



Greenhouse Gas Reporting Program

Subpart W - Petroleum and Natural Gas Systems

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2012 Natural Gas Star Annual Implementation Workshop
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Overview of Top “Take Home” Items from this Seminar

Overview of Top “Take Home” Items for subpart W reporters



- For 2012, what do I need to do?
- When?
- How?
- What are my resources?

Top “Take Home” Items – Breakdown of Topics



- **BAMM**
 - Automatic BAMM--RY2011
 - Deadlines for BAMM extension requests for RY2012 and beyond
- **Training and Testing**
 - Instructional Webinars
 - Testing of reporting in e-GGRT for RY 2011
 - Webinars in how to participate in Testing Period

Top “Take Home” items – Breakdown of Topics



- **Data Reporting**
 - E-GGRT Registration, Notification and Reporting Deadlines
- **Data Verification and Publication**
 - EPA review and verification of RY 2011 data
 - Data Publication



Seminar Agenda

Seminar Agenda



1. Brief Overview of subpart W

- For more info – please see subpart W website
www.epa.gov/climatechange/emissions/subpart/w.html

2. Reporting subpart W data

- How reports will be submitted
- Timeline for reporting
- BAMM

3. Additional Implementation Activities

Seminar Agenda



4. How subpart W 2011 BMM rule revisions and 12/23/11 Tech Revisions rule updated the November 30, 2010 Final Rule
5. Training Resources
6. Summary – Dates of Top “Take Home” Items



Submit all questions to the GHGRP Help Desk

www.epa.gov/climatechange/emissions/ghgrule_contactus.htm



1. Subpart W - Brief Overview

Brief Overview of Subpart W



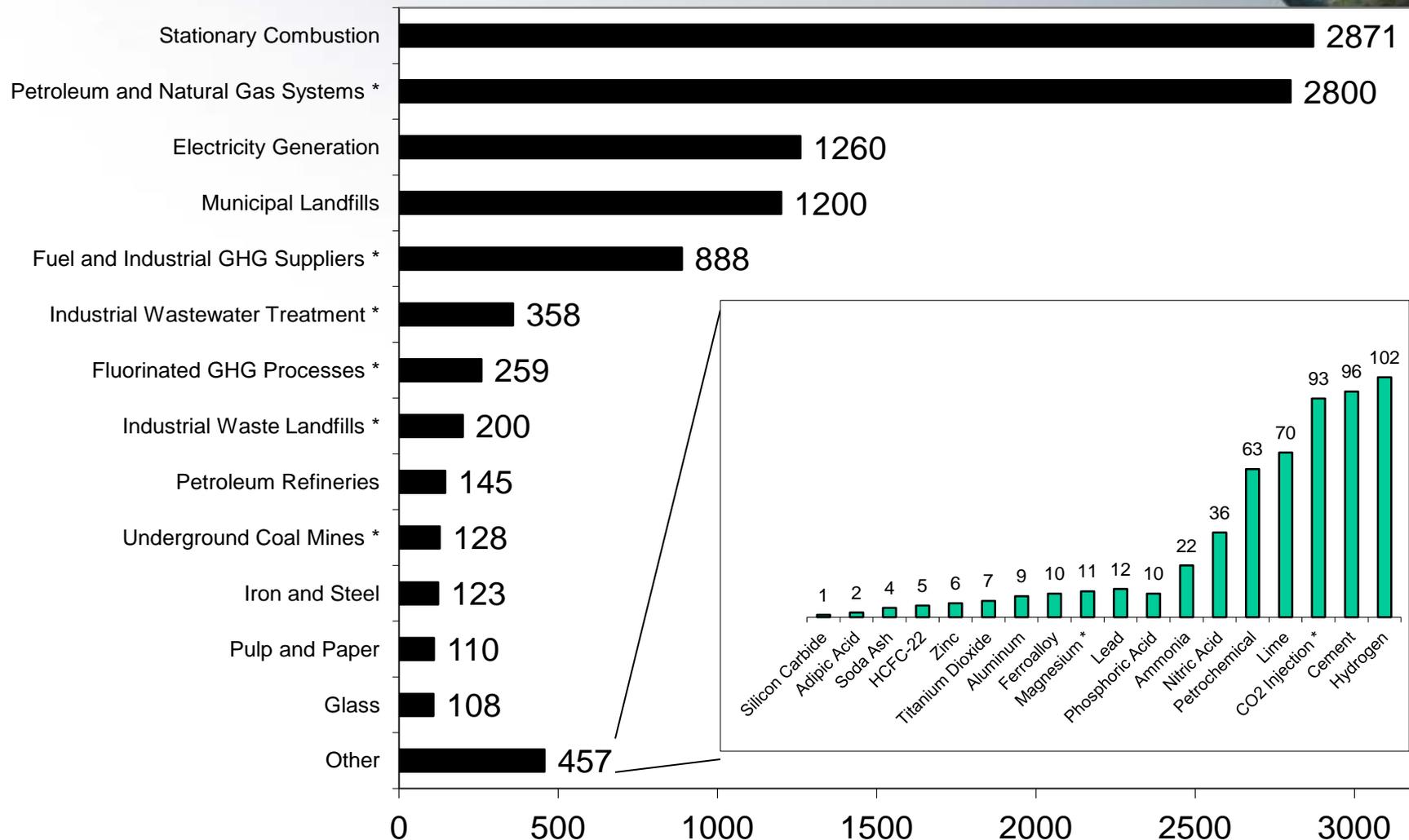
- **Background and Subpart A- General Rule Requirements**
- **Subpart W- Petroleum and Natural Gas Systems**

