DOE/EIA-M063(2011)

Documentation of the Oil and Gas Supply Module (OGSM)

July 2011

Office of Energy Analysis
U.S. Energy Information Administration
U.S. Department of Energy
Washington, DC 20585

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Update Information

This edition of the *Documentation of the Oil and Gas Supply Module* reflects changes made to the oil and gas supply module over the past year for the *Annual Energy Outlook 2011*. The major changes include:

- Texas Railroad Commission District 5 is included in the Southwest region instead of the Gulf Coast region.
- Re-estimation of Lower 48 onshore exploration and development costs.
- Updates to crude oil and natural gas resource estimates for emerging shale plays.
- Addition of play-level resource assumptions for tight gas, shale gas, and coalbed methane (Appendix 2.C).
- Updates to the assumptions used for the announced/nonproducing offshore discoveries.
- Revision of the North Slope New Field Wildcat (NFW) exploration wells drilling rate function. The NFW drilling rate is a function of the low-sulfur light projected crude oil prices and was statically estimated based on Alaska Oil and Gas Conservation Commission well counts and success rates.
- Recalibration of the Alaska oil and gas well drilling and completion costs based on the 2007 American Petroleum Institute Joint Association Survey drilling cost data.
- Updates to oil shale plant configuration, cost of capital calculation, and market penetration algorithms.
- Addition of natural gas processing and coal-to-liquids plants as anthropogenic sources of carbon dioxide (CO_2).

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1. Introduction

The purpose of this report is to define the objectives of the Oil and Gas Supply Module (OGSM), to describe the model's basic approach, and to provide detail on how the model works. This report is intended as a reference document for model analysts, users, and the public. It is prepared in accordance with the U.S. Energy Information Administration's (EIA) legal obligation to provide adequate documentation in support of its statistical and forecast reports (Public Law 93-275, Section 57(b)(2)).

Projected production estimates of U.S. crude oil and natural gas are based on supply functions generated endogenously within the National Energy Modeling System (NEMS) by the OGSM. The OGSM encompasses both conventional and unconventional domestic crude oil and natural gas supply. Crude oil and natural gas projections are further disaggregated by geographic region. The OGSM projects U.S. domestic oil and gas supply for six Lower 48 onshore regions, three offshore regions, and Alaska. The general methodology relies on forecasted profitability to determine exploratory and developmental drilling levels for each region and fuel type. These projected drilling levels translate into reserve additions, as well as a modification of the production capacity for each region.

The OGSM utilizes both exogenous input data and data from other modules within the NEMS. The primary exogenous inputs are resource levels, finding-rate parameters, costs, production profiles, and tax rates - all of which are critical determinants of the expected returns from projected drilling activities. Regional projections of natural gas wellhead prices and production are provided by the Natural Gas Transmission and Distribution Module (NGTDM). Projections of the crude oil wellhead prices at the OGSM regional level come from the Petroleum Market Model (PMM). Important economic factors, namely interest rates and GDP deflators, flow to the OGSM from the Macroeconomic Module. Controlling information (e.g., forecast year) and expectations information (e.g., expected price paths) come from the Integrating Module (i.e. system module).

Outputs from the OGSM go to other oil and gas modules (NGTDM and PMM) and to other modules of the NEMS. To equilibrate supply and demand in the given year, the NGTDM employs short-term supply functions (with the parameters provided by the OGSM) to determine non-associated gas production and natural gas imports. Crude oil production is determined within the OGSM using short-term supply functions. These short-term supply functions reflect potential oil or gas flows to the market for a 1-year period. The gas functions are used by the NGTDM and the oil volumes are used by the PMM for the determination of equilibrium prices and quantities of crude oil and natural gas at the wellhead. The OGSM also provides projections of natural gas production to the PMM to estimate the corresponding level of natural gas liquids production. Other NEMS modules receive projections of selected OGSM variables for various uses. Oil and gas production is passed to the Integrating Module for reporting purposes. Forecasts of oil and gas production are also provided to the Macroeconomic Module to assist in forecasting aggregate measures of output.

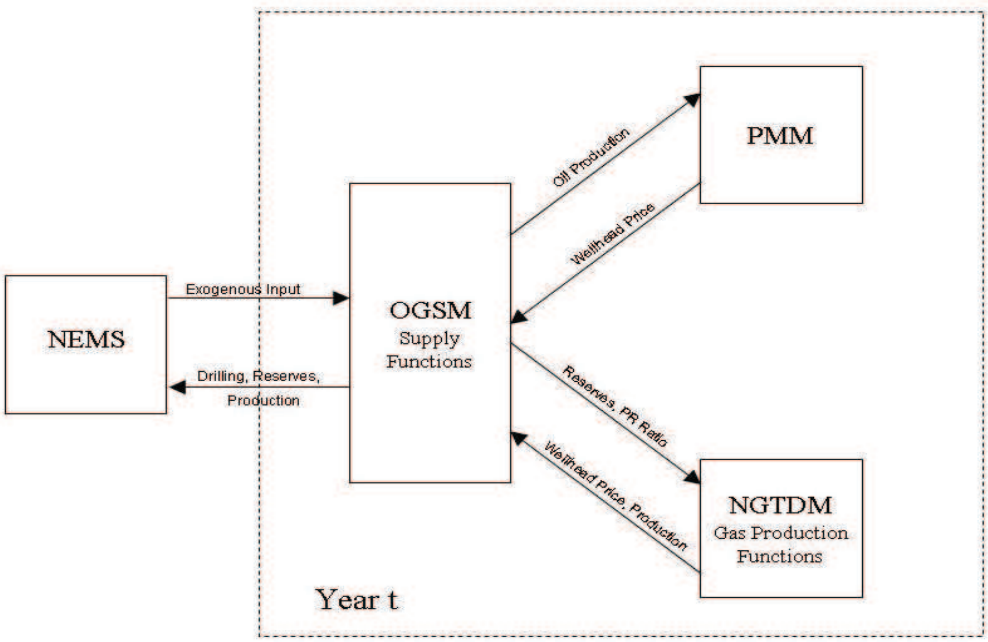
The OGSM is archived as part of the NEMS. The archival package of the NEMS is located under the model acronym NEMS2011. The NEMS version documented is that used to produce the *Annual Energy Outlook 2011 (AEO2011)*. The package is available on the EIA website.[1]

Model Purpose

The OGSM is a comprehensive framework used to analyze oil and gas supply potential and related issues. Its primary function is to produce domestic projections of crude oil and natural gas production as well as natural gas imports and exports in response to price data received endogenously (within the NEMS) from the NGTDM and PMM. Projected natural gas and crude oil wellhead prices are determined within the NGTDM and PMM, respectively. As the supply component only, the OGSM cannot project prices, which are the outcome of the equilibration of both demand and supply.

The basic interaction between the OGSM and the other oil and gas modules is represented in Figure 1-1. The OGSM provides beginning-of-year reserves and the production-to-reserves ratio to the NGTDM for use in its short-term domestic non-associated gas production functions and associated-dissolved natural gas production. The interaction of supply and demand in the NGTDM determines non-associated gas production.

Figure 1-1. OGSM Interface with Other Oil and Gas Modules



[1] ftp://ftp.eia.doe.gov/pub/forecasts/aeo/

The OGSM provides domestic crude oil production to the PMM. The interaction of supply and demand in the PMM determines the level of imports. System control information (e.g., forecast year) and expectations (e.g., expect price paths) come from the Integrating Module. Major exogenous inputs include resource levels, finding-rate parameters, costs, production profiles, and tax rates -- all of which are critical determinants of the oil and gas supply outlook of the OGSM.

The OGSM operates on a regionally disaggregated level, further differentiated by fuel type. The basic geographic regions are Lower 48 onshore, Lower 48 offshore, and Alaska, each of which, in turn, is divided into a number of subregions (see Figure 1-2). The primary fuel types are crude oil and natural gas, which are further disaggregated based on type of deposition, method of extraction, or geologic formation. Crude oil supply includes lease condensate. Natural gas is differentiated by non-associated and associated-dissolved gas.[2] Non-associated natural gas is categorized by fuel type: low-permeability carbonate and sandstone (conventional), high-permeability carbonate and sandstone (tight gas), shale gas, and coalbed methane.

The OGSM provides mid-term (through year 2035) projections and serves as an analytical tool for the assessment of alternative supply policies. One publication that utilizes OGSM forecasts is the *Annual Energy Outlook (AEO)*. Analytical issues that OGSM can address involve policies that affect the profitability of drilling through impacts on certain variables, including:

- drilling and production costs;
- regulatory or legislatively mandated environmental costs;
- key taxation provisions such as severance taxes, State or Federal income taxes, depreciation schedules and tax credits; and
- the rate of penetration for different technologies into the industry by fuel type.

The cash flow approach to the determination of drilling levels enables the OGSM to address some financial issues. In particular, the treatment of financial resources within the OGSM allows for explicit consideration of the financial aspects of upstream capital investment in the petroleum industry.

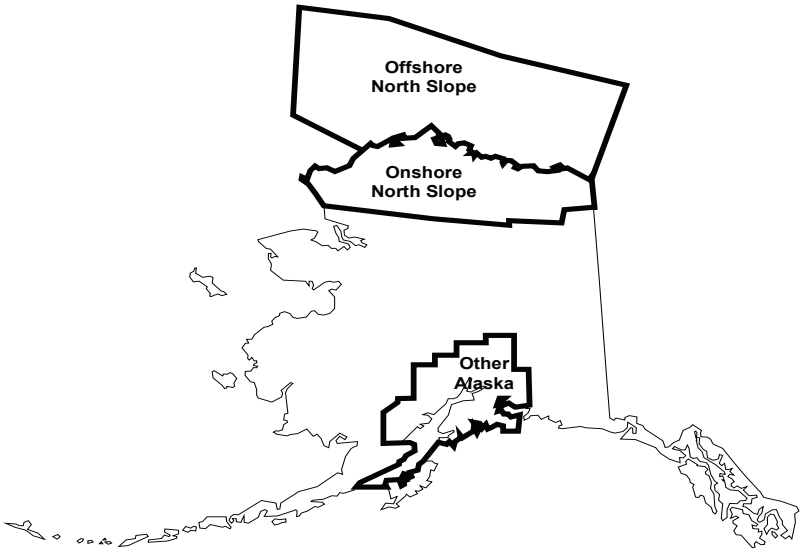
The OGSM is also useful for policy analysis of resource base issues. OGSM analysis is based on explicit estimates for technically recoverable oil and gas resources for each of the sources of domestic production (i.e., geographic region/fuel type combinations). With some modification, this feature could allow the model to be used for the analysis of issues involving:

- the uncertainty surrounding the technically recoverable oil and gas resource estimates, and
- access restrictions on much of the offshore Lower 48 states, the wilderness areas of the onshore Lower 48 states, and the 1002 Study Area of the Arctic National Wildlife Refuge (ANWR).

[2]Nonassociated (NA) natural gas is gas not in contact with significant quantities of crude oil in a reservoir. Associated-dissolved natural gas consists of the combined volume of natural gas that occurs in crude oil reservoirs either as free gas (associated) or as gas in solution with crude oil (dissolved).

In general, the OGSM is used to foster a better understanding of the integral role that the oil and gas extraction industry plays with respect to the entire oil and gas industry, the energy subsector of the U.S. economy, and the total U.S. economy.

Figure 1-2. Oil and Gas Supply Regions

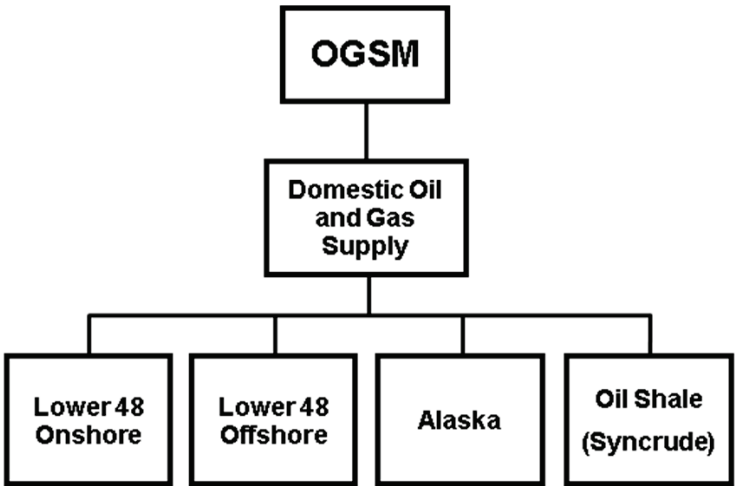


Model Structure

The OGSM consists of a set of submodules (Figure 1-3) and is used to perform supply analysis of domestic oil and gas as part of the NEMS. The OGSM provides crude oil production and parameter estimates representing natural gas supplies by selected fuel types on a regional basis to support the market equilibrium determination conducted within other modules of the NEMS. The oil and gas supplies in each period are balanced against the regionally-derived demand for the produced fuels to solve simultaneously for the market clearing prices and quantities in the wellhead and end-use markets. The description of the market analysis models may be found in the separate methodology documentation reports for the Petroleum Market Module (PMM) and the Natural Gas Transmission and Distribution Model (NGTDM).

The OGSM represents the activities of firms that produce oil and natural gas from domestic fields throughout the United States. The OGSM encompasses domestic crude oil and natural gas supply by both conventional and unconventional recovery techniques. Natural gas is categorized by fuel type: high-permeability carbonate and sandstone (conventional), low-permeability carbonate and sandstone (tight gas), shale gas, and coalbed methane. Unconventional oil includes production of synthetic crude from oil shale (syncrude). Crude oil and natural gas projections are further disaggregated by geographic region. Liquefied natural gas (LNG) imports and pipeline natural gas import/export trade with Canada and Mexico are determined in the NGTDM.

Figure 1-3. Submodules within the Oil and Gas Supply Module



The model's methodology is shaped by the basic principle that the level of investment in a specific activity is determined largely by its expected profitability. Output prices influence oil and gas supplies in distinctly different ways in the OGSM. Quantities supplied as the result of the annual market equilibration in the PMM and the NGTDM are determined as a direct result of the observed market price in that period. Longer-term supply responses are related to investments required for subsequent production of oil and gas. Output prices affect the expected profitability of these investment opportunities as determined by use of a discounted cash flow evaluation of representative prospects. The OGSM incorporates a complete and representative

description of the processes by which oil and gas in the technically recoverable resource base[3] convert to proved reserves.[4]

The breadth of supply processes that are encompassed within OGSM result in different methodological approaches for determining crude oil and natural gas production from Lower 48 onshore, Lower 48 offshore, Alaska, and oil shale. The present OGSM consequently comprises four submodules. The Onshore Lower 48 Oil and Gas Supply Submodule (OLOGSS) models crude oil and natural gas supply from resources in the Lower 48 States. The Offshore Oil and Gas Supply Submodule (OOGSS) models oil and gas exploration and development in the offshore Gulf of Mexico, Pacific, and Atlantic regions. The Alaska Oil and Gas Supply Submodule (AOGSS) models industry supply activity in Alaska. Oil shale (synthetic) is modeled in the Oil Shale Supply Submodule (OSSS). The distinctions of each submodule are explained in individual chapters covering methodology. Following the methodology chapters, four appendices are included: Appendix A provides a description of the discounted cash flow (DCF) calculation; Appendix B is the bibliography; Appendix C contains a model abstract; and Appendix D is an inventory of key output variables.

[3] *Technically recoverable resources* are those volumes considered to be producible with current recovery technology and efficiency but without reference to economic viability. Technically recoverable volumes include proved reserves and inferred reserves as well as undiscovered and other unproved resources. These resources may be recoverable by techniques considered either conventional or unconventional.

[4] *Proved reserves* are the estimated quantities that analyses of geological and engineering data demonstrate with reasonable certainty to be recoverable in future years from known reservoirs under existing economic and operating conditions.

2. Onshore Lower 48 Oil and Gas Supply Submodule

Introduction

U.S. onshore lower 48 crude oil and natural gas supply projections are determined by the Onshore Lower 48 Oil and Gas Supply Submodule (OLOGSS). The general methodology relies on a detailed economic analysis of potential projects in known crude oil and natural gas fields, enhanced oil recovery projects, developing natural gas plays, and undiscovered crude oil and natural gas resources. The projects that are economically viable are developed subject to the availability of resource development constraints which simulate the existing and expected infrastructure of the oil and gas industries. The economic production from the developed projects is aggregated to the regional and the national levels.

OLOGSS utilizes both exogenous input data and data from other modules within the National Energy Modeling System (NEMS). The primary exogenous data includes technical production for each project considered, cost and development constraint data, tax information, and project development data. Regional projections of natural wellhead prices and production are provided by the Natural Gas Transmission and Distribution Model (NGTDM). From the Petroleum Market Module (PMM) come projections of the crude oil wellhead prices at the OGSM regional level.

Model Purpose

OLOGSS is a comprehensive model with which to analyze the crude oil and natural gas supply potential and related economic issues. Its primary purpose is to project production of crude oil and natural gas from the onshore lower 48 in response to price data received from the PMM and the NGTDM. As a supply submodule, OLOGSS does not project prices.

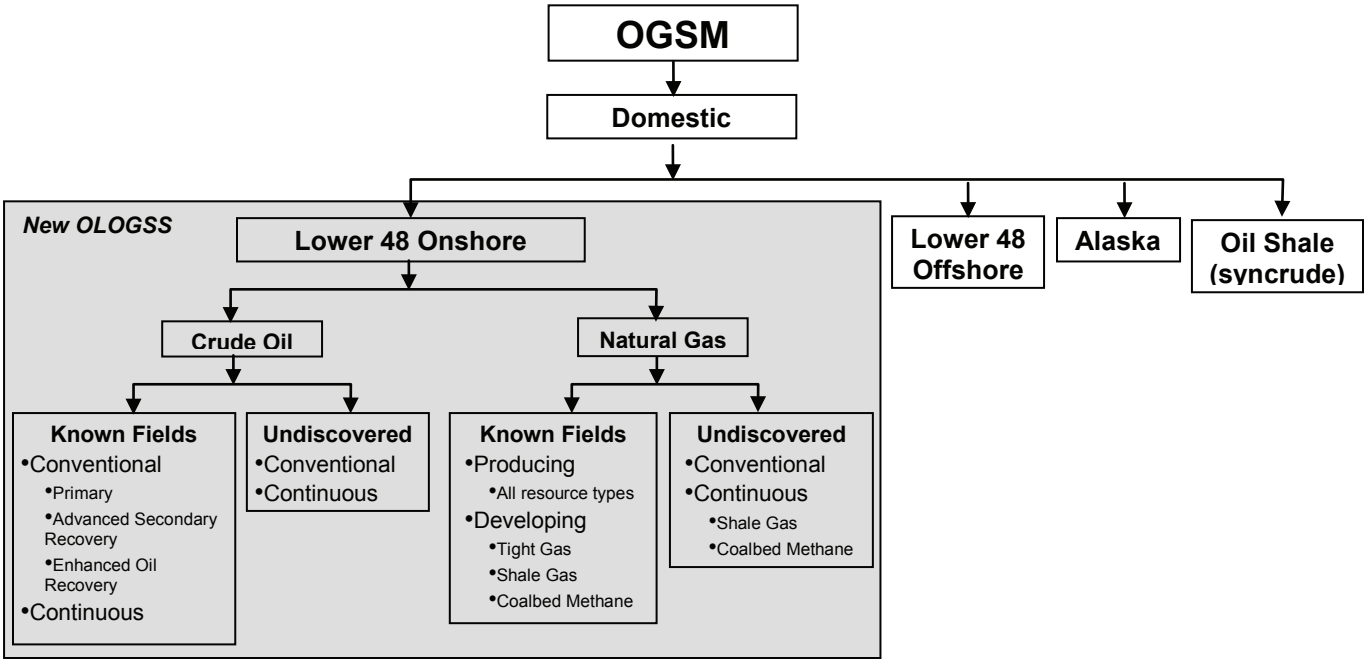
The basic interaction between OLOGSS and the OGSM is illustrated in figure 2-1. As seen in the figure, OLOGSS models the entirety of the domestic crude oil and natural gas production within the onshore lower 48.

Resources Modeled

Crude Oil Resources

Crude oil resources, as illustrated in figure 2-1, are divided into known fields and undiscovered fields. For known resources, exogenous production type curves are used for quantifying the technical production profiles from known fields under primary, secondary, and tertiary recovery processes. Primary resources are also quantified for their advanced secondary recovery (ASR) processes that include the following: waterflooding, infill drilling, horizontal continuity, and horizontal profile modification. Known resources are evaluated for the potential they may possess when employing enhanced oil recovery (EOR) processes such as CO_2 flooding, steam flooding, polymer flooding and profile modification. Known crude oil resources include highly fractured continuous zones such as the Austin chalk formations and the Bakken shale formations.

Figure 2-1: Subcomponents within OGSM



Undiscovered crude oil resources are characterized in a method similar to that used for discovered resources and are evaluated for their potential production from primary and secondary techniques. The potential from an undiscovered resource is defined based on United States Geological Survey (USGS) estimates and is distinguished as either conventional or continuous. Conventional crude oil and natural gas resources are defined as discrete fields with well-defined hydrocarbon-water contacts, where the hydrocarbons are buoyant on a column of water. Conventional resources commonly have relatively high permeability and obvious seals and traps. In contrast, continuous resources commonly are regional in extent, have diffuse boundaries, and are not buoyant on a column of water. Continuous resources have very low permeability, do not have obvious seals and traps, are in close proximity to source rocks, and are abnormally pressured. Included in the category of continuous accumulations are hydrocarbons that occur in tight reservoirs, shale reservoirs, fractured reservoirs, and coal beds.

Natural Gas Resources

Natural gas resources, as illustrated in figure 2-1, are divided into known producing fields, developing natural gas plays, and undiscovered fields. Exogenous production type curves have been used to estimate the technical production from known fields. The undiscovered resources have been characterized based on resource estimates developed by the USGS. Existing databases of developing plays, such as the Marcellus Shale, have been incorporated into the model's resource base. The natural gas resource estimates have been developed from detailed geological characterizations of producing plays.

Processes Modeled

OLOGSS models primary, secondary and tertiary oil recovery processes. For natural gas, OLOGSS models discovered and undiscovered fields, as well as discovered and developing fields. Table 2-1 lists the processes modeled by OLOGSS.

Table 2-1: Processes Modeled by OLOGSS

Crude Oil Processes	Natural Gas Processes
Existing Fields and Reservoirs	Existing Radial Flow
Waterflooding in Undiscovered Resources	Existing Water Drive
CO_2 Flooding	Existing Tight Sands
Steam Flooding	Existing Dry Coal/Shale
Polymer Flooding	Existing Wet Coal/Shale
Infill Drilling	Undiscovered Conventional
Profile Modification	Undiscovered Tight Gas
Horizontal Continuity	Undiscovered Coalbed Methane
Horizontal Profile	Undiscovered Shale Gas
Undiscovered Conventional	Developing Shale Gas
Undiscovered Continuous	Developing Coalbed Methane
	Developing Tight Gas

Major Enhancements

OLOGSS is a play-level model that projects the crude oil and natural gas supply from the onshore lower 48. The modeling procedure includes a comprehensive assessment method for determining the relative economics of various prospects based on future financial considerations, the nature of the undiscovered and discovered resources, prevailing risk factors, and the available technologies. The model evaluates the economics of future exploration and development from the perspective of an operator making an investment decision. Technological advances, including improved drilling and completion practices, as well as advanced production and processing operations are explicitly modeled to determine the direct impacts on supply, reserves, and various economic parameters. The model is able to evaluate the impact of research and development (R&D) on supply and reserves. Furthermore, the model design provides the flexibility to evaluate alternative or new taxes, environmental, or other policy changes in a consistent and comprehensive manner.

OLOGSS provides a variety of levers that allow the user to model developments affecting the profitability of development:

- Development of new technologies
- Rate of market penetration of new technologies
- Costs to implement new technologies
- Impact of new technologies on capital and operating costs
- Regulatory or legislative environmental mandates

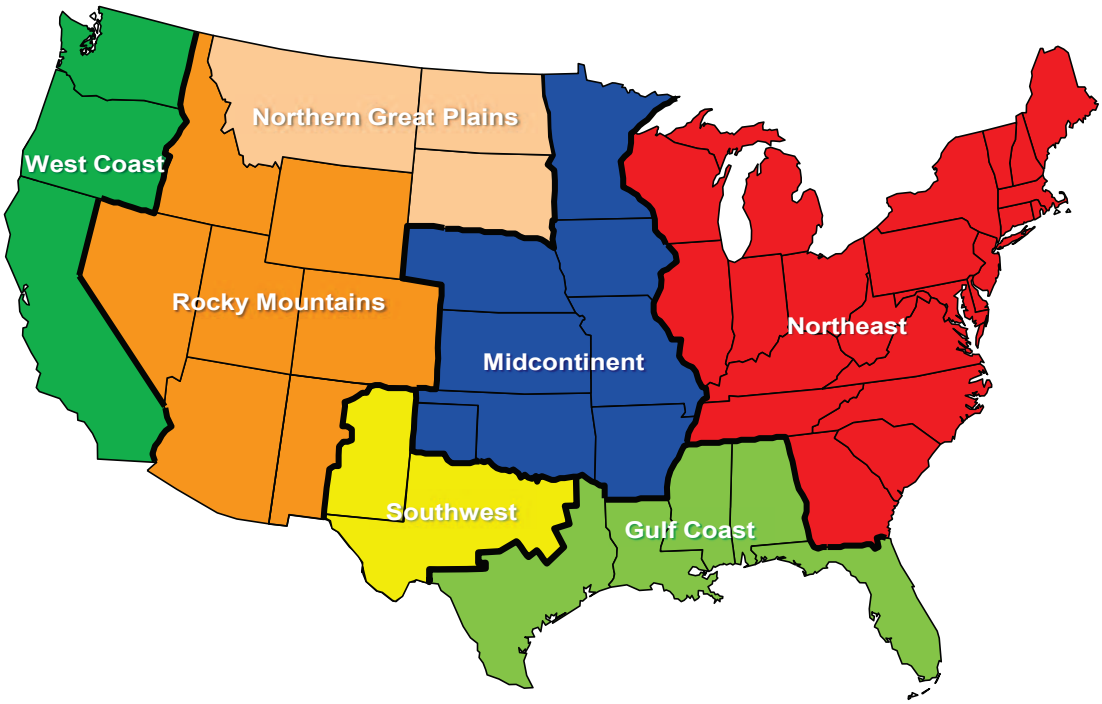
In addition, OLOGSS can quantify the effects of hypothetical developments that affect the resource base. OLOGSS is based on explicit estimates for technically recoverable crude oil and natural gas resources for each source of domestic production (i.e., geographic region/fuel type combinations).

OLOGSS is capable of addressing access issues concerning crude oil and natural gas resources located on federal lands. Undiscovered resources are divided into four categories:

- Officially inaccessible
- Inaccessible due to development constraints
- Accessible with federal lease stipulations
- Accessible under standard lease terms

OLOGSS uses the same geographical regions as the OGSM with one distinction. In order to capture the regional differences in costs and drilling activities in the Rocky Mountain region, the region has been divided into two sub-regions. These regions, along with the original six, are illustrated in figure 2-2. The Rocky Mountain region has been split to add the Northern Great Plains region. The results for these regions are aggregated before being passed to other OGSM or NEMS routines.

Figure 2-2: Seven OLOGSS Regions for Onshore Lower 48



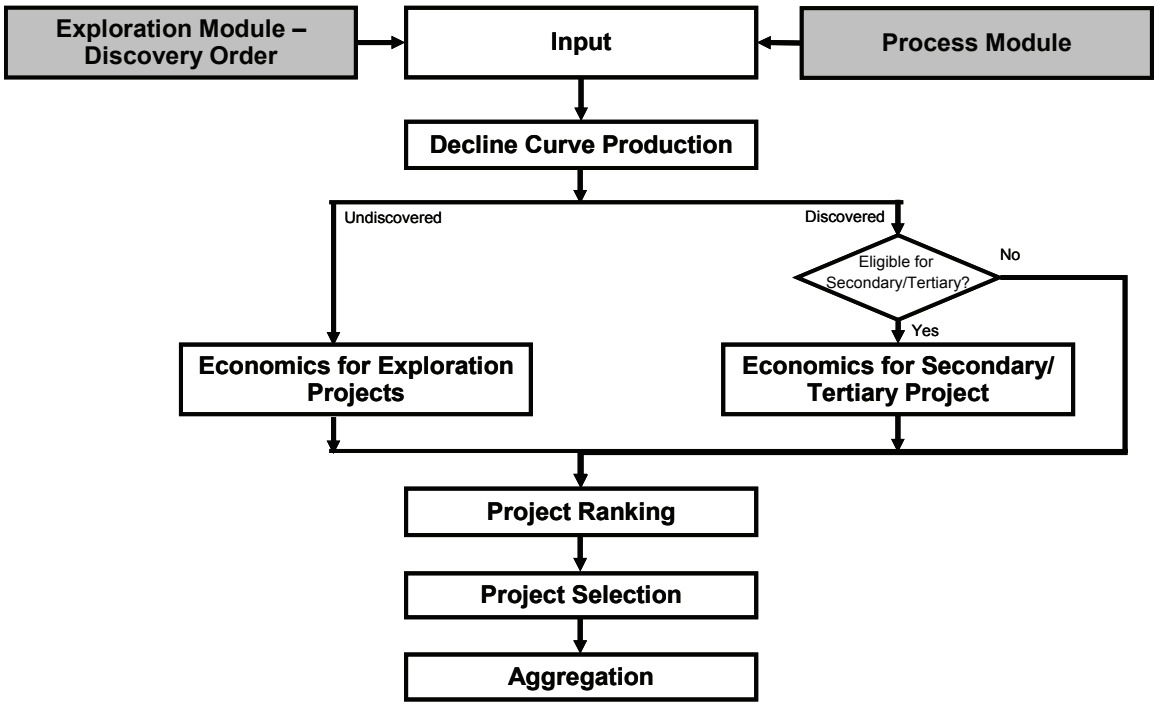
Model Structure

The OLOGSS projects the annual crude oil and natural gas production from existing fields, reserves growth, and exploration. It performs economic evaluation of the projects and ranks the reserves growth and exploration projects for development in a way designed to mimic the way decisions are made by the oil and gas industry. Development decisions and project selection depend upon economic viability and the competition for capital, drilling, and other available development constraints. Finally, the model aggregates production and drilling statistics using geographical and resource categories.

Overall System Logic

Figure 2-3 provides the overall system logic for the OLOGSS timing and economic module. This is the only component of OLOGSS which is integrated into NEMS.

Figure 2-3: OLOGSS Timing Module Overall System Logic



As seen in the figure, there are two primary sources of resource data. The exploration module provides the well-level technical production from the undiscovered projects which may be discovered in the next thirty years. It also determines the discovery order in which the projects will be evaluated by OLOGSS. The process module calculates the well-level technical production from known crude oil and natural gas fields, EOR and advanced secondary recovery (ASR) projects, and developing natural gas plays.

OLOGSS determines the potential domestic production in three phases. As seen in Figure 2-3, the first phase is the evaluation of the known crude oil and natural gas fields using a decline curve analysis. As part of the analysis, each project is subject to a detailed economic analysis used to determine the economic viability and expected life span of the project. In addition, the

model applies regional factors used for history matching and resource base coverage. The remaining resources are categorized as either exploration or EOR/ASR. Each year, the exploration projects are subject to economic analysis which determines their economic viability and profitability.

For the EOR/ASR projects, development eligibility is determined before the economic analysis is conducted. The eligibility is based upon the economic life span of the corresponding decline curve project and the process-specific eligibility window. If a project is not currently eligible, it will be re-evaluated in future years. The projects which are eligible are subject to the same type of economic analysis applied to existing and exploration projects in order to determine the viability and relative profitability of the project.

After the economics have been determined for each eligible project, the projects are sorted. The exploration projects maintain their discovery order. The EOR/ASR projects are sorted by their relative profitability. The finalized lists are then considered by the project selection routines.

A project will be selected for development only if it is economically viable and if there are sufficient development resources available to meet the project's requirements. Development resource constraints are used to simulate limits on the availability of infrastructure related to the oil and gas industries. If sufficient resources are not available for an economic project, the project will be reconsidered in future years if it remains economically viable. Other development options are considered in this step, including the waterflooding of undiscovered conventional resources and the extension of CO_2 floods through an increase in total pore volume injected.

The production, reserves, and other key parameters for the timed and developed projects are aggregated at the regional and national levels.

The remainder of this document provides additional details on the logic and particular calculations for each of these steps. These include the decline analysis, economic analysis, timing decisions, project selection, constraints, and modeling of technology.

Known Fields

In this step, the production from existing crude oil and natural gas projects is estimated. A detailed economic analysis is conducted in order to calculate the economically viable production as well as the expected life of each project. The project life is used to determine when a project becomes eligible for EOR and ASR processes.

The logic for this process is provided in figure 2-4. For each crude oil project, regional prices are set and the project is screened to determine whether the user has specified any technology and/or economic levers. The screening considers factors including region, process, depth, and several other petro-physical properties. After applicable levers are determined, the project undergoes a detailed economic analysis.

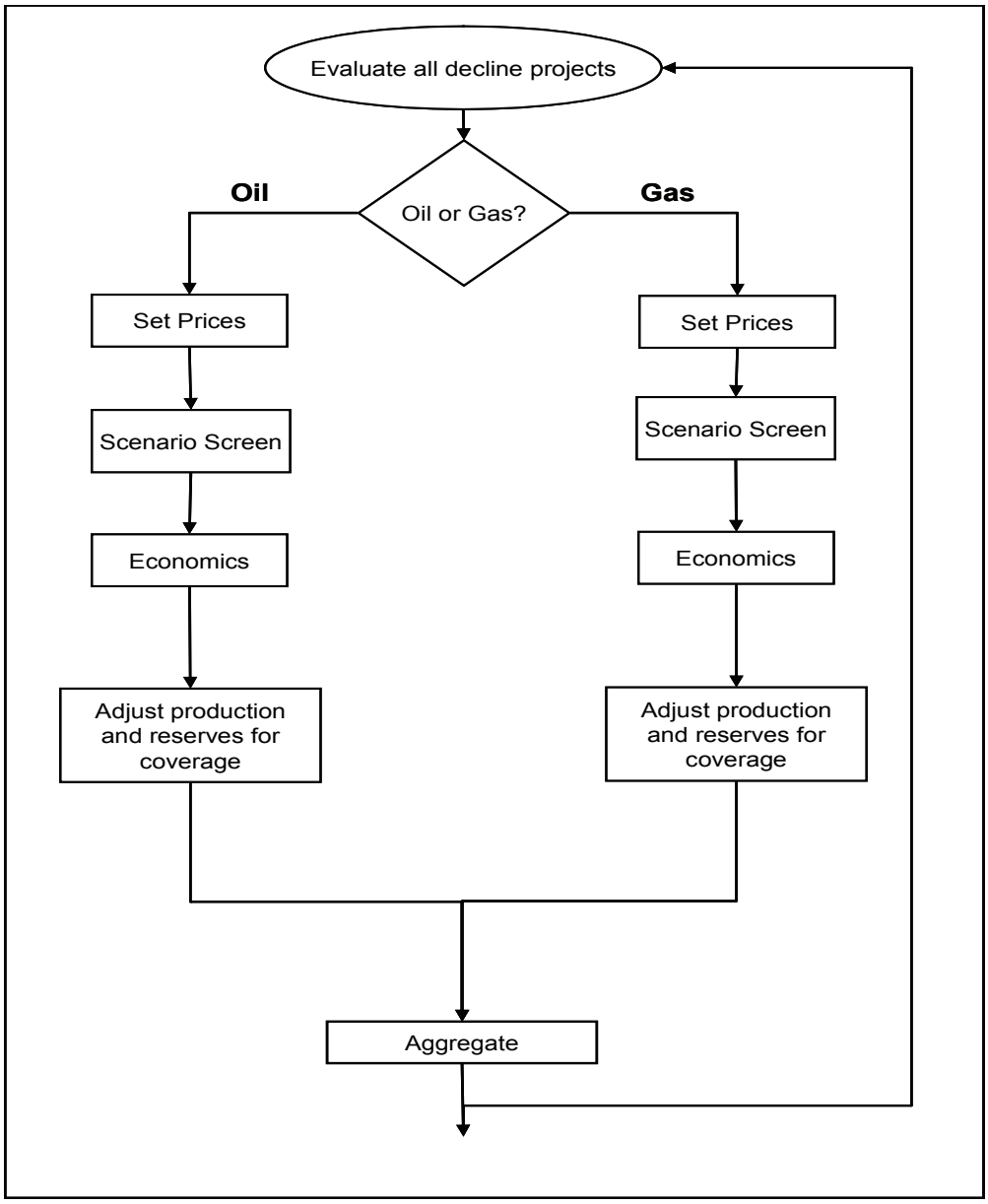
After the analysis, resource coverage factors are applied to the economic production and reserves, and the project results are aggregated at the regional and national levels. In a final step,

key parameters including the economic lifespan of the project are stored. A similar process is applied to the existing natural gas fields and reservoirs.

