

✓ A Guide to the Oil and Gas Air Emission Rule:

The more you can emit or the closer you are to residences – the more requirements apply to your oil and gas operations and equipment, unless you are a small business.

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? Questions? ☎ 505-476-4300 ✉ cindy.hollenberg@state.nm.us 🌐 www.env.nm.gov/air-quality/

Rule effective date:
05 August 2022

Applies to:
Existing and new sources.

With equipment on:
Private, state or federal land.

In the following counties:
Chaves, Dona Ana, Eddy, Lea, Rio Arriba, Sandoval, San Juan & Valencia.

Getting started:

- 1** As of 05 August 2022, operate/maintain equipment consistent with manufacturer specs, good engineering/maintenance practices, and in a manner to reduce emissions.
- 2** As of 05 August 2022, conduct sensory leak detection and repair efforts (see next page).
- 3** By 05 August 2024, calculate the potential to emit (PTE) for your equipment to emit air pollution from equipment like tanks, compressors, pig launching and receiving, and glycol dehydrators.

* Applicability:

Most sections of the rule expressly state the applicability of the requirement based on PTE. If you answer “no” for a piece of equipment, you are not subject to the emission standard.

- **Storage tanks:** Does the existing storage tank at a multi-tank battery emit more than 2 tpy of VOC or does the existing standalone storage tank emit more than 4 tpy of VOC?
- **Engines and turbines:** Are the types/ratings above the thresholds in the rule?
- **Compressors:** Is it used at a tank battery, gathering/boosting station or gas plant and is it a centrifugal compressor using wet seals or a reciprocating compressor?
- **Glycol dehydrators:** Does the glycol dehydrator emit more than 2 tpy of VOC?
- **Heaters:** Is heat input greater than 20 MMBTU/hour?
- **Pigging:** Can you emit greater than 1 tpy at the launcher or receiver?

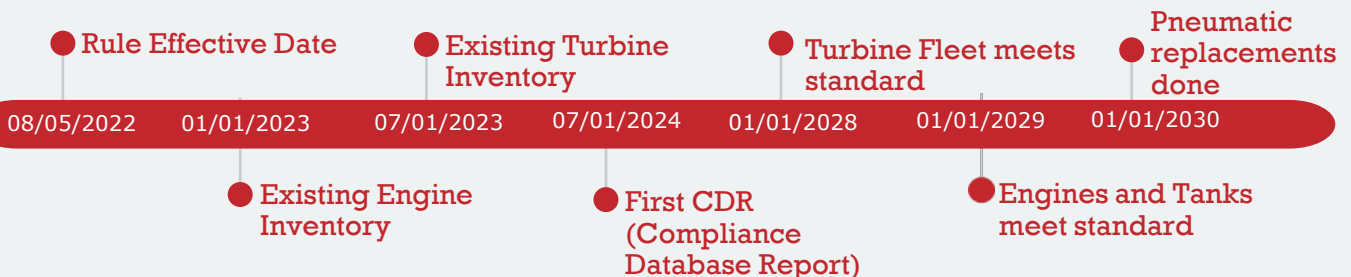
Answer: Yes.

On ramp to rule requirements

Answer: No.

Off ramp to rule requirements

🕒 Key dates:



👍 Small businesses:

- A small business is subject to only the basics: (1) maintain safe operations, (2) conduct monthly sight, sound and smell inspection of equipment, & (3) conduct leak detection and repair on a frequency dependent upon the PTE.
- Defined as independently-owned or operated company that employs no more than 10 people and has gross annual revenues of \$250,000 or less.

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✳ Pneumatics:

Emitting pneumatic controllers are required to be replaced with non-emitting pneumatic controllers based upon a phased approach. The more emissions, the greater the need to replace high bleed pneumatics with low/no-bleed pneumatics. The deadlines and percent replacement requirements are based upon an operator's initial percentage of non-emitting controllers.

By 01 January 2024 – 25% to 80% replaced

By 01 January 2027 – 65% to 85% replaced

By 01 January 2030 – 80% to 90% replaced

✳ Sensory requirements to find and fix leaks:

As of 5 August 2022:

Weekly

audible, visual or olfactory inspections of equipment

or

Monthly

audible, visual or olfactory inspections of equipment

and

Weekly

audible, visual or olfactory inspections of equipment

More than 10 barrels of oil per day or 60,000 standard cubic feet per day of natural gas

Equal to or less than 10 barrels of oil per day or 60,000 standard cubic feet per day of natural gas

Wells within 1,000 feet of an occupied area (e.g., residence)

✳ Technology requirements to find and fix leaks:

As of August 5, 2022, for new sites and as of August 5, 2024, for existing sites:

Annually

EPA method 21, optical gas imaging (OGI) or an alternative method

PTE < 2 tpy VOCs

Semi-Annually

EPA method 21, optical gas imaging (OGI) or an alternative method

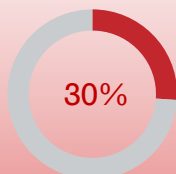
PTE ≥ 2 tpy and < 5 tpy VOCs

Quarterly

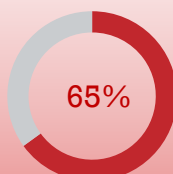
EPA method 21, optical gas imaging (OGI) or an alternative method

PTE ≤ 5 tpy VOCs *or* for any wells within 1,000 feet of occupied area (e.g., residence)

Phased in approach for existing wellhead only facilities:



01 January 2024



01 January 2025



01 January 2026