Purpose of 40 CFR Part 98



- Part 98 requires reporting of greenhouse gas (GHG) emissions and other relevant information from certain source categories in the United States
 - Better understand relative emissions of specific industries, and of individual facilities within those industries
 - Better understand factors that influence GHG emission rates and actions facilities could take to reduce emissions
- Does not require control of GHG emissions

Approximately 10,000 U.S. Facilities Covered



* Approximate (first reports due Sep 2012)

Key Elements of Part 98



- Annual reporting of GHG by:
 - Direct emitting source categories
 - Suppliers of certain products that would result in GHG emissions if released, combusted or oxidized.
- 25,000 metric tons CO₂e or more per year reporting threshold for many sources; capacity-based thresholds where feasible.
- Requires reporting by 41 industrial categories. For calendar year 2010, facilities in 29 categories are required to report. An additional 12 categories begin reporting for calendar year 2011 emissions.

Key Elements of Part 98



- Direct reporting to EPA electronically
- EPA verification of emissions data

Which petroleum and natural gas industry segments must report under Subpart W?



- Reporting is required by facilities that emit GHGs $\geq 25,000$ metric tons carbon dioxide equivalent (CO₂e) per year.
- Industry segments covered:
 - Offshore petroleum and natural gas production
 - Onshore petroleum and natural gas production*
 - Onshore Natural gas processing facilities
 - Onshore Natural gas transmission compression
 - Underground natural gas storage
 - Liquefied natural gas (LNG) storage
 - LNG import and export equipment
 - Natural gas distribution*

* Due to their unique characteristics, the facility definition for onshore petroleum and natural gas production and natural gas distribution differs from the definition of facility in subpart A.