Resource coverage factors are applied in the model to ensure that historical production from existing fields matches that reported by EIA. These factors are calculated at the regional level and applied to production data for the following resources:

- Crude oil (includes lease condensates)
- High-permeability natural gas
- Coalbed methane
- Shale gas
- Tight gas

Figure 2-4: Decline Process Flowchart



Economics

Project Costs

OLOGSS conducts the economic analysis of each project using regional crude oil and natural gas prices. After these prices are set, the model evaluates the base and advanced technology cases for the project. The base case is defined as the current technology and cost scenario for the project; while the advanced case includes technology and/or cost improvements associated with the application of model levers. It is important to note that these cases – for which the assumption are applied to data for the project – are not the same as the *AEO* low, reference, or high technology cases.

For each technology case, the necessary petro-physical properties and other project data are set, the regional dryhole rates are determined, and the process specific depreciation schedule is assigned. The capital and operating costs for the project are then calculated and aggregated for both the base and advanced technology cases.

In the next step, a standard cashflow analysis is conducted, the discounted rate of return is calculated, and the ranking criteria are set for the project. Afterwards, the number and type of wells required for the project, and the last year of actual economic production are set. Finally, the economic variables, including production, development requirements, and other parameters, are stored for project timing and aggregation. All of these steps are illustrated in figure 2-5.

The details of the calculations used in conducting the economic analysis of a project are provided in the following description.

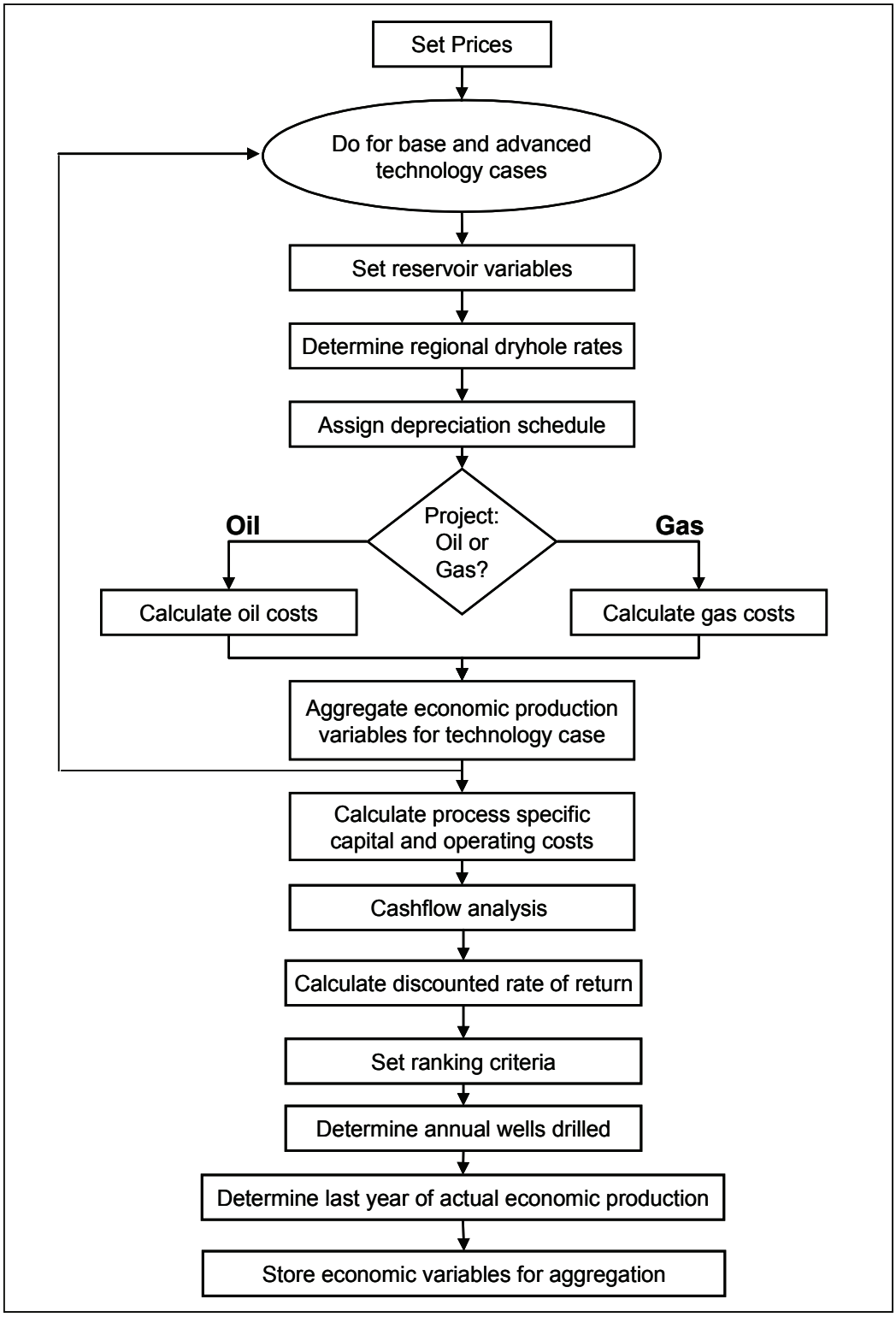
Determine the project shift: The first step is to determine the number of years the project development is shifted, i.e., the numbers of years between the discovery of a project and the start of its development. This will be used to determine the crude oil and natural gas price shift. The number of years is dependent upon both the development schedule – when the project drilling begins – and upon the process.

Determine annual prices: Determine the annual prices used in evaluating the project. Crude oil and natural gas prices in each year use the average price for the previous 5 years.

Begin analysis of base and advanced technology: To capture the impacts of technological improvements on both production and economics, the model divides the project into two categories. The first category – base technology – does not include improvements associated with technology or economic levers. The second category – advanced technology – incorporates the impact of the levers. The division of the project depends on the market penetration algorithm of any applicable technologies.

Determine the dryhole rate for the project: Assigns the regional dryhole rates for undiscovered exploration, undiscovered development, and discovered development. Three types of dryhole rates are used in the model: development in known fields and reservoirs, the first (wildcat) well in an exploration project, and subsequent wells in an exploration project. Specific dryhole rates are used for horizontal drilling and the developing natural gas resources.

Figure 2-5: Economic Analysis Logic



In the advanced case, the dryhole rates may also incorporate technology improvements associated with exploration or drilling success.

$$\text{REGDRYUE}_{im} = \left(\frac{\text{SUCEXP}_{im}}{100}\right) * \left(1.0 - \text{DRILL_FAC}_{itech}\right) * \text{EXPLR_FAC}_{itech} \tag{2-1}$$

$$\text{REGDRYUD}_{im} = \left(\frac{\text{SUCEXPD}_{im}}{100}\right) * \left(1.0 - \text{DRILL_FAC}_{itech}\right) \tag{2-2}$$

$$\text{REGDRYKD}_{im} = \left(\frac{\text{SUCDEVE}_{im}}{100}\right) * \left(1.0 - \text{DRILL_FAC}_{itech}\right) \tag{2-3}$$

If evaluating horizontal continuity or horizontal profile, then,

$$\text{REGDRYKD}_{im} = \left(\frac{\text{SUCCHDEV}_{im}}{100}\right) * \left(1.0 - \text{DRILL_FAC}_{itech}\right) \tag{2-4}$$

If evaluating developing natural gas resources, then,

$$\text{REGDRYUD}_{im} = \text{ALATNUM}_{ires} * \left(1.0 - \text{DRILL_FAC}_{itech}\right) \tag{2-5}$$

where

ITECH	=	Technology case number
IM	=	Region number
REGDRYUE	=	Project specific dryhole rate for undiscovered exploration (Wildcat)
REGDRYUD	=	Project specific dryhole rate for undiscovered development
REGDRYKD	=	Project specific dryhole rate for known field development
SUCEXPD	=	Regional dryhole rate for undiscovered development
ALATNUM	=	Variable representing the regional dryhole rate for known field development
SUCDEVE	=	Regional dryhole rate for undiscovered exploration (Wildcat)
SUCCDEVH	=	Dryhole rate for horizontal drilling
DRILL_FAC	=	Technology lever applied to dryhole rate
EXPLR_FAC	=	Technology factor applied to exploratory dryhole rate

Process specific depreciation schedule: The default depreciation schedule is based on an eight-year declining balance depreciation method. The user may select process-specific depreciation schedules for CO2 flooding, steam flooding, or water flooding in the input file.

Calculate the capital and operating costs for the project: The project costs are calculated for each technology case. The costs are specific to crude oil or natural gas resources. The results of

the cost calculations, which include technical crude oil and natural gas production, as well as drilling costs, facilities costs, and operating costs, are then aggregated to the project level.

G & G factor: Calculates the geological and geophysical (G&G) factor for each technology case. This is added to the first year cost.

$$GG_{itech} = GG_{itech} + DRL_CST_{itech} * INTANG_M_{itech} * GG_FAC \tag{2-6}$$

where

GG_{itech}	=	Geophysical and Geological costs for the first year of the project
DRL_CST_{itech}	=	Total drilling cost for the first year of the project
$INTANG_M_{itech}$	=	Energy Elasticity factor for intangible investments (first year)
GG_FAC	=	Portion of exploratory costs that is G&G costs

After the variables are aggregated, the technology case loop ends. At this point, the process specific capital costs, which apply to the entire project instead of the technology case, are calculated.

Cashflow Analysis: The model then conducts a cashflow analysis on the project and calculates the discounted rate of return. Economic Analysis is conducted using a standard cashflow routine described in Appendix A.

Calculate the discounted rate of return: Determines the projected rate of return for all investments and production. The cumulative investments and discounted after tax cashflow are used to calculate the investment efficiency for the project.

Calculate wells: The annual number of new and existing wells is calculated for the project. The model tracks five drilling categories:

- New production wells drilled
- New injection wells drilled
- Active production wells
- Active injection wells
- Shut in wells

The calculation of the annual well count depends on the number of existing production and injection wells as well as on the process and project-specific requirements to complete each drilling pattern developed.

Determine number of years a project is economic: The model calculates the last year of actual economic production. This is based on both the results of the cashflow analysis and the annual production in year specified by the analysis. The last year of production is used to determine the aggregation range to be used if the project is selected for development.

If the project is economic only in the first year, it will be considered uneconomic and unavailable for development at that time. If this occurs for an existing crude oil or natural gas project, the model will assume that all of the wells will be shut in.

Non-producing decline project: Determines if the existing crude oil or natural gas project is non-producing. If there is no production, then the end point for project aggregation is not calculated. This check applies only to the existing crude oil and natural gas projects

Ranking criteria: Ranks investment efficiency based on the discounted after tax cashflow over tangible and intangible investments.

Determine ranking criterion: The ranking criterion, specified by the user, is the parameter by which the projects will be sorted before development. Ranking criteria options include the project net present value, the rate of return for the project, and the investment efficiency.

Calculating Unit Costs

To conduct the cost analysis, the model calculates price adjustment factors as well as unit costs for all required capital and operating costs. Unit costs include the cost of drilling and completing a single well, producing one barrel of crude oil, or operating one well for a year. These costs are adjusted using the technology levers and CPI indices. After the development schedule for the project is determined and the economic life of a single well is calculated, the technical production and injection are determined for the project. Based on the project's development schedule and the technical production, the annual capital and operating costs are determined. In the final step, the process and resource specific capital and operating costs are calculated for the project. These steps are illustrated in figure 2-6.

The Onshore Lower 48 Oil and Gas Supply Submodule uses detailed project costs for economic calculations. There are three broad categories of costs used by the model: capital costs, operating costs, and other costs. These costs are illustrated in figure 2-7. Capital costs encompass the costs of drilling and equipment necessary for the production of crude oil and natural gas resources. Operating costs are used to calculate the full life cycle economics of the project. Operating costs consist of normal daily expenses and surface maintenance. Other cost parameters include royalty, state and federal taxes, and other required schedules and factors.

The calculations for capital costs and operating costs for both crude oil and natural gas are described in detail below. The capital and operating costs are used in the timing and economic module to calculate the lifecycle economics for all crude oil and natural gas projects.

There are two categories for these costs: costs that are applied to all processes, thus defined as *resource independent*, and the process-specific costs, or *resource dependent* costs. Resource dependent costs are used to calculate the economics for existing, reserves growth, and exploration projects. The capital costs for both crude oil and natural gas are calculated first, followed by the resource independent costs, and then the resource dependent costs.

The resource independent and resource dependent costs applied to each of the crude oil and natural gas processes are detailed in tables 2-2 and 2-3 respectively.

Figure 2-6: Project Cost Calculation Procedure

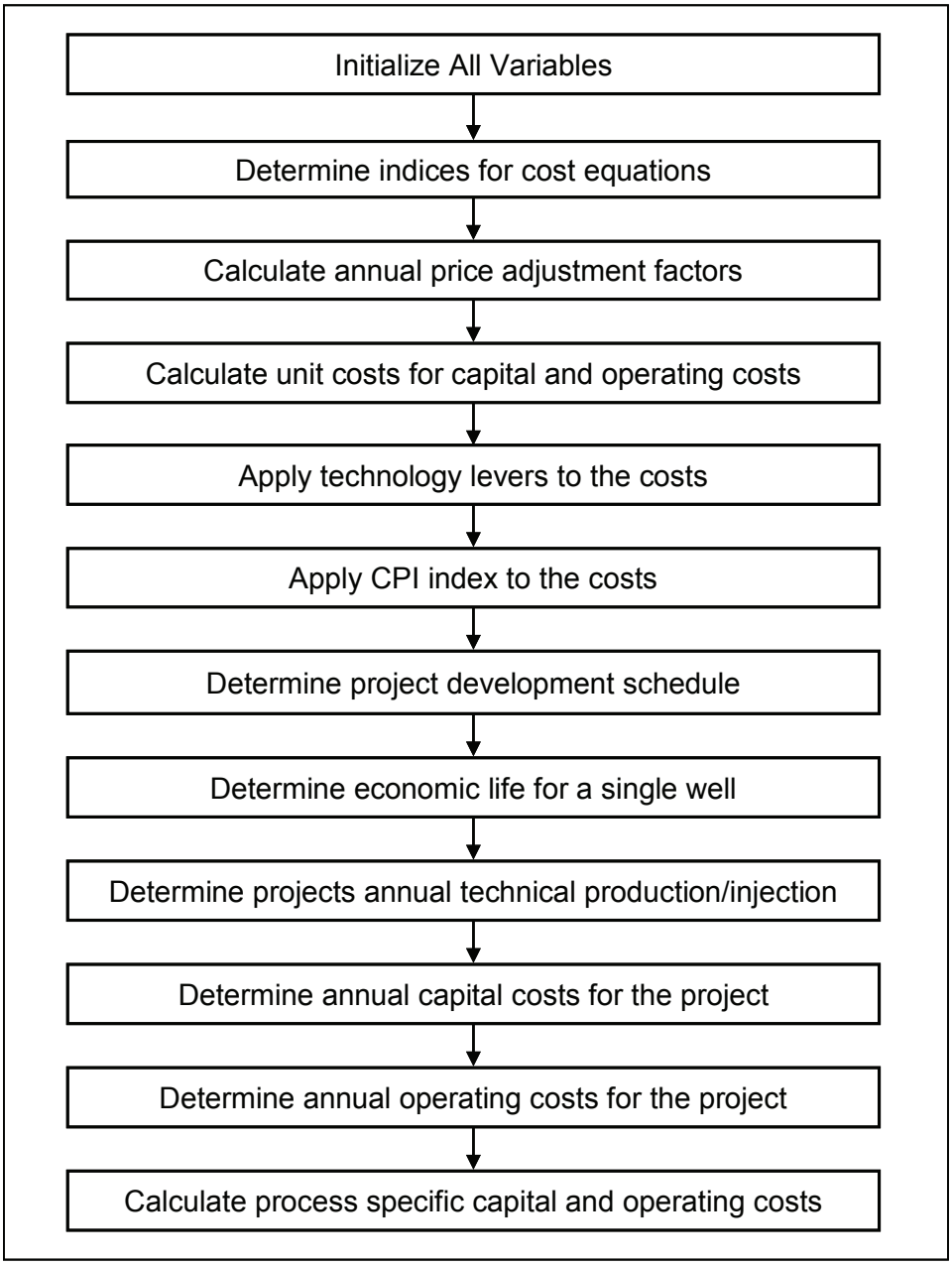


Figure 2-7: Cost Data Types and Requirements

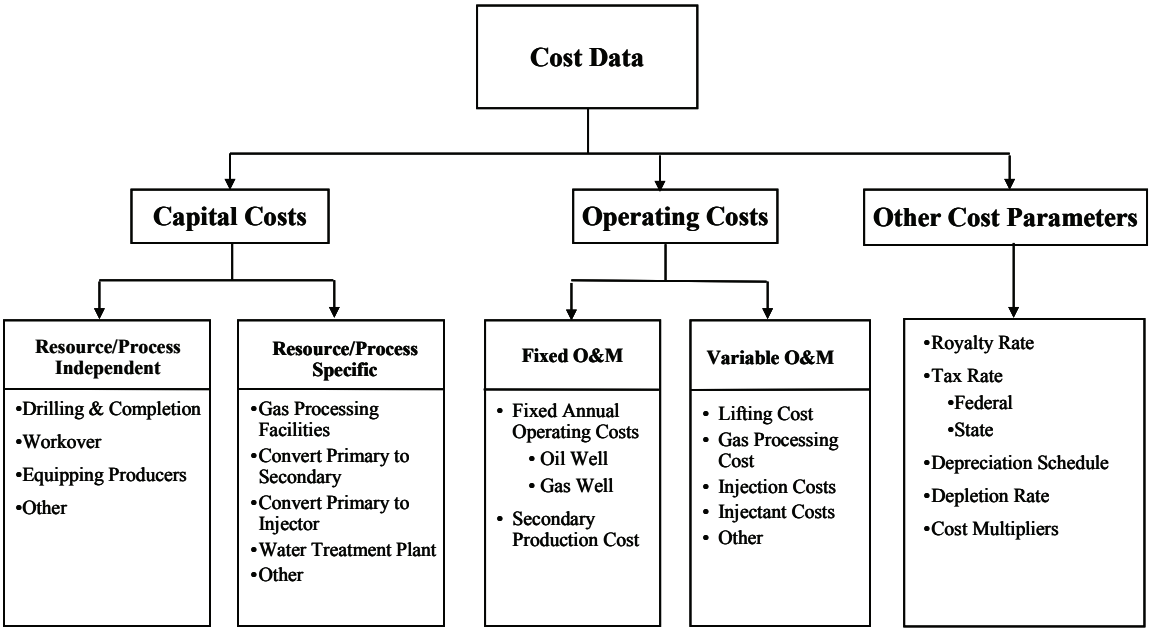


Table 2-2: Costs Applied to Crude Oil Processes

	Capital Cost for Oil	Existing	Water Flooding	CO2 Flooding	Steam Flooding	Polymer Flooding	Infill Drilling	Profile Modification	Undiscovered
Resource Independent	Vertical Drilling Cost	v	v	v	v	V	v	v	v
	Horizontal Drilling Cost								
	Drilling Cost for Dryhole	v	v	v	v	V	v	v	v
	Cost to Equip a Primary Producer		v	v	v	V	v	v	v
	Workover Cost		v	v	v	V	v	v	v
	Facillities Upgrade Cost		v	v	v	V	v	v	
	Fixed Annual Cost for Oil Wells	v	v	v	v	V	v	v	v
	Fixed Annual Cost for Secondary Production		v	v	v	V	v	v	v
	Lifting Cost		v	v	v	V	v	v	v
	O & M Cost for Active Patterns		v			V		v	
	Variable O & M Costs	v	v	v	v	V	v	v	v
	Socondary Workover Cost		v	v	v	V	v	v	v
Resource Dependent	Cost of Water Handling Plant		v			V		v	
	Cost of Chemical Plant					V			
	CO2 Recycle Plant			v					
	Cost of Injectant					V			
	Cost to Convert a Primary to Secondary Well		v	v	v	V	v	v	v
	Cost to Convert a Producer to an Injector		v	v	v	V	v	v	v
	Fixed O & M Cost for Secondary Operations		v	v	v	V	v	v	v
	Cost of a Water Injection Plant		v						
	O & M Cost for Active Patterns per Year		v			V		v	
	Cost to Inject CO2			v					
	King Factor				v				
	Steam Manifolds Cost				v				
	Steam Generators Cost				v				
	Cost to Inject Poloymer					V		v	

Table 2-3: Costs Applied to Natural Gas Processes

	Capital Costs for Gas	Conventional Radial Gas	Water Drive	Tight Sands	Coal/Shale Gas	Undiscovered Conventional
Resource Independent	Vertical Drilling Cost	v	v	v	v	v
	Horizontal Drilling Cost	v	v	v	v	v
	Drilling Cost for Dryhole	v	v	v	v	v
	Gas Facilities Cost	v	v	v	v	v
	Fixed Annual Costs for Gas Wells	v	v	v	v	v
	Gas Stimulation Costs	v	v	v	v	v
	Overhead Costs	v	v	v	v	v
	Variable O & M Cost	v	v	v	v	v
Resource Dependent	Gas Processing and Treatment Facilities	v	v	v	v	v

The following section details the calculations used to calculate the capital and operating costs for each crude oil and natural gas project. The specific coefficients are econometrically estimated according to the corresponding equations in Appendix 2.B.

Cost Multipliers

Cost multipliers are used to capture the impact on capital and operating costs associated with changes in energy prices. OLOGSS calculates cost multipliers for tangible and intangible investments, operating costs, and injectants (polymer and CO_2). The methodology used to calculate the multipliers is based on the National Energy Technology Laboratory (NETL's) Comprehensive Oil and Gas Analysis Model as well as the 1984 Enhanced Oil Recovery Study completed by the National Petroleum Council.

The multipliers for operating costs and injectant are applied while calculating project costs. The investment multipliers are applied during the cashflow analysis. The injectant multipliers are held constant for the analysis period while the others vary with changing crude oil and natural gas prices.

Operating Costs for Crude Oil: Operating costs are adjusted by the change between current crude oil prices and the base crude oil price. If the crude oil price in a given year falls below a pre-established minimum price, the adjustment factor is calculated using the minimum crude oil price.

$$\text{TERM} = \left(\frac{\text{OILPRICE}_{\text{iyr}} - \text{BASEOIL}}{\text{BASEOIL}} \right) \tag{2-7}$$

$$\text{INTANG_M}_{\text{iyr}} = 1.0 + (\text{OMULT_INT} * \text{TERM}) \tag{2-8}$$

$$\text{TANG_M}_{\text{iyr}} = 1.0 + (\text{OMULT_TANG} * \text{TERM}) \tag{2-9}$$

$$\text{OAM_M}_{\text{iyr}} = 1.0 + (\text{OMULT_OAM} * \text{TERM}) \tag{2-10}$$

where

IYR	=	Year
TERM	=	Fractional change in crude oil prices (from base price)
BASEOIL	=	Base crude oil price used for normalization of capital and operating costs
OMULT_INT	=	Coefficient for intangible crude oil investment factor
OMULT_TANG	=	Coefficient for tangible crude oil investment factor
OMULT_OAM	=	Coefficient for O & M factor
INTANG_M	=	Annual energy elasticity factor for intangible investments
TANG_M	=	Annual energy elasticity factor for tangible investments
OAM_M	=	Annual energy elasticity factor for crude oil O & M

Cost Multipliers for Natural Gas:

$$\text{TERM} = \left(\frac{\text{GASPRICEC}_{iyr} - \text{BASEGAS}}{\text{BASEGAS}} \right) \tag{2-11}$$

$$\text{TANG_M}_{iyr} = 1.0 + (\text{GMULT_TANG} * \text{TERM}) \tag{2-12}$$

$$\text{INTANG_M}_{iyr} = 1.0 + (\text{GMULT_INT} * \text{TERM}) \tag{2-13}$$

$$\text{OAM_M}_{iyr} = 1.0 + (\text{GMULT_OAM} * \text{TERM}) \tag{2-14}$$

where

GASPRICEC	=	Annual natural gas price
IYR	=	Year
TERM	=	Fractional change in natural gas prices
BASEGAS	=	Base natural gas price used for normalization of capital and operating costs
GMULT_INT	=	Coefficient for intangible natural gas investment factor
GMULT_TANG	=	Coefficient for tangible natural gas investment factor
GMULT_OAM	=	Coefficient for O & M factor
INTANG_M	=	Annual energy elasticity factor for intangible investments
TANG_M	=	Annual energy elasticity factor for tangible investments
OAM_M	=	Annual energy elasticity factor for crude oil O & M

Cost Multipliers for Injectant:

In the first year of the project:

$$\text{FPLY} = 1.0 + (0.3913 * \text{TERM}) \tag{2-15}$$

$$\text{FCO2} = \frac{0.5 + 0.013 * \text{BASEOIL} * (1.0 + \text{TERM})}{0.5 + 0.013 * \text{BASEOIL}} \tag{2-16}$$

where

TERM	=	Fractional change in crude oil prices
BASEOIL	=	Base crude oil price used for normalization of capital and operating costs
FPLY	=	Energy elasticity factor for polymer

FCO2 = Energy elasticity factor for natural CO_2 prices

Resource Independent Capital Costs for Crude Oil

Resource independent capital costs are applied to both crude oil and natural gas projects, regardless of the recovery method applied. The major resource independent capital costs are as follows: drilling and completion costs, the cost to equip a new or primary producer, and workover costs.

Drilling and Completion Costs: Drilling and completion costs incorporate the costs to drill and complete a crude oil or natural gas well (including tubing costs), and logging costs. These costs do not include the cost of drilling a dryhole/wildcat during exploration. OLOGSS uses a separate cost estimator, documented below, for dryholes drilled. Vertical well drilling costs include drilling and completion of vertical, tubing, and logging costs. Horizontal well costs include costs for drilling and completing a vertical well and the horizontal laterals.

Horizontal Drilling for Crude Oil:

$$DWC_W = OIL_DWCK_{r,d} + (OIL_DWCA_{r,d} * DEPTH^2) + (OIL_DWCB_{r,d} * DEPTH^2 * NLAT) + (OIL_DWCC_{r,d} * DEPTH^2 * NLAT * LATLEN) \quad (2\text{-}17)$$

Vertical Drilling for Crude Oil:

$$DWC_W = OIL_DWCK_{r,d} + (OIL_DWCA_{r,d} * DEPTH) + (OIL_DWCB_{r,d} * DEPTH^2) + (OIL_DWCC_{r,d} * DEPTH^3) \quad (2\text{-}18)$$

where

DWC_W	=	Cost to drill and complete a crude oil well (K$/Well)
r	=	Region number
d	=	Depth category number
OIL_DWCA, B, C, K	=	Coefficients for crude oil well drilling cost equation
DEPTH	=	Well depth
NLAT	=	Number of laterals
LATLEN	=	Length of lateral

Horizontal Drilling for a Dry Well:

$$DRY_W = DRY_DWCK_{r,d} + (DRY_DWCA_{r,d} * DEPTH^2) + (DRY_DWCB_{r,d} * DEPTH^2 * NLAT) + (DRY_DWCC_{r,d} * DEPTH^2 * NLAT * LATLEN) \quad (2\text{-}19)$$

Vertical Drilling for a Dry Well:

$$DRY_W = DRY_DWCK_{r,d} + (DRY_DWCA_{r,d} * DEPTH) + (DRY_DWCB_{r,d} * DEPTH^2) + (DRY_DWCC_{r,d} * DEPTH^3) \quad (2\text{-}20)$$

where

DRY_W	=	Cost to drill a dry well (K$/Well)
R	=	Region number
D	=	Depth category number
DRY_DWCA, B, C, K	=	Coefficients for dry well drilling cost equation
DEPTH	=	Well depth
NLAT	=	Number of laterals
LATLEN	=	Length of lateral

Cost to Equip a New Producer: The cost of equipping a primary producing well includes the production equipment costs for primary recovery.

$$NPR_W = NPRK_{r,d} + (NPRA_{r,d} * DEPTH) + (NPRB_{r,d} * DEPTH^2) + (NPRC_{r,d} * DEPTH^3) \quad (2\text{-}21)$$

where

NPR_W	=	Cost to equip a new producer (K$/Well)
R	=	Region number
D	=	Depth category number
NPRA, B, C, K	=	Coefficients for new producer equipment cost equation
DEPTH	=	Well depth

Workover Costs: Workover, also known as stimulation is done every 2-3 years to increase the productivity of a producing well. In some cases workover or stimulation of a wellbore is required to maintain production rates.

$$WRK_W = WRKK_{r,d} + (WRKA_{r,d} * DEPTH) + (WRKB_{r,d} * DEPTH^2) + (WRKC_{r,d} * DEPTH^3) \quad (2\text{-}22)$$

Where,

WRK_W	=	Cost for a well workover (K$/Well)
R	=	Region number
D	=	Depth category number
WRKA, B, C, K	=	Coefficients for workover cost equation
DEPTH	=	Well depth

Facilities Upgrade Cost: Additional cost of equipment upgrades incurred when converting a primary producing well to a secondary resource recovery producing well. Facilities upgrade costs consist of plant costs and electricity costs.

$$FAC_W = FACUPK_{r,d} + (FACUPA_{r,d} * DEPTH) + (FACUPB_{r,d} * DEPTH^2) + (FACUPC_{r,d} * DEPTH^3) \quad (2\text{-}23)$$

where

FAC_W	=	Well facilities upgrade cost (K$/Well)
R	=	Region number
D	=	Depth category number
FACUPA, B, C, K	=	Coefficients for well facilities upgrade cost equation

DEPTH = Well depth

Resource Independent Capital Costs for Natural Gas

Drilling and Completion Costs: Drilling and completion costs incorporate the costs to drill and complete a crude oil or natural gas well (including tubing costs), and logging costs. These costs do not include the cost of drilling a dryhole/wildcat during exploration. OLOGSS uses a separate cost estimator, documented below, for dryholes drilled. Vertical well drilling costs include drilling and completion of vertical, tubing, and logging costs. Horizontal well costs include costs for drilling and completing a vertical well and the horizontal laterals.

Vertical Drilling Costs:

$$DWC_W = GAS_DWCK_{r,d} + (GAS_DWCA_{r,d} * DEPTH) + (GAS_DWCB_{r,d} * DEPTH^2) + (GAS_DWCC_{r,d} * DEPTH^3) \quad (2\text{-}24)$$

Horizontal Drilling Costs:

$$DWC_W = GAS_DWCK_{r,d} + (GAS_DWCA_{r,d} * DEPTH^2) + (GAS_DWCB_{r,d} * DEPTH^2 * NLAT) + (GAS_DWCC_{r,d} * DEPTH^2 * NLAT * LATLEN) \quad (2\text{-}25)$$

Where,

DWC_W	=	Cost to drill and complete a natural gas well (K$/Well)
R	=	Region number
D	=	Depth category number
GAS_DWCA, B, C, K	=	Coefficients for natural gas well drilling cost equation
DEPTH	=	Well depth
NLAT	=	Number of laterals
LATLEN	=	Length of lateral

Vertical Drilling Costs for a Dry Well:

$$DRY_W = DRY_DWCK_{r,d} + (DRY_DWCA_{r,d} * DEPTH) + (DRY_DWCB_{r,d} * DEPTH^2) + (DRY_DWCC_{r,d} * DEPTH^3) \quad (2\text{-}26)$$

Horizontal Drilling Costs for a Dry Well:

$$DRY_W = DRY_DWCK_{r,d} + (DRY_DWCA_{r,d} * DEPTH^2) + (DRY_DWCB_{r,d} * DEPTH^2 * NLAT) + (DRY_DWCC_{r,d} * DEPTH^2 * NLAT * LATLEN) \quad (2\text{-}27)$$

where

DRY_W	=	Cost to drill a dry well (K$/Well)
R	=	Region number
D	=	Depth category number
DRY_DWCA, B, C, K	=	Coefficients for dry well drilling cost equation
DEPTH	=	Well depth
NLAT	=	Number of laterals
LATLEN	=	Length of lateral

Facilities Cost: Additional cost of equipment upgrades incurred when converting a primary producing well to a secondary resource recovery producing well. Facilities costs consist of flowlines and connections, production package costs, and storage tank costs.

$$FWC_W_{iyr} = FACGK_{r,\,d} + (FACGA_{r,\,d} * DEPTH) + (FACGB_{r,\,d} * PEAKDAILY_RATE) + (FACGC_{r,\,d} * DEPTH * PEAKDAILY_RATE) \quad (2\text{-}28)$$

where

FWC_W	=	Facilities cost for a natural gas well (K$/Well)
R	=	Region number
D	=	Depth category number
FACGA, B, C, K	=	Coefficients for facilities cost equation
DEPTH	=	Well depth
PEAKDAILY_RATE	=	Maximum daily natural gas production rate

Fixed Annual Operating Costs: The fixed annual operating costs are applied to natural gas projects in decline curve analysis.

$$FOAMG_W = OMGK_{r,\,d} + (OMGA_{r,\,d} * DEPTH) + (OMGB_{r,\,d} * PEAKDAILY_RATE) + (OMGC_{r,\,d} * DEPTH * PEAKDAILY_RATE) \quad (2\text{-}29)$$

where

FOAMG_W	=	Fixed annual operating costs for natural gas (K$/Well)
R	=	Region number
D	=	Depth category number
OMGA, B, C, K	=	Coefficients for fixed annual O & M cost equation for natural gas
DEPTH	=	Well depth
PEAKDAILY_RATE	=	Maximum daily natural gas production rate

Resource Independent Annual Operating Costs for Crude Oil

Fixed Operating Costs: The fixed annual operating costs are applied to crude oil projects in decline curve analysis.

$$OMO_W = OMOK_{r,\,d} + (OMOA_{r,\,d} * DEPTH) + (OMOB_{r,\,d} * DEPTH^2) + (OMOC_{r,\,d} * DEPTH^3) \quad (2\text{-}30)$$

where

OMO_W	=	Fixed annual operating costs for crude oil wells (K$/Well)
R	=	Region number
D	=	Depth category number
OMOA, B, C, K	=	Coefficients for fixed annual operating cost equation for crude oil
DEPTH	=	Well depth

Annual Costs for Secondary Producers: The direct annual operating expenses include costs in the following major areas: normal daily expenses, surface maintenance, and subsurface maintenance.

$$OPSEC_W = OPSECK_{r,d} + (OPSECA_{r,d} * DEPTH) + (OPSECB_{r,d} * DEPTH^2) + (OPSECC_{r,d} * DEPTH^3) \quad (2\text{-}31)$$

where

OPSEC_W	=	Fixed annual operating cost for secondary oil operations (K$/Well)
R	=	Region number
D	=	Depth category number
OPSECA, B, C, K	=	Coefficients for fixed annual operating cost for secondary oil operations
DEPTH	=	Well depth

Lifting Costs: Incremental costs are added to a primary and secondary flowing well. These costs include pump operating costs, remedial services, workover rig services and associated labor.

$$OML_W = OMLK_{r,d} + (OMLA_{r,d} * DEPTH) + (OMLB_{r,d} * DEPTH^2) + (OMLC_{r,d} * DEPTH^3) \quad (2\text{-}32)$$

where

OML_W	=	Variable annual operating cost for lifting (K$/Well)
R	=	Region number
D	=	Depth category number
OMLA, B, C, K	=	Coefficients for variable annual operating cost for lifting equation
DEPTH	=	Well depth

Secondary Workover: Secondary workover, also known as stimulation is done every 2-3 years to increase the productivity of a secondary producing well. In some cases secondary workover or stimulation of a wellbore is required to maintain production rates.

$$SWK_W = OMSWRK_{r,d} + (OMSWR\ A_{r,d} * DEPTH) + (OMSWR\ B_{r,d} * DEPTH^2) + (OMSWR\ C_{r,d} * DEPTH^3) \quad (2\text{-}33)$$

where

SWK_W	=	Secondary workover costs (K$/Well)
R	=	Region number
D	=	Depth category number
OMSWRA, B, C, K	=	Coefficients for secondary workover costs equation
DEPTH	=	Well depth

Stimulation Costs: Workover, also known as stimulation is done every 2-3 years to increase the productivity of a producing well. In some cases workover or stimulation of a wellbore is required to maintain production rates.

$$STIM_W = \left(\frac{STIM_A + STIM_B * DEPTH}{1000} \right) \tag{2-34}$$

where

STIM_W	=	Oil stimulation costs (K$/Well)
STIM_A, B	=	Stimulation cost equation coefficients
DEPTH	=	Well depth

Resource Dependent Capital Costs for Crude Oil

Cost to Convert a Primary Well to a Secondary Well: These costs consist of additional costs to equip a primary producing well for secondary recovery. The cost of replacing the old producing well equipment includes costs for drilling and equipping water supply wells but excludes tubing costs.

$$PSW_W = PSWK_{r,d} + (PSWA_{r,d} * DEPTH) + (PSWB_{r,d} * DEPTH^2) + (PSWC_{r,d} * DEPTH^3) \tag{2-35}$$

where

PSW_W	=	Cost to convert a primary well into a secondary well (K$/Well)
R	=	Region number
D	=	Depth category number
PSWA, B, C, K	=	Coefficients for primary to secondary well conversion cost equation
DEPTH	=	Well depth

Cost to Convert a Producer to an Injector: Producing wells may be converted to injection service because of pattern selection and favorable cost comparison against drilling a new well. The conversion procedure consists of removing surface and sub-surface equipment (including tubing), acidizing and cleaning out the wellbore, and installing new 2- 7/8 inch plastic-coated tubing and a waterflood packer (plastic-coated internally and externally).

$$PSI_W = PSIK_{r,d} + (PSIA_{r,d} * DEPTH) + (PSIB_{r,d} * DEPTH^2) + (PSIC_{r,d} * DEPTH^3) \tag{2-36}$$

where

PSI_W	=	Cost to convert a producing well into an injecting well (K$/Well)
R	=	Region number
D	=	Depth category number
PSIA, B, C, K	=	Coefficients for producing to injecting well conversion cost equation
DEPTH	=	Well depth

Cost of Produced Water Handling Plant: The capacity of the water treatment plant is a function of the maximum daily rate of water injected and produced (MBbl) throughout the life of the project.

$$PWP_F = PWHP * \left(\frac{RMAXW}{365} \right) \tag{2-37}$$

where

PWP_F	=	Cost of the produced water handling plant (K$/Well)
PWHP	=	Produced water handling plant multiplier
RMAXW	=	Maximum pattern level annual water injection rate

Cost of Chemical Handling Plant (Non-Polymer): The capacity of the chemical handling plant is a function of the maximum daily rate of chemicals injected throughout the life of the project.

$$CHM_F = CHMK * CHMA * \left(\frac{RMAXP}{365} \right)^{CHMB} \tag{2-38}$$

where

CHM_F	=	Cost of chemical handling plant (K$/Well)
CHMB	=	Coefficient for chemical handling plant cost equation
CHMK, A	=	Coefficients for chemical handling plant cost equation
RMAXP	=	Maximum pattern level annual polymer injection rate

Cost of Polymer Handling Plant: The capacity of the polymer handling plant is a function of the maximum daily rate of polymer injected throughout the life of the project.

$$PLY_F = PLYPK * PLYPA * \left(\frac{RMAXP}{365} \right)^{0.6} \tag{2-39}$$

where

PLY_F	=	Cost of polymer handling plant (K$/Well)
PLYPK, A	=	Coefficients for polymer handling plant cost equation
RMAXP	=	Maximum pattern level annual polymer injection rate

Cost of CO_2 Recycling Plant: The capacity of a recycling/injection plant is a function of the maximum daily injection rate of CO_2 (Mcf) throughout the project life. If the maximum CO_2 rate equals or exceeds 60 MBbl/Day then the costs are divided into two separate plant costs.

$$CO2_F = CO2rk * \left(\frac{0.75 * RMAXP}{365} \right)^{CO2RB} \tag{2-40}$$

where,

CO2_F	=	Cost of CO_2 recycling plant (K$/Well)
CO2RK, CO2RB	=	Coefficients for CO_2 recycling plant cost equation
RMAXP	=	Maximum pattern level annual CO_2 injection rate

Cost of Steam Manifolds and Pipelines: Cost to install and maintain steam manifolds and pipelines for steam flood enhanced oil recovery project.

$$STMM_F = TOTPAT * PATSZE * STMMA \quad (2\text{-}41)$$

where

STMM_F	=	Cost for steam manifolds and generation (K$)
TOTPAT	=	Total number of patterns in the project
PATSZE	=	Pattern size (Acres)
STMMA	=	Steam manifold and pipeline cost (per acre)

Resource Dependant Annual Operating Costs for Crude Oil

Injection Costs: Incremental costs are added for secondary injection wells. These costs include pump operating, remedial services, workover rig services, and associated labor.

$$OPINJ_W = OPINJK_{r,d} + (OPINJA_{r,d} * DEPTH) + (OPINJ\ B_{r,d} * DEPTH^2) + (OPINJ\ C_{r,d} * DEPTH^3) \quad (2\text{-}42)$$

where

OPINJ_W	=	Variable annual operating cost for injection (K$/Well)
R	=	Region number
D	=	Depth category number
OPINJA, B, C, K	=	Coefficients for variable annual operating cost for injection equation
DEPTH	=	Well depth

Injectant Cost: The injectant costs are added for the secondary injection wells. These costs are specific to the recovery method selected for the project. Three injectants are modeled: polymer, CO_2 from natural sources, and CO_2 from industrial sources.

