CALIFORNIA AIR RESOURCES BOARD

ADVISORY

**Number 1** **October 2017**

# Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

## Flash Analysis Testing for Separator and Tank Systems

This advisory applies to owners/operators of oil and gas facilities subject to the aforementioned regulation (title 17, California Code of Regulations, sec. 95665 et seq.). The California Air Resources Board (CARB) has been notified that a limited number of separator and tank systems are designed such that they do not allow for gathering composite oil and water samples. In these cases, multiple wells are plumbed into a common header, but the header does not provide a means for gathering a composite oil and a composite water sample. Some owners/operators have informed CARB that they have already performed testing on an individual wellhead with the intent of using the test result to represent all of the well stream fluids that enter the separator and tank system. However, the intent of the regulation is to gather a single, composite sample of crude oil and/or produced water which represents the combined well stream liquids that enter the separator and tank system. We were not made aware of the common header issue described above during the rulemaking process.

A few owners/operators have advised CARB that they will not be able to make the necessary hardware modifications in order to gather composite samples prior to January 1, 2018. Further, those owners/operators have advised CARB that there is insufficient time available to test each wellhead and get the samples analyzed.

CARB has considered the information provided and has determined that insufficient time is available to complete the testing of each individual wellhead by January 1, 2018. CARB is therefore allowing owners/operators of separator and tank systems that do not have a sampling point located on a common header to submit a single test result from a single wellhead and then multiply the test result by the total throughput of the separator and tank systems. This approach may be used for complying with the testing requirements specified in section 95668(a) of the regulation by no later than January 1, 2018. This decision provides a limited number of owners/operators with relief from testing every individual well or having to perform modifications during the remainder of the 2017 calendar year, and will provide additional time to retrofit these systems.

By January 1, 2019, owners/operators must submit composite samples for each separator and tank system, or sample all of the individual wells that flow into each system. The sampling may be performed with the use of a portable pressurized

separator that is temporarily installed in the system to gather the oil and water samples. After January 1, 2018, we will no longer accept a test result from a single well to represent the test results or emissions from separator and tank systems that process well streams from more than one well.

## Background

In 2017, CARB adopted the Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities regulation to control emissions at all oil and gas facilities in California. The regulation requires facilities to either permit or register equipment with CARB or their local air district, perform emissions testing, and comply with emission standards. As a part of the regulation, crude oil and natural gas facilities that operate crude oil and natural gas separator and tank systems must comply with emissions testing, and systems that exceed the emissions standard must comply with emission control requirements.

The flash analysis testing requirements apply to all oil and gas facilities in California. However, some facilities may have tank systems that are exempt from the testing requirements. At crude oil facilities, separator and tank systems that process less than 50 barrels of crude oil per day are exempted from the testing and emission control requirements. At natural gas facilities, separator and tank systems that receive less than 200 barrels of produced water per day are exempted from the same requirements. Please be advised that the facilities may still be subject to other testing requirements as well as other specific permitting and registration conditions. Owners or operators are encouraged to contact CARB or their local air district for additional information about the regulation and compliance requirements.

## Complying With Flash Analysis Testing Requirements

Given the limited number of systems that require modification to perform composite sampling, we believe we have already been in contact with all owners/operators or their representatives that have such systems. However, if you are an owner or operator of a system that does not allow for gathering composite oil and water samples from a common header or sampling point, you must contact CARB in order to apply for an extension to make modifications prior to January 1, 2019. The CARB must confirm you have such a system and will issue an approval so we can properly track the system for compliance and enforcement purposes. Please note, you must still perform testing on the system prior to January 1, 2018, but the testing may be limited to testing a single well and then multiplying the result by the total throughput of the system.

## More Information

To receive updates on the regulation, including public workshops and other related Enforcement Advisories, please join our listserve at the link below. CARB will be using this mechanism to communicate dates and information.

https://www.arb.ca.gov/listserv/listserv_ind.php?listname=oil-gas.

For additional information, or for a copy of the Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities regulation, please visit our website at http://www.arb.ca.gov/cc/oil-gas/oil-gas.htm

If you have any questions please email oilandgas@arb.ca.gov.

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