2. Reporting subpart W data

Electronic Reporting System



- For the GHGRP, all data is submitted to EPA electronically in e-GGRT
 - Except the one-time Electronic Signature Agreement (ESA) which is submitted on paper
- Web-based system for facility/supplier to EPA reporting
 - for subpart W RY 2011

Reporting through e-GGRT



- e-GGRT supports Part 98 reporting requirements
 - but NOT Part 98 recordkeeping requirements
 - supports reporting of both CBI and non-CBI data; does not currently collect deferred inputs to emission equations.
- Subpart W NOI and BAMM requests have already been submitted using e-GGRT

e-GGRT



- Reporters *MUST* be registered in e-GGRT 60 days before reporting deadline (for RY2011 this is July 30, 2012)
 - If reporters already reported to EPA in 2011 and will now be reporting for W, they would already be registered in the system; but need to have notified EPA by April 2 that they were deferring reporting to 9/28/12.
- Registration in e-GGRT- currently open
- *Do not wait until the last minute to register*

e-GGRT



- e-GGRT registration webinar will be held – May 10, 2012
 - *November 2011 powerpoint presentation on e-GGRT registration is located at:*
http://www.epa.gov/climatechange/emissions/downloads11/training/eGGRT_Webinar_SubpartW_NOI_BAMM.pdf (e-GGRT presentation starts with page 22)
- e-GGRT open for reporting RY2011 data –
 - mid/late-Aug 2012
- Reporting Deadline– Sept 28, 2012



Reporting subpart W RY2011 data

Reporting subpart W RY2011 data



For reporting of subpart W RY2011 data, reporters have 2 options:

1. Download MS Excel file (“reporting form”) from EPA and enter data

- Data calculated in-house, **or**
- Data calculated off-line using EPA’s optional Calculation tool – “Subpart W Calculation Spreadsheets”

Upload the reporting form into e-GGRT

OR

2. Download e-GGRT XML schema (the entire schema for all subparts)

Use schema to design data export from in-house data system

Upload completed XML file into e-GGRT

Please note: If using the XML bulk upload option, all applicable subparts must be included in the same XML bulk file. For example, a facility, if subject to multiple subparts, would submit a single XML bulk upload file including all applicable subparts (such as subparts A, W, Y, C, etc) in one file submission.

Reporting subpart W RY2011 data



- Reporters will have an opportunity for testing e-GGRT for RY2011 – June 4-15
 - Instructional webinars on how to participate in testing – May 28 – June 8
 - <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>
- Optional EPA-supplied “Subpart W Calculation Spreadsheets” provided to help reporters calculate emissions to input into either the reporting form or the XML file

Reporting subpart W RY2011 data



- **Best Available Monitoring Methods (BAMM) - if unique or unusual circumstances preclude being able to gather all the parameters to the subpart W equations, may BAMM be used for those parameters?**
 - **Yes, for RY 2011 data, BAMM automatically granted. For RY 2011 data only, no need to request from EPA**
 - **For details on BAMM – see BAMM Fact Sheet at: <http://www.epa.gov/climatechange/emissions/downloads11/documents/subpart-w-bamm-factsheet.pdf>**



Reporting subpart W RY2012 data

Reporting subpart W RY2012 data



- **RY2012 data reporting opens February 2013**
- **RY 2012 Annual report deadline: April 1, 2013**

Reporting subpart W RY2012 data



- If unique or unusual circumstances preclude being able to gather all the parameters to W equations, may BMM be used for those parameters?
 - If applying for BMM for Jan 1 to June 30, 2012 data
 - If reporter filed NOI by Dec 31, 2011, (Jan 3 with holiday) and BMM request submitted by March 30, 2012, then YES, BMM granted automatically
 - If applying for BMM from July 1 to Dec 31, 2012
 - Only if reporter filed NOI by Dec 31, 2011, (Jan 3 with holiday) BMM request submitted by March 30, 2012, **and if BMM request approved by EPA**



Reporting subpart W RY 2013 and following years

Reporting RY2013 data and for following years



- RY 2013 and beyond, annual report due Mar 31 of the year following data collection
 - Ex: RY 2013 data is due March 31, 2014

Reporting RY2013 data and for following years



- If unique or unusual circumstances preclude being able to gather all the parameters to W equations, may BAMM be used for those parameters?
 - Only BAMM request submitted by Sept 30 of the preceding year, **and if BAMM request approved by EPA**
 - Ex of BAMM submission deadline: For RY 2013, if applying for BAMM, BAMM request must be submitted by September 30, 2012