Polymer Cost:

$$POLYCOST = POLYCOST * FPLY \quad (2\text{-}43)$$

where

POLYCOST	=	Cost of polymer ($/Lb)
FPLY	=	Energy elasticity factor for polymer

Natural CO_2 Cost: Cost to drill, produce and ship CO_2 from natural sources, namely CO_2 fields in Western Texas.

$$CO2COST = CO2K + (CO2B * OILPRICEO(1)) \quad (2\text{-}44)$$

$$CO2COST = CO2COST * CO2PR(IST) \quad (2\text{-}45)$$

where

CO2COST	=	Cost of natural CO_2 ($/Mcf)
IST	=	State identifier
CO2K, CO2B	=	Coefficients for natural CO_2 cost equation
OILPRICEO(1)	=	Crude oil price for first year of project analysis
CO2PR	=	State CO_2 cost multiplier used to represent changes in cost associated with transportation outside of the Permian Basin

Industrial CO_2 Cost: Cost to capture and transport CO_2 from industrial sources. These costs include the capture, compression to pipeline pressure, and the transportation to the project site via pipeline. The regional costs, which are specific to the industrial source of CO_2, are exogenously determined and provided in the input file.

Industrial CO_2 sources include

- Hydrogen Plants
- Ammonia Plants
- Ethanol Plants
- Cement Plants
- Hydrogen Refineries
- Power Plants
- Natural Gas Processing Plants
- Coal to Liquids

After unit costs have been calculated for the project, they are adjusted using technology levers as well as CPI multipliers. Two types of levers are applied to the costs. The first is the fractional change in cost associated with a new technology. The second is the incremental cost associated with implementing the new technology. These factors are determined by the model user. As an example,

$$NPR_W = (NPR_W * CHG_FAC_FAC(ITECH)) + CST_FAC_FAC(ITECH) \qquad (2\text{-}46)$$

where,

NPR_W	=	Cost to equip a new oil producer (K$/well)
CHG_FAC_FAC	=	Fractional change in cost associated with technology improvements
CST_FAC_FAC	=	Incremental cost to apply the new technology
ITECH	=	Technology case (Base or Advanced)

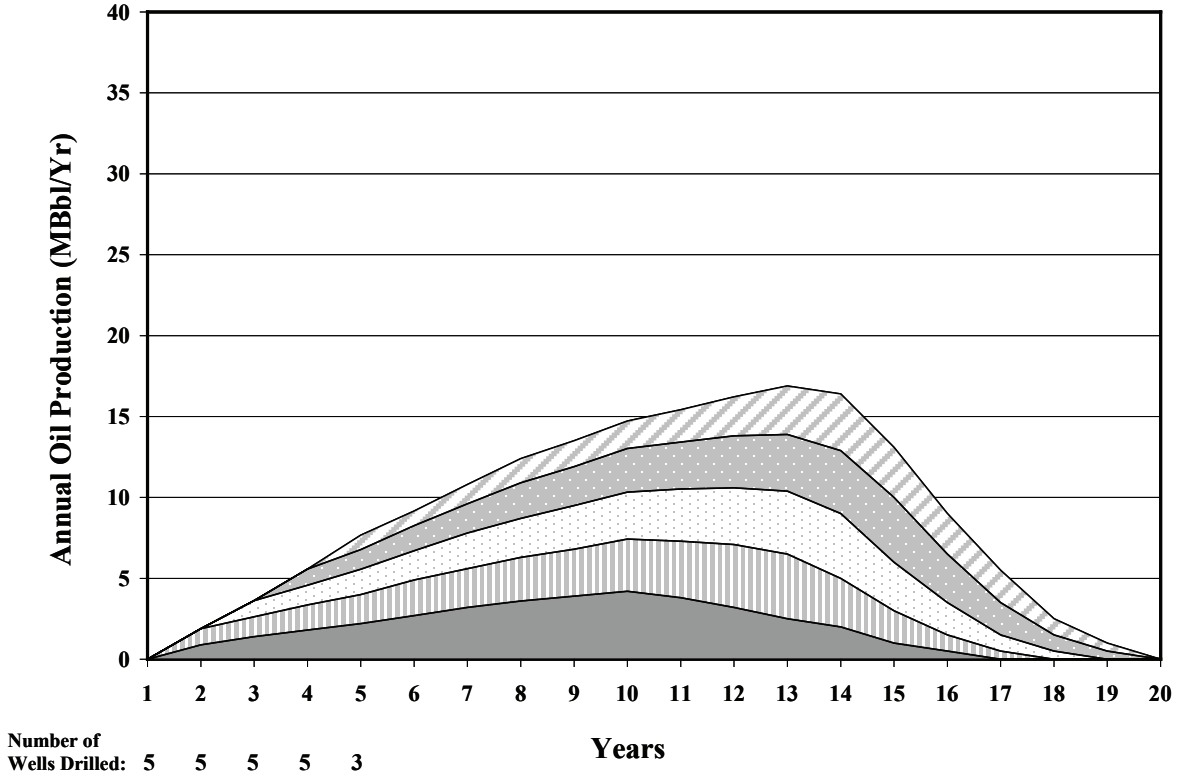
Determining Technical Production

The development schedule algorithms determine how the project's development over time will be modeled. They calculate the number of patterns initiated per year and the economic life of the well. The economic life is the number of years in which the revenue from production exceeds the costs required to produce the crude oil and natural gas.

The model then aggregates the well-level production of crude oil, natural gas, water, and injectant based upon the pattern life and number of wells initiated each year. The resulting profile is the technical production for the project.

Figure 2-8 shows the crude oil production for one project over the course of its life. The graph shows a hypothetical project. In this scenario patterns are initiated for five years. Each shaded area is the annual technical production associated with the initiated patterns.

Figure 2-8: Calculating Project Level Technical Production



The first step in modeling the technical production is to calculate the number of patterns drilled each year. The model uses several factors in calculating the development schedule:

- Potential delays between the discovery of the project and actual initiation
- The process modeled
- The resource access – the number of patterns developed each year is reduced if the resource is subject to cumulative surface use limitations
- The total number of patterns in the project
- The crude oil and natural gas prices
- The user specified maximum and minimum number of patterns developed each year
- The user specified percentage of the project to be developed each year
- The percentage of the project which is using base or advanced technology.

These apply to the EOR/ASR projects as well as the undiscovered and currently developing ones. The projects in existing fields and reservoirs are assumed to have all of their patterns – the number of active wells – developed in the first year of the project.

After calculating the number of patterns initiated each year, the model calculates the number of patterns which are active for each year of the project life.

Production Profile of the Project: For all EOR/ASR, undiscovered, and developing processes, the project level technical production is calculated using well-level production profiles. For infill

projects, the production is doubled because the model assumes that there are two producers in each pattern.

$$OILPROD_{iyr1} = OILPROD_{iyr1} + (OPROD_{kyr} * PATN_{iyr}) \quad (2\text{-}47)$$
$$GASPROD_{iyr1} = OILPROD_{iyr1} + (GPROD_{kyr} * PATN_{iyr}) \quad (2\text{-}48)$$
$$NGLPROD_{iyr1} = NGLPROD_{iyr1} + (NPROD_{kyr} * PATN_{iyr}) \quad (2\text{-}49)$$
$$WATPROD_{iyr1} = WATPROD_{iyr1} + (WPROD_{kyr} * PATN_{iyr}) \quad (2\text{-}50)$$
$$TOTINJ_{iyr1} = TOTINJ_{iyr1} + (OINJ_{kyr} * PATN_{iyr}) \quad (2\text{-}51)$$
$$WATINJ_{iyr1} = WATINJ_{iyr1} + (WINJ_{kyr} * PATN_{iyr}) \quad (2\text{-}52)$$
$$TORECY_{iyr1} = TORECY_{iyr1} + (ORECY_{kyr} * PATN_{iyr}) \quad (2\text{-}53)$$
$$SUMP_{iyr1} = SUMP_{iyr1} + PATN_{iyr} \quad (2\text{-}54)$$

where

IYR1	=	Number of years
IYR	=	Year of project development
JYR	=	Number of years the project is developed
KYR	=	Year (well level profile)
LYR	=	Last project year in which pattern level profile is applied
OPROD	=	Pattern level annual crude oil production
GPROD	=	Pattern level annual natural gas production
NPROD	=	Pattern level annual NGLl production
WPROD	=	Pattern level annual water production
WINJ	=	Pattern level annual water injection
OINJ	=	Pattern level annual injectant injection
ORECY	=	Pattern level annual injectant recycled
PATN	=	Number of patterns initiated each year
SUMP	=	Cumulative number of patterns developed
OILPROD	=	Project level annual crude oil production
GASPROD	=	Project level annual natural gas production
NGLPROD	=	Project level annual NGL production
WATPROD	=	Project level annual water production
WATINJ	=	Project level annual water injection
TOTINJ	=	Project level annual injectant injection
TORECY	=	Project level annual injectant recycled

Reviewer's note: The equations above are confusing, because the same variable appears on the LHS and RHS. I'm guessing that the variable is simply being incremented on an annual basis, i.e., that the first equation should read something like

In any case, please clarify what is happening in the equations and use a new variable name on the LHS.

Resource Accounting

OLOGSS incorporates a complete and representative description of the processes by which crude oil and natural gas in the technically recoverable resource base[1] are converted to proved reserves.[2]

OLOGSS distinguishes between drilling for new fields (new field wildcats) and drilling for additional deposits within old fields (other exploratory and developmental wells). This enhancement recognizes important differences in exploratory drilling, both by its nature and in its physical and economic returns. New field wildcats convert resources in previously undiscovered fields[3] into both proved reserves (as new discoveries) and inferred reserves.[4] Other exploratory drilling and developmental drilling add to proved reserves from the stock of inferred reserves. The phenomenon of reserves appreciation is the process by which initial assessments of proved reserves from a new field discovery grow over time through extensions and revisions.

End of Year Reserves: The model calculates two types of end of year (EOY) reserves at the project level: inferred reserves and proved reserves. Inferred reserves are calculated as the total technical production minus the technical production from patterns initiated through a particular year. Proved reserves are calculated as the technical production from wells initiated through a particular year minus the cumulative production from those patterns.

Inferred reserves = total technical production – technical production for wells initiated

$$\text{airsvoil}(\text{ires}, n) = \sum_{`i=1}^{max_yr}\left[\sum_{j=1}^{ilife}(\text{oprod}(j))\times \text{patn}(i)\right] - \sum_{i=1}^{n}\left[\sum_{j=1}^{ilife}(\text{oprod}(j))\times \text{patn}(i)\right] \quad (2\text{-}55)$$

$$\text{airsvgas}(\text{ires}, n) = \sum_{`i=1}^{max_yr}\left[\sum_{j=1}^{ilife}(\text{gprod}(j))\times \text{patn}(i)\right] - \sum_{i=1}^{n}\left[\sum_{j=1}^{ilife}(\text{gprod}(j))\times \text{patn}(i)\right] \quad (2\text{-}56)$$

Reviewers note: It's not clear what "ires" is above. Also, it looks like all of these equations can be simplified by writing the outer sums from n+1 to max_yr, e.g.,

Proved reserves = technical production for patterns initiated – cumulative production

[1] *Technically recoverable resources* are those volumes considered to be producible with current recovery technology and efficiency but without reference to economic viability. Technically recoverable volumes include proved reserves, inferred reserves, as well as undiscovered and other unproved resources. These resources may be recoverable by techniques considered either conventional or unconventional.

[2] *Proved reserves* are the estimated quantities that analyses of geological and engineering data demonstrate with reasonable certainty to be recoverable in future years from known reservoirs under existing economic and operating conditions.

[3] *Undiscovered resources* are located outside of oil and gas fields, in which the presence of resources has been confirmed by exploratory drilling, and thus exclude reserves and reserve extensions; however, they include resources from undiscovered pools within confirmed fields to the extent that such resources occur as unrelated accumulations controlled by distinctly separate structural features or stratigraphic conditions.

[4] *Inferred reserves* are that part of expected ultimate recovery from known fields in excess of cumulative production plus current reserves.

$$\text{aresvoil}(\text{ires}, n) = \sum_{`i=1}^{n}\left[\sum_{j=1}^{\text{ilife}}(\text{oprod}(j))\times \text{patn}(i)\right] - \sum_{i=1}^{n}\left[\sum_{j=1}^{n}(\text{oprod}(j))\times \text{patn}(i)\right] \quad (2\text{-}57)$$

$$\text{aresvgas}(\text{ires}, n) = \sum_{`i=1}^{n}\left[\sum_{j=1}^{\text{ilife}}(\text{gprod}(j))\times \text{patn}(i)\right] - \sum_{i=1}^{n}\left[\sum_{j=1}^{n}(\text{gprod}(j))\times \text{patn}(i)\right] \quad (2\text{-}58)$$

where,

I, J	=	Years
N	=	Current year evaluated
ILIFE	=	Pattern life
MAX_YR	=	Maximum number of years
OPROD	=	Pattern level annual crude oil production
GPROD	=	Pattern level annual natural gas production
PATN	=	Number of patterns developed each year
AIRSVOIL	=	Annual inferred crude oil reserves
AIRSVGAS	=	Annual inferred natural gas reserves
ARESVOIL	=	Annual proved oil reserves
ARESVGAS	=	Annual proved natural gas reserves

For existing crude oil and natural gas projects, the model calculates the proved reserves. For these processes, the proved reserves are defined as the total technical production divided by the life of the project.

Calculating Project Costs

The model uses four drilling categories for the calculation of drilling and facilities costs. These categories are:

- New producers
- New injectors
- Conversions of producers to injectors
- Conversions of primary wells to secondary wells.

The number of ??? in each category required for the pattern is dependent upon the process and the project.

Project Level Process Independent Costs

Drilling costs and facility costs are determined at the project level.

Drilling Costs: Drilling costs are calculated using one of four approaches, depending on the resource and recovery process. These approaches apply to the following resources:

- Undiscovered crude oil and natural gas
- Existing crude oil and natural gas fields
- EOR/ASR projects
- Developing natural gas projects

<u>For undiscovered crude oil and natural gas resources:</u> The first well drilled in the first year of the project is assumed to be a wildcat well. The remaining wells are assumed to be undiscovered development wells. This is reflected in the application of the dryhole rates.

$$DRL_CST2_{iyr} = DRL_CST2_{iyr} + (DWC_W + DRY_W * REGDRYUE_R) * 1.0 * XPP1 \quad (2\text{-}59)$$

$$DRL_CST2_{iyr} = DRL_CST2_{iyr} + (DWC_W + DRY_W * REGDRYUD_R) * (PATN_{iyr} - 1 * XPP1) \quad (2\text{-}60)$$

For existing crude oil and natural gas fields: As the field is already established, the developmental dryhole rate is used.

$$DRL_CST2_{iyr} = DRL_CST2_{iyr} + (DWC_W + DRY_W * REGDRYKD_R) * (PATDEV_{ires,iyr,\ itech} * XPP1) \quad (2\text{-}61)$$

For EOR/ASR Projects: As the project is in an established and known field, the developmental dryhole rate is used.

$$DRL_CST2_{iyr} = DRL_CST2_{iyr} + (DWC_W + DRY_W * REGDRYKD_R) * (PATN_{iyr} * XPP1) \quad (2\text{-}62)$$

For developing natural gas projects: As the project is currently being developed, it is assumed that the wildcat well(s) have previously been drilled. Therefore, the undiscovered developmental dryhole rate is applied to the project.

$$DRL_CST2_{iyr} = DRL_CST2_{iyr} + (DWC_W + DRY_W * REGDRYUD_R) * (PATN_{iyr} * XPP1) \quad (2\text{-}63)$$

where

IRES	=	Project index number
IYR	=	Year
R	=	Region
PATDEV	=	Number of patterns initiated each year for base and advanced technology cases
PATN	=	Annual number of patterns initiated
DRL_CST2	=	Technology case specific annual drilling cost
DWC_W	=	Cost to drill and complete a well
DRY_W	=	Cost to drill a dryhole
REGDRYUE	=	Dryhole rate for undiscovered exploration (wildcat)
REGDRYUD	=	Dryhole rate for undiscovered development
REGDRYKD	=	Dryhole rate for known fields development
XPP1	=	Number of producing wells drilled per pattern

Facilities Costs: Facilities costs depend on both the process and the resource. Five approaches are used to calculate the facilities costs for the project.

For undiscovered and developing natural gas projects:

$$FACCOST_{iyr} = FACCOST_{iyr} + (FWC_W * PATN_{iyr} * XPP1) \quad (2\text{-}64)$$

For existing natural gas fields:

$$FACCOST_{iyr} = FACCOST_{iyr} + (FWC_W * (PATDEV_{IRES,iyr,\ itech}) * XPP1) \quad (2\text{-}65)$$

<u>For undiscovered continuous crude oil:</u>

$$FACCOST_{iyr} = FACCOST_{iyr} + (NPR_W * PATN_{iyr} * XPP1) \quad (2\text{-}66)$$

<u>For existing crude oil fields:</u>

$$\begin{aligned} FACCOST_{iyr} = FACCOST_{iyr} &+ (PSW_W * (PATDEV_{IRES,iyr,\ itech}) * XPP4) \\ &+ (PSI_W * PATDEV_{IRES,iyr,\ itech} * XPP3) \\ &+ (FAC_W * PATDEV_{IRES,iyr,\ itech} * (XPP1 + XPP2)) \end{aligned} \quad (2\text{-}67)$$

<u>For undiscovered conventional crude oil and EOR/ASR projects:</u>

$$\begin{aligned} FACCOST_{iyr} = FACCOST_{iyr} &+ (PSW_W * PATN_{iyr} * XPP4) \\ &+ (PSI_W * PATN_{iyr} * XPP3) + (FAC_W * PATN_{iyr} * (XPP1 + XPP2)) \end{aligned} \quad (2\text{-}68)$$

where

IYR	=	Year
IRES	=	Project index number
ITECH	=	Technology case
PATN	=	Number of patterns initiated each year for the technology case being evaluated
PATDEV	=	Number of patterns initiated each year for base and advanced technology cases
XPP1	=	Number of new production wells drilled per pattern
XPP2	=	Number of new injection wells drilled per pattern
XPP3	=	Number of producers converted to injectors per pattern
XPP4	=	Number of primary wells converted to secondary wells per pattern
FAC_W	=	Crude oil well facilities upgrade cost
NPR_W	=	Cost to equip a new producer
PSW_W	=	Cost to convert a primary well to a secondary well
PSI_W	=	Cost to convert a production well to an injection well
FWC_W	=	Natural gas well facilities cost
FACCOST	=	Annual facilities cost for the well

Injectant Cost Added to Operating and Maintenance: The cost of injectant is calculated and added to the operating and maintenance costs.

$$INJ_{iyr} = INJ_{iyr} + INJ_OAM1 * WATINJ_{iyr} \quad (2\text{-}69)$$

where

IYR	=	Year

INJ	=	Annual injection cost
INJ_OAM1	=	Process specific cost of injection ($/Bbl)
WATINJ	=	Annual project level water injection

Fixed Annual Operating Costs for Crude Oil:
For CO_2 EOR:

$$AOAM_{iyr} = AOAM_{iyr} + OPSEC_W * SUMP_{iyr} \quad (2\text{-}70)$$

For undiscovered conventional crude oil:

Fixed annual operating costs for secondary oil wells are assumed to be zero.

For all crude oil processes except CO_2 EOR:

$$AOAM_{iyr} = AOAM_{iyr} + (OMO_W * XPATN_{iyr}) + (OPSEC_W * XPATN_{iyr}) \quad (2\text{-}71)$$

Fixed Annual Operating Costs for Natural Gas:
For existing natural gas fields:

$$AOAM_{iyr} = AOAM_{iyr} + (FOAMG_W * OAM_M_{iyr} * XPATN_{iyr}) \quad (2\text{-}72)$$

For undiscovered and developing natural gas resources:

$$AOAM_{iyr} = AOAM_{iyr} + (FOAMG_W * OAM_M_{iyr} * XPATN_{iyr}) * XPP1 \quad (2\text{-}73)$$

where,

AOAM	=	Annual fixed operating an maintenance costs
IYR	=	Year
SUMP	=	Total cumulative patterns initiated
OPSEC_W	=	Fixed annual operating costs for secondary oil wells
OMO_W	=	Fixed annual operating costs for crude oil wells
FOAMG_W	=	Fixed annual operating costs for natural gas wells
OAM_M	=	Energy elasticity factor for operating and maintenance costs
XPATN	=	Annual number of active patterns
XPP1	=	Number of producing wells drilled per pattern

Variable Operating Costs:

$$OAM_{iyr} = OAM_{iyr} + (OILPROD_{iyr} * OIL_OAM1 * OAM_M_{iyr}) + (GASPROD_{iyr} * GAS_OAM1 * OAM_M_{iyr}) + (WATPROD_{iyr} * WAT_OAM1 * OAM_M_{iyr}) \quad (2\text{-}74)$$

$$STIM_{iyr} = STIM_{iyr} + (0.2 * STIM_W * XPATN_{iyr} * XPP1) \quad (2\text{-}74)$$

<u>For infill drilling:</u> Injectant costs are zero.

$$OAM_{iyr} = OAM_{iyr} + INJ_{iyr} \quad (2\text{-}75)$$

where

OAM	=	Annual variable operating and maintenance costs
OILPROD	=	Annual project level crude oil production
GASPROD	=	Annual project level natural gas production
WATPROD	=	Annual project level water injection
OIL_OAM1	=	Process specific cost of crude oil production ($/Bbl)
GAS_OAM1	=	Process specific cost of natural gas production ($/Mcf)
WAT_OAM1	=	Process specific cost of water production ($/Bbl)
OAM_M	=	Energy elasticity factor for operating and maintenance costs
STIM	=	Project stimulation costs
STIM_W	=	Well stimulation costs
INJ	=	Cost of injection
XPATN	=	Annual number of active patterns
IYR	=	Year
XPP1	=	Number of producing wells drilled per pattern

Cost of Compression (Natural Gas Processes):
<u>Installation costs:</u>

$$COMP_{IYR} = COMP_{IYR} + (COMP_W*PATN_{IYR}*XPP1) \quad (2\text{-}76)$$

<u>O&M cost for compression:</u>

$$OAM_COMP_{IYR} = OAM_COMP_{IYR} + (GASPROD_{IYR} * COMP_OAM *OAM_M_{IYR}) \quad (2\text{-}77)$$

where

COMP	=	Cost of installing natural gas compression equipment
COMP_W	=	Natural gas compression cost
PATN	=	Number of patterns initiated each year
IYR	=	Year
XPP1	=	Number of producing wells drilled per pattern
OAM_COMP	=	Operating and maintenance costs for natural gas compression
GASPROD	=	Annual project level natural gas production
COMP_OAM	=	Compressor O & M costs
OAM_M	=	Energy elasticity factor for operating and maintenance costs

Process Dependent Costs

Process-specific facilities and capital costs are calculated at the project level.

Facilities Costs

Profile Model: The facilities cost of a water handling plant is added to the first year facilities costs.

$$FACCOST_1 = FACCOST_1 + PWHP * \left(\frac{RMAX}{365}\right) \quad (2\text{-}78)$$

where

$FACCOST_1$	=	First year of project facilities costs
PWHP	=	Produced water handling plant multiplier
RMAX	=	Maximum annual water injection rate

Polymer Model: The facilities cost for a water handling plant is added to the first year facilities costs.

$$FACCOST_1 = FACCOST_1 + PWP_F \quad (2\text{-}79)$$

where

$FACCOST_1$	=	First year of project facilities costs
PWP_F	=	Produced water handling plant

Advanced CO_2: Other costs added to the facilities costs include the facilities cost for a CO_2 handling plant and a recycling plant, the O&M cost for a CO_2 handling plant and recycling plant, injectant cost, O&M and fixed O&M costs for a CO_2 handling plant and a recycling plant. If the plant is developed in a single stage, the costs are added to the first year of the facilities costs. If a second stage is required, the additional costs are added to the sixth year of facilities costs.

$$FACCOST1 = FACCOST1 + \left(CO2RK * \left(\frac{0.75 * RMAX}{365}\right)^{CO2RB}\right) * 1{,}000 \quad (2\text{-}80)$$

$$FACCOST6 = FACCOST6 + \left(CO2RK * \left(\frac{0.75 * RMAX}{365}\right)^{CO2RB}\right) * 1{,}000$$

$$INJ_{iyr} = INJ_{iyr} + (TOTINJ_{iyr} - TORECY_{iyr}) * CO2COST \quad (2\text{-}81)$$

$$OAM_{iyr} = OAM_{iyr} + (OAM_M_{iyr} * TORECY_{iyr}) * (CO2OAM + PSW_W * 0.25) \quad (2\text{-}82)$$

$$FOAM_{iyr} = (FOAM_{iyr} + TOTINJ_{iyr}) * 0.40 * FCO2 \quad (2\text{-}83)$$

$$TORECY_CST_{iyr} = TORECY_CST_{iyr} + (TORECY_{iyr} * CO2OAM2 * OAM_M_{iyr}) \quad (2\text{-}84)$$

where

IYR	=	Year
RMAX	=	Maximum annual volume of recycled CO_2

CO2OAM	=	O & M cost for CO_2 handling plant
CO2OAM2	=	The O & M cost for the project's CO_2 injection plant
CO2RK, CO2RB	=	CO_2 recycling plant cost coefficients
INJ	=	Cost of purchased CO_2
TOTINJ	=	Annual project level volume of injected CO_2
TORECY	=	Annual project level CO_2 recycled volume
CO2COST	=	Cost of CO_2 ($/mcf)
OAM	=	Annual variable operating and maintenance costs
OAM_M	=	Energy elasticity factor for operating and maintenance costs
FOAM	=	Fixed annual operating and maintenance costs
FCO2	=	Energy elasticity factor for CO_2
FACCOST	=	Annual project facilities costs
TORECY_CST	=	The annual cost of operating the CO_2 recycling plant

Steam Model: Facilities and O&M costs for steam generators and recycling.

<u>Recalculate the facilities costs:</u> Facilities costs include the capital cost for injection plants, which is based upon the OOIP of the project, the steam recycling plant, and the steam generators required for the project.

$$\text{FACCOST1} = \text{FACCOST1} + \left(\frac{OOIP * 0.1 * 2.0 * APAT}{TOTPAT}\right) + (\text{RECY_WAT} * \text{RMAXWAT} + \text{RECY_OIL} * \text{RMAXOIL}) + (\text{STMMA} * \text{TOTPAT} * \text{PATSIZE}) + (\text{IGEN}_{iyr} - \text{IG}) * \text{STMGA} \quad (2\text{-}85)$$

$$\text{OAM}_{iyr} = \text{OAM}_{iyr} + (\text{WAT_OAM1} * \text{WATPROD}_{iyr} * \text{OAM_M}_{iyr}) + (\text{OIL_OAM1} * \text{OILPROD}_{iyr} * \text{OAM_M}_{iyr}) + (\text{INJ_OAM1} * \text{WATINJ}_{iyr} * \text{OAM_M}_{iyr}) \quad (2\text{-}86)$$

where

IYR	=	Year
IGEN	=	Number of active steam generators each year
IG	=	Number of active steam generators in previous year
FACCOST	=	Annual project level facilities costs
RMAXWAT	=	Maximum daily water production rate
RMAXOIL	=	Maximum daily crude oil production rate
APAT	=	Number of developed patterns
TOTPAT	=	Total number of patterns in the project
OOIP	=	Original oil in place (mmbbl)
PATSIZE	=	Pattern size (acres)
STMMA	=	Unit cost for steam manifolds
STMGA	=	Unit cost for steam generators
OAM	=	Annual variable operating and maintenance costs
OAM_M	=	Energy elasticity factor for operating and maintenance costs
WAT_OAM1	=	Process specific cost of water production ($/Bbl)
OIL_OAM1	=	Process specific cost of crude oil production ($/Bbl)

INJ_OAM1	=	Process specific cost of water injection ($/Bbl)
OILPROD	=	Annual project level crude oil production
WATPROD	=	Annual project level water production
WATINJ	=	Annual project level water injection
RECY_WAT	=	Recycling plant cost – water factor
RECY_OIL	=	Recycling plant cost – oil factor

Operating and Maintenance Cost

This subroutine calculates the process specific O&M costs.

Profile Model: Add the O&M costs of injected polymer.

$$INJ_{iyr} = INJ_{iyr} + \frac{OAM_M_{iyr} * TOTINJ_{iyr} * POLYCOST}{1000} \quad (2\text{-}87)$$

$$OAM_{iyr} = OAM_{iyr} + (XPATN_{iyr} * 0.25 * PSI_W) \quad (2\text{-}88)$$

where

IYR	=	Year
MAX_YR	=	Maximum number of years
INJ	=	Annual Injection cost
OAM_M	=	Energy elasticity factor for operating and maintenance cost
TOTINJ	=	Annual project level injectant injection volume
POLYCOST	=	Polymer cost
OAM	=	Annual variable operating and maintenance cost
XPATN	=	Number of active patterns
PSI_W	=	Cost to convert a primary well to an injection well

Polymer: Add the O&M costs of injected polymer.

$$INJ_{iyr} = INJ_{IYR} + \frac{TOTINJ_{iyr} * POLYCOST}{1{,}000} \quad (2\text{-}89)$$

$$OAM_{iyr} = OAM_{iyr} + (XPATN_{iyr} * 0.25 * PSI_W) \quad (2\text{-}90)$$

where

IYR	=	Year
MAX_YR	=	Maximum number of years
INJ	=	Annual Injection cost
TOTINJ	=	Annual project level injectant injection volume
POLYCOST	=	Polymer cost
OAM	=	Annual variable operating and maintenance cost
XPATN	=	Number of active patterns
PSI_W	=	Cost to convert a primary well to an injection well

Waterflood: Add the O&M costs of water injected as well as the cost to convert a primary well to an injection well.

$$OAM_{iyr} = OAM_{iyr} + (XPATN_{iyr} * 0.25 * PSI_W) \quad (2\text{-}91)$$

where

IYR	=	Year
MAX_YR	=	Maximum number of years
OAM	=	Annual variable operating and maintenance cost
XPATN	=	Number of active patterns
PSI_W	=	Cost to convert a primary well to an injection well

Existing crude oil fields and reservoirs: Since no new drilling or major investments are expected for decline, facilities and drilling costs are zeroed out.

$$OAM_{iyr} = OAM_{iyr} + ((OIL_OAM1 * OILPROD_{iyr}) + (GAS_OAM1 * GASPROD_{iyr}) + (WAT_OAM1 * WATPROD_{iyr})) * OAM_M_{iyr} \quad (2\text{-}92)$$

$$AOAM_{iyr} = AOAM_{iyr} + \left(\frac{OPSEC_W * OAM_M_{iyr} * SUMP_{iyr}}{5}\right) \quad (2\text{-}93)$$

where

IYR	=	Year
OILPROD	=	Annual project level crude oil production
GASPROD	=	Annual project level natural gas production
WATPROD	=	Annual project level water production
OIL_OAM1	=	Process specific cost of crude oil production ($/Bbl)
GAS_OAM1	=	Process specific cost of natural gas production ($/Mcf)
WAT_OAM1	=	Process specific cost of water production ($/Bbl)
OAM_M	=	Energy elasticity factor for operating and maintenance costs
OPSEC_W	=	Fixed annual operating cost for secondary well operations
SUMP	=	Cumulative patterns developed
AOAM	=	Fixed annual operating and maintenance costs
OAM	=	Variable annual operating and maintenance costs

Overhead Costs: : General and Administrative (G&A) costs on capitalized and expensed items, which consist of administration, accounting, contracting and legal fees/expenses for the project, are calculated according to the following equations:

$$GNA_EXP_{itech} = GNA_EXP_{itech} * CHG_GNA_FAC_{itech} \quad (2\text{-}94)$$

$$GNA_CAP_{itech} = GNA_CAP_{itech} * CHG_GNA_FAC_{itech} \quad (2\text{-}95)$$

where

ITECH	=	Technology case (base and advanced) number
GNA_EXP	=	The G&A rate applied to expensed items for the project
GNA_CAP	=	The G&A rate applied to capitalized items for the project
CHG_GNA_FAC	=	Technology case specific change in G&A rates

Timing

Overview of Timing Module

The timing routine determines which of the exploration and EOR/ASR projects are eligible for development in any particular year. Those that are eligible are subject to an economic analysis and passed to the project sort and development routines. The timing routine has two sections. The first applies to exploration projects while the second is applied to EOR/ASR and developing natural gas projects.

Figure 2-9 provides the overall logic for the exploration component of the timing routine. For each project regional crude oil and natural gas prices are obtained. The project is then examined to see if it has previously been timed and developed. The timed projects are no longer available and thus not considered.

The model uses four resource access categories for the undiscovered projects:

- No leasing due to statutory or executive order
- Leasing available but cumulative timing limitations between 3 and 9 months
- Leasing available but with controlled surface use
- Standard leasing terms

Each project has been assigned to a resource access category. If the access category is not available in the year evaluated, the project fails the resource access check.

After the project is evaluated, the number of considered projects is increased. Figure 2-10 shows the timing logic applied to the EOR/ASR projects as well as the developing natural gas projects.

Before the economics are evaluated, the prices are set and the eligibility is determined. The following conditions must be met:

- Project has not been previously timed
- Project must be eligible for timing, re-passed the economic pre-screening routine
- Corresponding decline curve project must have been timed. This does not apply to the developing natural gas projects.

If the project meets all of these criteria, then it is considered eligible for economic analysis. For an EOR/ASR project to be considered for timing, it must be within a process specific EOR/ASR development window. These windows are listed in Table 2-4.

Table 2-4: EOR/ASR Eligibility Ranges

Process	Before Economic Limit	After Economic Limit
CO_2 Flooding	After 2009	10 Years
Steam Flooding	5 Years	10 Years
Polymer Flooding	5 Years	10 Years
Infill Drilling	After 2009	7 Years
Profile Modification	5 Years	7 Years
Horizontal Continuity	5 Years	7 Years
Horizontal Profile	5 Years	7 Years
Waterflood	4 Years	6 Years

The economic viability of the eligible projects is then evaluated. A different analytical approach is applied to CO_2 EOR and all other projects. For non-CO_2 EOR projects the project is screened for applicable technology levers, and the economic analysis is conducted. CO_2 EOR projects are treated differently because of the different CO_2 costs associated with the different sources of industrial and natural CO_2.

For each available source, the economic variables are calculated and stored. These include the source of CO_2 and the project's ranking criterion.

Detailed description of timing module

Exploration projects: The first step in the timing module is to determine which reservoirs are eligible to be timed for conventional and continuous exploration. Prior to evaluation, the constraints, resource access, and technology and economic levers are checked, and the technology case is set.

Calculate economics for EOR/ASR and developing natural gas projects:
This section determines whether an EOR/ASR or developing natural gas project is eligible for economic analysis and timing. The following resources are processes considered in this step.
EOR Processes:

- CO_2 Flooding
- Steam Flooding
- Polymer Flooding
- Profile Modification

ASR Processes:

- Water Flooding
- Infill Drilling
- Horizontal Continuity
- Horizontal Profile

Developing natural gas

- Tight Gas
- Shale Gas
- Coalbed Methane

A project is eligible for timing if the corresponding decline curve project has previously been timed and the year of evaluation is within the eligibility window for the process, as listed in table 2-4.

Project Ranking: Sorts exploration and EOR/ASR projects which are economic for timing. The subroutine matches the discovery order for undiscovered projects and sorts the others by ranking criterion. The criteria include

- Net present value
- Investment efficiency
- Rate of return
- Cumulative discounted after tax cashflow

Selection and Timing: Times the exploration and EOR/ASR projects which are considered in that given year.

Project Selection

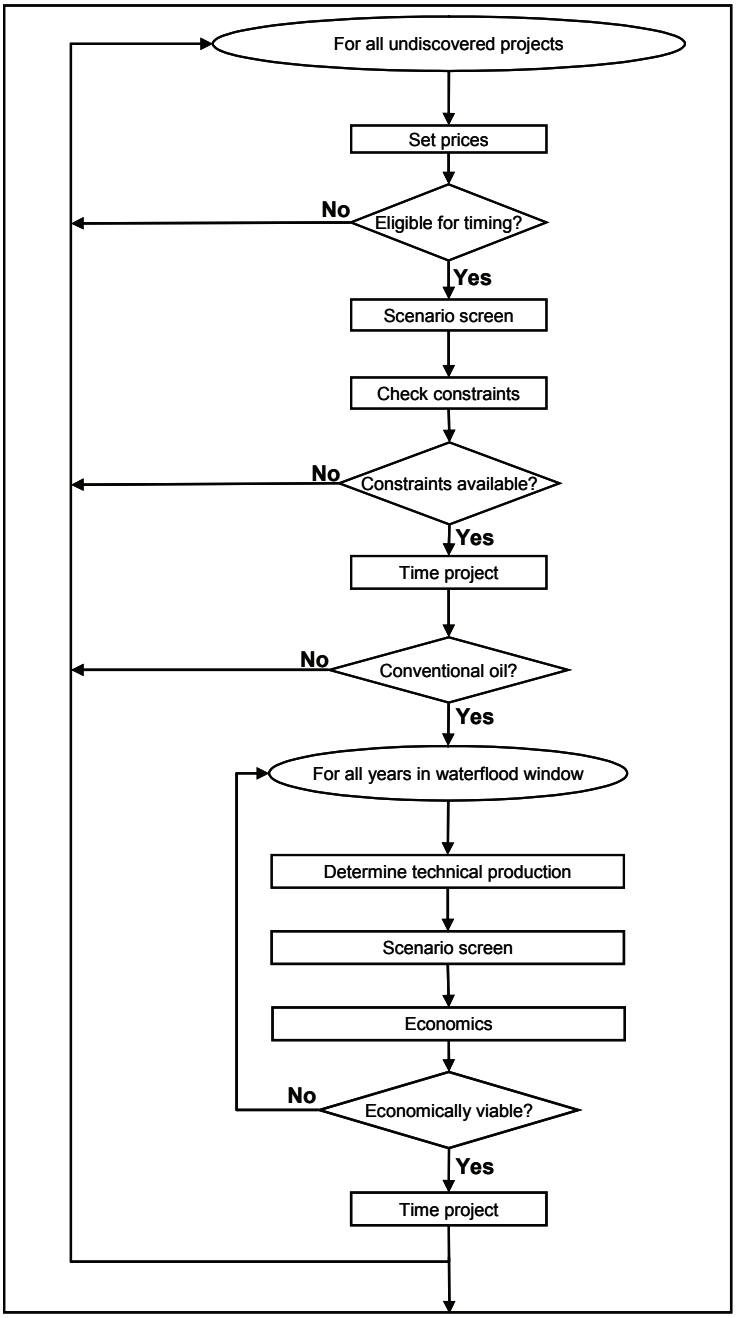
The project selection subroutine determines which exploration, EOR/ASR and developing natural gas projects will be modeled as developed in each year analyzed. In addition, the following development decisions are made:

- Waterflood of conventional undiscovered crude oil projects
- Extension of CO_2 floods as the total CO_2 injected is increased from 0.4 hydrocarbon pore volume (HCPV) to 1.0 HCPV

Overview of Project Selection

The project selection subroutine evaluates undiscovered projects separate from other projects. The logic for the development of exploration projects is provided in figure 2-9.

Figure 2-9: Selecting Undiscovered Projects



As illustrated in the figure the prices are set for the project before its eligibility is checked. Eligibility has the following requirements:

- Project is economically viable
- Project is not previously timed and developed

The projects which are eligible are screened for applicable technologies which impact the drilling success rates. The development constraints required for the project are checked against those that are available in the region.

If sufficient development resources are available, the project is timed and developed. As part of this process, the available development constraints are adjusted, the number of available accumulations is reduced and the results are aggregated. If no undiscovered accumulations remain, then the project is no longer eligible for timing. The projects that are eligible, economically viable, and undeveloped due to lack of development resources, are considered again for future projection years. If the project is conventional crude oil, it is possible to time a waterflood project.

The model evaluates the waterflood potential in a window centered upon the end of the economic life for the undiscovered project. For each year of that window, the technical production is determined for the waterflood project, applicable technology and economic levers are applied, and the economics are considered. If the waterflood project is economic, it is timed. This process is continued until either a waterflood project is timed or the window closes.

The second component of the project selection subroutine is applicable to EOR/ASR projects as well as the developing natural gas projects. The major steps applied to these projects are detailed in figures 2-10 and 2-11.

As seen in the flowchart, the prices are set for the project and the eligibility is checked. As with the undiscovered projects, the subroutine checks the candidate project for both economic viability and eligibility for timing. Afterwards, the project is screened for any applicable technology and economic levers.

If the project is eligible for CO_2 EOR, the economics are re-run for the specific source of CO_2. Afterwards, the availability of resource development constraints is checked for the project. If sufficient drilling and capital resources are available, the project preferences are checked.

The project preferences are rules which govern the competition between projects and selection of projects; these rules are listed below:

- CO_2 EOR and infill drilling are available after 2010
- Profile modification becomes available after 2011
- The annual number of infill drilling and profile modification projects is limited
- Horizontal continuity can compete against any other process except steam flood
- Horizontal profile can compete against any other process except steam flood or profile modification
- Polymer flooding cannot compete against any other process

If the project meets the technology preferences, then it is timed and developed. This process is different for CO_2 EOR and all other processes.

Figure 2-10: Selecting EOR/ASR projects

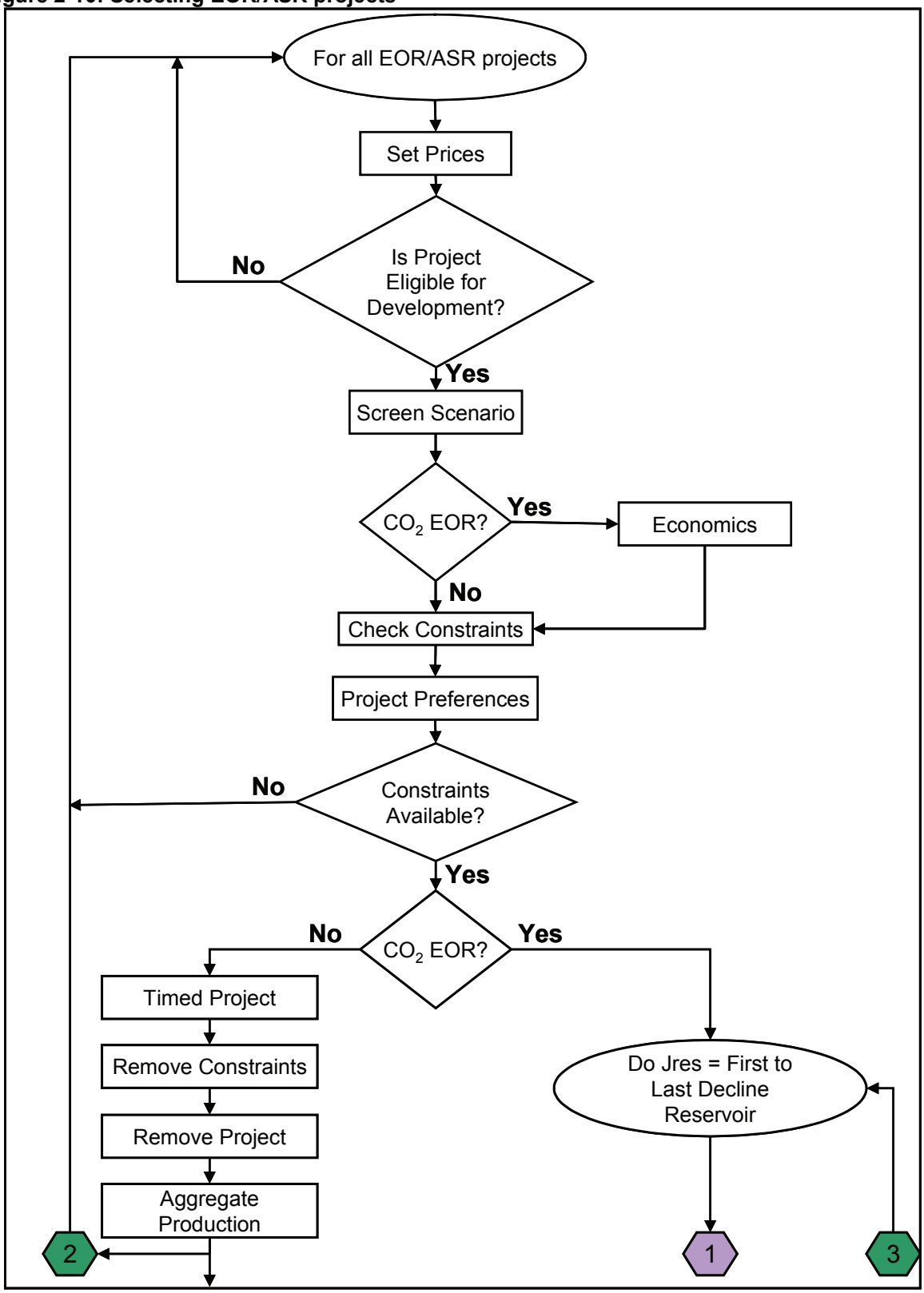
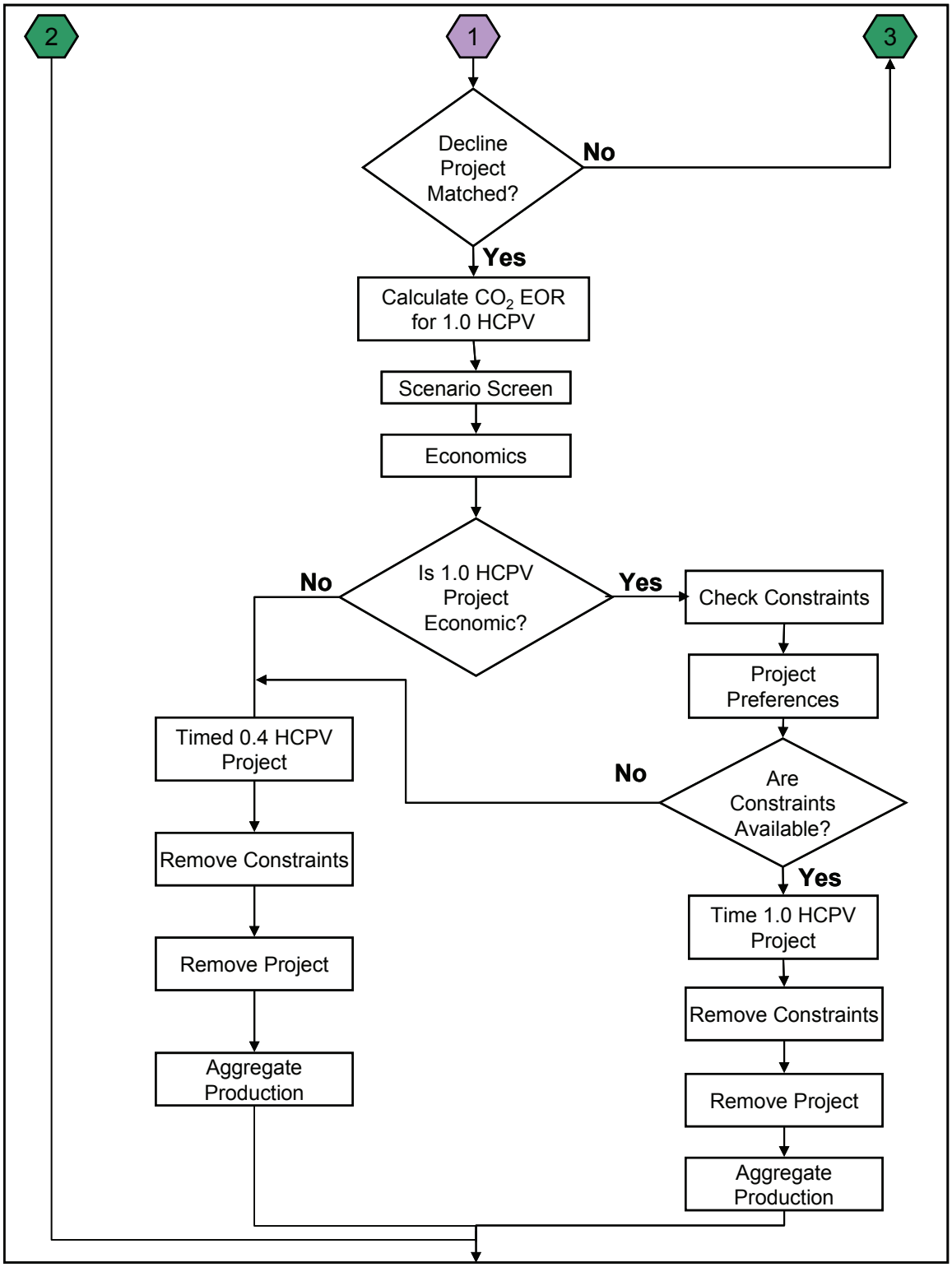


Figure 2-11: Selecting EOR/ASR projects, Continued



For non-CO_2 projects, the constraints are adjusted, the project is removed from the list of eligible projects, and the results are aggregated. It is assumed that most EOR/ASR processes are mutually exclusive and that a reservoir is limited to one process. There are a few exceptions:

- CO_2 EOR and infill drilling can be done in the same reservoir
- CO_2 EOR and horizontal continuity can be done in the same reservoir

For CO_2 EOR projects, a different methodology is used at this step: the decision to increase the total CO_2 injection from 0.4 hydrocarbon pore volume (HCPV) to 1.0 HCPV is made. The model performs the following steps, illustrated in figure 2-10 and continued in figure 2-11.

The CO_2 EOR project is matched to the corresponding decline curve project. Using the project-specific petro-physical properties, the technical production and injection requirements are determined for the 1.0 HCPV project. After applying any applicable technology and economic levers, the model evaluates the project economics. If the 1.0 HCPV project is not economically viable, then the 0.4 HCPV project is timed. If the 1.0 HCPV project is viable, the constraints and project preferences are checked. Assuming that there are sufficient development resources, and competition allows for the development of the project, then the model times the 1.0 HCPV project. If sufficient resources for the 1.0 HCPV project are not available, the model times the 0.4 HCPV project.

Detailed description of project selection

The project selection subroutine analyzes undiscovered crude oil and natural gas projects. If a project is economic and eligible for development, the drilling and capital constraints are examined to determine whether the constraints have been met. The model assumes that the projects for which development resources are available are developed.

Waterflood processing may be considered for undiscovered conventional crude oil projects. The waterflood project will be developed in the first year it is both eligible for implementation and the waterflood project is economically viable.

EOR/ASR Projects

When considering whether a project is eligible for EOR/ASR processing, the model first checks the availability of sufficient development resources are available. Based on the project economics and projected availability of development resources, it also decides whether or not to extend injection in CO_2 EOR projects from 0.4 HCPV to 1.0 HCPV.

If the 1.0 HCPV is economic but insufficient resources are available, the 0.4 HCPV project is selected instead. If the 1.0 HCPV project is uneconomic, the 0.4 HCPV project is selected.

Constraints

Resource development constraints are used during the selection of projects for development in order to mimic the infrastructure limitations of the oil and gas industry. The model assumes that only the projects that do not exceed the constraints available will be developed.

Types of constraints modeled

The development constraints represented in the model include drilling footage availability, rig depth rating, capital constraints, demand for natural gas, carbon dioxide volumes, and resource access.

In the remainder of this section, additional details will be provided for each of these constraints.

Drilling: Drilling constraints are bounding values used to determine the resource production in a given region. OLOGSS uses the following drilling categories:

- Developmental crude oil – applied to EOR/ASR projects
- Developmental natural gas – applied to developing natural gas projects
- Horizontal drilling – applied to horizontal wells
- Dual use – available for either crude oil or natural gas projects
- Conventional crude oil exploration – applied to undiscovered conventional crude oil projects
- Conventional natural gas exploration – applied to undiscovered conventional natural gas projects
- Continuous crude oil exploration – applied to undiscovered continuous crude oil projects
- Continuous natural gas exploration – applied to undiscovered continuous natural gas projects

Except for horizontal drilling, which is calculated as a fraction of the national developmental crude oil footage, all categories are calculated at the national level and apportioned to the regional level. Horizontal drilling is at the national level.

The following equations are used to calculate the national crude oil development drilling. The annual footage available is a function of lagged five year average crude oil prices and the total growth in drilling.

The total growth in drilling is calculated using the following algorithm.

<u>For the first year:</u>

$$\text{TOT_GROWTH} = 1.0 * \left(1.0 + \frac{\text{DRILL_OVER}}{100}\right) \tag{2-96}$$

<u>For the remaining years:</u> (2-97)

$$\text{TOT_GROWTH} = \left(\left(\text{TOT_GROWTH} * \left(1.0 + \frac{\text{RGR}}{100}\right)\right) - \left(\text{TOT_GROWTH} * \left(1.0 + \frac{\text{RGR}}{100}\right)\right) * \left(\frac{\text{RRR}}{100}\right)\right) * \left(1.0 * \frac{\text{DRILL_OVER}}{100}\right)$$

Reviewers note: The equation above would be clearer if it were written as

where

IYR	=	Year evaluated
MAX_YR	=	Maximum number of years
TOT_GROWTH	=	Annual growth change for drilling at the national level (fraction)
DRILL_OVER	=	Percent of drilling constraint available for footage over run
RGR	=	Annual rig development rate (percent)
RRR	=	Annual rig retirement rate (percent)

The national level crude oil and natural gas development footage available for drilling is calculated using the following equations. The coefficients for the drilling footage equations were estimated by least squares using model equations 2.B-16 and 2.B-17 in Appendix 2.B.

$$NAT_OIL_{IYR} = (OILA0 + OILA1 * OILPRICED_{IYR}) * TOTMUL * TOT_GROWTH * OIL_ADJ_{IYR} \quad (2\text{-}98)$$

$$NAT_GAS_{IYR} = (GASA0 + GASA1 * GASPRICED_{IYR}) * TOTMUL * TOT_GROWTH * GAS_ADJ_{IYR} \quad (2\text{-}99)$$

where

IYR	=	Year evaluated
TOT_GROWTH	=	Final calculated annual growth change for drilling at the national level
NAT_OIL NAT_GAS	=	National development footage available (Thousand Feet)
OILA0,1 GASA0,1	=	Footage equation coefficients
OILPRICED GASPRICED	=	Annual prices used in drilling constraints, five year average
TOTMUL	=	Total drilling constraint multiplier
OIL_ADJ GAS_ADJ	=	Annual crude oil, natural gas developmental drilling availability factors

After the available footage for drilling is calculated at the national level, regional allocations are used to allocate the drilling to each of the OLOGSS regions. The drilling which is not allocated, due to the "drill_trans" factor, is available in any region and represents the drilling which can be transferred among regions. The regional allocations are then subtracted from the national availability.

$$REG_OIL_{j,iyr} = NAT_OIL_{IYR} * \left(\frac{PRO_REGOIL_J}{100}\right) * \left(1.0 - \frac{DRILL_TRANS}{100}\right) \quad (2\text{-}100)$$

where

J	=	Region number
IYR	=	Year

REG_OIL	=	Regional development oil footage (Thousand Feet) available in a specified region
NAT_OIL	=	National development oil footage (Thousand Feet). After allocation, the footage transferrable among regions.
PRO_REGOIL	=	Regional development oil footage allocation (percent)
DRILL_TRANS	=	Percent of footage that is transferable among regions

Footage Constraints: The model determines whether there is sufficient footage available to drill the complete project. The drilling constraint is applied to all projects. Footage requirements are calculated in two stages: vertical drilling and horizontal drilling. The first well for an exploration project is assumed to be a wildcat well and uses a different success rate than the other wells in the project. The vertical drilling is calculated using the following formula.

<u>For non-exploration projects:</u>

$$FOOTREQ_{ii} = (DEPTH_{itech} * (1.0 + SUC_RATEKD_{itech})) * PATDEV_{irs,ii-itimeyr+1,itech} * (ATOTPROD_{irs,itech} + ATOTINJ_{irs,itech}) + (DEPTH_{itech} * PATDEV_{irs,ii-itiimeyr+1,itech}) * 0.5 * ATOTCONV_{irs,itech} \quad (2\text{-}101)$$

<u>For exploration projects:</u>

For the first year of the project (2-102)

$$FOOTREQ_{ii} = (DEPTH_{itech} * (1.0 + SUC_RATEUE_{itech})) * (ATOTPROD_{irs,itech} + ATOTINJ_{irs,itech}) + (0.5 * ATOTCONV_{irs,itech}) + (DEPTH_{itech} * (1.0 + SUC_RATEUD_{itech})) * (PATDEV_{irs,ii-itimeyr+1,itech} - 1 * ATOTPROD_{irs,itech} + ATOTINJ_{ir,itech} + 0.5 * ATOTCONV_{irs,itech})$$

For all other project years (2-103)

$$FOOTREQ_{ii} = (DEPTH_{itech} * (1.0 + SUC_RATEUD_{itech})) * PATDEV_{irs,ii-itimeyr+1,itech} * (ATOTPROD_{irs,itech} + ATOTINJ_{irs,itech}) + (DEPTH_{itech} * PATDEV_{irs,ii-itimeyr+1,itech} * 0.5 * ATOTCONV_{irs,itech})$$

where

irs	=	Project index number
itech	=	Technology index number
itimeyr	=	Year in which project is evaluated for development
ii	=	Year evaluated
FOOTREQ	=	Footage required for drilling (Thousand Feet)
DEPTH	=	Depth of formation (Feet)
SUC_RATEKD	=	Success rate for known development
SUC_RATEUE	=	Success rate for undiscovered exploration (wildcat)
SUC_RATEUD	=	Success rate for undiscovered development
PATDEV	=	Annual number of patterns developed for base and advanced technology
ATOTPROD	=	Number of new producers drilled per pattern
ATOTINJ	=	Number of new injectors drilled per patterns
ATOTCONV	=	Number of conversions from producing to injection wells per pattern

Add Laterals and Horizontal Wells: The lateral length and the horizontal well length are added to the footage required for drilling.

$$FOOTREQii = FOOTREQii + (ALATNUM_{irs,itech} * ALATLEN_{irs,itech} * (1.0 + SUC_RATEKD_{itech}) * PATDEV_{irs,ii-itimeyr+1,itech}) \quad (2\text{-}104)$$

where

irs	=	Project index number
itech	=	Technology index number
itimeyr	=	Year in which project is evaluated for development
ii	=	Year evaluated
FOOTREQ	=	Footage required for drilling (Feet)
ALATNUM	=	Number of laterals
ALATLEN	=	Length of laterals (Feet)
SUC_RATEKD	=	Success rate for known development
PATDEV	=	Annual number of patterns developed for base and advanced technology

After determining the footage requirements, the model calculates the footage available for the project. The available footage is specific to the resource, the process, and the constraint options which have been specified by the user. If the footage required to drill the project is greater than the footage available then the project is not feasible.

Rig depth rating: The rig depth rating is used to determine whether a rig is available which can drill to the depth required by the project. OLOGSS uses the nine rig depth categories provided in table 2-5.

Table 2-5 Rig Depth Categories

Depth Category	Minimum Depth (Ft)	Maximum Depth (Ft)
1	1	2,500
2	2,501	5,000
3	5,001	7,500
4	7,501	10,000
5	10,001	12,500
6	12,501	15,000
7	15,001	17,500
8	17,251	20,000
9	20,001	Deeper

The rig depth rating is applied at the national level. The available footage is calculated using the following equation.

$$RDR_FOOTAGE_{j,\,iyr} = (NAT_TOT_{iyr} + NAT_EXP_{iyr} + NAT_EXPG_{iyr}) * \frac{RDR_j}{100} \quad (2\text{-}106)$$

where

J	=	Rig depth rating category
IYR	=	Year
RDR_FOOTAGE	=	Footage available in this interval (K Ft)

NAT_TOT	=	Total national developmental (crude oil, natural gas, and horizontal) drilling footage available (Thousand feet)
NAT_EXPG	=	National gas exploration drilling constraint
NAT_EXP	=	Total national exploration drilling footage available (Thousand feet)
RDR_j	=	Percentage of rigs which can drill to depth category j

Capital: Crude oil and natural gas companies use different investment and project evaluation criteria based upon their specific cost of capital, the portfolio of investment opportunities available, and their perceived technical risks. OLOGSS uses capital constraints to mimic limitations on the amount of investments the oil and gas industry can make in a given year. The capital constraint is applied at the national level.

Natural Gas Demand: Demand for natural gas is calculated at the regional level by the NGTDM and supplied to OLOGSS.

Carbon Dioxide: For CO_2 miscible flooding, availability of CO_2 gas from natural and industrial sources is a limiting factor in developing the candidate projects. In the Permian Basin, where the majority of the current CO_2 projects are located, the CO_2 pipeline capacity is a major concern.

The CO_2 constraint in OLOGSS incorporates both industrial and natural sources of CO_2. The industrial sources of CO_2 are ammonia plants, hydrogen plants, existing and planned ethanol plants, cement plants, refineries, fossil fuel power plants, and new IGCC plants.

Technology and market constraints prevent the total volumes of CO_2 produced from becoming immediately available. The development of the CO_2 market is divided into 3 periods:
1) technology R&D, 2) infrastructure construction, and 3) market acceptance. The capture technology is under development during the R&D phase, and no CO_2 produced by the technology is assumed available at that time. During the infrastructure development, the required capture equipment, pipelines, and compressors are being constructed, and no CO_2 is assumed available. During the market acceptance phase, the capture technology is being widely implemented and volumes of CO_2 are assumed to become available.

The maximum CO_2 available is achieved when the maximum percentage of the industry that will adopt the technology has adopted it. This provides an upper limit on the volume of CO_2 that will be available. The graph below provides the annual availability of CO_2 from ammonia plants. Availability curves were developed for each source of industrial, as well as natural CO_2.

CO_2 constraints are calculated at the regional level and are source specific.

Resource Access: Restrictions on access to Federal lands constrain the development of undiscovered crude oil and natural gas resources. OLOGSS uses four resource access categories:

- No leasing due to statutory or executive order
- Leasing available but cumulative timing limitations between 3 and 9 months
- Leasing available but with controlled surface use
- Standard leasing terms

The percentage of the undiscovered resource in each category was estimated using data from the Department of Interior's Basin Inventories of Onshore Federal Land's Oil and Gas Resources.

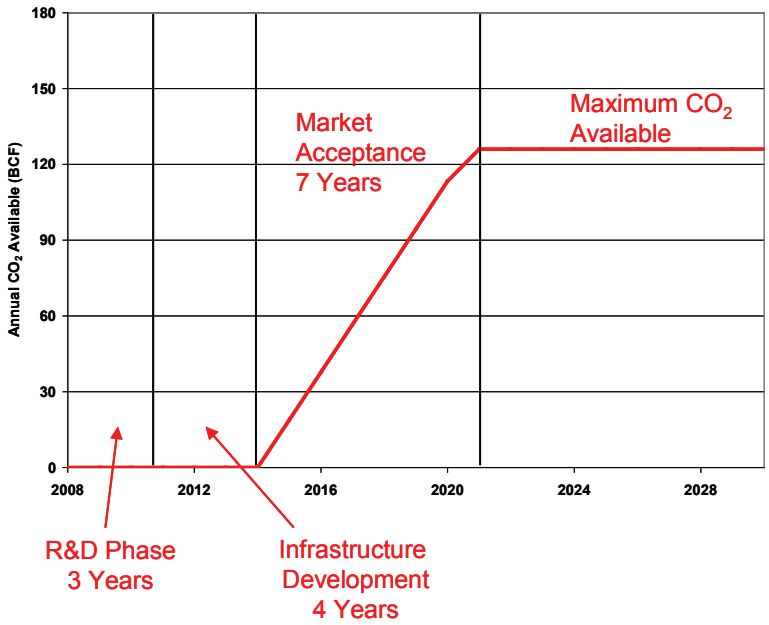


Figure 2-12: CO2 Market Acceptance Curve

Technology

Research and development programs are designed to improve technology to increase the amount of resources recovered from crude oil and natural gas fields. Key areas of study include methods of increasing production, extending reserves, and reducing costs. To optimize the impact of R & D efforts, potential benefits of a new technology are weighed against the costs of research and development. OLOGSS has the capability to model the effects of R & D programs and other technology improvements as they impact the production and economics of a project. This is done in two steps: (1) modeling the implementation of the technology within the oil and gas industry and (2) modeling the costs and benefits for a project that applies this technology.

Impact of technology on economics and recovery

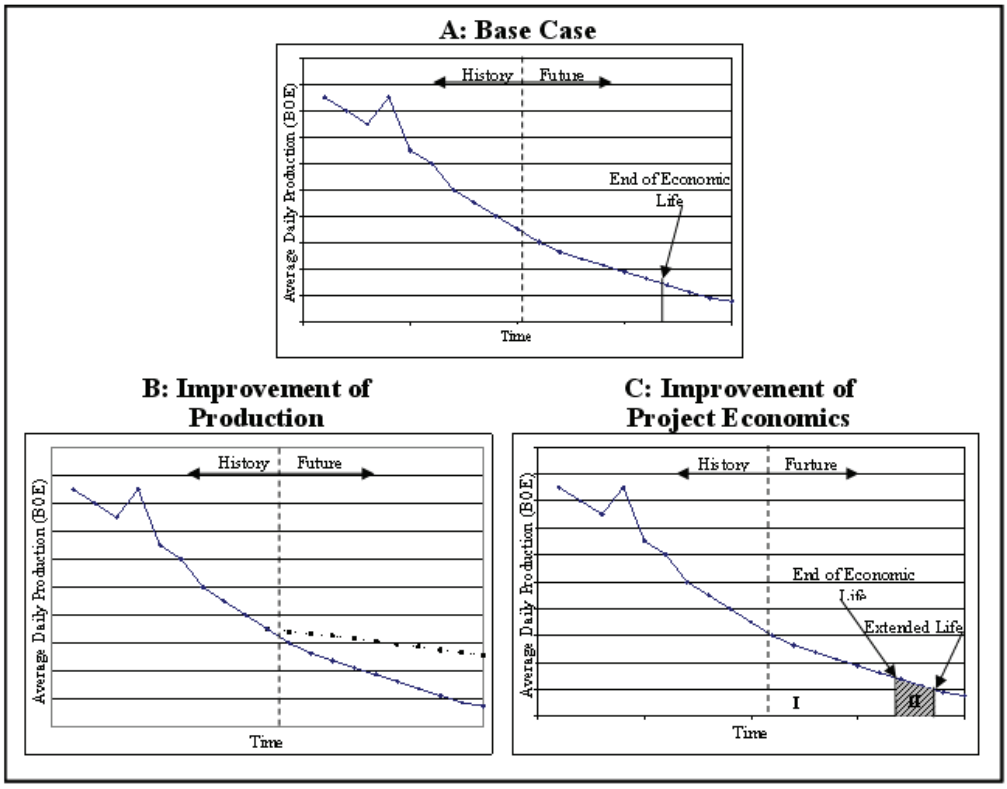
Figure 2-13 illustrates the effects of technology improvement on the production and project economics of a hypothetical well. The graphs plot the daily average production, projected by decline analysis, over the life of the project. Each graph represents a different scenario: (A) base case, (B) production improvement, and (C) economic improvement.

Graph A plots the production for the base case. In the base case, no new technology is applied to the project. The end of the project's economic life, the point at which potential revenues are less than costs of further production, is indicated. At that point, the project would be subject to reserves-growth processes or shut in.

Graph B plots the production for the base case and a production-increasing technology such as skin reduction. The reduction in skin, through well-bore fracturing or acidizing, increases the daily production flow rate. The increase in daily production rate is shown by the dotted line in graph B. The outcome of the production-increasing technology is reserves growth for the well. The amount of reserves growth for the well is shown by the area between the two lines as illustrated in figure 2-13 graph B.

Another example of technology improvement is captured in graph C. In this case a technology is implemented that reduces the cost of operation and maintenance, thereby extending the reservoir life as shown in figure 2-13 graph C.

Figure 2-13: Impact of Economic and Technology Levers



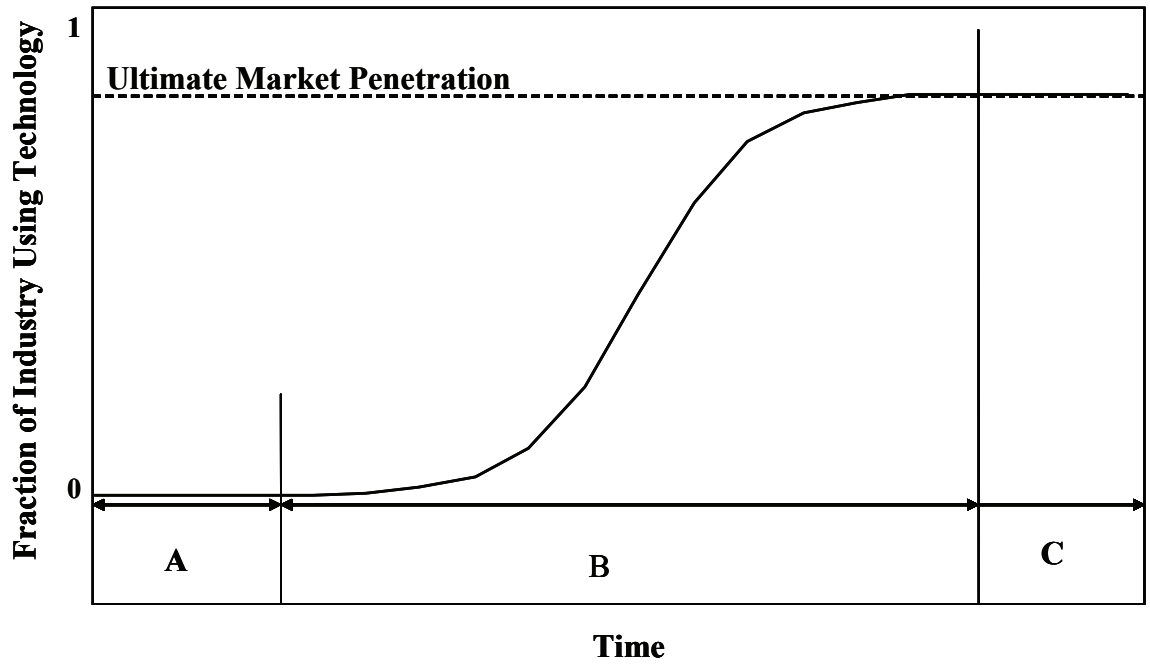
Technology improvements are modeled in OLOGSS using a variety of technology and economic levers. The technology levers, which impact production, are applied to the technical production of the project. The economic levers, which model improvement in project economics, are applied to cashflow calculations. Technology penetration curves are used to model the market penetration of each technology.

The technology-penetration curve is divided into three sections, each of which represents a phase of development. The first section is the research and development phase. In this phase the technology is developed and tested in the laboratory. During these years, the industry may be aware of the technology but has not begun implementation, and therefore does not see a benefit to production or economics. The second section corresponds to the commercialization phase. In the commercialization phase, the technology has successfully left the laboratory and is being

adopted by the industry. The third section represents maximum market penetration. This is the ultimate extent to which the technology is adopted by the industry.

Figure 2-14 provides the graph of a generic technology-penetration curve. This graph plots the fraction of industry using the new technology (between 0 and 1) over time. During the research and development phase (A) the fraction of the industry using the technology is 0. This increases during commercialization phase (B) until it reaches the ultimate market penetration. In phase C, the period of maximum market acceptance, the percentage of industry using the technology remains constant.

Figure 2-14: Generic Technology Penetration Curve



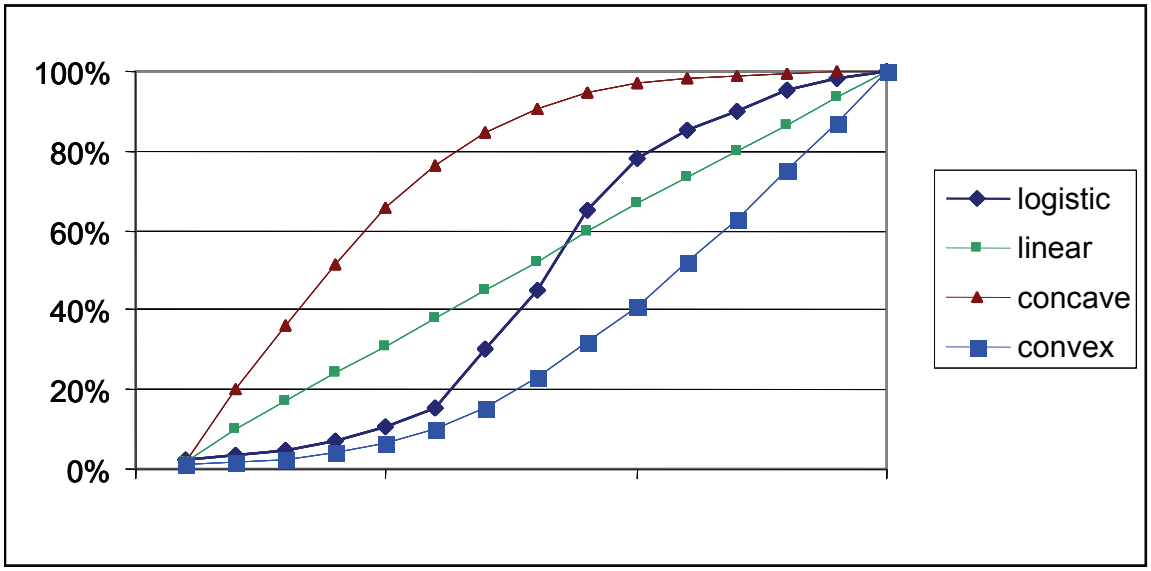
Technology modeling in OLOGSS

The success of the technology program is measured by estimating the probability that the technology development program will be successfully completed. It reflects the pace at which technology performance improves and the probability that the technology project will meet the program goals. There are four possible curve shapes that may represent the adoption of the technology: convex, concave, sigmoid/logistic or linear, as shown in figure 2-15. The convex curve corresponds to rapid initial market penetration followed by slow market penetration. The concave curve corresponds to slow initial market penetration followed by rapid market penetration. The sigmoid/logistic curve represents a slow initial adoption rate followed by rapid increase in adoption and the slow adoption again as the market becomes saturated. The linear curve represents a constant rate of market penetration, and may be used when no other predictions can be made.

The market penetration curve is a function of the relative economic attractiveness of the technology instead of being a time-dependent function. A technology will not be implemented

unless the benefits through increased production or cost reductions are greater than the cost to apply the technology. As a result, the market penetration curve provides a limiting value on commercialization instead of a specific penetration path. In addition to the curve, the implementation probability captures the fact that not all technologies that have been proved in the lab are able to be successfully implemented in the field. The implementation probability does not reflect resource access, development constraints, or economic factors.

Figure 2-15: Potential Market Penetration Profiles



The three phases of the technology penetration curve are modeled using three sets of equations. The first set of equations models the research and development phase, the second set models the commercialization phase, and the third set models the maximum market penetration phase.

In summary, technology penetration curves are defined using the following variables:

- Number of years required to develop a technology = Y_d
- First year of commercialization = Y_c
- Number of years to fully penetrate the market = Y_a
- Ultimate market penetration (%) = UP
- Probability of success = P_s
- Probability of implementation = P_i
- Percent of industry implementing the technology (fraction) in year x = Imp_x

Research and Development Phase:
During the research and development phase, the percentage of industry implementing the new technology for a given year is zero.

This equation is used for all values of *market_penetration_profile.*

Commercialization Phase:

The commercialization phase covers the years from the beginning of commercialization through the number of years required to fully develop the technology. The equations used to model this phase depend upon the value of *market_penetration_profile.*

If the *market_penetration_profile* is assumed to be *convex*, then

Step 1: Calculate raw implementation percentage:

$$Imp_{xr} = -0.9 * 0.4^{[(x - Ys) / Ya]} \tag{2-105}$$

Step 2: Normalize Imp_x using the following equation:

$$Imp_x = \frac{[(-0.6523) - Imp_x]}{[(-0.6523) - (-0.036)]} \tag{2-106}$$

If the *market_penetration_profile* is assumed to be *concave*, then

Step 1: Calculate raw implementation percentage:

$$Imp_x = 0.9 * 0.04^{[1 - \{(x + 1 - Ys)/ Ya\}]} \tag{2-107}$$

Step 2: Normalize Imp_x using the following equation:

$$Imp_x = \frac{[(0.04) - Imp_{xr}]}{[(0.04) - (0.74678)]} \tag{2-108}$$

If the *market_penetration_profile* is assumed to be *sigmoid*, then

Step 1: Determine midpoint of the sigmoid curve = $\text{int}\left(\frac{Y_a}{2}\right)$

Where $\text{int}\left(\frac{Y_a}{2}\right) = \left(\frac{Y_a}{2}\right)$ rounded to the nearest integer

Step 2: Assign a value of 0 to the midpoint year of the commercialization period, incrementally increase the values for the years above the midpoint year, and incrementally decrease the values for the years below the midpoint year.

Step 3: Calculate raw implementation percentage:

$$Imp_x = \frac{e^{value_x}}{1 + e^{value_x}} \tag{2-109}$$

No normalizing of Imp_x is required for the sigmoid profile.

If the *market_penetration_profile* is assumed to be *linear*, then

Step 1: Calculate the raw implementation percentage:

$$Imp_x = \left[\frac{P_s * P_i * UP}{Y_a + 1} \right] * x_i \quad (2\text{-}110)$$

No normalizing of Imp_x is required for the linear profile.

Note that the maximum technology penetration is 1.

Ultimate Market Penetration Phase:
For each of the curves generated, the ultimate technology penetration applied per year will be calculated using:

$$Imp_{final} = Imp_x * P_s * P_i \quad (2\text{-}111)$$

Note that Imp_{final} is not to exceed Ultimate Market Penetration ("UP")

Using these three sets of equations, the industry-wide implementation of a technology improvement can be mapped using a technology-penetration curve.

Levers included in model

Project Level Technology Impact: Adopting a new technology can impact two aspects of a project. It improves the production and/or improves the economics. Technology and economic levers are variables in OLOGSS. The values for these levers are set by the user.

There are two cost variables to which economic levers can be applied in the cashflow calculations: the cost of applying the technology and the cost reductions that result from the technology's implementation. The cost to apply is the incremental cost to apply the technology. The cost reduction is the savings associated with using the new technology. The "cost to apply" levers can be applied at the well and/or project level. The model recognizes the distinction between technologies that are applied at the well level – modeling while drilling - and reservoir characterization and simulation, which affects the entire project. By using both types of levers, users can model the relationship between implementation costs and offsetting cost reductions.

The model assumes that the technology will be implemented only if the cost to apply the technology is less than the increased revenue generated through improved production and cost reductions.

Resource and Filter Levers: Two other types of levers are incorporated into OLOGSS: resource-access levers and technology levers. Resource-access levers allow the user to model changes in resource-access policy. For example, the user can specify that the federal lands in the Santa Maria Basin, which are currently inaccessible due to statutory or executive orders, will be available for exploration in 2015. A series of filter levers is also incorporated in the model. These are used to specifically locate the impact of technology improvement. For example, a technology can be applied only to CO_2 flooding projects in the Rocky Mountain region that are between 5,000 and 7,000 feet deep.

Appendix 2.A: Onshore Lower 48 Data Inventory

Variable Name	Variable Type	Description	Unit
AAPI	Input	API gravity	
AARP	Input	CO_2 source acceptance rate	
ABO	Variable	Current formation volume factor	Bbl/stb
ABOI	Input	Initial formation volume factor	Bbl/stb
ABTU	Variable	BTU content	Btu/Cf
ACER	Input	ACE rate	Percent
ACHGASPROD	Input	Cumulative historical natural gas production	MMcf
ACHOILPROD	Input	Cumulative historical crude oil production	MBbl
ACO2CONT	Input	CO_2 impurity content	%
ADEPTH	Input	Depth	Feet
ADGGLA	Variable	Depletable items in the year (G & G and lease acquisition cost)	K$
ADJGAS	Variable	National natural gas drilling adjustment factor	Fraction
ADJGROSS	Variable	Adjusted gross revenue	K$
ADJOIL	Variable	National crude oil drilling adjustment factor	Fraction
ADOILPRICE	Variable	Adjusted crude oil price	$/Bbl
ADVANCED	Variable	Patterns to be developed using advanced technology	Fraction
AECON_LIFE	Variable	Economic life of the project	Years
AFLP	Input	Portion of reservoir on federal lands	Fraction
AGAS_GRAV	Input	Natural gas gravity	
AGOR	Input	Gas/oil ratio	Mcf/bbl
AH2SCONT	Input	H_2S impurity content	%
AHCPV	Variable	Hydro Carbon Pore Volume	0.4 HCPV
AHEATVAL	Input	Heat content of natural gas	Btu/Cf
AINJINJ	Input	Annual injectant injected	MBbl, Mcf, MLbs
AINJRECY	Variable	Annual injectant recycled	MBbl, Mcf
AIRSVGAS	Variable	End of year inferred natural gas reserves	MMcf
AIRSVOIL	Variable	End of year inferred crude oil reserves	MBbl
ALATLEN	Input	Lateral length	Feet
ALATNUM	Input	Number of laterals	
ALYRGAS	Input	Last year of historical natural gas production	MMcf

ALYROIL	Input	Last year of historical crude oil production	MBbl
AMINT	Variable	Alternative minimum income tax	K$
AMOR	Variable	Intangible investment depreciation amount	K$
AMOR_BASE	Variable	Amortization base	K$
AMORSCHL	Input	Annual fraction amortized	Fraction
AMT	Input	Alternative minimum tax	K$
AMTRATE	Input	Alternative minimum tax rate	K$
AN2CONT	Input	N_2 impurity content	%
ANGL	Input	NGL	bbl/MMcf
ANUMACC	Input	Number of accumulations	
ANWELLGAS	Input	Number of natural gas wells	
ANWELLINJ	Input	Number of injection wells	
ANWELLOIL	Input	Number of crude oil wells	
AOAM	Variable	Annual fixed O & M cost	K$
AOGIP	Variable	Original Gas in Place	Bcf
AOILVIS	Input	Crude Oil viscosity	CP
AOOIP	Variable	Original Oil In Place	MBbl
AORGOOIP	Input	Original OOIP	MBbl
APATSIZ	Input	Pattern size	Acres
APAY	Input	Net pay	Feet
APD	Variable	Annual percent depletion	K$
APERM	Input	Permeability	MD
APHI	Input	Porosity	Percent
APLAY_CDE	Input	Play number	
APRESIN	Variable	Initial pressure	PSIA
APRODCO2	Input	Annual CO_2 production	MMcf
APRODGAS	Input	Annual natural gas production	MMcf
APRODNGL	Input	Annual NGL production	MBbl
APRODOIL	Input	Annual crude oil production	MBbl
APRODWAT	Input	Annual water production	MBbl
APROV	Input	Province	
AREGION	Input	Region number	
ARESACC	Input	Resource Access	
ARESFLAG	Input	Resource flag	
ARESID	Input	Reservoir ID number	
ARESVGAS	Variable	End of year proven natural gas reserves	MMcf
ARESVOIL	Variable	End of year proven crude oil reserves	MBbl
ARRC	Input	Railroad Commission District	
ASC	Input	Reservoir Size Class	
ASGI	Variable	Gas saturation	Percent
ASOC	Input	Current oil saturation	Percent
ASOI	Input	Initial oil saturation	Percent

ASOR	Input	Residual oil saturation	Percent
ASR_ED	Input	Number of years after economic life of ASR	
ASR_ST	Input	Number of years before economic life of ASR	
ASULFOIL	Input	Sulfur content of crude oil	%
ASWI	Input	Initial water saturation	Percent
ATCF	Variable	After tax cashflow	K$
ATEMP	Variable	Reservoir temperature	F°
ATOTACRES	Input	Total area	Acres
ATOTCONV	Input	Number of conversions from producing wells to injecting wells per pattern	
ATOTINJ	Input	Number of new injectors drilled per pattern	
ATOTPAT	Input	Total number of patterns	
ATOTPROD	Input	Number of new producers drilled per pattern	
ATOTPS	Input	Number of primary wells converted to secondary wells per pattern	
AVDP	Input	Dykstra Parsons coefficient	
AWATINJ	Input	Annual water injected	MBbl
AWOR	Input	Water/oil ratio	Bbl/Bbl
BAS_PLAY	Input	Basin number	
BASEGAS	Input	Base natural gas price used for normalization of capital and operating costs	$/Mcf
BASEOIL	Input	Base crude oil price used for normalization of capital and operating costs	K$
BSE_AVAILCO2	Variable	Base annual volume of CO_2 available by region	Bcf
CAP_BASE	Variable	Capital to be depreciated	K$
CAPMUL	Input	Capital constraints multiplier	
CATCF	Variable	Cumulative discounted cashflow	K$
CHG_ANNSEC_FAC	Input	Change in annual secondary operating cost	Fraction
CHG_CHMPNT_FAC	Input	Change in chemical handling plant cost	Fraction
CHG_CMP_FAC	Input	Change in compression cost	Fraction
CHG_CO2PNT_FAC	Input	Change in CO_2 injection/recycling plant cost	Fraction
CHG_COMP_FAC	Input	Change in completion cost	Fraction
CHG_DRL_FAC	Input	Change in drilling cost	Fraction
CHG_FAC_FAC	Input	Change in facilities cost	Fraction

CHG_FACUPG_FAC	Input	Change in facilities upgrade cost	Fraction
CHG_FOAM_FAC	Input	Change in fixed annual O & M cost	Fraction
CHG_GNA_FAC	Input	Change in G & A cost	Fraction
CHG_INJC_FAC	Input	Change in injection cost	Fraction
CHG_INJCONV_FAC	Input	Change in injector conversion cost	Fraction
CHG_INJT_FAC	Input	Change in injectant cost	Fraction
CHG_LFT_FAC	Input	Change in lifting cost	Fraction
CHG_OGAS_FAC	Input	Change in natural gas O & M cost	K$
CHG_OINJ_FAC	Input	Change in injection O & M cost	K$
CHG_OOIL_FAC	Input	Change in oil O & M cost	K$
CHG_OWAT_FAC	Input	Change in water O & M cost	K$
CHG_PLYPNT_FAC	Input	Change in polymer handling plant cost	Fraction
CHG_PRDWAT_FAC	Input	Change in produced water handling plant cost	Fraction
CHG_SECWRK_FAC	Input	Change in secondary workover cost	Fraction
CHG_SECCONV_FAC	Input	Change in secondary conversion cost	Fraction
CHG_STM_FAC	Input	Change in stimulation cost	Fraction
CHG_STMGEN_FAC	Input	Change in steam generation and distribution cost	Fraction
CHG_VOAM_FAC	Input	Change in variable O & M cost	Fraction
.CHG_WRK_FAC	Input	Change in workover cost	Fraction
CHM_F	Variable	Cost for a chemical handling plant	K$
CHMA	Input	Chemical handling plant	
CHMB	Input	Chemical handling plant	
CHMK	Input	Chemical handling plant	
CIDC	Input	Capitalize intangible drilling costs	K$
CO2_F	Variable	Cost for a CO_2 recycling/injection plant	K$
CO2_RAT_ FAC	Input	CO_2 injection factor	
CO2AVAIL	Variable	Total CO_2 available in a region across all sources	Bcf/Yr
CO2BASE	Input	Total Volume of CO_2 Available	Bcf/Yr
CO2COST	Variable	Final cost for CO_2	$/Mcf

CO2B	Input	Constant and coefficient for natural CO_2 cost equation	
CO2K	Input	Constant and coefficient for natural CO_2 cost equation	
CO2MUL	Input	CO_2 availability constraint multiplier	
CO2OAM	Variable	CO_2 variable O & M cost	K$
CO2OM_20	Input	The O & M cost for CO_2 injection < 20 MMcf	K$
CO2OM20	Input	The O & M cost for CO_2 injection > 20 MMcf	K$
CO2PR	Input	State/regional multipliers for natural CO_2 cost	
CO2PRICE	Input	CO_2 price	$/Mcf
CO2RK, CO2RB	Input	CO_2 recycling plant cost	K$
CO2ST	Input	State code for natural CO_2 cost	
COI	Input	Capitalize other intangibles	
COMP	Variable	Compressor cost	K$
COMP_OAM	Variable	Compressor O & M cost	K$
COMP_VC	Input	Compressor O & M costs	K$
COMP_W	Variable	Compression cost to bring natural gas up to pipeline pressure	K$
COMYEAR_FAC	Input	Number of years of technology commercialization for the penetration curve	Years
CONTIN_ FAC	Input	Continuity increase factor	
COST_BHP	Input	Compressor Cost	$/Bhp
COTYPE	Variable	CO_2 source, either industrial or natural	
CPI_2003	Variable	CPI conversion for 2003$	
CPI_2005	Variable	CPI conversion for 2005$	
CPI_AVG	Input	Average CPI from 1990 to 2010	
CPI_FACTOR	Input	CPI factor from 1990 to 2010	
CPI_YEAR	Input	Year for CPI index	
CREDAMT	Input	Flag that allows AMT to be credited in future years	
CREGPR	Input	The CO_2 price by region and source	$/Mcf
CST_ANNSEC_ FAC	Input	Well level cost to apply secondary producer technology	K$
CST_ANNSEC_CSTP	Variable	Project level cost to apply secondary producer technology	K$

CST_CMP_CSTP	Variable	Project level cost to apply compression technology	K$
CST_CMP_FAC	Input	Well level cost to apply compression technology	K$
CST_COMP_ FAC	Input	Well level cost to apply completion technology	K$
CST_COMP_CSTP	Variable	Project level cost to apply completion technology	K$
CST_DRL_ FAC	Input	Well level cost to apply drilling technology	K$
CST_DRL_CSTP	Variable	Project level cost to apply drilling technology	K$
CST_FAC_ FAC	Input	Well level cost to apply facilities technology	K$
CST_FAC_CSTP	Variable	Project level cost to apply facilities technology	K$
CST_FACUPG_ FAC	Input	Well level cost to apply facilities upgrade technology	K$
CST_FACUPG_CSTP	Variable	Project level cost to apply facilities upgrade technology	K$
CST_FOAM_ FAC	Input	Well level cost to apply fixed annual O & M technology	K$
CST_FOAM_CSTP	Variable	Project level cost to apply fixed annual O & M technology	K$
CST_GNA_ FAC	Input	Well level cost to apply G & A technology	K$
CST_GNA_CSTP	Variable	Project level cost to apply G & A technology	K$
CST_INJC_ FAC	Input	Well level cost to apply injection technology	K$
CST_INJC_CSTP	Variable	Project level cost to apply injection technology	K$
CST_INJCONV_ FAC	Input	Well level cost to apply injector conversion technology	K$
CST_INJCONV_CSTP	Variable	Project level cost to apply injector conversion technology	K$
CST_LFT_ FAC	Input	Well level cost to apply lifting technology	K$
CST_LFT_CSTP	Variable	Project level cost to apply lifting technology	K$
CST_SECCONV_ FAC	Input	Well level cost to apply secondary conversion technology	K$

CST_SECCONV_CSTP	Variable	Project level cost to apply secondary conversion technology	K$
CST_SECWRK_ FAC	Input	Well level cost to apply secondary workover technology	K$
CST_SECWRK_CSTP	Variable	Project level cost to apply secondary workover technology	K$
CST_STM_ FAC	Input	Well level cost to apply stimulation technology	K$
CST_STM_CSTP	Variable	Project level cost to apply stimulation technology	K$
CST_VOAM_ FAC	Input	Well level cost to apply variable annual O & M technology	K$
CST_VOAM_CSTP	Variable	Project level cost to apply variable annual O & M technology	K$
CST_WRK_ FAC	Input	Well level cost to apply workover technology	K$
CST_WRK_CSTP	Variable	Project level cost to apply workover technology	K$
CSTP_ANNSEC_ FAC	Input	Project level cost to apply secondary producer technology	K$
CSTP_CMP_ FAC	Input	Project level cost to apply compression technology	K$
CSTP_COMP_ FAC	Input	Project level cost to apply completion technology	K$
CSTP_DRL_ FAC	Input	Project level cost to apply drilling technology	K$
CSTP_FAC_ FAC	Input	Project level cost to apply facilities technology	K$
CSTP_FACUPG_ FAC	Input	Project level cost to apply facilities upgrade technology	K$
CSTP_FOAM_ FAC	Input	Project level cost to apply fixed annual O & M technology	K$
CSTP_GNA_ FAC	Input	Project level cost to apply G & A technology	K$
CSTP_INJC_ FAC	Input	Project level cost to apply injection technology	K$
CSTP_INJCONV_ FAC	Input	Project level cost to apply injector conversion technology	K$
CSTP_LFT_ FAC	Input	Project level cost to apply lifting technology	K$

CSTP_SECCONV_ FAC	Input	Project level cost to apply secondary conversion technology	K$
CSTP_SECWRK_ FAC	Input	Project level cost to apply secondary workover technology	K$
CSTP_STM_ FAC	Input	Project level cost to apply stimulation technology	K$
CSTP_VOAM_ FAC	Input	Project level cost to apply variable annual O & M technology	K$
CSTP_WRK_ FAC	Input	Project level cost to apply workover technology	K$
CUTOIL	Input	Base crude oil price for the adjustment term of price normalization	$/Bbl
DATCF	Variable	Discounted cashflow after taxes	K$
DEP_CRD	Variable	Depletion credit	K$
DEPLET	Variable	Depletion allowance	K$
DEPR	Variable	Depreciation amount	K$
DEPR_OVR	Input	Annual fraction to depreciate	
DEPR_PROC	Input	Process number for override schedule	
DEPR_YR	Input	Number of years for override schedule	
DEPRSCHL	Input	Annual Fraction Depreciated	Fraction
DEPR_SCH	Variable	Process specific depreciation schedule	Years
DGGLA	Variable	Depletion base (G & G and lease acquisition cost)	K$
DISC_DRL	Variable	Discounted drilling cost	K$
DISC_FED	Variable	Discounted federal tax payments	K$
DISC_GAS	Variable	Discounted revenue from natural gas sales	K$
DISC_INV	Variable	Discounted investment rate	K$
DISC_NDRL	Variable	Discounted project facilities costs	K$
DISC_OAM	Variable	Discounted O & M cost	K$
DISC_OIL	Variable	Discounted revenue from crude oil sales	K$
DISC_ROY	Variable	Discounted royalty	K$
DISC_ST	Variable	Discounted state tax rate	K$
DISCLAG	Input	Number of years between discovery and first production	
DISCOUNT_RT	Input	Process discount rates	Percent

DRCAP_D	Variable	Regional dual use drilling footage for crude oil and natural gas development	Ft
DRCAP_G	Variable	Regional natural gas well drilling footage constraints	Ft
DRCAP_O	Variable	Regional crude oil well drilling footage constraints	Ft
DRILL_FAC	Input	Drilling rate factor	
DRILL_OVER	Input	Drilling constraints available for footage over run	%
DRILL_RES	Input	Development drilling constraints available for transfer between crude oil and natural gas	%
DRILL_TRANS	Input	Drilling constraints transfer between regions	%
DRILLCST	Variable	Drill cost by project	K$
DRILLL48	Variable	Successful well drilling costs	1987$ per well
DRL_CST	Variable	Drilling cost	K$
DRY_CST	Variable	Dryhole drilling cost	K$
DRY_DWCA	Estimated	Dryhole well cost	K$
DRY_DWCB	Estimated	Dryhole well cost	K$
DRY_DWCC	Estimated	Dryhole well cost	K$
DRY_DWCD	Input	Maximum depth range for dry well drilling cost equations	Ft
DRY_DWCK	Estimated	Constant for dryhole drilling cost equation	
DRY_DWCM	Input	Minimum depth range for dry well drilling equations	Ft
DRY_W	Variable	Cost to drill a dry well	K$
DRYCST	Variable	Dryhole cost by project	K$
DRYL48	Variable	Dry well drilling costs	1987$ per well
DRYWELLL48	Variable	Dry Lower 48 onshore wells drilled	Wells
DWC_W	Variable	Cost to drill and complete a crude oil well	K$
EADGGLA	Variable	G&G and lease acquisition cost depletion	K$
EADJGROSS	Variable	Adjusted revenue	K$
EAMINT	Variable	Alternative minimum tax	K$
EAMOR	Variable	Amortization	K$
EAOAM	Variable	Fixed annual operating cost	K$
EATCF	Variable	After tax cash flow	K$
ECAP_BASE	Variable	Depreciable/capitalized base	K$

ECATCF	Variable	Cumulative discounted after tax cashflow	K$
ECO2CODE	Variable	CO_2 source code	
ECO2COST	Variable	CO_2 cost	K$
ECO2INJ	Variable	Economic CO_2 injection	Bcf/Yr
ECO2LIM	Variable	Source specific project life for CO_2 EOR projects	
ECO2POL	Variable	Injected CO_2	MMcf
ECO2RANKVAL	Variable	Source specific ranking value for CO_2 EOR projects	
ECO2RCY	Variable	CO_2 recycled	Bcf/Yr
ECOMP	Variable	Compressor tangible capital	K$
EDATCF	Variable	Discounted after tax cashflow	K$
EDEP_CRD	Variable	Adjustment to depreciation base for federal tax credits	K$
EDEPGGLA	Variable	Depletable G & G/lease cost	K$
EDEPLET	Variable	Depletion	K$
EDEPR	Variable	Depreciation	K$
EDGGLA	Variable	Depletion base	K$
EDRYHOLE	Variable	Number of dryholes drilled	
EEC	Input	Expensed environmental costs	K$
EEGGLA	Variable	Expensed G & G and lease acquisition cost	K$
EEORTCA	Variable	Tax credit addback	K$
EEXIST_ECAP	Variable	Environmental existing capital	K$
EEXIST_EOAM	Variable	Environmental existing O & M costs	K$
EFEDCR	Variable	Federal tax credits	K$
EFEDROY	Variable	Federal royalty	K$
EFEDTAX	Variable	Federal tax	K$
EFOAM	Variable	CO_2 FOAM cost	K$
EGACAP	Variable	G & A capitalized	K$
EGAEXP	Variable	G & A expensed	K$
EGASPRICE2	Variable	Natural gas price used in the economics	K$
EGG	Variable	Expensed G & G cost	K$
EGGLA	Variable	Expensed G & G and lease acquisition cost	K$
EGGLAADD	Variable	G & G/lease addback	K$
EGRAVADJ	Variable	Gravity adjustment	K$
EGREMRES	Variable	Remaining proven natural gas reserves	Bcf
EGROSSREV	Variable	Gross revenues	K$
EIA	Variable	Environmental intangible addback	K$

EICAP	Variable	Environmental intangible capital	
EICAP2	Variable	Environmental intangible capital	
EIGEN	Variable	Number of steam generators	
EIGREMRES	Variable	Remaining inferred natural gas reserves	Bcf
EII	Variable	Intangible investment	K$
EIIDRL	Variable	Intangible investment drilling	K$
EINJCOST	Variable	CO_2/Polymer cost	K$
EINJDR	Variable	New injection wells drilled per year	
EINJWELL	Variable	Active injection wells per year	
EINTADD	Variable	Intangible addback	K$
EINTCAP	Variable	Tangible investment drilling	K$
EINVEFF	Variable	Investment efficiency	
EIREMRES	Variable	Remaining inferred crude oil reserves	MMBbl
EITC	Input	Environmental intangible tax credit	K$
EITCAB	Input	Environmental intangible tax credit rate addback	%
EITCR	Input	Environmental intangible tax credit rate	K$
ELA	Variable	Lease and acquisition cost	K$
ELYRGAS	Variable	Last year of historical natural gas production	MMcf
ELYROIL	Variable	Last year of historical crude oil production	MBbl
ENETREV	Variable	Net revenues	K$
ENEW_ECAP	Variable	Environmental new capital	K$
ENEW_EOAM	Variable	Environmental new O & M costs	K$
ENIAT	Variable	Net income after taxes	K$
ENIBT	Variable	Net income before taxes	K$
ENPV	Variable	Net present value	K$
ENV_FAC	Input	Environmental capital cost multiplier	
ENVOP_FAC	Input	Environmental operating cost multiplier	
ENVSCN	Input	Include environmental costs?	
ENYRSI	Variable	Number of years project is economic	
EOAM	Variable	Variable operating and maintenance	K$

EOCA	Variable	Environmental operating cost addback	K$
EOCTC	Input	Environmental operating cost tax credit	K$
EOCTCAB	Input	Environmental operating cost tax credit rate addback	%
EOCTCR	Input	Environmental operating cost tax credit rate	K$
EOILPRICE2	Variable	Crude oil price used in the economics	K$
EORTC	Input	EOR tax credit	K$
EORTCA	Variable	EOR tax credit addback	K$
EORTCAB	Input	EOR tax credit rate addback	%
EORTCP	Input	EOR tax credit phase out crude oil price	K$
EORTCR	Input	EOR tax credit rate	K$
EORTCRP	Input	EOR tax credit applied by year	%
EOTC	Variable	Other tangible capital	K$
EPROC_OAM	Variable	Natural gas processing cost	K$
EPRODDR	Variable	New production wells drilled per year	
EPRODGAS	Variable	Economic natural gas production	MMcf
EPRODOIL	Variable	Economic crude oil production	MBbl
EPRODWAT	Variable	Economic water production	MBbl
EPRODWELL	Variable	Active producing wells per year	
EREMRES	Variable	Remaining proven crude oil reserves	MMBbl
EROR	Variable	Rate of return	
EROY	Variable	Royalty	K$
ESEV	Variable	Severance tax	K$
ESHUTIN	Variable	New shut in wells drilled per year	
ESTIM	Variable	Stimulation cost	K$
ESTTAX	Variable	State tax	K$
ESUMP	Variable	Number of patterns	
ESURFVOL	Variable	Total volume injected	MMcf/ MBbl/ MLbs
ETAXINC	Variable	Net income before taxes	K$
ETCADD	Variable	Tax credit addbacks taken from NIAT	K$
ETCI	Variable	Federal tax credit	K$
ETCIADJ	Variable	Adjustment for federal tax credit	K$

ETI	Variable	Tangible investments	K$
ETOC	Variable	Total operating cost	K$
ETORECY	Variable	CO_2/Surf/Steam recycling volume	Bcf/MBbl/Yr
ETORECY_CST	Variable	CO_2/Surf/Steam recycling cost	Bcf/MBbl/Yr
ETTC	Input	Environmental tangible tax credit	K$
ETTCAB	Input	Environmental tangible tax credit rate addback	%
ETTCR	Input	Environmental tangible tax credit rate	K$
EWATINJ	Variable	Economic water injected	MBbl
EX_CONRES	Variable	Number of exploration reservoirs	
EX_FCRES	Variable	First exploration reservoir	
EXIST_ECAP	Variable	Existing environmental capital cost	K$
EXIST_EOAM	Variable	Existing environmental O & M cost	K$
EXP_ADJ	Input	Fraction of annual crude oil exploration drilling which is made available	Fraction
EXP_ADJG	Input	Fraction of annual natural gas exploration drilling which is made available	Fraction
EXPA0	Estimated	Crude oil exploration well footage A0	
EXPA1	Estimated	Crude oil exploration well footage A1	
EXPAG0	Input	Natural gas exploration well footage A0	
EXPAG1	Input	Natural gas exploration well footage A1	
EXPATN	Variable	Number of active patterns	
EXPCDRCAP	Variable	Regional conventional exploratory drilling footage constraints	Ft
EXPCDRCAPG	Variable	Regional conventional natural gas exploration drilling footage constraint	Ft
EXPGG	Variable	Expensed G & G cost	K$
EXPL_FRAC	Input	Exploration drilling for conventional crude oil	%
EXPL_FRACG	Input	Exploration drilling for conventional natural gas	%

EXPL_MODEL	Input	Selection of exploration models	
EXPLA	Variable	Expensed lease purchase costs	K$
EXPLR_ FAC	Input	Exploration factor	
EXPLR_CHG	Variable	Change in exploration rate	
EXPLSORTIRES	Variable	Sort pointer for exploration	
EXPMUL	Input	Exploration constraint multiplier	
EXPRDL48	Variable	Expected Production	Oil-MMB Gas-BCF
EXPUDRCAP	Variable	Regional continuous exploratory drilling footage constraints	Ft
EXPUDRCAPG	Variable	Regional continuous natural gas exploratory drilling footage constraints	Ft
FAC_W	Variable	Facilities upgrade cost	K$
FACCOST	Variable	Facilities cost	K$
FACGA	Estimated	Natural gas facilities costs	
FACGB	Estimated	Natural gas facilities costs	
FACGC	Estimated	Natural gas facilities costs	
FACGD	Input	Maximum depth range for natural gas facilities costs	Ft
FACGK	Estimated	Constant for natural gas facilities costs	
FACGM	Input	Minimum depth range for natural gas facilities costs	Ft
FACUPA	Estimated	Facilities upgrade cost	
FACUPB	Estimated	Facilities upgrade cost	
FACUPC	Estimated	Facilities upgrade cost	
FACUPD	Input	Maximum depth range for facilities upgrade cost	Ft
FACUPK	Estimated	Constant for facilities upgrade costs	
FACUPM	Input	Minimum depth range for facilities upgrade cost	Ft
FCO2	Variable	Cost multiplier for natural CO_2	
FEDRATE	Input	Federal income tax rate	Percent
FEDTAX	Variable	Federal tax	K$
FEDTAX_CR	Variable	Federal tax credits	K$
FIRST_ASR	Variable	First year a decline reservoir will be considered for ASR	
FIRST_DEC	Variable	First year a decline reservoir will be considered for EOR	

FIRSTCOM_FAC	Input	First year of commercialization for technology on the penetration curve	
FIT	Variable	Federal income tax	K$
FOAM	Variable	CO_2 fixed O & M cost	K$
FOAMG_1	Variable	Fixed annual operating cost for natural gas 1	K$
FOAMG_2	Variable	Fixed annual operating cost for natural gas 2	K$
FOAMG_W	Variable	Fixed operating cost for natural gas wells	K$
FGASPRICE	Input	Fixed natural gas price	$/MCF
FOILPRICE	Input	Fixed crude oil price	$/BBL
FPLY	Variable	Cost multiplier for polymer	
FPRICE	Input	Selection to use fixed prices	
FR1L48	Variable	Finding rates for new field wildcat drilling	Oil-MMB per well Gas-BCF per well
FR2L48	Variable	Finding rates for other exploratory drilling	Oil-MMB per well Gas-BCF per well
FR3L48	Variable	Finding rates for developmental drilling	Oil-MMB per well Gas-BCF per well
FRAC_CO2	Variable	Fraction of CO_2	Fraction
FRAC_H2S	Variable	Fraction of hydrogen sulfide	Fraction
FRAC_N2	Variable	Fraction of nitrogen	Fraction
FRAC_NGL	Variable	NGL yield	Fraction
FWC_W	Variable	Natural gas facilities costs	K$
GA_CAP	Variable	G & A on capital	K$
GA_EXP	Variable	G & A on expenses	K$
GAS_ADJ	Input	Fraction of annual natural gas drilling which is made available	Fraction
GAS_CASE	Input	Filter for all natural gas processes	
GAS_DWCA	Estimated	Horizontal natural gas drilling and completion costs	
GAS_DWCB	Estimated	Horizontal natural gas drilling and completion costs	
GAS_DWCC	Estimated	Horizontal natural gas drilling and completion costs	

