitude in decimals: (e.g., 30.27463)		
G. Well Longitude in decimals: (e.g., -97.74036)		
H. Anticipated date of well completion operation: (MM/DD/YYYY)		
I. Planned date of the beginning of flowback: (MM/DD/YYYY)		
II. How to submit form.		
<ul style="list-style-type: none"> • Please Save the file with the API well number as the file name. (e.g., 4323451.pdf) • Please Print a copy of the form for your records. • Please Send the PDF file as an attachment in an email. <ul style="list-style-type: none"> ◦ Click the Submit button and attach the PDF File <i>or</i> ◦ Use "Attach by email" in Adobe Reader. <ul style="list-style-type: none"> ▪ Email to: NSPSWell@tceq.texas.gov ▪ Subject line "NSPS OOOO Notification" 		
Information to obtain a Regulated Entity Number can be found at: https://www.tceq.texas.gov/permitting/central_registry/guidance.html . If you have questions about this form or need assistance, please call the Program Support Section at (512) 239-0400. Additional information can be found at: https://www.tceq.texas.gov/goto/nsps-0000 .		

Submit

<https://www.tceq.texas.gov/assets/public/assistance/sblga/forms/20640.pdf>



Information to obtain a Regulated Entity Number can be found at:
https://www.tceq.texas.gov/permitting/central_registry/guidance.html.
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Compliance Alert: Sour Gas Handling Compliance



External oil and gas Compliance Alerts can be found on the agency's Oil and Gas Activities web page:

<https://www.tceq.texas.gov/assistance/industry/oil-and-gas>



Definition of Sour Gas

- Railroad Commission of Texas:
hydrogen sulfide (H_2S) > 100 parts per million (ppm)
- TCEQ defines Sour Gas in Chapter 101 as: “any natural gas containing more than 1.5 grains of hydrogen sulfide per 100 cubic feet, or more than 30 grains of total sulfur per 100 cubic feet.” And this means what?

Approximately 24 ppm



Maintaining Compliance

- As wells get older the H₂S levels can increase
- We are strongly encouraging owner/operators to periodically review/sample the current H₂S concentration of their wells
- We are encouraging that each site (not the overall field) have a H₂S gas analysis that is not older than two years old



Permitting Options

Wells outside the Barnett Shale counties that are handling sour gas are required to, at least, meet the following: (found in PBR 30 TAC 106.352(l)(3)):

- One-quarter (1/4) mile distance from any recreational area, residence, or other structure not occupied or used solely by the owner/operator of the site or the owner of the property (owner of ranch or farm)
- Limits on total emissions of sulfur compounds (excluding SO₂)
- Register with TCEQ via STEERS
- If a company can't meet these requirements, you can look at getting a Standard Permit, non-rule Standard Permit or case-by-case New Source Review permit



Government Assistance Home

Air Compliance Resources

Water Compliance Resources

Waste Compliance Resources

The Advocate: Email Updates

 **How are we doing? Take our customer satisfaction survey**

[Compliance Resources for Small Businesses](#) / [Oil and Gas Facilities: Compliance Resources](#)

Oil and Gas Activities

While the regulation of oil and gas activities in Texas falls primarily under the jurisdiction of the Railroad Commission of Texas (RRC), the Texas Commission on Environmental Quality (TCEQ) plays an important role in the areas of air quality, surface water management, water quality, and waste management.

