



New Mexico Environment Department Testimony in EIB 21-27 (R)

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NMED Equipment Database
Key Exhibits

Section 20.2.50.111 - Applicability



NMED's Equipment Database

- AQB utilizes a database called "TEMPO" to record, monitor, and track information about equipment and facilities regulated by the Air Quality Control Act and the Board's regulations
- Information is collected from different types of submittals:
 - Registrations
 - permit applications
 - compliance report submittals for state and federal air quality regulations
 - settlement requirements
 - emissions inventories.



Facility Data

- Each facility entered in TEMPO includes:
 - the company that owns, operates, and is the billing party for the facility;
 - the person designated as the main contact or consultant for air permitting submittals;
 - the estimated, potential, and actual quantities of facility-wide emissions;
 - location information;
 - applicable air quality regulations;
 - the reported NAICS and SIC codes; and
 - general information related to the facility.



Equipment Data

- Equipment-level data includes:
 - ▣ equipment stack parameters;
 - ▣ operating hours;
 - ▣ emission limits;
 - ▣ control device and efficiency;
 - ▣ fuel type, heating value, and fuel use rates;
 - ▣ general information such as serial numbers, manufacturer and construction dates, capacity rates; federal regulations; and source classification codes (“SCCs”).



Data Provided to ERG

- ❑ NMED downloaded equipment and facility data and provided it to ERG
- ❑ ERG used this data to develop the equipment spreadsheets used to evaluate the emissions reductions and costs of Part 50.
- ❑ NMED data provided to ERG is included in a tab in each equipment spreadsheet, and is referred to throughout this testimony as the “NMED Equipment Data.” The ERG spreadsheets are provided as exhibits in electronic format as Microsoft Xcel files.



Overview of Key Exhibits

- NMED and ERG developed and/or relied upon several key documents in developing the proposed rule and the supporting technical information, and these documents are referred to throughout this testimony.
- The following list contains the exhibit number, name as referred to in the testimony, and description or citation information for each key document.



Explanation of Key Exhibits

- ❑ **“EPA CTG”** (NMED Exhibit 34): EPA Office of Air and Radiation’s 2016 *Control Techniques Guidelines for the Oil and Natural Gas Industry*
- ❑ **“NSPS Subpart OOOO” or “Quad O”** (NMED Exhibit 35): EPA’s New Source Performance Standards for new sources at 40 C.F.R. Part 60, Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015.
- ❑ **“NSPS Subpart OOOOa” or “Quad Oa”** (NMED Exhibit 36: NSPA at 40 C.F.R. Part 60, Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.



Explanation of Key Exhibits

- ❑ **“Pennsylvania GP-5”** (NMED Exhibit 37): Pennsylvania’s General Operating Permit for Natural Gas Compression Stations, Processing Plants, and Transmission Stations.
- ❑ **“Pennsylvania GP-5A”** (NMED Exhibit 38): Pennsylvania’s General Operating Permit for Unconventional Natural Gas Well Site Operations and Remote Pigging Stations.
- ❑ **“Colorado Reg. 7”** (NMED Exhibit 39): Colorado’s Regulation Number 7 regulating emissions of NO_x and VOCs from the oil and gas sector for the purpose of controlling ozone.
- ❑ **“Wyoming Permitting Guidance”** (NMED Exhibit 40): Wyoming Department of Environmental Quality, Air Quality Division’s permitting guidance for oil and gas production facilities, revised through May 2016.



Section 20.2.50.111 – Applicability

- ❑ Section 111 outlines the specific sources covered under Part 50:
 - ❑ Crude oil and natural gas production and processing equipment
 - ❑ Operations at well sites, tank batteries, gathering and boosting sites, natural gas processing plants, and transmission compressor stations located up to the point of the local distribution company custody transfer station.



Overview of Applicability Section

- ❑ Calculation of the potential to emit (PTE) in order to determine applicability
- ❑ PTE calculation must be certified by a Professional Engineer or inhouse engineer
- ❑ Requirements of Part 50 may not be used in the PTE calculation
- ❑ Specific requirements for small business facilities as defined in Part 50
- ❑ Oil refineries, transmission pipelines, and saltwater disposal facilities are exempt



Summary of Applicability Requirements

- ❑ NMED received comments on this section and made multiple revisions to address those

20.2.50.111 APPLICABILITY:

- A. This Part applies to certain crude oil and natural gas production and processing equipment ~~and associated with~~ operations that extract, collect, separate, dehydrate, store, process, transport, transmit, or handle hydrocarbon liquids or produced water in the areas specified in 20.2.50.2 NMAC and are located at wellhead sites, tank batteries, gathering and boosting ~~sites~~stations, natural gas processing plants, and transmission compressor stations, up to the point of the local distribution company custody transfer station.
- B. In determining if any source is subject to this Part, including a small business facility as defined in this Part, the owner or operator shall calculate the Potential to Emit (PTE) of such source and shall have the PTE calculation certified by a qualified professional engineer or an inhouse engineer with expertise in the operation of oil and gas equipment, vapor control systems, and pressurized liquid samples. The emission standards and requirements of this Part may not be considered in the PTE calculation required in this Section or in determining if any source is subject to this Part. The calculation shall be kept on file for a minimum of five years and shall be provided to the department upon request.
- C. An owner or operator of a small business facility as defined in this Part shall comply with the requirements of this Part as specified in 20.2.50.125 NMAC.
- D. Oil refineries, ~~and~~ transmission pipelines, and saltwater disposal facilities are not subject to this Part.



Defined Terms Associated with Section 20.2.50.111

Q. “Gathering and boosting station” means a facility, including all equipment and compressors, located downstream of a well site that collects or moves natural gas prior to the inlet of a natural gas processing plant; or prior to a natural gas transmission pipeline or transmission compressor station if no gas processing is performed; or collects, moves, or stabilizes crude oil or condensate prior to an oil transmission pipeline or other form of transportation. Gathering and boosting stations may include equipment for liquids separation, natural gas dehydration, and tanks for the storage of water and hydrocarbon liquids. ~~means a permanent combination of equipment that collects or moves natural gas, crude oil, condensate, or produced water between a wellhead site and a midstream oil and natural gas collection or distribution facility, such as a storage vessel battery or compressor station, or into or out of storage.~~

~~**W. “Natural gas compressor station”** means one or more compressors designed to compress natural gas from well pressure to gathering system pressure before the inlet of a natural gas processing plant, or to move compressed natural gas through a transmission pipeline.~~

SS. “Transmission Compressor Station” means a facility, including all equipment and compressors, that moves pipeline quality natural gas at increased pressure from a well site or natural gas processing plant through a transmission pipeline for ultimate delivery to the local distribution company custody transfer station, underground storage, or to other industrial end users. Transmission compressor stations may include equipment for liquids separation, natural gas dehydration, and tanks for the storage of water and hydrocarbon liquids.

~~**UUT.**~~ **“Wellhead site”** means the equipment directly associated with one or more oil wells or natural gas wells upstream of the natural gas processing plant. A wellhead site may include equipment used for extraction, collection, routing, storage, separation, treating, dehydration, artificial lift, combustion, compression, pumping, metering, monitoring, and product piping.

[20.2.50.7 NMAC - N, XX/XX/2021]