



## Comprehensive Control Standards

These standards for controlling emissions from new and/or existing wells are in place in various oil & gas producing states.

Segment	Standard	Where in effect
<b>Leaks</b>	Require quarterly, comprehensive LDAR with no step-down.	<b>California:</b> <a href="#">California Final Regulation Order, March 25, 2016, 17 C.C.R., Sections 95667(a)(9) and 95668(e)(3).</a> <b>Colorado:</b> <a href="#">Colorado Regulation Number 7, 5 C.C.R. 1001-9, Sections XII &amp; XVII.</a> <b>Ohio:</b> <a href="#">Ohio General Permit 18.1.C.1.d.2.b.</a>
	<b>Effect on emissions:</b> Additional 20% reduction on top of NSPS for new sources; 80% reduction existing sources ( <i>source: <a href="#">ICF Report</a></i> )	
<b>Centrifugal Compressors</b>	No venting from new seals on compressors.	<b>Canada:</b> Environment and Climate Change Canada (ECCC) Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil and Gas Sector), May 2017. <a href="#">Canada Gazette, Vol. 151, No. 21, Section 11.</a>
	Reduce emissions from wet seal fluid degassing systems on wet seal centrifugal compressors by at least 98% by either utilizing dry-seals or routing wet seal emissions to a closed system or VRU.	<b>Colorado:</b> <a href="#">Colorado Regulation Number 7, 5 C.C.R. 1001-9, Section XVII.B.3.b.</a>
	<b>Effect on emissions:</b> 98% reduction on new sources; 98% reduction existing sources ( <i>as required by regulation</i> )	

<b>Reciprocating Compressors</b>	No venting from new compressors.	<b>Canada:</b> Environment and Climate Change Canada (ECCC) Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil and Gas Sector), May 2017. <a href="#">Canada Gazette, Vol. 151, No. 21, Section 11.</a>
	Replace rod packing before the compressor has operated for 26,000 hours or prior to 36 months; or collect emissions using rod packing emissions collection system which operates under negative pressure and route emissions to process through a closed system or VRU.	<b>Colorado:</b> <a href="#">Colorado Regulation Number 7, 5 C.C.R. 1001-9</a> , Section XVII.B.3.c.
	<b>Effect on emissions:</b> 98% reduction on new sources; 35% reduction existing sources (source: <a href="#">ICF Report</a> )	
<b>Dehydrators</b>	Reduce emissions of methane by at least 98% through use of air pollution control equipment	<b>Colorado:</b> <a href="#">Colorado Regulation Number 7, 5 C.C.R. 1001-9</a> , Section XVII.D.3.  <b>Wyoming:</b> Wyoming Nonattainment Area Regulations, Section 6(d)(1)(A) (applicable to dehydrators located at well sites in the Upper Green River Basin ozone nonattainment area that have VOC emissions of 4 tons per year or more). See: <a href="https://rules.wyo.gov/Search.aspx?mode=1">https://rules.wyo.gov/Search.aspx?mode=1</a>
	<b>Effect on emissions:</b> 98% reduction (as required by regulation)	
<b>Tanks</b>	Route emissions from all tanks with 10 TPY of CH <sub>4</sub> to vapor recovery unit. Flaring only permitted if no VRU onsite.	<b>California:</b> <a href="#">California Final Regulation Order, March 25, 2016, 17 C.C.R.</a> , Section 95668(a)(6) (applicable to separator and tank systems that receive an average of more than 50 barrels of crude oil or condensate a day).
	<b>Effect on emissions:</b> 97% reduction (EDF's assumption when emissions sent to control devices.)	

<b>Pneumatics</b>	Zero bleed for all new continuous bleed controllers.	<b>California:</b> <a href="#">California Final Regulation Order, March 25, 2016, 17 C.C.R., Section 95668(e)(2).</a>
	Low-bleed for all existing.	<b>Colorado:</b> <a href="#">Colorado Regulation Number 7, 5 C.C.R. 1001-9, Section XVIII.C.2.a.</a>
<b>Effect on emissions:</b> 76% reduction ( <i>Source: Allen et al 2015</i> )		
<b>Pumps</b>	Zero bleed for new pumps.	<b>California:</b> <a href="#">California Final Regulation Order, March 25, 2016, 17 C.C.R., Section 95668(e)(4).</a>
	98% control, if control available onsite for existing pumps.	<b>Wyoming:</b> Wyoming Nonattainment Area Regulation, Section 6(e) ( <i>applies to existing pumps in the UGRB ozone nonattainment area</i> ). See: <a href="https://rules.wyo.gov/Search.aspx?mode=1">https://rules.wyo.gov/Search.aspx?mode=1</a>
	<b>Effect on emissions:</b> 82% reduction on top of NSPS for new sources; 12% reduction for existing sources ( <i>98% required by regulation; 12% estimates availability of onsite control</i> )	
<b>Pigging</b>	98% control of pigging emissions.	<b>See Ohio:</b> <a href="#">Ohio EPA General Permit 21.1 C.1.b.</a> ( <i>Requires use of add-on control--recovery, flare/combustor or equivalent--as needed to comply with 0.27 ton/month VOC limit.</i> )
	<b>Effect on emissions:</b> 98% reduction ( <i>as required by regulation</i> )	
<b>Liquids Unloading</b>	Create differential pressure to minimize the need for venting during unloading activities & operator must remain onsite.	<b>Colorado:</b> <a href="#">Colorado Regulation Number 7, 5 C.C.R. 1001-9 Section XVII.H.1.a.</a>
	<b>Effect on emissions:</b> 68% reduction ( <i>Estimated based on EPA Greenhouse Gas Reporting Program data.</i> )	