Compliance Alerts

- **HOT Guide to "Find and Fix It" Initiative** – Effective through January 31, 2021, the TCEQ Office of Compliance and Enforcement is implementing a "find and fix it" initiative to incentivize compliance with air quality rules and regulations at oil and gas operations in the 61 counties comprising the Permian Basin.
- **HOT Oil and Gas Emissions Events** – To improve consistency in the evaluation of emissions events (EE) reports from oil and gas operations, TCEQ has developed updated guidelines for operators to determine if an incident is an emissions event or a routine event.
- **HOT Guidance for Bulk Crude Oil Storage Regulated by TCEQ** – Amid the COVID-19 pandemic, TCEQ has received numerous inquiries related to the regulatory requirements of temporary storage of excess crude oil in aboveground storage tanks (ASTs) at locations not regulated by the Railroad Commission of Texas (RRC). While the storage of crude oil in ASTs is not regulated under TCEQ Petroleum Storage Tank (PST) rules, there are other permitting, reporting, and spill requirements that we regulate. The purpose of this guide is to summarize TCEQ's regulatory oversight for those storage tanks in Texas.
- **HOT Sour Gas Handling Compliance** – Permitting options and guidance relating to oil and gas sites that handle or produce 'sour' gas.

TexasEnviroHelp@tceq.texas.gov



 **Get e-mail or text updates on your choice of topics**

Hot Topic

HOT Free Workshops for Oil and Gas Industry

The TCEQ is hosting a series of free online workshops for the oil and gas industry covering emissions events, reportable quantities, air permitting options for oil and gas, and the Texas Environmental, Health, and Safety Audit Privilege Act with the Permian Basin Find and Fix It Initiative. To learn more and to register for the workshops, visit the Oil and Gas workshop webpage.

Oil and Gas Wastewater Stakeholder Group

TCEQ's schedule for implementing House Bill 2771, 86th Legislature 2019, relating

Emissions Events vs. Permitted Emissions



Emissions Event Reviews

Goal: To improve consistency in the submission and evaluation of emissions events (EE) reports, specifically from oil and gas operations.

Routine event or an emissions event

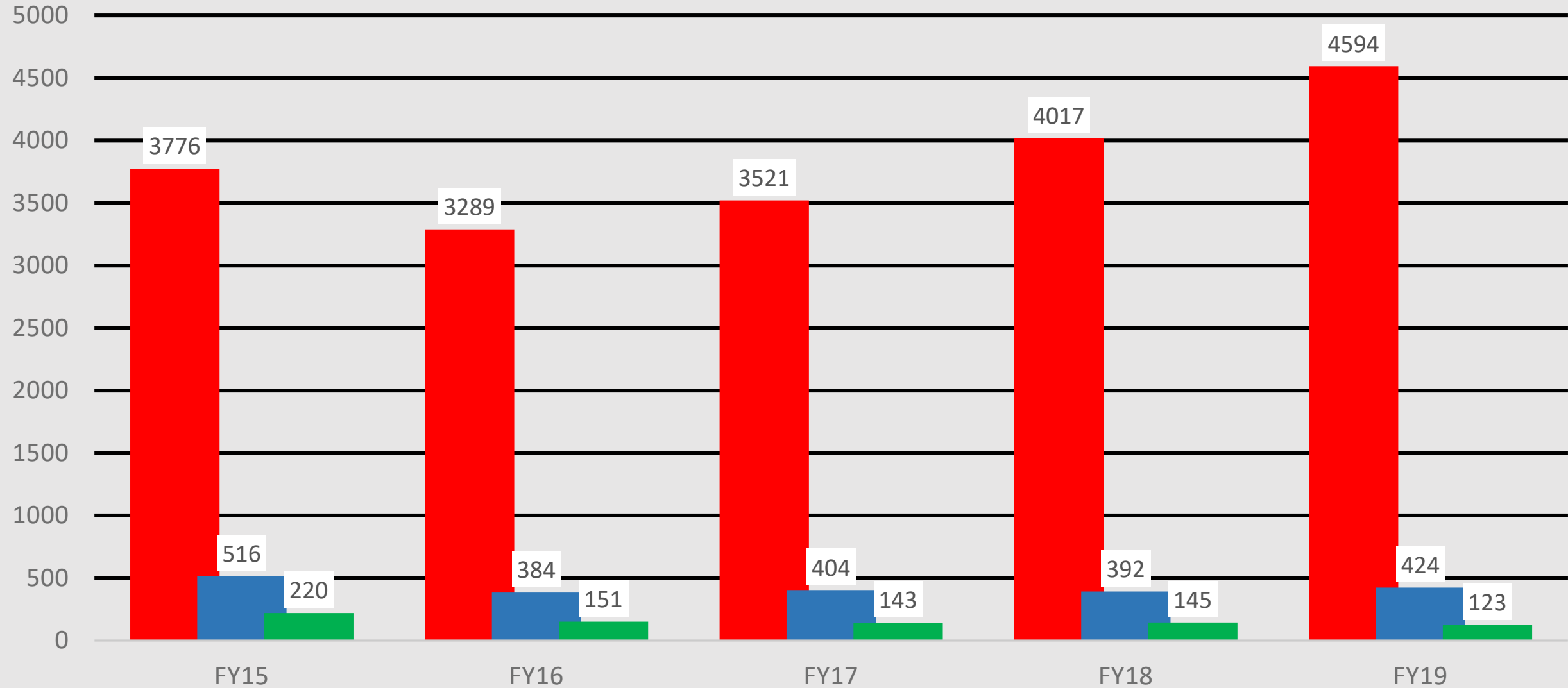
If activities and resulting emissions are **routine, planned and/or predictable** but are unauthorized, then the incident does not qualify as an emissions event and should either be authorized with applicable control requirements through the TCEQ's permitting program or prevented.

