

Proposed 20.2.50 NMAC: Oil and Gas Sector – Ozone Precursor Pollutants
The GCA’s Proposed Amendments to 20.2.50.7; 20.2.50.122.B(3), Tables 1 & 2;
20.2.50.122.B(4); and 20.2.50.122.C(1) & (4)

The GCA’s Proposed Amendments to 20.2.50.7 NMAC:

20.2.50.7 DEFINITIONS:

“Intermittent pneumatic controller” means a pneumatic controller that is not designed to have a continuous bleed rate, but is designed to only release natural gas to the atmosphere as part of the actuation cycle.

The GCA’s Proposed Amendments to 20.2.50.122.B(3), Tables 1 & 2; 20.2.50.122.B(4); and 20.2.50.122.C(1) & (4) NMAC:

20.2.50.122 PNEUMATIC CONTROLLERS AND PUMPS:

A. Applicability: Natural gas-driven pneumatic controllers and pumps located at wellhead sites, tank batteries, gathering and boosting sites, natural gas processing plants, and transmission compressor stations are subject to the requirements of 20.2.50.122 NMAC.

B. Emission standards:

(1) A new natural gas-driven pneumatic controller or pump shall comply with the requirements of 20.2.50.122 NMAC upon startup.

(2) An existing natural gas-driven pneumatic pump shall comply with the requirements of 20.2.50.122 NMAC within three years of the effective date of this Part.

(3) An existing natural gas-driven pneumatic controller shall comply with the requirements of 20.2.50.122 NMAC according to the following schedule:

Table 1 – WELLHEAD SITES, TANK BATTERIES, GATHERING AND BOOSTING FACILITIES

Total Historic Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u>	Total Required Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u> by January 1, 2024	Total Required Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u> by January 1, 2027	Total Required Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u> by January 1, 2030
> 75%	80%	85%	90%
> 60-75%	80%	85%	90%

>40-60%	65%	70%	80%
> 20-40%	45%	70%	80%
0-20%	25%	65%	80%

Table 2 – NATURAL GAS COMPRESSOR STATIONS AND GAS PROCESSING PLANTS

Total Historic Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u>	Total Required Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u> by January 1, 2024	Total Required Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u> by January 1, 2027	Total Required Percentage of Non-Emitting Controllers <u>or Intermittent Pneumatic Controllers</u> by January 1, 2030
> 75%	80%	95%	98%
> 60-75%	80%	95%	98%
>40-60%	65%	95%	98%
> 20-40%	50%	95%	98%
0-20%	35%	95%	98%

(4) Standards for natural gas-driven pneumatic controllers.

(a) new pneumatic controllers shall have an emission rate of zero where on-site electrical grid power is being used and use of a no-bleed pneumatic controller is technically and economically feasible. Where on-site electrical grid power is not being used or the use of a no-bleed pneumatic controller is not technically or economically feasible, new pneumatic controllers must be intermittent pneumatic controllers.

(b) existing pneumatic controllers ~~with access to commercial line electrical power where on-site electrical grid power is being used and use of a no-bleed pneumatic controller is technically and economically feasible~~ shall have an emission rate of zero.

(c) existing pneumatic controllers shall meet the required percentage of non-emitting controllers or intermittent pneumatic controllers within the deadlines in tables 1 and 2 of Paragraph (3) of Subsection B of 20.2.50.122 NMAC, and shall comply with the following:

(i) by January 1, 2023, the owner or operator shall determine the total controller count for all controllers at all of the owner or operator's affected facilities that commenced construction before the effective date of this Part. The total controller count must include all emitting pneumatic controllers, intermittent pneumatic controllers, and all non-emitting pneumatic controllers, except that pneumatic controllers necessary for a safety or process purpose that cannot otherwise be met without emitting natural gas shall not be included in the total controller count.

(ii) determine which controllers in the total controller count are non-emitting controllers or intermittent pneumatic controllers and sum the total number of non-emitting or intermittent pneumatic controllers and designate those as total historic non-emitting or intermittent pneumatic controllers.

(iii) determine the total historic non-emitting and intermittent pneumatic controller percent of controllers by dividing the total historic non-emitting and intermittent pneumatic controller count by the total controller count and multiplying by 100.

(iv) based on the percent calculated in (iii) above, the owner or operator shall determine which provisions of tables 1 and 2 of Paragraph (3) of Subsection B of 20.2.50.122 NMAC apply and the replacement schedule the owner or operator must meet.

(v) if an owner or operator meets at least seventy-five percent total non-emitting or intermittent pneumatic controllers by January 1, 2025, the owner or operator has satisfied the requirements of tables 1 and 2 of Paragraph (3) of Subsection B of 20.2.50.122 NMAC.

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C. Monitoring requirements:

(1) Pneumatic controllers or pumps with an emission rate of a natural gas bleed rate equal to zero and intermittent pneumatic controllers are not subject to the monitoring requirements in Subsection C of 20.2.5.122 NMAC.

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(3) The owner or operator of a pneumatic controller that is subject to the monitoring requirements in Subsection C of 20.2.5.122 NMAC with a bleed rate greater than zero shall, on a monthly basis, scan the controller and conduct an AVO inspection, and shall also inspect the pneumatic controller, perform necessary maintenance (such as cleaning, tuning, and repairing a leaking gasket, tubing fitting and seal; tuning to operate over a broader range of proportional band; eliminating an unnecessary valve positioner), and maintain the pneumatic controller according to manufacturer specifications to ensure that the VOC emissions are minimized.

(4) The EMT shall be linked to The owner or operator of a pneumatic controller shall maintain a database that contains the following:

- (a) pneumatic controller identification number;
- (b) type of controller (continuous or intermittent);

- per hour;
- (c) if continuous, design continuous bleed rate in standard cubic feet
- cubic feet; and
- (d) if intermittent, bleed volume per intermittent bleed in standard
- (e) if continuous, design annual bleed in standard cubic feet per year.

D. Recordkeeping requirements:

- (5) The owner or operator shall maintain an electronic record for each pneumatic controller that is subject to the monitoring requirements in Subsection C of 20.2.5.122 NMAC ~~with a natural gas bleed rate greater than zero~~. The record shall include the following: