



CLEAN AIR
TASK FORCE

David McCabe, Ph.D. Clean Air Task Force

No. EIB 21-27

Ozone Precursor Rule

Colorado requirements for retrofit of venting gas-driven controllers at gathering compressor stations

TABLE 2* – Natural Gas Compressor Stations					
Total Historic Percentage of Non-Emitting Controllers	May 1, 2022 Additional Required Percentage of Non-Emitting Controllers	May 1, 2022 Maximum Required Percentage of Non-Emitting Controllers	May 1, 2023 Additional Required Percentage of Non-Emitting Controllers	May 1, 2023 Maximum Required Percentage of Non-Emitting Controllers	Total Additional Required Percentage of Non-Emitting Controllers By May 1, 2023
> 75 %	+10%	90%	+15%	100%	+25%
>60-75 %	+10%	85%	+20%	92%	+30%
>40-60 %	+10%	70%	+25%	75%	+35%
>20-40 %	+15%	50%	+25%	65%	+40%
0-20 %	+20%	35%	+25%	60%	+45%

Colorado requirements for retrofit of venting gas-driven controllers at well pads

TABLE 1*—Well Production Facilities					
Total Historic Non-Emitting Facility Percent Production	May 1, 2022 Additional Required Non-Emitting Facility Percent Production	May 1, 2022 Maximum Required Non-Emitting Facility Percent Production	May 1, 2023 Additional Required Non-Emitting Facility Percent Production	May 1, 2023 Maximum Required Non-Emitting Facility Percent Production	Total Additional Required Non-Emitting Facility Percent Production By May 1 2023
> 75 %	+5%	90%	+10%	96.5%	+15%
> 60-75 %	+5%	80%	+10%	90%	+15%
> 40-60 %	+10%	65%	+15%	75%	+25%
> 20-40 %	+15%	50%	+20%	65%	+35%
0-20 %	+15%	35%	+25%	55%	+40%

Comparison of retrofit requirements (near-term) for gathering compressor stations under Colorado's rule and NMED's proposal

COHORT	COLORADO RULE		NMED's PROPOSAL
	Total Additional Required Non-Emitting Facility Percent Production By May 1 2023	Maximum Required Non- Emitting Facility Percent Production By May 1 2023	Total Required Percentage of Non- Emitting Controllers by January 1, 2024
> 75 %	+25%	100%	80%
> 60-75%	+30%	92%	80%
> 40-60 %	+35%	75%	65%
> 20-40 %	+40%	65%	45%
0-20 %	+45%	60%	25%

Note: Both the Colo. rule and the NMED proposal structure requirements for gathering compressor stations around converting a given portion of an operator's total fleet of controllers. Colo. requires operators in each cohort to convert a fixed % of controllers by the target date. NMED would require all operators in each cohort to convert enough controllers to reach a given fixed %.

Comparison of retrofit requirements (near term) for wellpads under Colorado's rule, the Joint Proposal, and NMED's proposal

COHORT	COLORADO RULE		JOINT PROPOSAL		NMED's PROPOSAL
	Total Additional Required Non-Emitting Facility Percent Production By May 1 2023	Maximum Required Non-Emitting Facility Percent Production By May 1 2023	Conversion Required by December 31, 2023	Maximum Percentage Requirement by December 31, 2023	Total Required Percentage of Non-Emitting Controllers by January 1, 2024
> 75 %	+15%	96.5%	+10%	92%	80%
> 60-75%	+15%	90%	+15%	85%	80%
> 40-60 %	+25%	75%	+20%	75%	65%
> 20-40 %	+35%	65%	+30%	60%	45%
0-20 %	+40%	55%	+35%	50%	25%

Note: Colorado rule and Joint Proposal requires operators to convert facilities producing a certain % of the operator's total liquids production by the target date.

Note: NM proposal would require operators to convert enough controllers to reach a given % of their total controller count by the target date.