What does it matter?

Proper classification of incidents as either a *routine event* or an *emissions event* is important because the regulatory obligations differ depending on the characterization. The affirmative defense in [30 TAC § 101.222](#), applies to emissions events but **does not** apply to routine events and predictable emissions.



Emissions Events in Texas



■ Emissions Events ■ Scheduled MSS ■ Excess Opacity

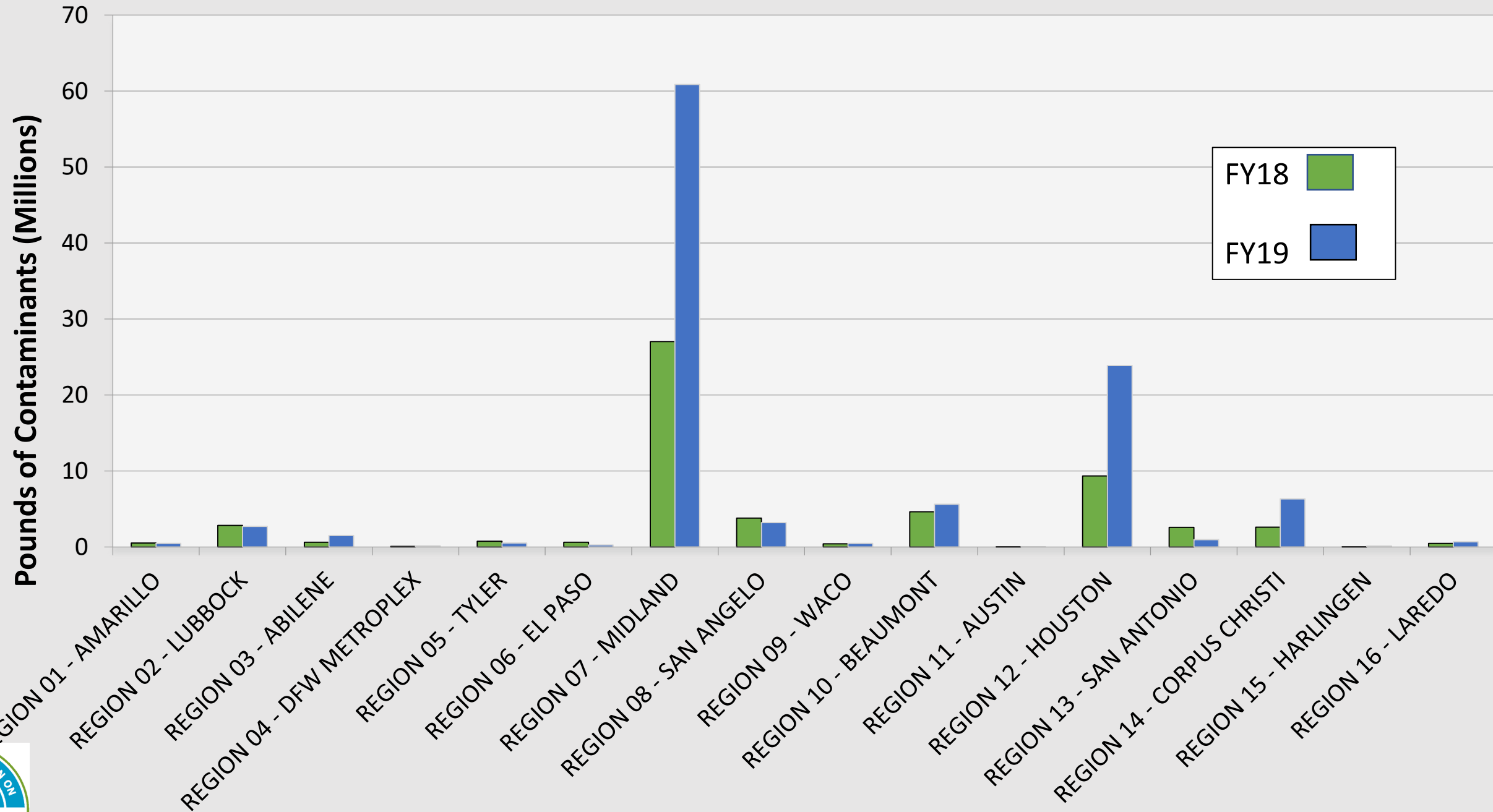
Source: Annual Enforcement Report
Chapter 5

