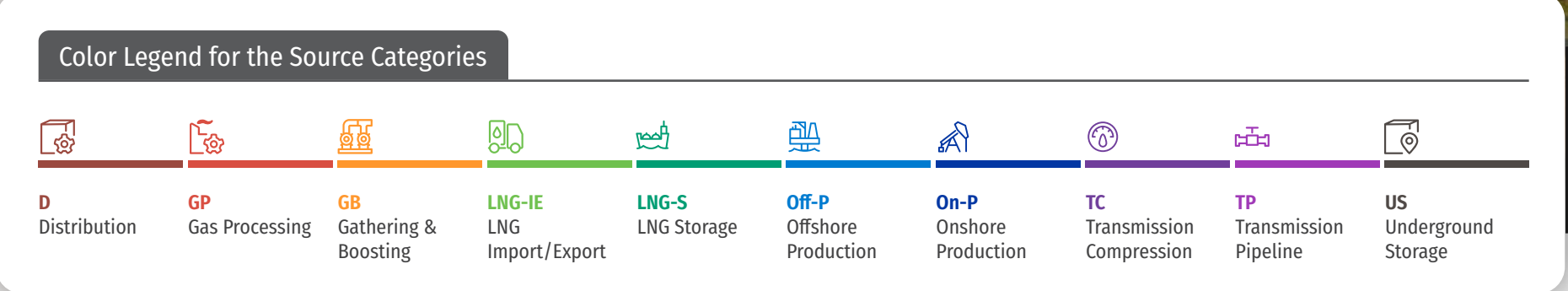


Expansions on Subpart W Emissions Tracking

The latest revisions to Subpart W are aimed at improving the completeness and accuracy of GHG emissions reported by the oil and gas sector. These changes are moving the industry away from using default emissions factors to using site-specific direct measurement for empirical data to meet the mandates of the Inflation Reduction Act (IRA) Methane Emission Reduction Program (MERP).

We have outlined the major impacts of the proposed changes across various segments of the industry sector. The proposed changes fall into one of 3 main groupings:

- 1. New source categories added to the rule
- 2. Existing source categories expanded to other industry segments
- 3. Revisions to existing monitoring, calculation methods, and emission factors



New Reportable Source Categories

Emissions from **Nitrogen Removal Units** must now be reported for the following segments:

Emissions of **Mud Degassing** must now be reported for the following segment:

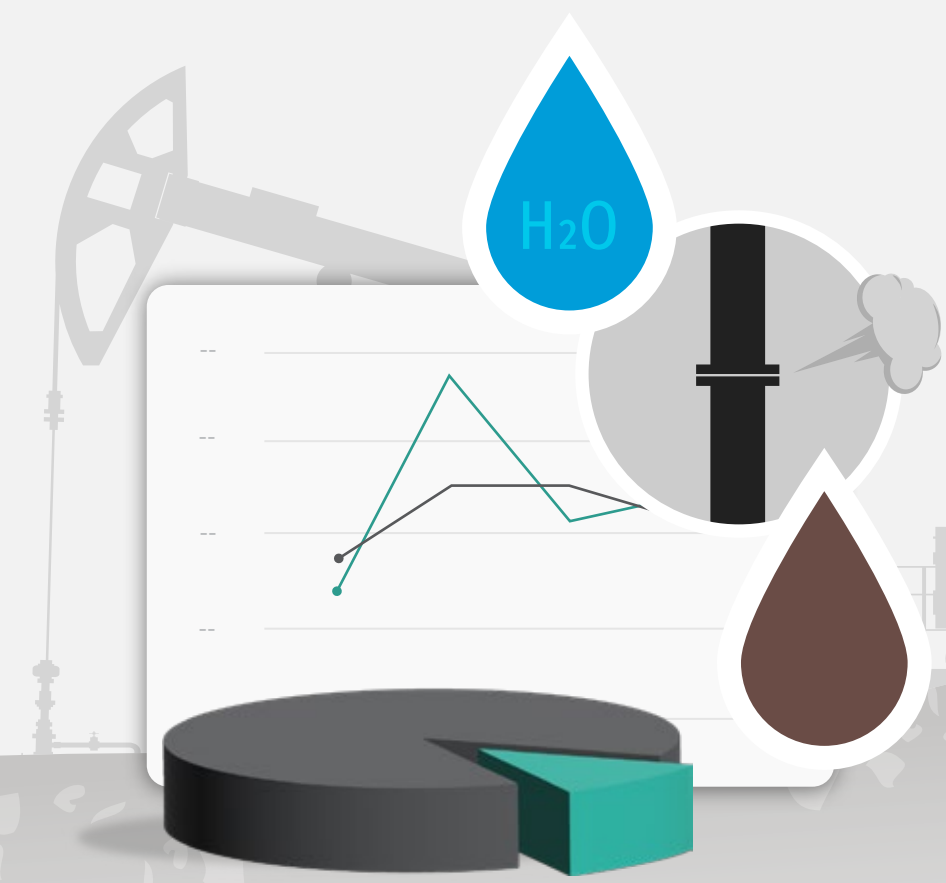
Produced Water Storage Tanks' emissions must now be reported for the following segments:

Emissions from **Crankcase Venting** must now be reported for the following segments:

Other Large Release Events' emissions must now be reported for the following segments:

Expanded Applicability of Existing Source Categories

Acid Gas Removal	
Blowdowns	
Dehydration Units	
Equipment Leaks	
Hydrocarbon Storage Tanks	
Pneumatic Devices	



Revisions to Existing Monitoring, Calculation Methods, and Emission Factors

Many changes throughout Subpart W are proposed. Some of the more impactful ones are highlighted below:

Combustion

Significant increase in default methane emission factors for internal combustion sources to account for methane slip

Compressor Vents

Significant increase in default emission factors

Flares

Adding monitoring and direct measurement requirements, such as flow rate and gas composition, and changing default control efficiency from 98% to a sliding scale of 92% - 98%, depending on the level of measurement employed

Storage Tanks

Adding a requirement to assume 0% capture/control efficiency during periods of "open or not properly seated" thief hatches

Equipment Leaks

Significant increases in default emission factors for most component types and industry segments, except where Method 21 is being employed for surveys

Centralized Production Facilities

Designation of centralized sites (such as tank batteries) as being part of the gathering & boosting segment and not part of production segment

Pneumatic Devices

Eliminating default factors and requiring direct measurement for all intermittent bleed devices

As this infographic detailed, EPA is proposing wide-sweeping revisions to this reporting rule that will not only having financial implications due to its interdependence with the IRA's methane waste emissions charge program but will also require significant time and resources to implement.

Key Dates to Remember	
Proposed rule published	8/1/2023
Comments closed	10/2/2023
Final rule expected	Q1 2024
Effective date	1/1/2025
First report with revised rule due	3/31/2026
The first IRA MERP fee assessments will be based on 2024 emissions data, which is BEFORE these changes go into effect.	



Trinity Consultants has oil & gas experts to lighten your burden and help you “drill” down into the subtle nuances and detailed complexity of your emissions sources from fracking to flares, and everywhere in between. Contact us today at **800.229.6655!**