3. Additional Implementation Activities

Additional Implementation Activities



- **Subpart W CBI Determinations**
- **Subpart W Technical Corrections**
- **Litigation**
- **CARB subpart W reporting**

Additional Implementation Activities (cont'd)



- **Subpart W CBI Determinations**
 - Like other subparts, EPA is determining which data are CBI and deferring the deadline for reporting all W inputs until 2015
 - Proposal was published on Feb 24, 2012
 - Comment Period closed on Apr 9, 2012
 - RY2011 reports will include only non-deferred data
 - There is no place to make a claim of CBI in e-GGRT

Additional Implementation Activities (cont'd)



- **Subpart W Technical Corrections**
 - EPA has identified a few technical corrections. EPA is considering options to address these.
- **Subpart W Litigation Discussions are on-going**

Additional Implementation Activities (cont'd)



- **California Air Resources Board (CARB) subpart W reporting**
 - For 2012 CARB follows the technical requirements of EPA's 11/30/10 rule and allows use of BMM for RY2011.
 - CARB's data reporting tool is called Cal e-GGRT. RY 2011 Subpart W reporting in Cal e-GGRT has already started.



**4. How subpart W 2011 BAPPS rule
revisions and
12/23/11 Tech Revisions rule updated
the November 30, 2010 Final Rule**

How BMM revisions and Tech Revisions updated the 11/30/12 Final Rule



- Rule revisions published: April and Sept. 2011 (BMM changes) and Dec 23, 2011 (Technical Revisions)

- Rule notices found on Subpart W website:
 - www.epa.gov/climatechange/emissions/subpart/w.html
 - *Reporters should refer to the e-CFR for the final rule (http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=9415fad5f1c7ea4d940d308e1ea74e11&tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl).*



How BMM Revisions updated the 11/30/10 Final Rule

How BMM Revisions updated the 11/30/10 Final Rule



Review - If Unique or Unusual Circumstances preclude being able to gather all the parameters to W equations, may I use BMM for those parameters?

- RY 2011 – Yes, allowed automatic BMM
- For Jan 1 to June 30, 2012 data - If reporter filed NOI by Dec 31, 2011 (Jan 3, 2012), and BMM request submitted by March 30, 2012, then YES, granted automatically
- For July 1 to Dec 31, 2012 - Only if reporter filed NOI by Dec 31, 2011, BMM request submitted by March 30, 2012, **and if BMM request approved by EPA**
- For RY beyond 2012 - Only if reporter submitted BMM request by Sept 30 of the preceding year, **and if BMM request approved by EPA**
 - Ex: For RY 2013, if applying for BMM, must apply by September 30, 2012

How BMM Revisions updated the 11/30/10 Final Rule



If allowed to use BMM, what methods must I follow?

- Please refer to 40 CFR 98.234 (f) for further details. Please note that reporters are still required to use the calculation equations in the rule but may use alternative means to determine the inputs to those equations.

“EPA will allow owners or operators to use BMM for parameters in 98.333 Calculating GHG Emissions as specified in paragraphs (f) (2), (f) (3), and (f) (4) of this section.”

- BMM Fact Sheet is on the W website
<http://www.epa.gov/climatechange/emissions/downloads11/documents/subpart-w-bamm-factsheet.pdf>



**How December 23, 2011
Technical Revisions updated the
11/30/10 Final Rule**

How 12/23/11 Tech Revisions updated the 11/30/10 Final Rule



SUBPART W (Petroleum and Natural Gas Systems)

- Clarified definitions for the following industry segments: 1) onshore petroleum and natural gas production, 2) onshore natural gas processing, 3) onshore natural gas transmission compression; and 4) natural gas distribution
- For the onshore petroleum and natural gas segment measurement requirements, replaced the “field” designation with “sub-basin category” consisting of counties and major formation types.