Total Number of Incidents Reported Statewide – FY19

Region	Emissions Events	Scheduled Maintenance	Scheduled Shutdown	Scheduled Startup	Excess Opacity	Total
REGION 01 - AMARILLO	56	6	2	5	3	72
REGION 02 - LUBBOCK	176	13	0	0	1	190
REGION 03 - ABILENE	41	8	2	0	3	54
REGION 04 - DFW	36	128	0	1	13	178
REGION 05 - TYLER	42	4	0	2	31	79
REGION 06 - EL PASO	12	5	0	0	0	17
REGION 07 - MIDLAND	3,287	41	6	4	1	3,339
REGION 08 - SAN ANGELO	110	1	2	0	2	115
REGION 09 - WACO	35	2	0	0	1	38
REGION 10 - BEAUMONT	160	3	3	17	17	200
REGION 11 - AUSTIN	18	0	0	0	0	18
REGION 12 - HOUSTON	364	27	3	17	39	450
REGION 13 - SAN ANTONIO	72	2	0	2	7	83
REGION 14 - CORPUS CHRISTI	139	24	27	55	5	250
REGION 15 - HARLINGEN	8	1	0	0	0	9
REGION 16 - LAREDO	38	11	0	0	0	49
Total	4,594	276	45	103	123	5,141



Total Quantity of Emissions Reported Statewide – FY19



Is it really an Emissions Event?

The chapter 101 definitions will help
in making this determination



Emissions Event

Any **upset event** or unscheduled maintenance, startup, or shutdown activity, from a common cause that results in **unauthorized emissions** of air contaminants from one or more emissions points at a regulated entity [30 TAC 101.1(28)]

Unauthorized
Emissions

Emissions of any air contaminant except water, nitrogen, ethane, noble gases, hydrogen, and oxygen that **exceed any air emission limitation in a permit, rule, or order** of the commission or as authorized by Texas Health and Safety Code, §382.0518(g).

