

# Options

## Portable Oil and Gas Operations

---

FEBRUARY 04, 2016

# Options Committee

---

2

- ❖ Tom Turner
- ❖ Brad Thomas
- ❖ Joshua Kindred
- ❖ John Kuterbach
- ❖ Goal: Recommend technically sound and statutorily approvable approaches that reduce current requirements while still ensuring portable oil and gas operations will not endanger short term air quality standards.

# Considerations

---

- ❖ Based on technical committee's work, unrestricted drilling typically complies with air quality standards, but could operate in a manner that would not comply.
- ❖ Options to address this:
  - ❖ Fuel and exhaust limitations based on prior ambient data and modeling analyses performed for reasonable operational scenarios
  - ❖ Expanded ambient monitoring with reduced or eliminated permitting
  - ❖ Registration and fuel use trigger levels to require case-by-case permitting

# Options Committee Recommendation 4

---

## ❖ Fuel and exhaust limitations

- ❖ Sound Technical Basis
- ❖ Most operations are well below the limits
- ❖ Prevents rather than responds to potential air quality violations
- ❖ No need for expensive ambient monitoring or case-by-case modeling

# How limits could be imposed

---

5

## ❖ Direct Regulation or Permit by Rule

- ❖ Requires Regulation project
  - ❖ 6-9 months
- ❖ No application
- ❖ Difficult to change
- ❖ Requires a SIP change
- ❖ EPA Approval

## ➤ General Permit

- Issued under current regulations
  - 3-6 months
- Requires a complete application
- Easy to change
- No SIP change
- EPA approval for modeling

# Main General Permit Points

---

6

- ❖ Application
  - ❖ Identification of Planned Drilling
  - ❖ Fee payment
  - ❖ Certification that covered operations will comply with limits, monitoring, recordkeeping, and reporting
- ❖ Permit
  - ❖ Covers identified drilling
  - ❖ Requires operations to comply with applicable fuel limits
  - ❖ Requires appropriate fuel use monitoring and record keeping
  - ❖ Requires reporting to assure compliance

# Technical Details

---

7

- ❖ To be addressed through Draft Permit and Public Comment
  - ❖ Details of application content – how specific, length of time
  - ❖ Fee amounts and format
  - ❖ Limits and allowable excursions –including emission units subject to them
  - ❖ Notifications
  - ❖ Monitoring methods and records
  - ❖ Reporting – routine and deviation
  - ❖ Adding or deleting authorized operations

# Additional Considerations

---

8

- ❖ Operation outside the North Slope
- ❖ Operation on Title V or PSD Major source
- ❖ How to address operations which do not qualify
- ❖ Technical support for the general permit will require EPA approval for use of model PVMRM for NO<sub>x</sub>
- ❖ Next steps



# Contact Information

- ❖ John Kuterbach 907.465.5103  
[john.kuterbach@alaska.gov](mailto:john.kuterbach@alaska.gov)
- ❖ Brad Thomas 907.263.4741  
[Brad.C.Thomas@conocophillips.com](mailto:Brad.C.Thomas@conocophillips.com)
- ❖ Drill Rig Workgroup website  
<http://dec.alaska.gov/air/ap/OilGasDrillWorkgroup.html>