How 12/23/11 Tech Revisions updated the 11/30/10 Final Rule



Revisions included:

- In the onshore production and natural gas distribution industry segment, established a 1 mmBtu threshold for internal combustion engines (not compressor drivers). Units that fall below this threshold only need to report activity data.
- For the natural gas distribution industry segment, provided the option for facilities to conduct monitoring at their transmission-distribution transfer stations over a multi-year period (not to exceed 5 years).

How 12/23/11 Tech Revisions updated the 11/30/10 Final Rule



- Finalized a default natural gas composition of 95% methane and 1% carbon dioxide for specific industry segments that is consistent with other parts of subpart W.
- Clarified key terms such as blowdown vent stacks, well venting and flaring, well completion and well workover event boundaries, and sonic and subsonic flow rates in pipelines.
- Allowed company records to be used for flow meter calibration.

How 12/23/11 Tech Revisions updated the 11/30/10 Final Rule



- Refined some equations and variables to correct inaccuracies, errors or inconsistencies.

SUBPART A (General Provisions)

- Added a new paragraph that states that for the purposes of applying the terms owner and operator used throughout the general provisions, facilities reporting under the onshore production industry segment and the natural gas distribution industry segment of subpart W will use their uniquely defined facility definitions as outlined in subpart W.

How 12/23/11 Tech Revisions updated the 11/30/10 Final Rule



- Clarified definitions for continuous bleed and intermittent bleed pneumatic devices.

A Technical Revisions Fact Sheet is located on the W website

http://www.epa.gov/climatechange/emissions/downloads11/documents/2011-revisions_subpart-w-factsheet.pdf



5. Training Resources

For More Information



www.epa.gov/climatechange/emissions/ghgrulemaking.html

- Information sheets and fact sheets for each subpart
- Preamble and rule
- Technical background documents on source categories
- Comment response documents
- Training and Webinar schedule
- Other technical assistance materials (e.g. applicability tool)

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For More Information



www.epa.gov/climatechange/emissions/ghgrulemaking.html

- FAQs (by topic areas)
<http://www.ccdsupport.com/confluence/display/faq/FAQs>
- Subpart W FAQs
www.ccdsupport.com/confluence/display/help/Subpart+W.+Oil+and+Natural+Gas+Systems
- GHGRP 's Rule Help Center
www.epa.gov/climatechange/emissions/help.html
- e-GGRT help website - www.ccdsupport.com
- Help Desk
www.epa.gov/climatechange/emissions/ghgrule_contactus.htm

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6. Summary

Top “Take Home” Items



- BAMM
 - Automatic BAMM--Jan 1 to Dec 31, 2011 (Past)
 - Deadline for BAMM extension for 2012- NOI by Dec 31, 2011 with BAMM application by Mar 30, 2012 (Past)
 - Deadline for BAMM request for 2013 - Oct 1, 2012
- Training and Testing
 - e-GGRT Registration Webinar - May 10, 2012 - Register at www.epa.gov/climatechange/emissions/training.html
 - Webinars on Background of Subpart W and Subpart W reporting of 2011 data - Late May, 2012
 - Webinars in how to participate in Testing Period – May 28-June 8, 2012
 - Testing - June 4-15, 2012

Top “Take Home” items



- Data Reporting
 - Deadline for facilities that reported in 2011 to notify EPA that they have a new 2011 source category (e.g., subpart W) & will delay reporting until 9/28 – **April 2, 2012 (Past)**
 - Deadline for Facility registration - **July 30, 2012**
 - e-GGRT begins accepting W 2011 data – **mid/late Aug 2012**
 - Deadline for reporting 2011 data- **Sept 28, 2012**
- Data Publication
 - EPA review and verification of 2011 data - **Oct to Dec 2012**
 - Data Publication- **early 2013**



Reminder - Please write down any questions you have about this seminar and submit them to the GHG Reporting Rule helpdesk:

http://www.epa.gov/climatechange/emissions/ghgrule_contactus.htm

Thank you