Upset Event (1)

An **unplanned and unavoidable** breakdown or excursion of a process or operation that results in unauthorized emissions. [30 TAC 101.1(110)]

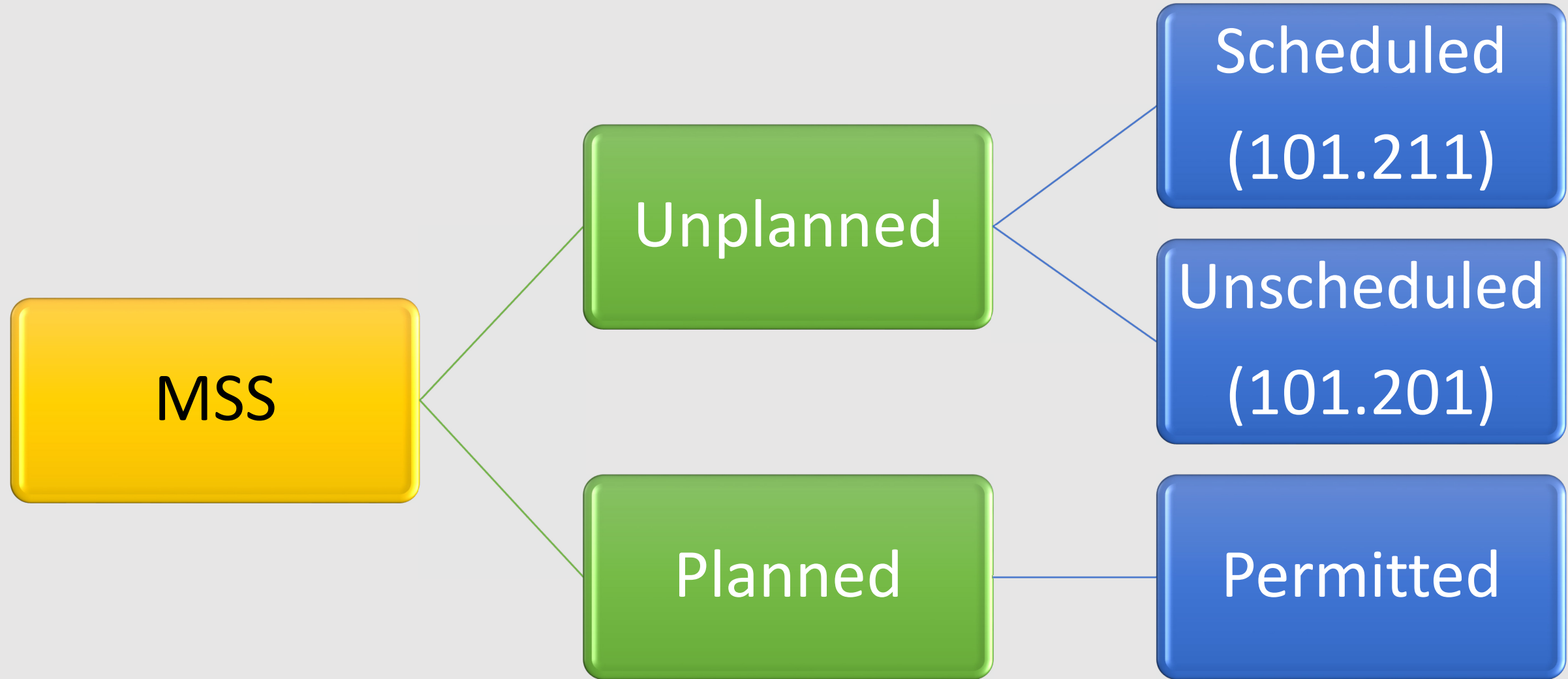
NOTE: The sentence reads: An unplanned and unavoidable breakdown or (unplanned and unavoidable) excursion of a process or operation is an upset event.