GAS_DWCD	Input	Maximum depth range for natural gas well drilling cost equations	Ft
GAS_DWCK	Estimated	Constant for natural gas well drilling cost equations	
GAS_DWCM	Input	Minimum depth range for natural gas well drilling cost equations	Ft
GAS_FILTER	Input	Filter for all natural gas processes	
GAS_OAM	Input	Process specific operating cost for natural gas production	$/Mcf
GAS_SALES	Input	Will produced natural gas be sold?	
GASA0	Estimated	Natural gas footage A0	
GASA1	Estimated	Natural gas footage A1	
GASD0	Input	Natural gas drywell footage A0	
GASD1	Input	Natural gas drywell footage A1	
GASPRICE2	Variable	Natural gas price dummy to shift price track	K$
GASPRICEC	Variable	Annual natural gas prices used by cashflow	K$
GASPRICED	Variable	Annual natural gas prices used in the drilling constraints	K$
GASPRICEO	Variable	Annual natural gas prices used by the model	K$
GASPROD	Variable	Annual natural gas production	MMcf
GG	Variable	G & G cost	K$
GG_FAC	Input	G & G factor	
GGCTC	Input	G & G tangible depleted tax credit	K$
GGCTCAB	Input	G & G tangible tax credit rate addback	%
GGCTCR	Input	G & G tangible depleted tax credit rate	K$
GGETC	Input	G & G intangible depleted tax credit	K$
GGETCAB	Input	G & G intangible tax credit rate addback	%
GGETCR	Input	G & G intangible depleted tax credit rate	K$
GGLA	Variable	G & G and lease acquisition addback	K$
GMULT_INT	Input	Natural gas price adjustment factor, intangible costs	K$

GMULT_OAM	Input	Natural gas price adjustment factor, O & M	K$
GMULT_TANG	Input	Natural gas price adjustment factor, tangible costs	K$
GNA_CAP2	Input	G & A capital multiplier	Fraction
GNA_EXP2	Input	G & A expense multiplier	Fraction
GPROD	Variable	Well level natural gas production	MMcf
GRAVPEN	Variable	Gravity penalty	K$
GREMRES	Variable	Remaining proven natural gas reserves	MMcf
GROSS_REV	Variable	Gross revenue	K$
H_GROWTH	Input	Horizontal growth rate	Percent
H_PERCENT	Input	Crude oil constraint available for horizontal drilling	%
H_SUCCESS	Input	Horizontal development well success rate by region	%
H2SPRICE	Input	H_2S price	$/Metric ton
HOR_ADJ	Input	Fraction of annual horizontal drilling which is made available	Fraction
HOR_VERT	Input	Split between horizontal and vertical drilling	
HORMUL	Input	Horizontal drilling constraint multiplier	
IAMORYR	Input	Number of years in default amortization schedule	
ICAP	Variable	Other intangible costs	K$
ICST	Variable	Intangible cost	K$
IDCA	Variable	Intangible drilling capital addback	K$
IDCTC	Input	Intangible drilling cost tax credit	K$
IDCTCAB	Input	Intangible drilling cost tax credit rate addback	%
IDCTCR	Input	Intangible drilling cost tax credit rate	K$
IDEPRYR	Input	Number of years in default depreciation schedule	
IGREMRES	Variable	Remaining inferred natural gas reserves	MMcf
II_DRL	Variable	Intangible drilling cost	K$
IINFARSV	Variable	Initial inferred AD gas reserves	Bcf
IINFRESV	Variable	Initial inferred reserves	MMBbl
IMP_CAPCR	Input	Capacity for NGL cryogenic expander plant	MMCf/D

IMP_CAPST	Input	Capacity for NGL straight refrigeration	MMCf/D
IMP_CAPSU	Input	Capacity for Claus Sulfur Recovery	Long ton/day
IMP_CAPTE	Input	Natural gas processing plant capacity	MMcf/D
IMP_CO2_LIM	Input	Limit on CO_2 in natural gas	Fraction
IMP_DIS_RATE	Input	Discount rate for natural gas processing plant	
IMP_H2O_LIM	Input	Limit on H_2O in natural gas	Fraction
IMP_H2S_LIM	Input	Limit on H_2S in natural gas	Fraction
IMP_N2_LIM	Input	Limit on N^2 in natural gas	Fraction
IMP_NGL_LIM	Input	Limit on NGL in natural gas	Fraction
IMP_OP_FAC	Input	Natural gas processing operating factor	
IMP_PLT_LFE	Input	Natural gas processing plant life	Years
IMP_THRU	Input	Throughput	
IND_SRCCO2	Input	Use industrial source of CO_2?	
INDUSTRIAL	Variable	Natural or industrial CO_2 source	
INFLFAC	Input	Annual Inflation Factor	
INFR_ADG	Input	Adjustment factor for inferred AD gas reserves	Tcf
INFR_CBM	Input	Adjustment factor for inferred coalbed methane reserves	Tcf
INFR_DNAG	Input	Adjustment factor for inferred deep non-associated gas reserves	Tcf
INFR_OIL	Input	Adjustment factor for inferred crude oil reserves	Bbl?
INFR_SHL	Input	Adjustment factor for inferred shale gas reserves	Tcf
INFR_SNAG	Input	Adjustment factor for inferred shallow non-associated gas reserves	Tcf
INFR_THT	Input	Adjustment factor for inferred tight gas reserves	Tcf
INFARSV	Variable	Inferred AD gas reserves	Bcf
INFRESV	Variable	Inferred reserves, crude oil or natural gas	MMBbl, Bcf
INJ	Variable	Injectant cost	K$
INJ_OAM	Input	Process specific operating cost for injection	$/Bbl
INJ_RATE_FAC	Input	Injection rate increase	fraction
INTADD	Variable	Total intangible addback	K$
INTANG_M	Variable	Intangible cost multiplier	

INTCAP	Variable	Intangible to be capitalized	K$
INVCAP	Variable	Annual total capital investments constraints, used for constraining projects	MM$
IPDR	Input	Independent producer depletion rate	
IRA	Input	Max alternate minimum tax reduction for independents	K$
IREMRES	Variable	Remaining inferred crude oil reserves	MBbl
IUNDARES	Variable	Initial undiscovered resource	MMBbl/Tcf
IUNDRES	Variable	Initial undiscovered resource	MMBbl/Tcf
L48B4YR	Input	First year of analysis	
LA	Variable	Lease and acquisition cost	K$
LACTC	Input	Lease acquisition tangible depleted tax credit	K$
LACTCAB	Input	Lease acquisition tangible credit rate addback	%
LACTCR	Input	Lease acquisition tangible depleted tax credit rate	K$
LAETC	Input	Lease acquisition intangible expensed tax credit	K$
LAETCAB	Input	Lease acquisition intangible tax credit rate addback	%
LAETCR	Input	Lease acquisition intangible expensed tax credit rate	K$
LAST_ASR	Variable	Last year a decline reservoir will be considered for ASR	
LAST_DEC	Variable	Last year a decline reservoir will be considered for EOR	
LBC_FRAC	Input	Lease bonus fraction	Fraction
LEASCST	Variable	Lease cost by project	K$
LEASL48	Variable	Lease equipment costs	1987$/well
MARK_PEN_FAC	Input	Ultimate market penetration	
MAXWELL	Input	Maximum number of dryholes per play per year	
MAX_API_CASE	Input	Maximum API gravity	
MAX_DEPTH_CASE	Input	Maximum depth	
MAX_PERM_CASE	Input	Maximum permeability	
MAX_RATE_CASE	Input	Maximum production rate	
MIN_API_CASE	Input	Minimum API gravity	
MIN_DEPTH_CASE	Input	Minimum depth	
MIN_PERM_CASE	Input	Minimum permeability	
MIN_RATE_CASE	Input	Minimum production rate	
MOB_RAT_ FAC	Input	Change in mobility ratio	
MPRD	Input	Maximum depth range for new producer equations	Ft

N_CPI	Input	Number of years	
N2PRICE	Input	N_2 price	$/Mcf
NAT_AVAILCO2	Input	Annual CO_2 availability by region	Bcf
NAT_DMDGAS	Variable	Annual natural gas demand in region	Bcf/Yr
NAT_DRCAP_D	Variable	National dual use drilling footage for crude oil and natural gas development	Ft
NAT_DRCAP_G	Variable	National natural gas well drilling footage constraints	Ft
NAT_DRCAP_O	Variable	National crude oil well drilling footage constraints	Ft
NAT_DUAL	Variable	National dual use drilling footage for crude oil and natural gas development	Ft
NAT_EXP	Variable	National exploratory drilling constraint	Bcf/Yr
NAT_EXPC	Variable	National conventional exploratory drilling crude oil constraint	MBbl/Yr
NAT_EXPCDRCAP	Variable	National conventional exploratory drilling footage constraints	Ft
NAT_EXPCDRCAPG	Variable	National high-permeability natural gas exploratory drilling footage constraints	Ft
NAT_EXPCG	Variable	National conventional exploratory drilling natural gas constraint	Bcf/Yr
NAT_EXPG	Variable	National natural gas exploration drilling constraint	Bcf/Yr
NAT_EXPU	Variable	National continuous exploratory drilling crude oil constraint	MBbl/Yr
NAT_EXPUDRCAP	Variable	National continuous exploratory drilling footage constraints	Ft
NAT_EXPUDRCAPG	Variable	National continuous natural gas exploratory drilling footage constraints	Ft
NAT_EXPUG	Variable	National continuous exploratory drilling natural gas constraint	Bcf/Yr
NAT_GAS	Variable	National natural gas drilling constraint	Bcf/Yr
NAT_GDR	Variable	National natural gas dry drilling footage	Bcf/Yr

NAT_HGAS	Variable	Annual dry natural gas	MMcf
NAT_HOIL	Variable	Annual crude oil and lease condensates	MBbl
NAT_HOR	Variable	Horizontal drilling constraint	MBbl/Yr
NAT_INVCAP	Input	Annual total capital investment constraint	MM$
NAT_ODR	Variable	National crude oil dry drilling footage	MBbl/Yr
NAT_OIL	Variable	National crude oil drilling constraint	MBbl/Yr
NAT_SRCCO2	Input	Use natural source of CO_2?	
NAT_TOT	Variable	Total national footage	Ft
NET_REV	Variable	Net revenue	K$
NEW_ECAP	Variable	New environmental capital cost	K$
NEW_EOAM	Variable	New environmental O & M cost	K$
NEW_NRES	Variable	New total number of reservoirs	
NGLPRICE	Input	NGL price	$/Gal
NGLPROD	Variable	Annual NGL production	MBbl
NIAT	Variable	Net income after taxes	K$
NIBT	Variable	Net income before taxes	K$
NIBTA	Variable	Net operating income after adjustments before addback	K$
NIL	Input	Net income limitations	K$
NILB	Variable	Net income depletable base	K$
NILL	Input	Net income limitation limit	K$
NOI	Variable	Net operating income	K$
NOM_YEAR	Input	Year for nominal dollars	
NPR_W	Variable	Cost to equip a new producer	K$
NPRA	Estimated	Constant for new producer equipment	
NPRB	Estimated	Constant for new producer equipment	
NPRC	Estimated	Constant for new producer equipment	
NPRK	Estimated	Constant for new producer equipment	
NPRM	Input	Minimum depth range for new producer equations	Ft
NPROD	Variable	Well level NGL production	MMcf
NRDL48	Variable	Proved reserves added by new field discoveries	Oil-MMB Gas-BCF
NREG	Input	Number of regions	

NSHUT	Input	Number of years after economics life in which EOR can be considered	
NTECH	Input	Number of technology impacts	
NUMPACK	Input	Number of packages per play per year	
NWELL	Input	Number of wells in continuous exploration drilling package	
OAM	Variable	Variable O & M cost	K$
OAM_COMP	Variable	Compression O & M	K$
OAM_M	Variable	O & M cost multiplier	
OIA	Variable	Other intangible capital addback	K$
OIL_ADJ	Input	Fraction of annual crude oil drilling which is made available	Fraction
OIL_CASE	Input	Filter for all crude oil processes	
OIL_DWCA	Estimated	Constant for crude oil well drilling cost equations	
OIL_DWCB	Estimated	Constant for crude oil well drilling cost equations	
OIL_DWCC	Estimated	Constant for crude oil well drilling cost equations	
OIL_DWCD	Input	Maximum depth range for crude oil well drilling cost equations	Ft
OIL_DWCK	Estimated	Constant for crude oil well drilling cost equations	
OIL_DWCM	Input	Minimum depth range for crude oil well drilling cost equations	Ft
OIL_FILTER	Input	Filter for all crude oil processes	
OIL_OAM	Input	Process specific operating cost for crude oil production	$/Bbl
OIL_RAT_ FAC	Input	Change in crude oil production rate	
OIL_RAT_CHG	Variable	Change in crude oil production rate	
OIL_SALES	Input	Sell crude oil produced from the reservoir?	
OILA0	Estimated	Oil footage A0	
OILA1	Estimated	Oil footage A1	

OILCO2	Input	Fixed crude oil price used for economic pre-screening of industrial CO_2 projects	K$
OILD0	Input	Crude oil drywell footage A0	
OILD1	Input	Crude oil drywell footage A1	
OILPRICEC	Variable	Annual crude oil prices used by cashflow	K$
OILPRICED	Variable	Annual crude oil prices used in the drilling constraints	K$
OILPRICEO	Variable	Annual crude oil prices used by the model	K$
OILPROD	Variable	Annual crude oil production	MBbl
OINJ	Variable	Well level injection	MMcf
OITC	Input	Other intangible tax credit	K$
OITCAB	Input	Other intangible tax credit rate addback	%
OITCR	Input	Other intangible tax credit rate	K$
OMGA	Estimated	Fixed annual cost for natural gas	$/Well
OMGB	Estimated	Fixed annual cost for natural gas	$/Well
OMGC	Estimated	Fixed annual cost for natural gas	$/Well
OMGD	Input	Maximum depth range for fixed annual O & M natural gas cost	Ft
OMGK	Estimated	Constant for fixed annual O & M cost for natural gas	
OMGM	Input	Minimum depth range for fixed annual O & M cost for natural gas	Ft
OML_W	Variable	Variable annual operating cost for lifting	K$
OMLA	Estimated	Lifting cost	$/Well
OMLB	Estimated	Lifting cost	$/Well
OMLC	Estimated	Lifting cost	$/Well
OMLD	Input	Maximum depth range for fixed annual operating cost for crude oil	Ft
OMLK	Estimated	Constant for fixed annual operating cost for crude oil	
OMLM	Input	Minimum depth range for annual operating cost for crude oil	Ft
OMO_W	Variable	Fixed annual operating cost for crude oil	K$

OMOA	Estimated	Fixed annual cost for crude oil	$/Well
OMOB	Estimated	Fixed annual cost for crude oil	$/Well
OMOC	Estimated	Fixed annual cost for crude oil	$/Well
OMOD	Input	Maximum depth range for fixed annual operating cost for crude oil	Ft
OMOK	Estimated	Constant for fixed annual operating cost for crude oil	
OMOM	Input	Minimum depth range for fixed annual operating cost for crude oil	Ft
OMSWRA	Estimated	Secondary workover cost	$/Well
OMSWRB	Estimated	Secondary workover cost	$/Well
OMSWRC	Estimated	Secondary workover cost	$/Well
OMSWRD	Input	Maximum depth range for variable operating cost for secondary workover	Ft
OMSWRK	Estimated	Constant for variable operating cost for secondary workover	
OMSWRM	Input	Minimum depth range for variable operating cost for secondary workover	Ft
OMULT_INT	Input	Crude oil price adjustment factor, intangible costs	
OMULT_OAM	Input	Crude oil price adjustment factor, O & M	
OMULT_TANG	Input	Crude oil price adjustment factor, tangible costs	
OPCOST	Variable	AOAM by project	K$
OPERL48	Variable	Operating Costs	1987$/Well
OPINJ_W	Variable	Variable annual operating cost for injection	K$
OPINJA	Input	Injection cost	$/Well
OPINJB	Input	Injection cost	$/Well
OPINJC	Input	Injection cost	$/Well
OPINJD	Input	Maximum depth range for variable annual operating cost for injection	Ft
OPINJK	Input	Constant for variable annual operating cost for injection	
OPINJM	Input	Minimum depth range for variable annual operating cost for injection	Ft

OPROD	Variable	Well level crude oil production	MBbl
OPSEC_W	Variable	Fixed annual operating cost for secondary operations	K$
OPSECA	Estimated	Annual cost for secondary production	$/Well
OPSECB	Estimated	Annual cost for secondary production	$/Well
OPSECC	Estimated	Annual cost for secondary production	$/Well
OPSECD	Input	Maximum depth range for fixed annual operating cost for secondary operations	Ft
OPSECK	Estimated	Constant for fixed annual operating cost for secondary operations	
OPSECM	Input	Minimum depth range for fixed annual operating cost for secondary operations	Ft
OPT_RPT	Input	Report printing options	
ORECY	Variable	Well level recycled injectant	MBbl
OTC	Variable	Other tangible costs	K$
PATT_DEV	Input	Pattern development	
PATT_DEV_MAX	Input	Maximum pattern development schedule	
PATT_DEV_MIN	Input	Minimum pattern development schedule	
PATDEV	Variable	Annual number of patterns developed for base and advanced technology	
PATN	Variable	Patterns initiated each year	
PATNDCF	Variable	DCF by project	K$
PATTERNS	Variable	Shifted patterns initiated	
PAYCONT_ FAC	Input	Pay continuity factor	
PDR	Input	Percent depletion rate	%
PGGC	Input	Percent of G & G depleted	%
PIIC	Input	Intangible investment to capitalize	%
PLAC	Input	Percent of lease acquisition cost capitalized	%
PLAYNUM	Input	Play number	
PLY_F	Variable	Cost for a polymer handling plant	K$
PLYPA	Input	Polymer handling plant constant	
PLYPK	Input	Polymer handling plant constant	

POLY	Input	Polymer cost	
POLYCOST	Variable	Polymer cost	$/Lb
POTENTIAL	Variable	The number of reservoirs in the resource file	
PRICEYR	Input	First year of prices in price track	K$
PRO_REGEXP	Input	Regional exploration well drilling footage constraint	Ft
PRO_REGEXPG	Input	Regional exploration well drilling footage constraint	Ft
PRO_REGGAS	Input	Regional natural gas well drilling footage constraint	Ft
PRO_REGOIL	Input	Regional crude oil well drilling footage constraint	Ft
PROB_IMP_FAC	Input	Probability of industrial implementation	
PROB_RD_FAC	Input	Probability of successful R & D	
PROC_CST	Variable	Processing cost	$/Mcf
PROC_OAM	Variable	Processing and treating cost	K$
PROCESS_CASE	Input	Filter for crude oil and natural gas processes	
PROCESS_FILTER	Input	Filter for crude oil and natural gas processes	
PROD_IND_ FAC	Input	Production impact	
PROVACC	Input	Year file for resource access	
PROVNUM	Input	Province number	
PRRATL48	Variable	Production to reserves ratio	Fraction
PSHUT	Input	Number of years prior to economic life in which EOR can be considered	
PSI_W	Variable	Cost to convert a primary well to an injection well	K$
PSIA	Estimated	Cost to convert a producer to an injector	
PSIB	Estimated	Cost to convert a producer to an injector	
PSIC	Estimated	Cost to convert a producer to an injector	
PSID	Input	Maximum depth range for producer to injector	Ft
PSIK	Estimated	Constant for producer to injector	
PSIM	Input	Minimum depth range for producer to injector	Ft
PSW_W	Variable	Cost to convert a primary to secondary well	K$

PSWA	Estimated	Cost to convert a primary to secondary well	
PSWB	Estimated	Cost to convert a primary to secondary well	
PSWC	Estimated	Cost to convert a primary to secondary well	
PSWD	Input	Maximum depth range for producer to injector	Ft
PSWK	Estimated	Constant for primary to secondary	
PSWM	Input	Minimum depth range for producer to injector	Ft
PWHP	Input	Produced water handling plant multiplier	K$
PWP_F	Variable	Cost for a produced water handling plant	K$
RDEPTH	Variable	Reservoir depth	ft
RDR	Input	Depth interval	
RDR_FOOTAGE	Variable	Footage available in this interval	Ft
RDR_FT	Variable	Running total of footage used in this bin	Ft
REC_EFF_ FAC	Input	Recovery efficiency factor	
RECY_OIL	Input	Produced water recycling cost	K$
RECY_WAT	Input	Produced water recycling cost	
REG_DUAL	Variable	Regional dual use drilling footage for crude oil and natural gas development	Ft
REG_EXP	Variable	Regional exploratory drilling constraints	MBbl/Yr
REG_EXPC	Variable	Regional conventional crude oil exploratory drilling constraint	MBbl/Yr
REG_EXPCG	Variable	Regional conventional natural gas exploratory drilling constraint	Bcf/Yr
REG_EXPG	Variable	Regional exploratory natural gas drilling constraint	Bcf/Yr
REG_EXPU	Variable	Regional continuous crude oil exploratory drilling constraint	MBbl/Yr
REG_EXPUG	Variable	Regional continuous natural gas exploratory drilling constraint	Bcf/Yr
REG_GAS	Variable	Regional natural gas drilling constraint	Bcf/Yr
REG_HADG	Variable	Regional historical AD gas	MMcf
REG_HCBM	Variable	Regional historical CBM	MMcf

REG_HCNV	Variable	Regional historical high-permeability natural gas	MMcf
REG_HEOIL	Variable	Regional crude oil and lease condensates for continuing EOR	MBbl
REG_HGAS	Variable	Regional dry natural gas	MMcf
REG_HOIL	Variable	Regional crude oil and lease condensates	MBbl
REG_HSHL	Variable	Regional historical shale gas	MMcf
REG_HTHT	Variable	Regional historical tight gas	MMcf
REG_NAT	Input	Regional or national	
REG_OIL	Variable	Regional crude oil drilling constraint	MBbl/Yr
REGDRY	Variable	Regional dryhole rate	
REGDRYE	Variable	Exploration regional dryhole rate	
REGDRYG	Variable	Development natural gas regional dryhole rate	
REGDRYKD	Variable	Regional dryhole rate for discovered development	
REGDRYUD	Variable	Regional dryhole rate for undiscovered development	
REGDRYUE	Variable	Regional dryhole rate for undiscovered exploration	
REGION_CASE	Input	Filter for OLOGSS region	
REGION_FILTER	Input	Filter for OLOGSS region	
REGSCALE_CBM	Input	Regional historical daily CBM gas production for the last year of history	Bcf
REGSCALE_CNV	Input	Regional historical daily high-permeability natural gas production for the last year of history	Bcf
REGSCALE_GAS	Input	Regional historical daily natural gas production for the last year of history	Bcf
REGSCALE_OIL	Input	Regional historical daily crude oil production for the last year of history	MBbl
REGSCALE_SHL	Input	Regional historical daily shale gas production for the last year of history	Bcf
REGSCALE_THT	Input	Regional historical daily tight gas production for the last year of history	Bcf
REM_AMOR	Variable	Remaining amortization base	K$
REM_BASE	Variable	Remaining depreciation base	K$

REMRES	Variable	Remaining proven crude oil reserves	MBbl
RESADL48	Variable	Total additions to proved reserves	Oil-MMB Gas-BCF
RESBOYL48	Variable	End of year reserves for current year	Oil-MMB Gas-BCF
RES_CHR_ FAC	Input	Reservoir characterization cost	$/Cumulative BOE
RES_CHR_CHG	Variable	Reservoir characterization cost	$/Cumulative BOE
RESV_ADGAS	Input	Historical AD gas reserves	Tcf
RESV_CBM	Input	Historical coalbed methane reserves	Tcf
RESV_CONVGAS	Input	Historical high-permeability dry natural gas reserves	Tcf
RESV_OIL	Input	Historical crude oil and lease condensate reserves	BBbl
RESV_SHL	Input	Historical shale gas reserves	Tcf
RESV_THT	Input	Historical tight gas reserves	Tcf
RGR	Input	Annual drilling growth rate	
RIGSL48	Variable	Available rigs	Rigs
RNKVAL	Input	Ranking criteria for the projects	
ROR	Variable	Rate of return	K$
ROYALTY	Variable	Royalty	K$
RREG	Variable	Reservoir region	
RRR	Input	Annual drilling retirement rate	
RUNTYPE	Input	Resources selected to evaluate in the Timing subroutine	
RVALUE	Variable	Reservoir technical crude oil production	MBbl
SCALE_DAY	Input	Number of days in the last year of history	Days
SCALE_GAS	Input	Historical daily natural gas production for the last year of history	Bcf
SCALE_OIL	Input	Historical daily crude oil production for the last year of history	MBbl
SEV_PROC	Variable	Process code	
SEV_TAX	Variable	Severance tax	K$
SFIT	Variable	Alternative minimum tax	K$
SKIN_FAC	Input	Skin factor	
SKIN_CHG	Variable	Change in skin amount	
SMAR	Input	Six month amortization rate	%

SPLIT_ED	Input	Split exploration and development	
SPLIT_OG	Input	Split crude oil and natural gas constraints	
STARTPR	Variable	First year a pattern is initiated	
STATE_TAX	Variable	State tax	K$
STIM	Variable	Stimulation cost	K$
STIM_A, STIM_B	Input	Coefficients for natural gas/oil stimulation cost	K$
STIM_W	Variable	Natural gas well stimulation cost	K$
STIM_YR	Input	Number of years between stimulations of natural gas/oil wells	
STIMFAC	Input	Stimulation efficiency factor	
STL	Variable	State identification number	
STMGA	Input	Steam generator cost multiplier	
STMM_F	Variable	Cost for steam manifolds and generators	K$
STMMA	Input	Steam manifold/pipeline multiplier	
SUCCHDEV	Variable	Horizontal development well success rate by region	Fraction
SUCDEVE	Input	Developmental well dryhole rate by region	%
SUCDEVG	Variable	Final developmental natural gas well success rate by region	Fraction
SUCDEVO	Variable	Final developmental crude oil well success rate by region	Fraction
SUCEXP	Input	Undiscovered exploration well dryhole rate by region	%
SUCEXPD	Input	Exploratory well dryhole rate by region	%
SUCG	Variable	Initial developmental natural gas well success rate by region	Fraction
SUCO	Variable	Initial developmental crude oil well success by region	Fraction
SUCWELLL48	Variable	Successful Lower 48 onshore wells drilled	Wells
SUM_DRY	Variable	Developmental dryholes drilled	
SUM_GAS_CONV	Variable	High-permeability natural gas drilling	MMcf

SUM_GAS_UNCONV	Variable	Low-permeability natural gas drilling	MMcf
SUM_OIL_CONV	Variable	Conventional crude oil drilling	MBbl
SUM_OIL_UNCONV	Variable	Continuous crude oil drilling	MBbl
SUMP	Variable	Total cumulative patterns	
SWK_W	Variable	Secondary workover cost	K$
TANG_FAC_RATE	Input	Percentage of the well costs which are tangible	Percent
TANG_M	Variable	Tangible cost multiplier	
TANG_RATE	Input	Percentage of drilling costs which are tangible	Percent
TCI	Variable	Total capital investments	K$
TCIADJ	Variable	Adjusted capital investments	K$
TCOII	Input	Tax credit on intangible investments	K$
TCOTI	Input	Tax credit on tangible investments	K$
TDTC	Input	Tangible development tax credit	K$
TDTCAB	Input	Tangible development tax credit rate addback	%
TDTCR	Input	Tangible development tax credit rate	K$
TECH01_FAC	Input	WAG ratio applied to CO2EOR	
TECH02_FAC	Input	Recovery Limit	
TECH03_FAC	Input	Vertical Skin Factor for natural gas	
TECH04_FAC	Input	Fracture Half Length	Ft
TECH05_FAC	Input	Fracture Conductivity	Ft
TECH_CO2FLD	Variable	Technical production from CO_2 flood	MBbl
TECH_COAL	Variable	Annual technical coalbed methane gas production	MMcf
TECH_CURVE	Variable	Technology commercialization curve for market penetration	
TECH_CURVE_FAC	Input	Technology commercialization curve for market penetration	
TECH_DECLINE	Variable	Technical decline production	MBbl
TECH_GAS	Variable	Annual technical natural gas production	MMcf
TECH_HORCON	Variable	Technical production from horizontal continuity	MBbl

TECH_HORPRF	Variable	Technical production for horizontal profile	MBbl
TECH_INFILL	Variable	Technical production from infill drilling	MBbl
TECH_NGL	Variable	Annual technical NGL production	MBbl
TECH_OIL	Variable	Annual technical crude oil production	MBbl
TECH_PLYFLD	Variable	Technical production from polymer injection	MBbl
TECH_PRFMOD	Variable	Technical production from profile modification	MBbl
TECH_PRIMARY	Variable	Technical production from primary sources	MBbl
TECH_RADIAL	Variable	Technical production from conventional radial flow	MMcf
TECH_SHALE	Variable	Annual technical shale gas production	MMcf
TECH_STMFLD	Variable	Technical production from steam flood	MBbl
TECH_TIGHT	Variable	Annual technical tight gas production	MMcf
TECH_TIGHTG	Variable	Technical tight gas production	MMcf
TECH_UCOALB	Variable	Technical undiscovered coalbed methane production	MMcf
TECH_UCONTO	Variable	Technical undiscovered continuous crude oil production	MBbl
TECH_UCONVG	Variable	Technical low-permeability natural gas production	MMcf
TECH_UCONVO	Variable	Technical undiscovered conventional crude oil production	MBbl
TECH_UGCOAL	Variable	Annual technical developing coalbed methane gas production	MMcf
TECH_UGSHALE	Variable	Annual technical developing shale gas production	MMcf
TECH_UGTIGHT	Variable	Annual technical developing tight gas production	MMcf
TECH_USHALE	Variable	Technical undiscovered shale gas production	MMcf
TECH_UTIGHT	Variable	Technical undiscovered tight gas production	MMcf
TECH_WATER	Variable	Technical production from waterflood	MBbl

TECH_WTRFLD	Variable	Technical production from waterflood	MBbl
TGGLCD	Variable	Total G & G cost	K$
TI	Variable	Tangible costs	K$
TI_DRL	Variable	Tangible drilling cost	K$
TIMED	Variable	Timing flag	
TIMEDYR	Variable	Year in which the project is timed	
TOC	Variable	Total operating costs	K$
TORECY	Variable	Annual water injection	MBbl
TORECY_CST	Variable	Water injection cost	K$
TOTHWCAP	Variable	Total horizontal drilling footage constraint	Ft
TOTINJ	Variable	Annual water injection	MBbl
TOTMUL	Input	Total drilling constraint multiplier	
TOTSTATE	Variable	Total state severance tax	K$
UCNT	Variable	Number of undiscovered reservoirs	
UDEPTH	Variable	Reservoir depth	K$
UMPCO2	Input	CO_2 ultimate market acceptance	
UNAME	Variable	Reservoir identifier	
UNDARES	Variable	Undiscovered resource, AD gas or lease condensate	Bcf, MMBbl
UNDRES	Variable	Undiscovered resource	MMBbl, Bcf
UREG	Variable	Reservoir region	
USE_AVAILCO2	Variable	Used annual volume of CO_2 by region	Bcf
USE_RDR	Input	Use rig depth rating	
USEAVAIL	Variable	Used annual CO_2 volume by region across all sources	Bcf
USECAP	Variable	Annual total capital investment constraints, used by projects	MM$
UVALUE	Variable	Reservoir undiscovered crude oil production	MBbl
UVALUE2	Variable	Reservoir undiscovered natural gas production	MMcf
VEORCP	Input	Volumetric EOR cutoff	%
VIABLE	Variable	The number of economically viable reservoirs	
VOL_SWP_ FAC	Input	Sweep volume factor	
VOL_SWP_CHG	Variable	Change in sweep volume	
WAT_OAM	Input	Process specific operating cost for water production	$/Bbl
WATINJ	Variable	Annual water injection	MBbl

WATPROD	Variable	Annual water production	MBbl
WELLSL48	Variable	Lower 48 onshore wells drilled	Wells
WINJ	Variable	Well level water injection	MBbl
WPROD	Variable	Well level water production	MBbl
WRK_W	Variable	Cost for well workover	K$
WRKA	Estimated	Constant for workover cost equations	
WRKB	Estimated	Constant for workover cost equations	
WRKC	Estimated	Constant for workover cost equations	
WRKD	Input	Maximum depth range for workover cost	Ft
WRKK	Estimated	Constant for workover cost equations	
WRKM	Input	Minimum depth range for workover cost	Ft
XCAPBASE	Variable	Cumulative cap stream	
XCUMPROD	Variable	Cumulative production	MBbl
XPATN	Variable	Active patterns each year	
XPP1	Variable	Number of new producers drilled per pattern	
XPP2	Variable	Number of new injectors drilled per pattern	
XPP3	Variable	Number of producers converted to injectors	
XPP4	Variable	Number of primary wells converted to secondary wells	
XROY	Input	Royalty rate	Percent
YEARS_STUDY	Input	Number of years of analysis	
YR1	Input	Number of years for tax credit on tangible investments	
YR2	Input	Number of years for tax credit on intangible investments	
YRDI	Input	Years to develop infrastructure	
YRDT	Input	Years to develop technology	
YRMA	Input	Years to reach full capacity	

Appendix 2.B: Cost and Constraint Estimation

The major sections of OLOGSS consist of a series of equations that are used to calculate project economics and the development of crude oil and natural gas resources subject to the availability of regional development constraints. The cost and constraint calculation was assessed as unit costs per well. The product of the cost equation and cost adjustment factor is the actual cost. The actual cost reflects the influence on the resource, region and oil or gas price. The equations, the estimation techniques, and the statistical results for these equations are documented below. The statistical software included within Microsoft Excel was used for the estimations.

Drilling and Completion Costs for Crude Oil

The 2004 – 2007 Joint Association Survey (JAS) data was used to calculate the equation for vertical drilling and completion costs for crude oil. The data was analyzed at a regional level. The independent variables were depth, raised to powers of 1 through 3. Drilling cost is the cost of drilling on a per well basis. Depth is also on a per well basis. The method of estimation used was ordinary least squares. The form of the equation is given below. β1 (the coefficient for depth raised to the first power) is statistically insignificant and is therefore assumed zero.

$$\text{Drilling Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}1)$$

where Drilling Cost = DWC_W
β0 = OIL_DWCK
β1 = OIL_DWCA
β2 = OIL_DWCB
β3 = OIL_DWCC
from equations 2-17 and 2-18 in Chapter 2.