Upset Event (2)

A maintenance, startup, or shutdown activity that was **reported under §101.211** of this title (relating to Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements), but had emissions that exceeded the reported amount by more than a reportable quantity due to an **unplanned and unavoidable breakdown** or excursion of a process or operation is an upset event. [30 TAC 101.1(110)]

NOTE: The last part of the definition reads as: ... due to an unplanned and unavoidable breakdown or (unplanned and unavoidable) excursion of a process or operation is an upset event.

Maintenance, Startup, and Shutdown



What is a Routine Event

- *Activities* that are predictable or could be planned/anticipated are *routine events*.
- These include emissions that were caused by routine maintenance startup and shutdown (MSS), are part of normal or routine operations, and/or were predictable and could be authorized.
- Emissions from these activities should be prevented, if possible, or authorized by TCEQ, with applicable control requirements.

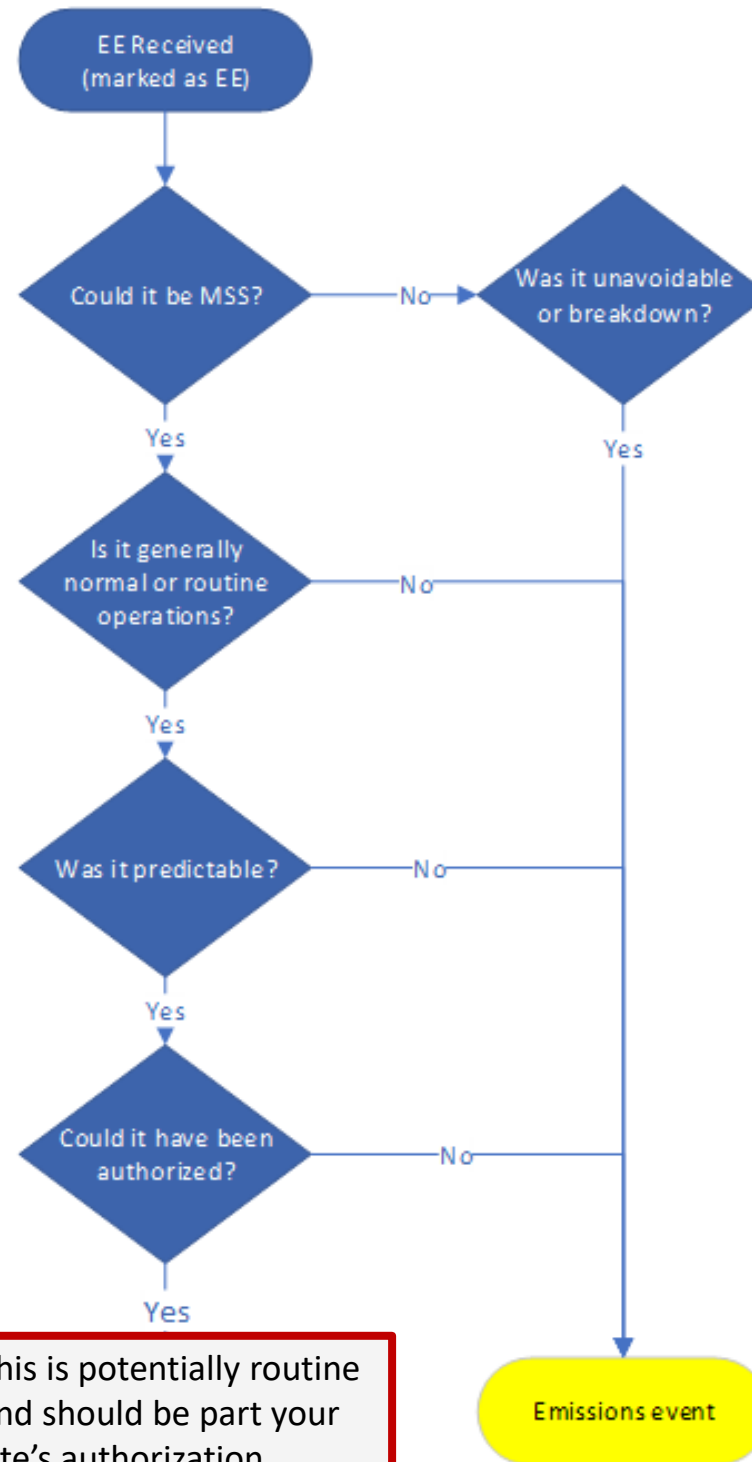
Emission Event Investigations

- As stated before, the first step is to determine if the reported emissions event is a routine event or meets the definition of an emissions event.
- The evaluation should entail a review of:
 - The list of permissible activities and
 - A review of the “Determined if Reported Event is an Emissions Event” flowchart.

Determine if Reported Event is an "Emissions Event"

Key Assumptions:

- Event has some unauthorized emissions.
- Claimed as EE in STEERS.
- Not scheduled MSS.



This is potentially routine and should be part your site's authorization

This is potentially routine and should be part your site's authorization

Emissions event



Determine if Reportable Event is an “Emissions Event”

EE Received
(marked as EE)

Could it be MSS?

No

Was it unavoidable
or breakdown?