Northeast Region:

Regression Statistics	
Multiple R	0.836438789
R Square	0.699629848
Adjusted R Square	0.691168717
Standard Error	629377.1735
Observations	74

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	6.55076E+13	3.27538E+13	82.6875087	2.86296E-19
Residual	71	2.81242E+13	3.96116E+11		
Total	73	9.36318E+13			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	122428.578	126464.5594	0.968086068	0.336287616	-129734.7159	374591.8719	-129734.7159	374591.8719
β2	0.058292022	0.020819613	2.799860932	0.006580083	0.016778872	0.099805172	0.016778872	0.099805172
β3	5.68014E-07	2.56497E-06	0.221450391	0.825377435	-4.5464E-06	5.68243E-06	-4.5464E-06	5.68243E-06

Gulf Coast Region:

Regression Statistics	
Multiple R	0.927059199
R Square	0.859438758
Adjusted R Square	0.85771408
Standard Error	754021.7218
Observations	166

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	5.66637E+14	2.83318E+14	498.3184388	3.55668E-70
Residual	163	9.26734E+13	5.68549E+11		
Total	165	6.5931E+14			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	171596.0907	99591.43949	1.723000407	0.086784881	-25059.61405	368251.7955	-25059.61405	368251.7955
β2	0.026582707	0.005213357	5.098961204	9.38664E-07	0.016288283	0.036877131	0.016288283	0.036877131
β3	5.10946E-07	3.82305E-07	1.336488894	0.183252113	-2.43962E-07	1.26585E-06	-2.43962E-07	1.26585E-06

Mid-Continent Region:

Regression Statistics	
Multiple R	0.898305188
R Square	0.806952211
Adjusted R Square	0.803343841
Standard Error	865339.0638
Observations	110

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	3.34919E+14	1.67459E+14	223.6334505	6.06832E-39
Residual	107	8.01229E+13	7.48812E+11		
Total	109	4.15042E+14			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	44187.62539	135139.2151	0.326978556	0.744322892	-223710.0994	312085.3502	-223710.0994	312085.3502
β2	0.038468835	0.005870927	6.552429326	2.04023E-09	0.026830407	0.050107263	0.026830407	0.050107263
β3	-9.45921E-07	3.70017E-07	-2.556425591	0.011978314	-1.67944E-06	-2.12405E-07	-1.67944E-06	-2.12405E-07

Southwest Region:

Regression Statistics	
Multiple R	0.927059199
R Square	0.859438758
Adjusted R Square	0.85771408
Standard Error	754021.7218
Observations	166

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	5.66637E+14	2.83318E+14	498.3184388	3.55668E-70
Residual	163	9.26734E+13	5.68549E+11		
Total	165	6.5931E+14			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	171596.0907	99591.43949	1.723000407	0.086784881	-25059.61405	368251.7955	-25059.61405	368251.7955
β2	0.026582707	0.005213357	5.098961204	9.38664E-07	0.016288283	0.036877131	0.016288283	0.036877131
β3	5.10946E-07	3.82305E-07	1.336488894	0.183252113	-2.43962E-07	1.26585E-06	-2.43962E-07	1.26585E-06

Rocky Mountain Region:

Regression Statistics	
Multiple R	0.905358855
R Square	0.819674657
Adjusted R Square	0.81505093
Standard Error	1524859.577
Observations	81

ANOVA

	df	SS	MS	F	Significance F
Regression	2	8.24402E+14	4.12201E+14	177.2757561	9.68755E-30
Residual	78	1.81365E+14	2.3252E+12		
Total	80	1.00577E+15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	85843.77642	334865.8934	0.256352702	0.798353427	-580822.9949	752510.5477	-580822.9949	752510.5477
β2	0.024046279	0.017681623	1.35995883	0.177760898	-0.011155127	0.059247685	-0.011155127	0.059247685
β3	3.11588E-06	1.35985E-06	2.291329746	0.024643617	4.08613E-07	5.82314E-06	4.08613E-07	5.82314E-06

West Coast Region:

Regression Statistics	
Multiple R	0.829042211
R Square	0.687310988
Adjusted R Square	0.66961161
Standard Error	1192282.08
Observations	57

ANOVA

	df	SS	MS	F	Significance F
Regression	3	1.65605E+14	5.52018E+13	38.83249387	2.05475E-13
Residual	53	7.53414E+13	1.42154E+12		
Total	56	2.40947E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	416130.9988	739996.4118	0.562341914	0.576253925	-1068113.806	1900375.804	-1068113.806	1900375.804
β1	44.24458907	494.4626992	0.089480135	0.929037628	-947.5219666	1036.011145	-947.5219666	1036.011145
β2	0.032683532	0.091113678	0.35871159	0.721235869	-0.150067358	0.215434422	-0.150067358	0.215434422
β3	3.38129E-07	4.76464E-06	0.070966208	0.94369176	-9.21853E-06	9.89479E-06	-9.21853E-06	9.89479E-06

Northern Great Plains Region:

Regression Statistics	
Multiple R	0.847120174
R Square	0.71761259
Adjusted R Square	0.702750095
Standard Error	1967213.576
Observations	61

ANOVA

	df	SS	MS	F	Significance F
Regression	3	5.60561E+14	1.86854E+14	48.2834529	1.1626E-15
Residual	57	2.20586E+14	3.86993E+12		
Total	60	7.81147E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	98507.54357	1384010.586	0.071175426	0.943507284	-2672925.83	2869940.917	-2672925.83	2869940.917
β1	478.7358996	548.203512	0.873281344	0.386173991	-619.0226893	1576.494489	-619.0226893	1576.494489
β2	-0.00832112	0.058193043	-0.142991666	0.886801051	-0.124850678	0.108208438	-0.124850678	0.108208438
β3	6.1159E-07	1.79131E-06	0.34142064	0.7340424	-2.97545E-06	4.19863E-06	-2.97545E-06	4.19863E-06

Drilling and Completion Cost for Oil - Cost Adjustment Factor

The cost adjustment factor for vertical drilling and completion costs for oil was calculated using JAS data through 2007. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the

price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Northeast Region:

Regression Statistics	
Multiple R	0.993325966
R Square	0.986696475
Adjusted R Square	0.986411399
Standard Error	0.029280014
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.901997029	2.967332343	3461.175482	4.4887E-131
Residual	140	0.120024694	0.000857319		
Total	143	9.022021723			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.309616442	0.009839962	31.46520591	2.3349E-65	0.290162308	0.329070576	0.290162308	0.329070576
β1	0.019837121	0.000434252	45.68110123	5.41725E-86	0.018978581	0.020695661	0.018978581	0.020695661
β2	-0.000142411	5.21769E-06	-27.29392193	6.44605E-58	-0.000152727	-0.000132095	-0.000152727	-0.000132095
β3	3.45898E-07	1.69994E-08	20.34770764	1.18032E-43	3.1229E-07	3.79507E-07	3.1229E-07	3.79507E-07

Gulf Coast Region:

Regression Statistics	
Multiple R	0.975220111
R Square	0.951054265
Adjusted R Square	0.950005428
Standard Error	0.054224144
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	7.998414341	2.666138114	906.7701736	1.76449E-91
Residual	140	0.411636098	0.002940258		
Total	143	8.410050438			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.404677859	0.01822279	22.2072399	1.01029E-47	0.368650426	0.440705292	0.368650426	0.440705292
β1	0.016335847	0.000804199	20.31319148	1.41023E-43	0.014745903	0.017925792	0.014745903	0.017925792
β2	-0.00010587	9.66272E-06	-10.95654411	1.47204E-20	-0.000124974	-8.67663E-05	-0.000124974	-8.67663E-05
β3	2.40517E-07	3.14814E-08	7.639970947	3.10789E-12	1.78277E-07	3.02758E-07	1.78277E-07	3.02758E-07

Mid-Continent Region:

Regression Statistics	
Multiple R	0.973577019
R Square	0.947852212
Adjusted R Square	0.94673476
Standard Error	0.058882142
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.822668656	2.940889552	848.2258794	1.4872E-89
Residual	140	0.485394925	0.003467107		
Total	143	9.308063582			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.309185338	0.019788175	15.62475232	1.738E-32	0.270063053	0.348307623	0.270063053	0.348307623
β1	0.019036286	0.000873282	21.79856116	7.62464E-47	0.017309761	0.020762811	0.017309761	0.020762811
β2	-0.000123667	1.04928E-05	-11.78593913	1.05461E-22	-0.000144412	-0.000102922	-0.000144412	-0.000102922
β3	2.60516E-07	3.41858E-08	7.620611936	3.45556E-12	1.92929E-07	3.28104E-07	1.92929E-07	3.28104E-07

Southwest Region:

Regression Statistics	
Multiple R	0.993452577
R Square	0.986948023
Adjusted R Square	0.986668338
Standard Error	0.030207623
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.66004438	3.220014793	3528.781511	1.1799E-131
Residual	140	0.127750066	0.0009125		
Total	143	9.787794446			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.293837119	0.010151698	28.944627	5.92751E-61	0.273766667	0.313907571	0.273766667	0.313907571
β1	0.020183122	0.00044801	45.05064425	3.35207E-85	0.019297383	0.021068861	0.019297383	0.021068861
β2	-0.000142936	5.38299E-06	-26.55334755	1.63279E-56	-0.000153579	-0.000132294	-0.000153579	-0.000132294
β3	3.44926E-07	1.75379E-08	19.66744699	4.04901E-42	3.10253E-07	3.796E-07	3.10253E-07	3.796E-07

Rocky Mountain Region:

Regression Statistics	
Multiple R	0.993622433
R Square	0.987285538
Adjusted R Square	0.987013086
Standard Error	0.029478386
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.446702681	3.148900894	3623.69457	1.8856E-132
Residual	140	0.121656535	0.000868975		
Total	143	9.568359216			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.297270516	0.009906628	30.00723517	7.63744E-63	0.27768458	0.316856451	0.27768458	0.316856451
β1	0.020126228	0.000437194	46.03497443	1.9664E-86	0.019261872	0.020990585	0.019261872	0.020990585
β2	-0.000143079	5.25304E-06	-27.23739215	8.23219E-58	-0.000153465	-0.000132693	-0.000153465	-0.000132693
β3	3.45557E-07	1.71145E-08	20.19080817	2.6538E-43	3.1172E-07	3.79393E-07	3.1172E-07	3.79393E-07

West Coast Region:

Regression Statistics	
Multiple R	0.993362569
R Square	0.986769193
Adjusted R Square	0.986485676
Standard Error	0.030158697
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.496912448	3.165637483	3480.455028	3.0585E-131
Residual	140	0.127336582	0.000909547		
Total	143	9.62424903			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.297702178	0.010135256	29.37293095	1.01194E-61	0.277664233	0.317740124	0.277664233	0.317740124
β1	0.020091425	0.000447284	44.91872099	4.92225E-85	0.019207121	0.02097573	0.019207121	0.02097573
β2	-0.000142627	5.37427E-06	-26.53879345	1.74092E-56	-0.000153252	-0.000132001	-0.000153252	-0.000132001
β3	3.44597E-07	1.75095E-08	19.68054067	3.78057E-42	3.0998E-07	3.79214E-07	3.0998E-07	3.79214E-07

Northern Great Plains Region:

Regression Statistics	
Multiple R	0.993744864
R Square	0.987528854
Adjusted R Square	0.987261615
Standard Error	0.029293844
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.513146663	3.171048888	3695.304354	4.8762E-133
Residual	140	0.1201381	0.000858129		
Total	143	9.633284764			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.292784596	0.00984461	29.74059899	2.25193E-62	0.273321274	0.312247919	0.273321274	0.312247919
β1	0.020415818	0.000434457	46.99153447	1.31433E-87	0.019556872	0.021274763	0.019556872	0.021274763
β2	-0.000146385	5.22015E-06	-28.04230529	2.6131E-59	-0.000156706	-0.000136065	-0.000156706	-0.000136065
β3	3.5579E-07	1.70074E-08	20.91972526	6.3186E-45	3.22166E-07	3.89415E-07	3.22166E-07	3.89415E-07

Drilling and Completion Costs for Natural Gas

The 2004 – 2007 JAS data was used to calculate the equation for vertical drilling and completion costs for natural gas. The data was analyzed at a regional level. The independent variable was depth. Drilling cost is the cost of drilling on a per well basis. Depth is also on a per well basis. The method of estimation used was ordinary least squares. The form of the equation is given below.

$$\text{Drilling Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}2)$$

where Drilling Cost = DWC_W
β0 = GAS_DWCK
β1 = GAS_DWCA
β2 = GAS_DWCB
β3 = GAS_DWCC
from equations 2-24 and 2-25 in Chapter 2.

Northeast Region:

Regression Statistics	
Multiple R	0.837701882
R Square	0.701744444
Adjusted R Square	0.694887994
Standard Error	1199562.042
Observations	90

ANOVA

	df	SS	MS	F	Significance F
Regression	2	2.94547E+14	1.47274E+14	102.3480792	1.39509E-23
Residual	87	1.25189E+14	1.43895E+12		
Total	89	4.19736E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	197454.5012	290676.607	0.679292714	0.498755704	-380296.7183	775205.7207	-380296.7183	775205.7207
β1	19.31146768	128.263698	0.150560665	0.880670823	-235.6265154	274.2494508	-235.6265154	274.2494508
β2	0.040120878	0.009974857	4.022200679	0.000122494	0.020294769	0.059946987	0.020294769	0.059946987

Gulf Coast Region:

Regression Statistics	
Multiple R	0.842706997
R Square	0.710155083
Adjusted R Square	0.708248209
Standard Error	2573551.438
Observations	307

ANOVA

	df	SS	MS	F	Significance F
Regression	2	4.93318E+15	2.46659E+15	372.4183744	1.77494E-82
Residual	304	2.01344E+15	6.62317E+12		
Total	306	6.94662E+15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	318882.7578	272026.272	1.172249855	0.242014577	-216410.0169	854175.5325	-216410.0169	854175.5325
β2	0.019032113	0.008289474	2.295937192	0.022359763	0.002720101	0.035344125	0.002720101	0.035344125
β3	1.12638E-06	4.6744E-07	2.409676918	0.016560642	2.06552E-07	2.04621E-06	2.06552E-07	2.04621E-06

Mid-Continent Region:

Regression Statistics	
Multiple R	0.92348831
R Square	0.852830659
Adjusted R Square	0.850494637
Standard Error	1309841.335
Observations	129

ANOVA

	df	SS	MS	F	Significance F
Regression	2	1.25272E+15	6.26359E+14	365.0782904	3.73674E-53
Residual	126	2.16176E+14	1.71568E+12		
Total	128	1.46889E+15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	355178.8049	240917.4549	1.47427593	0.142901467	-121589.7497	831947.3594	-121589.7497	831947.3594
β1	54.21184769	45.96361807	1.17945127	0.240440741	-36.74880003	145.1724954	-36.74880003	145.1724954
β3	1.20269E-06	1.12352E-07	10.70467954	2.04711E-19	9.80347E-07	1.42503E-06	9.80347E-07	1.42503E-06

Southwest Region:

Regression Statistics	
Multiple R	0.915492169
R Square	0.838125912
Adjusted R Square	0.834866702
Standard Error	1386872.99
Observations	153

ANOVA

	df	SS	MS	F	Significance F
Regression	3	1.48386E+15	4.94618E+14	257.1561693	1.088E-58
Residual	149	2.86589E+14	1.92342E+12		
Total	152	1.77044E+15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	91618.176	571133.886	0.160414534	0.872771817	-1036949.89	1220186.242	-1036949.89	1220186.242
β1	376.1968481	269.4896391	1.395960339	0.164802951	-156.3182212	908.7119175	-156.3182212	908.7119175
β2	-0.062403125	0.034837969	-1.791238896	0.075284827	-0.131243411	0.00643716	-0.131243411	0.00643716
β3	5.03882E-06	1.29778E-06	3.88265606	0.000154832	2.4744E-06	7.60325E-06	2.4744E-06	7.60325E-06

Rocky Mountain Region:

Regression Statistics	
Multiple R	0.936745489
R Square	0.877492112
Adjusted R Square	0.87539796
Standard Error	2403080.549
Observations	120

ANOVA

	df	SS	MS	F	Significance F
Regression	2	4.83951E+15	2.41976E+15	419.0202716	4.54566E-54
Residual	117	6.75651E+14	5.7748E+12		
Total	119	5.51516E+15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	219733.2637	346024.9678	0.635021412	0.526654367	-465551.0299	905017.5572	-465551.0299	905017.5572
β2	0.032265399	0.013130355	2.457313594	0.015464796	0.00626142	0.058269377	0.00626142	0.058269377
β3	2.6019E-06	7.88034E-07	3.301759413	0.001274492	1.04124E-06	4.16256E-06	1.04124E-06	4.16256E-06

West Coast Region:

Regression Statistics	
Multiple R	0.901854712
R Square	0.813341922
Adjusted R Square	0.795564962
Standard Error	494573.0787
Observations	24

ANOVA

	df	SS	MS	F	Significance F
Regression	2	2.23824E+13	1.11912E+13	45.75258814	2.21815E-08
Residual	21	5.13665E+12	2.44603E+11		
Total	23	2.75191E+13			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	385532.8938	215673.5911	1.787575808	0.088286514	-62984.89058	834050.6782	-62984.89058	834050.6782
β2	0.01799366	0.016370041	1.099182335	0.284130777	-0.016049704	0.052037025	-0.016049704	0.052037025
β3	1.01127E-06	1.49488E-06	0.676491268	0.506112235	-2.0975E-06	4.12005E-06	-2.0975E-06	4.12005E-06

Northern Great Plains Region:

Regression Statistics	
Multiple R	0.856130745
R Square	0.732959853
Adjusted R Square	0.706255838
Standard Error	2157271.229
Observations	23

ANOVA

	df	SS	MS	F	Significance F
Regression	2	2.55472E+14	1.27736E+14	27.44755272	1.84402E-06
Residual	20	9.30764E+13	4.65382E+12		
Total	22	3.48548E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	267619.9291	1118552.942	0.239255487	0.813342236	-2065640.615	2600880.473	-2065640.615	2600880.473
β1	30.61609506	550.5220307	0.055612843	0.956202055	-1117.752735	1178.984925	-1117.752735	1178.984925
β2	0.049406678	0.035529716	1.390573371	0.179635875	-0.024707012	0.123520367	-0.024707012	0.123520367

Drilling and Completion Cost for Gas - Cost Adjustment Factor

The cost adjustment factor for vertical drilling and completion costs for gas was calculated using JAS data through 2007. The initial cost was normalized at various prices from $1 to $20 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $5 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Gas Price} + \beta 2 * \text{Gas Price}^2 + \beta 3 * \text{Gas Price}^3$$

Northeast Region:

Regression Statistics	
Multiple R	0.988234523
R Square	0.976607472
Adjusted R Square	0.976106203
Standard Error	0.03924461
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.001833192	3.000611064	1948.272332	6.4218E-114
Residual	140	0.215619522	0.001540139		
Total	143	9.217452714			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.315932281	0.013188706	23.95476038	2.2494E-51	0.289857502	0.34200706	0.289857502	0.34200706
β1	0.195760743	0.005820373	33.63371152	6.11526E-69	0.184253553	0.207267932	0.184253553	0.207267932
β2	-0.013906425	0.000699337	-19.88514708	1.29788E-42	-0.015289053	-0.012523798	-0.015289053	-0.012523798
β3	0.000336178	2.27846E-05	14.75458424	2.61104E-30	0.000291131	0.000381224	0.000291131	0.000381224

Gulf Coast Region:

Regression Statistics	
Multiple R	0.976776879
R Square	0.954093072
Adjusted R Square	0.953109352
Standard Error	0.051120145
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	7.60369517	2.534565057	969.8828784	1.98947E-93
Residual	140	0.365857688	0.002613269		
Total	143	7.969552858			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.343645899	0.017179647	20.00308313	7.02495E-43	0.309680816	0.377610983	0.309680816	0.377610983
β1	0.190338822	0.007581635	25.10524794	1.08342E-53	0.175349523	0.205328121	0.175349523	0.205328121
β2	-0.013965513	0.000910959	-15.33056399	9.3847E-32	-0.015766527	-0.012164498	-0.015766527	-0.012164498
β3	0.000342962	2.96793E-05	11.55560459	4.15963E-22	0.000284285	0.00040164	0.000284285	0.00040164

Mid-continent Region:

Regression Statistics	
Multiple R	0.973577019
R Square	0.947852212
Adjusted R Square	0.94673476
Standard Error	0.058882142
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.822668656	2.940889552	848.2258794	1.4872E-89
Residual	140	0.485394925	0.003467107		
Total	143	9.308063582			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.309185338	0.019788175	15.62475232	1.738E-32	0.270063053	0.348307623	0.270063053	0.348307623
β1	0.019036286	0.000873282	21.79856116	7.62464E-47	0.017309761	0.020762811	0.017309761	0.020762811
β2	-0.000123667	1.04928E-05	-11.78593913	1.05461E-22	-0.000144412	-0.000102922	-0.000144412	-0.000102922
β3	2.60516E-07	3.41858E-08	7.620611936	3.45556E-12	1.92929E-07	3.28104E-07	1.92929E-07	3.28104E-07

Southwest Region:

Regression Statistics	
Multiple R	0.966438524
R Square	0.934003421
Adjusted R Square	0.932589209
Standard Error	0.06631093
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.712149531	2.904049844	660.4406967	2.13407E-82
Residual	140	0.615599523	0.004397139		
Total	143	9.327749054			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.323862308	0.022284725	14.53292844	9.46565E-30	0.279804211	0.367920404	0.279804211	0.367920404
β1	0.193832047	0.009834582	19.70923084	3.2532E-42	0.174388551	0.213275544	0.174388551	0.213275544
β2	-0.013820723	0.001181658	-11.69604336	1.80171E-22	-0.016156924	-0.011484522	-0.016156924	-0.011484522
β3	0.000334693	3.84988E-05	8.693602923	8.44808E-15	0.000258579	0.000410807	0.000258579	0.000410807

Rocky Mountains Region:

Regression Statistics	
Multiple R	0.985593617
R Square	0.971394777
Adjusted R Square	0.970781808
Standard Error	0.0421446
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.444274294	2.814758098	1584.737059	8.3614E-108
Residual	140	0.248663418	0.001776167		
Total	143	8.692937712			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.32536782	0.014163288	22.97261928	2.42535E-49	0.29736624	0.353369401	0.29736624	0.353369401
β1	0.194045615	0.006250471	31.04496067	1.21348E-64	0.181688099	0.206403131	0.181688099	0.206403131
β2	-0.01396687	0.000751015	-18.59732564	1.18529E-39	-0.015451667	-0.012482073	-0.015451667	-0.012482073
β3	0.000339698	2.44683E-05	13.88318297	4.22503E-28	0.000291323	0.000388073	0.000291323	0.000388073

West Coast Region:

Regression Statistics	
Multiple R	0.994143406
R Square	0.988321112
Adjusted R Square	0.98807085
Standard Error	0.026802603
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.510960152	2.836986717	3949.147599	4.9307E-135
Residual	140	0.100573131	0.00071838		
Total	143	8.611533284			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.325917293	0.009007393	36.18330938	6.29717E-73	0.308109194	0.343725393	0.308109194	0.343725393
β1	0.193657091	0.003975097	48.71757347	1.12458E-89	0.185798111	0.201516072	0.185798111	0.201516072
β2	-0.013893214	0.000477621	-29.08835053	3.2685E-61	-0.014837497	-0.012948932	-0.014837497	-0.012948932
β3	0.000337413	1.5561E-05	21.68318808	1.35414E-46	0.000306648	0.000368178	0.000306648	0.000368178

Northern Great Plains Region:

Regression Statistics	
Multiple R	0.970035104
R Square	0.940968103
Adjusted R Square	0.939703134
Standard Error	0.057035843
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	7.259587116	2.419862372	743.8663996	8.71707E-86
Residual	140	0.455432229	0.003253087		
Total	143	7.715019345			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.352772153	0.0191677	18.40451098	3.34838E-39	0.31487658	0.390667726	0.31487658	0.390667726
β1	0.189510541	0.008458993	22.40344064	3.85701E-48	0.172786658	0.206234423	0.172786658	0.206234423
β2	-0.014060192	0.001016376	-13.83364754	5.65155E-28	-0.016069622	-0.012050761	-0.016069622	-0.012050761
β3	0.000347364	3.31138E-05	10.49000322	2.34854E-19	0.000281896	0.000412832	0.000281896	0.000412832

Drilling and Completion Costs for Dryholes

The 2004 – 2007 JAS data was used to calculate the equation for vertical drilling and completion costs for dryholes. The data was analyzed at a regional level. The independent variable was depth. Drilling cost is the cost of drilling on a per well basis. Depth is also on a per well basis. The method of estimation used was ordinary least squares. The form of the equation is given bellow.

$$\text{Drilling Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}3)$$

where Drilling Cost = DWC_W
β0 = DRY_DWCK
β1 = DRY_DWCA
β2 = DRY_DWCB
β3 = DRY_DWCC
from equations 2-19 and 2-20 in Chapter 2.

Northeast Region:

Regression Statistics	
Multiple R	0.913345218
R Square	0.834199487
Adjusted R Square	0.828851084
Standard Error	1018952.27
Observations	97

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	4.85819E+14	1.6194E+14	155.9716777	3.64706E-36
Residual	93	9.65585E+13	1.03826E+12		
Total	96	5.82378E+14			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	170557.6447	323739.1839	0.526836581	0.599561475	-472323.5706	813438.8601	-472323.5706	813438.8601
β1	256.9930321	233.0025772	1.102962187	0.272889552	-205.7034453	719.6895095	-205.7034453	719.6895095
β2	-0.043428533	0.043117602	-1.007211224	0.31644672	-0.129051459	0.042194394	-0.129051459	0.042194394
β3	5.9031E-06	2.11581E-06	2.789995653	0.006394574	1.70153E-06	1.01047E-05	1.70153E-06	1.01047E-05

Gulf Coast Region:

Regression Statistics	
Multiple R	0.868545327
R Square	0.754370985
Adjusted R Square	0.752096642
Standard Error	2529468.051
Observations	328

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	6.36662E+15	2.12221E+15	331.6874692	2.10256E-98
Residual	324	2.07302E+15	6.39821E+12		
Total	327	8.43964E+15			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	118790.7619	515360.6337	0.230500264	0.81784853	-895084.76	1132666.284	-895084.76	1132666.284
β1	126.2333724	241.1698405	0.523421055	0.601039076	-348.2231187	600.6898634	-348.2231187	600.6898634
β2	-0.001057252	0.0294162	-0.035941139	0.971351426	-0.058928115	0.056813612	-0.058928115	0.056813612
β3	2.32104E-06	1.0194E-06	2.276864977	0.02344596	3.15558E-07	4.32653E-06	3.15558E-07	4.32653E-06

Mid-Continent Region:

Regression Statistics	
Multiple R	0.80373002
R Square	0.645981944
Adjusted R Square	0.636056204
Standard Error	904657.9939
Observations	111

ANOVA

	df	SS	MS	F	Significance F
Regression	3	1.59789E+14	5.32631E+13	65.08149035	5.0095E-24
Residual	107	8.75695E+13	8.18406E+11		
Total	110	2.47359E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	163849.8824	309404.7345	0.529564884	0.597510699	-449508.8999	777208.6646	-449508.8999	777208.6646
β1	17.95111978	155.7546455	0.115252548	0.908460959	-290.8142902	326.7165297	-290.8142902	326.7165297
β2	0.022715716	0.021144885	1.074288957	0.285109837	-0.019201551	0.064632983	-0.019201551	0.064632983
β3	-3.50301E-07	7.90957E-07	-0.442882115	0.658745077	-1.91828E-06	1.21768E-06	-1.91828E-06	1.21768E-06

Southwest Region:

Regression Statistics	
Multiple R	0.916003396
R Square	0.839062222
Adjusted R Square	0.835290243
Standard Error	734795.4183
Observations	132

ANOVA

	df	SS	MS	F	Significance F
Regression	3	3.60312E+14	1.20104E+14	222.4461445	1.40193E-50
Residual	128	6.91103E+13	5.39924E+11		
Total	131	4.29423E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	22628.66985	252562.1046	0.089596457	0.928747942	-477108.2352	522365.5749	-477108.2352	522365.5749
β1	262.7649266	164.1391792	1.600866581	0.111871702	-62.01224262	587.5420958	-62.01224262	587.5420958
β2	-0.064989728	0.029352301	-2.21412721	0.02859032	-0.123068227	-0.006911229	-0.123068227	-0.006911229
β3	6.52693E-06	1.49073E-06	4.378340081	2.46095E-05	3.57727E-06	9.4766E-06	3.57727E-06	9.4766E-06

Rocky Mountain Region:

Regression Statistics	
Multiple R	0.908263682
R Square	0.824942917
Adjusted R Square	0.821295894
Standard Error	1868691.311
Observations	99

ANOVA

	df	SS	MS	F	Significance F
Regression	2	1.57976E+15	7.89879E+14	226.1962739	4.70571E-37
Residual	96	3.35233E+14	3.49201E+12		
Total	98	1.91499E+15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	288056.5506	314517.8483	0.915867103	0.362031526	-336256.4285	912369.5298	-336256.4285	912369.5298
β2	0.018141347	0.017298438	1.048727458	0.296936644	-0.01619578	0.052478474	-0.01619578	0.052478474
β3	3.85847E-06	1.27201E-06	3.033362592	0.003110773	1.33355E-06	6.3834E-06	1.33355E-06	6.3834E-06

West Coast Region:

Regression Statistics	
Multiple R	0.853182771
R Square	0.727920841
Adjusted R Square	0.707514904
Standard Error	907740.218
Observations	44

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.81804E+13	2.93935E+13	35.67201271	2.18647E-11
Residual	40	3.29597E+13	8.23992E+11		
Total	43	1.2114E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	106996.0572	512960.104	0.208585534	0.835830348	-929734.9747	1143727.089	-929734.9747	1143727.089
β1	687.3095347	329.4149478	2.086455212	0.043357214	21.53709715	1353.081972	21.53709715	1353.081972
β2	-0.15898723	0.058188911	-2.732259905	0.009317504	-0.276591406	-0.041383054	-0.276591406	-0.041383054
β3	1.14978E-05	2.91968E-06	3.938046272	0.000320309	5.59694E-06	1.73987E-05	5.59694E-06	1.73987E-05

Northern Great Plains Region:

Regression Statistics	
Multiple R	0.841621294
R Square	0.708326403
Adjusted R Square	0.687977082
Standard Error	2155533.512
Observations	47

ANOVA

	df	SS	MS	F	Significance F
Regression	3	4.85193E+14	1.61731E+14	34.80835607	1.41404E-11
Residual	43	1.99792E+14	4.64632E+12		
Total	46	6.84985E+14			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	122507.9534	1373015.289	0.089225484	0.929317007	-2646441.235	2891457.142	-2646441.235	2891457.142
β1	345.4371452	801.6324436	0.430917122	0.668681154	-1271.20873	1962.08302	-1271.20873	1962.08302
β2	-0.014734575	0.126273194	-0.11668807	0.907650548	-0.269388738	0.239919588	-0.269388738	0.239919588
β3	3.23748E-06	5.69952E-06	0.568026219	0.572971531	-8.2567E-06	1.47317E-05	-8.2567E-06	1.47317E-05

Drilling and Completion Cost for Dry - Cost Adjustment Factor

The cost adjustment factor for vertical drilling and completion costs for dryholes was calculated using JAS data through 2007. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Northeast Region:

Regression Statistics	
Multiple R	0.994846264
R Square	0.989719089
Adjusted R Square	0.989498783
Standard Error	0.026930376
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.774469405	3.258156468	4492.489925	6.5663E-139
Residual	140	0.101534319	0.000725245		
Total	143	9.876003725			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.290689859	0.009050333	32.11924425	1.85582E-66	0.272796865	0.308582854	0.272796865	0.308582854
β1	0.020261651	0.000399405	50.72962235	5.26469E-92	0.019472006	0.021051296	0.019472006	0.021051296
β2	-0.000143294	4.79898E-06	-29.85918012	1.391E-62	-0.000152782	-0.000133806	-0.000152782	-0.000133806
β3	3.45487E-07	1.56352E-08	22.09672004	1.74153E-47	3.14575E-07	3.76399E-07	3.14575E-07	3.76399E-07

Gulf Coast Region:

Regression Statistics	
Multiple R	0.993347128
R Square	0.986738516
Adjusted R Square	0.986454342
Standard Error	0.031666016
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.44539464	3.481798214	3472.296057	3.5967E-131
Residual	140	0.140383119	0.001002737		
Total	143	10.58577776			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.277940175	0.010641812	26.11774938	1.12431E-55	0.256900742	0.298979608	0.256900742	0.298979608
β1	0.020529977	0.000469639	43.71437232	1.71946E-83	0.019601475	0.021458479	0.019601475	0.021458479
β2	-0.000143466	5.64287E-06	-25.42421447	2.53682E-54	-0.000154622	-0.000132309	-0.000154622	-0.000132309
β3	3.43878E-07	1.83846E-08	18.70465533	6.66256E-40	3.07531E-07	3.80226E-07	3.07531E-07	3.80226E-07

Mid-Continent Region:

Regression Statistics	
Multiple R	0.984006541
R Square	0.968268874
Adjusted R Square	0.967588921
Standard Error	0.048034262
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.856909541	3.285636514	1424.023848	1.1869E-104
Residual	140	0.323020652	0.00230729		
Total	143	10.17993019			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.289971748	0.016142592	17.96314638	3.67032E-38	0.258056977	0.32188652	0.258056977	0.32188652
β1	0.020266191	0.000712397	28.44789972	4.71502E-60	0.018857744	0.021674637	0.018857744	0.021674637
β2	-0.000143007	8.55969E-06	-16.70702184	3.8001E-35	-0.00015993	-0.000126084	-0.00015993	-0.000126084
β3	3.44462E-07	2.78877E-08	12.35174476	3.63124E-24	2.89326E-07	3.99597E-07	2.89326E-07	3.99597E-07

Southwest Region:

Regression Statistics	
Multiple R	0.993309425
R Square	0.986663613
Adjusted R Square	0.986377833
Standard Error	0.031536315
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.30103457	3.43367819	3452.531986	5.3348E-131
Residual	140	0.139235479	0.000994539		
Total	143	10.44027005			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.278136296	0.010598224	26.24367047	6.42248E-56	0.257183038	0.299089554	0.257183038	0.299089554
β1	0.020381432	0.000467715	43.57656163	2.59609E-83	0.019456733	0.02130613	0.019456733	0.02130613
β2	-0.00014194	5.61976E-06	-25.25738215	5.41293E-54	-0.000153051	-0.00013083	-0.000153051	-0.00013083
β3	3.38578E-07	1.83093E-08	18.49210412	2.08785E-39	3.0238E-07	3.74777E-07	3.0238E-07	3.74777E-07

Rocky Mountain Region:

Regression Statistics	
Multiple R	0.9949703
R Square	0.9899658
Adjusted R Square	0.9897508
Standard Error	0.0266287
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.79418782	3.2647293	4604.11	1.199E-139
Residual	140	0.09927263	0.0007091		
Total	143	9.89346045			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.2902761	0.00894897	32.436833	5.504E-67	0.27258355	0.3079687	0.2725836	0.3079687
β1	0.0202676	0.00039493	51.319418	1.133E-92	0.01948684	0.0210484	0.0194868	0.0210484
β2	-0.0001433	4.7452E-06	-30.194046	3.595E-63	-0.0001527	-0.0001339	-0.0001527	-0.0001339
β3	3.454E-07	1.546E-08	22.340389	5.253E-48	3.1482E-07	3.76E-07	3.148E-07	3.76E-07

West Coast Region:

Regression Statistics	
Multiple R	0.992483684
R Square	0.985023864
Adjusted R Square	0.984702946
Standard Error	0.032081124
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.477071064	3.159023688	3069.401798	1.7868E-127
Residual	140	0.144087788	0.001029198		
Total	143	9.621158852			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.297817853	0.010781315	27.62351924	1.55941E-58	0.276502615	0.31913309	0.276502615	0.31913309
β1	0.020092432	0.000475796	42.22913162	1.54864E-81	0.019151759	0.021033105	0.019151759	0.021033105
β2	-0.000142719	5.71684E-06	-24.96465108	2.06229E-53	-0.000154021	-0.000131416	-0.000154021	-0.000131416
β3	3.44906E-07	1.86256E-08	18.51777816	1.81824E-39	3.08082E-07	3.81729E-07	3.08082E-07	3.81729E-07

Northern Great Plains Region:

Regression Statistics	
Multiple R	0.993525621
R Square	0.987093159
Adjusted R Square	0.986816584
Standard Error	0.031179889
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.40915184	3.469717279	3568.986978	5.3943E-132
Residual	140	0.136105966	0.000972185		
Total	143	10.5452578			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.281568556	0.010478442	26.87122338	4.04796E-57	0.260852113	0.302284998	0.260852113	0.302284998
β1	0.020437386	0.000462429	44.19569691	4.11395E-84	0.019523138	0.021351633	0.019523138	0.021351633
β2	-0.000142671	5.55624E-06	-25.67758357	8.07391E-55	-0.000153656	-0.000131686	-0.000153656	-0.000131686
β3	3.42012E-07	1.81024E-08	18.89319503	2.43032E-40	3.06223E-07	3.77802E-07	3.06223E-07	3.77802E-07

Drilling and Completion Costs for Horizontal Wells

The costs of horizontal drilling for crude oil, natural gas, and dryholes are based upon cost estimates developed for the Department of Energy's Comprehensive Oil and Gas Analysis Model. The form of the equation is as follows:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth}^2 + \beta 2 * \text{Depth}^2 * \text{nlat} + \beta 3 * \text{Depth}^2 * \text{nlat} * \text{latlen} \qquad (2.B\text{-}4)$$

Where, nlat is the number of laterals per pattern and latlen is the length of those laterals. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares.