No

This is potentially routine
and should be part your
site’s authorization

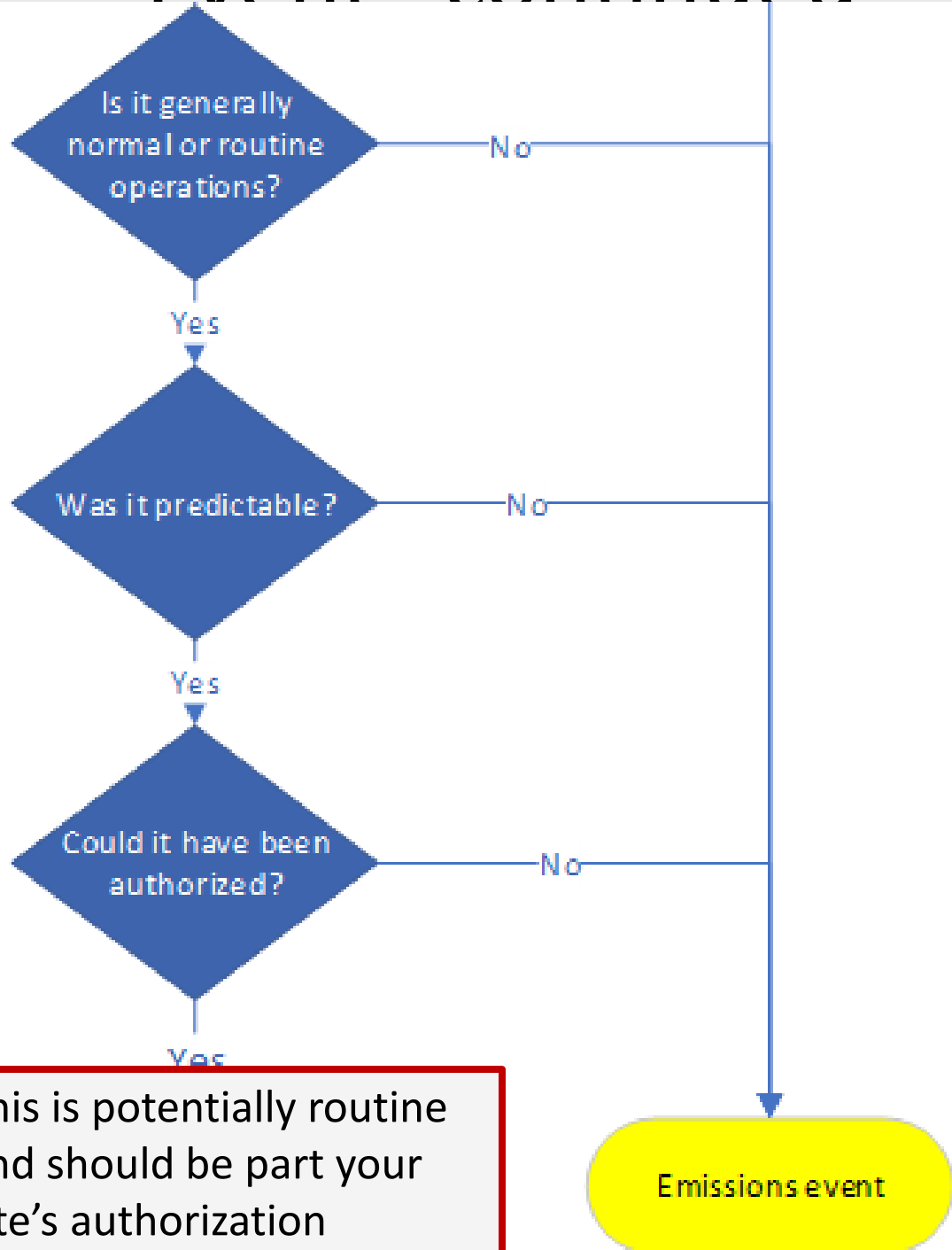
Yes

Emissions event

Key Assumptions:

- Event has some unauthorized emissions.
- Claimed as EE in STEERS.
- Not scheduled MSS.

Determine if Reportable Event is an “Emissions Event” continued



This is potentially routine and should be part your site’s authorization

Emissions event

Oil and Gas Permittable Activities

- Some resource to be reviewed: the lists of planned maintenance, startup, shutdown (MSS) activities included in the [Oil and Gas MSS PBR](#) (30 TAC §106.359) and the [Oil and Gas Standard Permit](#).
- These oil and gas activities have been categorized as potentially routine, planned, or predictable MSS events.
- Examples include:
 - Turbine washing
 - Scheduled equipment repair or replacement
 - Maintenance blow downs
 - Routine pigging activities
 - Any of the maintenance events listed above at dependent facilities that impact the ability to receive gas



Unplanned and Unavoidable

Emissions Event

- Unscheduled and unplanned maintenance onsite (*or downstream*)
- Equipment breakdown
- Leaks, spills, pipeline breaks
- Power outages onsite (*or downstream*)
- *Weather related events*

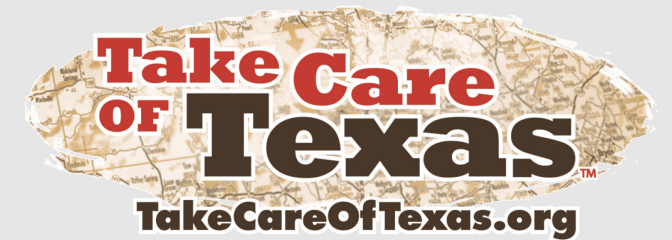
Routine and/or Predictable

Not Emissions Event

- Planned maintenance onsite (*or downstream*)
- Flaring due to pipeline capacity
- Flaring permitted by RRC
- Unpermitted or under-permitted emissions
- Negligence, exceeding permit limit



Next Webinars



- **November 12, 2020 from 9:00 a.m. to 11:30 a.m.**
Air Permitting Options for the Oil and Gas Industry
Air authorizations available to the oil and gas industry
- **November 17, 2020 from 9:00 a.m. to 11:30 a.m.**
The Audit Act and Permian Basin Find and Fix It Initiative
How to participate in the Permian Basin "find and fix it" initiative
The Texas Environmental, Health and Safety Audit Privilege Act (Audit Act)

Registration: <https://www.tceq.texas.gov/assistance/industry/oil-and-gas/oil-gas-online-workshops>



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The Small Business and Local Government Assistance (SBLGA) program
provides confidential technical assistance
Call toll free at (800) 447-2827, or
TexasEnviroHelp.org (<https://www.tceq.texas.gov/assistance/sblga.html>)



Questions?