Regression Statistics	
Multiple R	1
R Square	1
Adjusted R Square	1
Standard Error	3.12352E-12
Observations	120

ANOVA

	df	SS	MS	F	Significance F
Regression	3	147,510,801.46	49,170,267.15	5.04E+30	0.00
Residual	116	0.00	0.00		
Total	119	147,510,801.46			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	172.88	4.37E-13	3.95E+14	0.00	172.88	172.88	172.88	172.88
β1	8.07E-06	8.81E-21	9.16E+14	0.00	8.07E-06	8.07E-06	8.07E-06	8.07E-06
β2	1.15E-06	3.20E-21	3.60E+14	0.00	1.15E-06	1.15E-06	1.15E-06	1.15E-06
β3	9.22E-10	1.48E-24	6.23E+14	0.00	9.22E-10	9.22E-10	9.22E-10	9.22E-10

Cost to Equip a Primary Producer

The cost to equip a primary producer was calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). The cost to equip a primary producer is equal to the grand total cost minus the producing equipment subtotal. The data was analyzed on a regional level. The independent variable is depth. The form of the equation is given below:

$$Cost = \beta0 + \beta1 * Depth + \beta2 * Depth^2 + \beta3 * Depth^3 \quad (2.B\text{-}5)$$

where Cost = NPR_W
β0 = NPRK
β1 = NPRA
β2 = NPRB
β3 = NPRC
from equation 2-21 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS regions 2 and 4:

Regression Statistics	
Multiple R	0.921
R Square	0.849
Adjusted R Square	0.697
Standard Error	621.17
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	2,163,010.81	2,163,010.81	5.61	0.254415
Residual	1	385,858.01	385,858.01		
Total	2	2,548,868.81			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	51,315.4034	760.7805	67.4510	0.0094	41,648.8117	60,981.9952	41,648.8117	60,981.9952
β1	0.3404	0.1438	2.3676	0.2544	-1.4864	2.1672	-1.4864	2.1672

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.995
R Square	0.990
Adjusted R Square	0.981
Standard Error	1,193.14
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	145,656,740.81	145,656,740.81	102.32	0.06
Residual	1	1,423,576.87	1,423,576.87		
Total	2	147,080,317.68			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	45,821.717	1,461.289	31.357	0.020	27,254.360	64,389.074	27,254.360	64,389.074
β1	2.793	0.276	10.115	0.063	-0.716	6.302	-0.716	6.302

Rocky Mountains, applied to OLOGSS regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.9998
R Square	0.9995
Adjusted R Square	0.9990
Standard Error	224.46
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	105,460,601.42	105,460,601.42	2,093.17	0.01
Residual	1	50,383.23	50,383.23		
Total	2	105,510,984.64			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	62,709.378	274.909	228.110	0.003	59,216.346	66,202.411	59,216.346	66,202.411
β1	2.377	0.052	45.751	0.014	1.717	3.037	1.717	3.037

West Coast, applied to OLOGSS regions 6:

Regression Statistics	
Multiple R	0.9095
R Square	0.8272
Adjusted R Square	0.7408
Standard Error	2,257.74
Observations	4

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	48,812,671.60	48,812,671.60	9.58	0.09
Residual	2	10,194,785.98	5,097,392.99		
Total	3	59,007,457.58			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	106,959.788	2,219.144	48.199	0.000	97,411.576	116,508.001	97,411.576	116,508.001
β1	0.910	0.294	3.095	0.090	-0.355	2.174	-0.355	2.174

Cost to Equip a Primary Producer - Cost Adjustment Factor

The cost adjustment factor for the cost to equip a primary producer was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.994410537
R Square	0.988852316
Adjusted R Square	0.988613437
Standard Error	0.026443679
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.683975313	2.894658438	4139.554242	1.896E-136
Residual	140	0.097897541	0.000699268		
Total	143	8.781872854			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.31969898	0.008886772	35.97470366	1.30857E-72	0.302129355	0.337268604	0.302129355	0.337268604
β1	0.01951727	0.000392187	49.76527469	6.72079E-91	0.018741896	0.020292644	0.018741896	0.020292644
β2	-0.000139868	4.71225E-06	-29.68181785	2.86084E-62	-0.000149185	-0.000130552	-0.000149185	-0.000130552
β3	3.39583E-07	1.53527E-08	22.11882142	1.56166E-47	3.0923E-07	3.69936E-07	3.0923E-07	3.69936E-07

South Texas, Applied to OLOGSS Regions 2:

Regression Statistics	
Multiple R	0.994238324
R Square	0.988509845
Adjusted R Square	0.988263627
Standard Error	0.026795052
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.647535343	2.882511781	4014.781289	1.5764E-135
Residual	140	0.100516472	0.000717975		
Total	143	8.748051814			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.320349357	0.009004856	35.57517997	5.36201E-72	0.302546274	0.33815244	0.302546274	0.33815244
β1	0.019534419	0.000397398	49.15583863	3.4382E-90	0.018748742	0.020320096	0.018748742	0.020320096
β2	-0.000140302	4.77487E-06	-29.38344709	9.69188E-62	-0.000149742	-0.000130862	-0.000149742	-0.000130862
β3	3.41163E-07	1.55567E-08	21.9303828	3.96368E-47	3.10407E-07	3.7192E-07	3.10407E-07	3.7192E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994150147
R Square	0.988334515
Adjusted R Square	0.98808454
Standard Error	0.026852947
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.552894405	2.850964802	3953.738464	4.5499E-135
Residual	140	0.100951309	0.000721081		
Total	143	8.653845713			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.322462264	0.009024312	35.73261409	3.07114E-72	0.304620715	0.340303814	0.304620715	0.340303814
β1	0.019485751	0.000398256	48.9276546	6.36471E-90	0.018698377	0.020273125	0.018698377	0.020273125
β2	-0.000140187	4.78518E-06	-29.29612329	1.3875E-61	-0.000149648	-0.000130727	-0.000149648	-0.000130727
β3	3.41143E-07	1.55903E-08	21.88177944	5.04366E-47	3.1032E-07	3.71966E-07	3.1032E-07	3.71966E-07

West Texas, Applied to OLOGSS Regions 4:

Regression Statistics	
Multiple R	0.99407047
R Square	0.988176099
Adjusted R Square	0.98792273
Standard Error	0.026915882
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.476544403	2.825514801	3900.141282	1.1696E-134
Residual	140	0.101425062	0.000724465		
Total	143	8.577969465			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.324216701	0.009045462	35.84302113	2.08007E-72	0.306333337	0.342100066	0.306333337	0.342100066
β1	0.019446254	0.00039919	48.71430741	1.1346E-89	0.018657034	0.020235473	0.018657034	0.020235473
β2	-0.000140099	4.7964E-06	-29.20929598	1.98384E-61	-0.000149582	-0.000130617	-0.000149582	-0.000130617
β3	3.41157E-07	1.56268E-08	21.8315363	6.47229E-47	3.10262E-07	3.72052E-07	3.10262E-07	3.72052E-07

West Coast, Applied to OLOGSS Regions 6:

Regression Statistics	
Multiple R	0.994533252
R Square	0.98909639
Adjusted R Square	0.988862741
Standard Error	0.026511278
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.92601569	2.975338563	4233.261276	4.0262E-137
Residual	140	0.098398698	0.000702848		
Total	143	9.024414388			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.314154129	0.008909489	35.26062149	1.64245E-71	0.296539591	0.331768668	0.296539591	0.331768668
β1	0.019671366	0.000393189	50.03029541	3.32321E-91	0.01889401	0.020448722	0.01889401	0.020448722
β2	-0.000140565	4.7243E-06	-29.75371308	2.13494E-62	-0.000149906	-0.000131225	-0.000149906	-0.000131225
β3	3.40966E-07	1.53919E-08	22.15229024	1.32417E-47	3.10535E-07	3.71397E-07	3.10535E-07	3.71397E-07

Primary Workover Costs

Primary workover costs were calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Workover costs consist of the total of workover rig services, remedial services, equipment repair and other costs. The data was analyzed on a regional level. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}6)$$

where Cost = WRK_W
β0 = WRKK
β1 = WRKA
β2 = WRKB
β3 = WRKC
from equation 2-22 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

Rocky Mountains, Applied to OLOGSS Region 1, 5, and 7:

Regression Statistics	
Multiple R	0.9839
R Square	0.9681
Adjusted R Square	0.9363
Standard Error	1,034.20
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	32,508,694.98	32,508,694.98	30.39	0.11
Residual	1	1,069,571.02	1,069,571.02		
Total	2	33,578,265.99			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	1,736.081	1,266.632	1.371	0.401	-14,357.935	17,830.097	-14,357.935	17,830.097
β1	1.320	0.239	5.513	0.114	-1.722	4.361	-1.722	4.361

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.7558
R Square	0.5713
Adjusted R Square	0.4284
Standard Error	978.19
Observations	5

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	3,824,956.55	3,824,956.55	4.00	0.14
Residual	3	2,870,570.06	956,856.69		
Total	4	6,695,526.61			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	1,949.479	1,043.913	1.867	0.159	-1,372.720	5,271.678	-1,372.720	5,271.678
β1	0.364	0.182	1.999	0.139	-0.216	0.945	-0.216	0.945

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.9762
R Square	0.9530
Adjusted R Square	0.9060
Standard Error	2,405.79
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	117,342,912.53	117,342,912.53	20.27	0.14
Residual	1	5,787,839.96	5,787,839.96		
Total	2	123,130,752.49			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	-2,738.051	2,946.483	-0.929	0.523	-40,176.502	34,700.400	-40,176.502	34,700.400
β1	2.507	0.557	4.503	0.139	-4.568	9.582	-4.568	9.582

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.9898
R Square	0.9798
Adjusted R Square	0.9595
Standard Error	747.71
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	27,074,389.00	27,074,389.00	48.43	0.09
Residual	1	559,069.20	559,069.20		
Total	2	27,633,458.19			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	389.821	915.753	0.426	0.744	-11,245.876	12,025.518	-11,245.876	12,025.518
β1	1.204	0.173	6.959	0.091	-0.995	3.403	-0.995	3.403

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.9985
R Square	0.9969
Adjusted R Square	0.9939
Standard Error	273.2
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	24,387,852.65	24,387,852.65	326.67	0.04
Residual	1	74,656.68	74,656.68		
Total	2	24,462,509.32			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	1,326.648	334.642	3.964	0.157	-2,925.359	5,578.654	-2,925.359	5,578.654
β1	1.143	0.063	18.074	0.035	0.339	1.947	0.339	1.947

Primary Workover Costs - Cost Adjustment Factor

The cost adjustment factor for primary workover costs was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.994400682
R Square	0.988832717
Adjusted R Square	0.988593418
Standard Error	0.02694729
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.001886791	3.00062893	4132.207262	2.1441E-136
Residual	140	0.101661902	0.000726156		
Total	143	9.103548693			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.312539579	0.009056017	34.51181296	2.43715E-70	0.294635346	0.330443812	0.294635346	0.330443812
β1	0.019707131	0.000399656	49.31028624	2.26953E-90	0.018916991	0.020497272	0.018916991	0.020497272
β2	-0.000140623	4.802E-06	-29.28428914	1.45673E-61	-0.000150117	-0.000131129	-0.000150117	-0.000131129
β3	3.40873E-07	1.5645E-08	21.78791181	8.03921E-47	3.09942E-07	3.71804E-07	3.09942E-07	3.71804E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.994469633
R Square	0.98896985
Adjusted R Square	0.98873349
Standard Error	0.026569939
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.861572267	2.953857422	4184.161269	9.0291E-137
Residual	140	0.098834632	0.000705962		
Total	143	8.960406899			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.315903453	0.008929203	35.37868321	1.07799E-71	0.298249938	0.333556967	0.298249938	0.333556967
β1	0.019629392	0.000394059	49.81332121	5.91373E-91	0.018850316	0.020408468	0.018850316	0.020408468
β2	-0.000140391	4.73475E-06	-29.65123432	3.24065E-62	-0.000149752	-0.00013103	-0.000149752	-0.00013103
β3	3.40702E-07	1.5426E-08	22.08625878	1.83379E-47	3.10204E-07	3.712E-07	3.10204E-07	3.712E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994481853
R Square	0.988994155
Adjusted R Square	0.988758316
Standard Error	0.026752366
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.003736634	3.001245545	4193.504662	7.7373E-137
Residual	140	0.100196473	0.000715689		
Total	143	9.103933107			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.312750341	0.00899051	34.78671677	9.00562E-71	0.294975619	0.330525063	0.294975619	0.330525063
β1	0.019699787	0.000396765	49.6510621	9.11345E-91	0.018915362	0.020484212	0.018915362	0.020484212
β2	-0.000140541	4.76726E-06	-29.480463	6.51147E-62	-0.000149966	-0.000131116	-0.000149966	-0.000131116
β3	3.40661E-07	1.55319E-08	21.93302302	3.91217E-47	3.09954E-07	3.71368E-07	3.09954E-07	3.71368E-07

West Texas, Applied to OLOGSS Regions 4:

Regression Statistics	
Multiple R	0.949969362
R Square	0.902441789
Adjusted R Square	0.900351256
Standard Error	0.090634678
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.63829925	3.546099748	431.6802228	1.59892E-70
Residual	140	1.150050289	0.008214645		
Total	143	11.78834953			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.281549378	0.030459064	9.243533578	3.55063E-16	0.221330174	0.341768582	0.221330174	0.341768582
β1	0.020360006	0.001344204	15.14651492	2.70699E-31	0.017702443	0.02301757	0.017702443	0.02301757
β2	-0.000140998	1.61511E-05	-8.729925387	6.86299E-15	-0.000172929	-0.000109066	-0.000172929	-0.000109066
β3	3.36972E-07	5.26206E-08	6.403797584	2.14112E-09	2.32938E-07	4.41006E-07	2.32938E-07	4.41006E-07

West Coast, Applied to OLOGSS Regions 6:

Regression Statistics	
Multiple R	0.994382746
R Square	0.988797046
Adjusted R Square	0.988556983
Standard Error	0.026729324
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.828330392	2.942776797	4118.9013	2.6803E-136
Residual	140	0.100023944	0.000714457		
Total	143	8.928354335			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.316566704	0.008982767	35.24155917	1.75819E-71	0.298807292	0.334326116	0.298807292	0.334326116
β1	0.019613748	0.000396423	49.47682536	1.45204E-90	0.018829998	0.020397497	0.018829998	0.020397497
β2	-0.000140368	4.76315E-06	-29.46957335	6.80842E-62	-0.000149785	-0.000130951	-0.000149785	-0.000130951
β3	3.40752E-07	1.55185E-08	21.95777375	3.46083E-47	3.10071E-07	3.71433E-07	3.10071E-07	3.71433E-07

Cost to Convert a Primary to Secondary Well

The cost to convert a primary to secondary well was calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Conversion costs for a primary to a secondary well consist of pumping equipment, rods and pumps, and supply wells. The data was analyzed on a regional level. The secondary operations costs for each region are determined by multiplying the costs in West Texas by the ratio of primary operating costs. This method was used in the National Petroleum Council's (NPC) EOR study of 1984. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}7)$$

where Cost = PSW_W
β0 = PSWK
β1 = PSWA
β2 = PSWB
β3 = PSWC
from equation 2-35 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.999208
R Square	0.998416
Adjusted R Square	0.996832
Standard Error	9968.98
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	62,643,414,406.49	62,643,414,406.49	630.34	0.03
Residual	1	99,380,639.94	99,380,639.94		
Total	2	62,742,795,046.43			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	-115.557	12,209.462	-0.009	0.994	-155,250.815	155,019.701	-155,250.815	155,019.701
β1	57.930	2.307	25.107	0.025	28.612	87.248	28.612	87.248

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.996760
R Square	0.993531
Adjusted R Square	0.991914
Standard Error	16909.05
Observations	6

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	175,651,490,230.16	175,651,490,230.16	614.35	0.00
Residual	4	1,143,664,392.16	285,916,098.04		
Total	5	176,795,154,622.33			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	-10,733.7	14,643.670	-0.733	0.504	-51,391.169	29,923.692	-51,391.169	29,923.692
β1	68.593	2.767	24.786	0.000	60.909	76.276	60.909	76.276

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.999830
R Square	0.999660
Adjusted R Square	0.999320
Standard Error	4047.64
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	48,164,743,341	48,164,743,341	2,939.86	0.01
Residual	1	16,383,350	16,383,350		
Total	2	48,181,126,691			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	-32,919.3	4,957.320	-6.641	0.095	-95,907.768	30,069.148	-95,907.768	30,069.148
β1	50.796	0.937	54.220	0.012	38.893	62.700	38.893	62.700

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	1.00000
R Square	0.99999
Adjusted R Square	0.99999
Standard Error	552.23
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	44,056,261,873.48	44,056,261,873.48	144,469.3	0.00
Residual	1	304,952.52	304,952.52		
Total	2	44,056,566,825.99			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	-25,175.8	676.335	-37.224	0.017	-33,769.389	-16,582.166	-33,769.389	-16,582.166
β1	48.581	0.128	380.091	0.002	46.957	50.205	46.957	50.205

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.999970
R Square	0.999941
Adjusted R Square	0.999882
Standard Error	2317.03
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	90,641,249,203.56	90,641,249,203.56	16,883.5	0.00
Residual	1	5,368,613.99	5,368,613.99		
Total	2	90,646,617,817.55			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	-47,775.5	2,837.767	-16.836	0.038	-83,832.597	-11,718.412	-83,832.597	-11,718.412
β1	69.683	0.536	129.937	0.005	62.869	76.498	62.869	76.498

Cost to Convert a Primary to Secondary Well - Cost Adjustment Factor

The cost adjustment factor for the cost to convert a primary to secondary well was calculated using data through 2008 from the Cost and Indices data base provided EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.994210954
R Square	0.988455421
Adjusted R Square	0.988208037
Standard Error	0.032636269
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	12.7675639	4.255854635	3995.634681	2.1943E-135
Residual	140	0.149117649	0.001065126		
Total	143	12.91668155			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.386844292	0.010967879	35.27065592	1.58464E-71	0.365160206	0.408528378	0.365160206	0.408528378
β1	0.023681158	0.000484029	48.92509151	6.40898E-90	0.022724207	0.024638109	0.022724207	0.024638109
β2	-0.000169861	5.81577E-06	-29.207048	2.00231E-61	-0.00018136	-0.000158363	-0.00018136	-0.000158363
β3	4.12786E-07	1.89479E-08	21.78527316	8.14539E-47	3.75325E-07	4.50247E-07	3.75325E-07	4.50247E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.965088368
R Square	0.931395559
Adjusted R Square	0.929925464
Standard Error	0.077579302
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	11.43935934	3.813119781	633.5614039	3.21194E-81
Residual	140	0.842596733	0.006018548		
Total	143	12.28195608			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.403458143	0.02607162	15.4749932	4.09637E-32	0.351913151	0.455003136	0.351913151	0.455003136
β1	0.023030837	0.00115058	20.01672737	6.5441E-43	0.02075608	0.025305595	0.02075608	0.025305595
β2	-0.000167719	1.38246E-05	-12.13194348	1.34316E-23	-0.000195051	-0.000140387	-0.000195051	-0.000140387
β3	4.10451E-07	4.5041E-08	9.112847285	7.57277E-16	3.21403E-07	4.995E-07	3.21403E-07	4.995E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.930983781
R Square	0.866730801
Adjusted R Square	0.863875032
Standard Error	0.115716747
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	12.19199867	4.063999556	303.5017657	4.7623E-61
Residual	140	1.874651162	0.013390365		
Total	143	14.06664983			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.39376891	0.038888247	10.12565341	2.02535E-18	0.316884758	0.470653063	0.316884758	0.470653063
β1	0.023409924	0.001716196	13.6405849	1.759E-27	0.020016911	0.026802936	0.020016911	0.026802936
β2	-0.000169013	2.06207E-05	-8.196307608	1.41642E-13	-0.000209782	-0.000128245	-0.000209782	-0.000128245
β3	4.11972E-07	6.71828E-08	6.132113904	8.35519E-09	2.79148E-07	5.44796E-07	2.79148E-07	5.44796E-07

West Texas, Applied to OLOGSS Regions 4:

Regression Statistics	
Multiple R	0.930623851
R Square	0.866060752
Adjusted R Square	0.863190626
Standard Error	0.117705607
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	12.5418858	4.180628599	301.7500036	6.76263E-61
Residual	140	1.939645392	0.01385461		
Total	143	14.48153119			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.363067907	0.039556632	9.178433366	5.17966E-16	0.284862323	0.441273492	0.284862323	0.441273492
β1	0.024133277	0.001745693	13.82446554	5.96478E-28	0.020681947	0.027584606	0.020681947	0.027584606
β2	-0.000175479	2.09751E-05	-8.366057262	5.44112E-14	-0.000216948	-0.00013401	-0.000216948	-0.00013401
β3	4.28328E-07	6.83375E-08	6.267838182	4.24825E-09	2.93221E-07	5.63435E-07	2.93221E-07	5.63435E-07

West Coast, Applied to OLOGSS Regions 6:

Regression Statistics	
Multiple R	0.930187107
R Square	0.865248054
Adjusted R Square	0.862360512
Standard Error	0.116469162
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	12.19426209	4.06475403	299.6486777	1.03233E-60
Residual	140	1.899109212	0.013565066		
Total	143	14.0933713			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.393797507	0.039141107	10.06097011	2.96602E-18	0.316413437	0.471181577	0.316413437	0.471181577
β1	0.023409194	0.001727356	13.55204156	2.96327E-27	0.01999412	0.026824269	0.01999412	0.026824269
β2	-0.000168995	2.07548E-05	-8.142483197	1.91588E-13	-0.000210029	-0.000127962	-0.000210029	-0.000127962
β3	4.11911E-07	6.76196E-08	6.091589926	1.02095E-08	2.78223E-07	5.45599E-07	2.78223E-07	5.45599E-07

Cost to Convert a Producer to an Injector

The cost to convert a production well to an injection well was calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Conversion costs for a production to an injection well consist of tubing replacement, distribution lines and header costs. The data was analyzed on a regional level. The secondary operation costs for each region are determined by multiplying the costs in West Texas by the ratio of primary operating costs. This method was used in the National Petroleum Council's (NPC) EOR study of 1984. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}8)$$

where Cost = PSI_W
β0 = PSIK
β1 = PSIA
β2 = PSIB
β3 = PSIC
from equation 2-36 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.994714
R Square	0.989456
Adjusted R Square	0.978913
Standard Error	3204.94
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	963,939,802.16	963,939,802.16	93.84	0.07
Residual	1	10,271,635.04	10,271,635.04		
Total	2	974,211,437.20			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	11,129.3	3,925.233	2.835	0.216	-38,745.259	61,003.937	-38,745.259	61,003.937
β1	7.186	0.742	9.687	0.065	-2.239	16.611	-2.239	16.611

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.988716
R Square	0.977560
Adjusted R Square	0.971950
Standard Error	4435.41
Observations	6

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	3,428,080,322.21	3,428,080,322.21	174.25	0.00
Residual	4	78,691,571.93	19,672,892.98		
Total	5	3,506,771,894.14			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	24,640.6	3,841.181	6.415	0.003	13,975.763	35,305.462	13,975.763	35,305.462
β1	9.582	0.726	13.201	0.000	7.567	11.598	7.567	11.598

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.993556
R Square	0.987154
Adjusted R Square	0.974307
Standard Error	3770.13
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1,092,230,257.01	1,092,230,257.01	76.84	0.07
Residual	1	14,213,917.83	14,213,917.83		
Total	2	1,106,444,174.85			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	9,356.411	4,617.453	2.026	0.292	-49,313.648	68,026.469	-49,313.648	68,026.469
β1	7.649	0.873	8.766	0.072	-3.438	18.737	-3.438	18.737

Rocky Mountains, applied to OLOGSS regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.995436
R Square	0.990893
Adjusted R Square	0.981785
Standard Error	3266.39
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	1,160,837,008.65	1,160,837,008.65	108.80	0.06
Residual	1	10,669,310.85	10,669,310.85		
Total	2	1,171,506,319.50			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	24,054.311	4,000.496	6.013	0.105	-26,776.589	74,885.211	-26,776.589	74,885.211
β1	7.886	0.756	10.431	0.061	-1.720	17.492	-1.720	17.492

West Coast, applied to OLOGSS region 6:

Regression Statistics	
Multiple R	0.998023
R Square	0.996050
Adjusted R Square	0.992100
Standard Error	2903.09
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	2,125,305,559.02	2,125,305,559.02	252.17	0.04
Residual	1	8,427,914.12	8,427,914.12		
Total	2	2,133,733,473.15			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	11,125.846	3,555.541	3.129	0.197	-34,051.391	56,303.083	-34,051.391	56,303.083
β1	10.670	0.672	15.880	0.040	2.133	19.208	2.133	19.208

Cost to Convert a Producer to an Injector - Cost Adjustment Factor

The cost adjustment factor for the cost to convert a producer to an injector was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.99432304
R Square	0.988678308
Adjusted R Square	0.9884357
Standard Error	0.026700062
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.715578807	2.905192936	4075.214275	5.6063E-136
Residual	140	0.099805061	0.000712893		
Total	143	8.815383869			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.318906241	0.008972933	35.54091476	6.05506E-72	0.301166271	0.336646211	0.301166271	0.336646211
β1	0.019564167	0.000395989	49.40584281	1.75621E-90	0.018781276	0.020347059	0.018781276	0.020347059
β2	-0.000140323	4.75794E-06	-29.49235038	6.20216E-62	-0.00014973	-0.000130916	-0.00014973	-0.000130916
β3	3.40991E-07	1.55015E-08	21.9972576	2.84657E-47	3.10343E-07	3.71638E-07	3.10343E-07	3.71638E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.994644466
R Square	0.989317613
Adjusted R Square	0.989088705
Standard Error	0.025871111
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.678119686	2.892706562	4321.895164	9.5896E-138
Residual	140	0.093704013	0.000669314		
Total	143	8.771823699			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.316208692	0.008694352	36.36943685	3.2883E-73	0.299019491	0.333397893	0.299019491	0.333397893
β1	0.01974618	0.000383695	51.46325116	7.80746E-93	0.018987594	0.020504765	0.018987594	0.020504765
β2	-0.000142963	4.61022E-06	-31.00997536	1.39298E-64	-0.000152077	-0.000133848	-0.000152077	-0.000133848
β3	3.4991E-07	1.50202E-08	23.29589312	5.12956E-50	3.20214E-07	3.79606E-07	3.20214E-07	3.79606E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994321224
R Square	0.988674696
Adjusted R Square	0.988432011
Standard Error	0.026701262
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.713550392	2.904516797	4073.899599	5.7329E-136
Residual	140	0.099814034	0.000712957		
Total	143	8.813364425			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.318954549	0.008973336	35.54470092	5.97425E-72	0.301213782	0.336695317	0.301213782	0.336695317
β1	0.019563077	0.000396007	49.40087012	1.77978E-90	0.018780151	0.020346004	0.018780151	0.020346004
β2	-0.000140319	4.75815E-06	-29.49027089	6.25518E-62	-0.000149726	-0.000130912	-0.000149726	-0.000130912
β3	3.40985E-07	1.55022E-08	21.99592439	2.8654E-47	3.10337E-07	3.71634E-07	3.10337E-07	3.71634E-07

West Texas, Applied to OLOGSS Regions 4:

Regression Statistics	
Multiple R	0.994322163
R Square	0.988676564
Adjusted R Square	0.988433919
Standard Error	0.026700311
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.714383869	2.904794623	4074.579587	5.667E-136
Residual	140	0.099806922	0.000712907		
Total	143	8.814190792			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.318944377	0.008973016	35.54483358	5.97144E-72	0.301204242	0.336684512	0.301204242	0.336684512
β1	0.019563226	0.000395993	49.40300666	1.76961E-90	0.018780328	0.020346125	0.018780328	0.020346125
β2	-0.000140317	4.75798E-06	-29.49085218	6.24031E-62	-0.000149724	-0.00013091	-0.000149724	-0.00013091
β3	3.40976E-07	1.55017E-08	21.99610109	2.8629E-47	3.10328E-07	3.71624E-07	3.10328E-07	3.71624E-07

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.994041278
R Square	0.988118061
Adjusted R Square	0.987863448
Standard Error	0.027307293
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.681741816	2.893913939	3880.863048	1.6477E-134
Residual	140	0.104396354	0.000745688		
Total	143	8.78613817			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.31978359	0.009177001	34.84619603	7.26644E-71	0.301640166	0.337927015	0.301640166	0.337927015
β1	0.019531533	0.000404995	48.22662865	4.2897E-89	0.018730837	0.02033223	0.018730837	0.02033223
β2	-0.000140299	4.86615E-06	-28.83170535	9.47626E-61	-0.00014992	-0.000130679	-0.00014992	-0.000130679
β3	3.41616E-07	1.58541E-08	21.54755837	2.66581E-46	3.10272E-07	3.7296E-07	3.10272E-07	3.7296E-07

Facilities Upgrade Costs for Crude Oil Wells

The facilities upgrading cost for secondary oil wells was calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Facilities costs for a secondary oil well consist of plant costs and electrical costs. The data was analyzed on a regional level. The secondary operation costs for each region are determined by multiplying the costs in West Texas by the ratio of primary operating costs. This method was used in the National Petroleum Council's (NPC) EOR study of 1984. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}9)$$

where Cost = FAC_W
β0 = FACUPK
β1 = FACUPA
β2 = FACUPB
β3 = FACUPC
from equation 2-23 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.947660
R Square	0.898060
Adjusted R Square	0.796120
Standard Error	6332.38
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	353,260,332.81	353,260,332.81	8.81	0.21
Residual	1	40,099,063.51	40,099,063.51		
Total	2	393,359,396.32			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	20,711.761	7,755.553	2.671	0.228	-77,831.455	119,254.977	-77,831.455	119,254.977
β1	4.350	1.466	2.968	0.207	-14.273	22.973	-14.273	22.973

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.942744
R Square	0.888767
Adjusted R Square	0.851689
Standard Error	6699.62
Observations	5

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1,075,905,796.72	1,075,905,796.72	23.97	0.02
Residual	3	134,654,629.89	44,884,876.63		
Total	4	1,210,560,426.61			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	33,665.6	7,149.747	4.709	0.018	10,911.921	56,419.338	10,911.921	56,419.338
β1	6.112	1.248	4.896	0.016	2.139	10.085	2.139	10.085

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.950784
R Square	0.903990
Adjusted R Square	0.807980
Standard Error	6705.31
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	423,335,427.35	423,335,427.35	9.42	0.20
Residual	1	44,961,183.70	44,961,183.70		
Total	2	468,296,611.04			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	19,032.550	8,212.294	2.318	0.259	-85,314.094	123,379.194	-85,314.094	123,379.194
β1	4.762	1.552	3.068	0.201	-14.957	24.482	-14.957	24.482

Rocky Mountains, applied to OLOGSS regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.90132
R Square	0.81238
Adjusted R Square	0.62476
Standard Error	8,531
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	315,132,483.91	315,132,483.91	4.33	0.29
Residual	1	72,780,134.04	72,780,134.04		
Total	2	387,912,617.95			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	37,322	10,448.454	3.572	0.174	-95,437.589	170,081.677	-95,437.589	170,081.677
β1	4.109	1.975	2.081	0.285	-20.980	29.198	-20.980	29.198

West Coast, applied to OLOGSS region 6:

Regression Statistics	
Multiple R	0.974616
R Square	0.949876
Adjusted R Square	0.899753
Standard Error	6,765.5
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	867,401,274.79	867,401,274.79	18.95	0.14
Residual	1	45,771,551.83	45,771,551.83		
Total	2	913,172,826.62			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	23,746.6	8,285.972	2.866	0.214	-81,536.251	129,029.354	-81,536.251	129,029.354
β1	6.817	1.566	4.353	0.144	-13.080	26.713	-13.080	26.713

Facilities Upgrade Costs for Oil Wells - Cost Adjustment Factor

The cost adjustment factor for facilities upgrade costs for oil wells was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.994217662
R Square	0.988468759
Adjusted R Square	0.988221661
Standard Error	0.026793237
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.615198936	2.871732979	4000.310244	2.0238E-135
Residual	140	0.100502859	0.000717878		
Total	143	8.715701795			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.321111529	0.009004246	35.66223488	3.93903E-72	0.303309651	0.338913406	0.303309651	0.338913406
β1	0.019515262	0.000397371	49.11095778	3.88014E-90	0.018729638	0.020300885	0.018729638	0.020300885
β2	-0.00014023	4.77454E-06	-29.37035185	1.02272E-61	-0.00014967	-0.00013079	-0.00014967	-0.00013079
β3	3.4105E-07	1.55556E-08	21.92459665	4.07897E-47	3.10296E-07	3.71805E-07	3.10296E-07	3.71805E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.994217643
R Square	0.988468723
Adjusted R Square	0.988221624
Standard Error	0.026793755
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.615504692	2.871834897	4000.297521	2.0242E-135
Residual	140	0.100506746	0.000717905		
Total	143	8.716011438			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.321091731	0.00900442	35.65934676	3.9795E-72	0.30328951	0.338893953	0.30328951	0.338893953
β1	0.019515756	0.000397379	49.11125155	3.87707E-90	0.018730117	0.020301395	0.018730117	0.020301395
β2	-0.000140234	4.77464E-06	-29.37065243	1.02145E-61	-0.000149674	-0.000130794	-0.000149674	-0.000130794
β3	3.41061E-07	1.55559E-08	21.92486379	4.07357E-47	3.10306E-07	3.71816E-07	3.10306E-07	3.71816E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994881087
R Square	0.989788377
Adjusted R Square	0.989569556
Standard Error	0.025598703
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.892246941	2.964082314	4523.289171	4.0903E-139
Residual	140	0.0917411	0.000655294		
Total	143	8.983988041			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.305413562	0.008602806	35.50162345	6.96151E-72	0.288405354	0.32242177	0.288405354	0.32242177
β1	0.019922983	0.000379655	52.47659224	5.82045E-94	0.019172385	0.020673581	0.019172385	0.020673581
β2	-0.000143398	4.56168E-06	-31.43544891	2.62249E-65	-0.000152417	-0.00013438	-0.000152417	-0.00013438
β3	3.48664E-07	1.48621E-08	23.45993713	2.3433E-50	3.1928E-07	3.78047E-07	3.1928E-07	3.78047E-07

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.994218671
R Square	0.988470767
Adjusted R Square	0.988223712
Standard Error	0.026793398
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.616820316	2.872273439	4001.015021	1.9993E-135
Residual	140	0.100504067	0.000717886		
Total	143	8.717324383			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.32105584	0.0090043	35.65583598	4.02926E-72	0.303253856	0.338857825	0.303253856	0.338857825
β1	0.019516684	0.000397373	49.11424236	3.84594E-90	0.018731056	0.020302312	0.018731056	0.020302312
β2	-0.00014024	4.77457E-06	-29.37236101	1.01431E-61	-0.00014968	-0.000130801	-0.00014968	-0.000130801
β3	3.4108E-07	1.55557E-08	21.92639924	4.0427E-47	3.10326E-07	3.71835E-07	3.10326E-07	3.71835E-07

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.994682968
R Square	0.989394207
Adjusted R Square	0.98916694
Standard Error	0.025883453
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.749810675	2.916603558	4353.444193	5.7951E-138
Residual	140	0.093793438	0.000669953		
Total	143	8.843604113			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.320979436	0.0086985	36.90055074	5.22609E-74	0.303782034	0.338176837	0.303782034	0.338176837
β1	0.019117244	0.000383878	49.80033838	6.12166E-91	0.018358297	0.019876191	0.018358297	0.019876191
β2	-0.000134273	4.61242E-06	-29.11109331	2.97526E-61	-0.000143392	-0.000125154	-0.000143392	-0.000125154
β3	3.21003E-07	1.50274E-08	21.36117616	6.78747E-46	2.91293E-07	3.50713E-07	2.91293E-07	3.50713E-07

Natural Gas Well Facilities Costs

Natural gas well facilities costs were calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Well facilities costs consist of flowlines and connections, production package costs, and storage tank costs. The data was analyzed on a regional level. The independent variables are depth and Q, which is the flow rate of natural gas in million cubic feet. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * Q + \beta 3 * \text{Depth} * Q \qquad (2.B\text{-}10)$$

where Cost = FWC_W
β0 = FACGK
β1 = FACGA
β2 = FACGB
β3 = FACGC
Q = PEAKDAILY_RATE
from equation 2-28 in Chapter 2.

Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.9834
R Square	0.9672
Adjusted R Square	0.9562
Standard Error	5,820.26
Observations	13

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8,982,542,532.41	2,994,180,844.14	88.39	0.00
Residual	9	304,879,039.45	33,875,448.83		
Total	12	9,287,421,571.86			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	3,477.41	4,694.03	0.74	0.48	-7,141.24	14,096.05	-7,141.24	14,096.05
β1	5.04	0.40	12.51	0.00	4.13	5.95	4.13	5.95
β2	63.87	19.07	3.35	0.01	20.72	107.02	20.72	107.02
β3	0.00	0.00	-3.18	0.01	-0.01	0.00	-0.01	0.00

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.9621
R Square	0.9256
Adjusted R Square	0.9139
Standard Error	8,279.60
Observations	23

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	16,213,052,116.02	5,404,350,705.34	78.84	0.00
Residual	19	1,302,484,315.70	68,551,806.09		
Total	22	17,515,536,431.72			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	14,960.60	4,066.98	3.68	0.00	6,448.31	23,472.90	6,448.31	23,472.90
β1	4.87	0.47	10.34	0.00	3.88	5.85	3.88	5.85
β2	28.49	6.42	4.43	0.00	15.04	41.93	15.04	41.93
β3	0.00	0.00	-3.62	0.00	0.00	0.00	0.00	0.00

Mid-Continent, applied to OLOGSS regions 3 and 6:

Regression Statistics	
Multiple R	0.9917
R Square	0.9835
Adjusted R Square	0.9765
Standard Error	4,030.43
Observations	11

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	6,796,663,629.62	2,265,554,543.21	139.47	0.00
Residual	7	113,710,456.60	16,244,350.94		
Total	10	6,910,374,086.22			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	10,185.92	3,441.41	2.96	0.02	2,048.29	18,323.54	2,048.29	18,323.54
β1	4.51	0.29	15.71	0.00	3.83	5.18	3.83	5.18
β2	55.38	14.05	3.94	0.01	22.16	88.60	22.16	88.60
β3	0.00	0.00	-3.78	0.01	-0.01	0.00	-0.01	0.00

Rocky Mountains, applied to OLOGSS regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.9594
R Square	0.9204
Adjusted R Square	0.8806
Standard Error	7,894.95
Observations	10

ANOVA

	df	SS	MS	F	Significance F
Regression	3	4,322,988,996.06	1,440,996,332.02	23.12	0.00
Residual	6	373,981,660.54	62,330,276.76		
Total	9	4,696,970,656.60			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	7,922.48	8,200.06	0.97	0.37	-12,142.36	27,987.31	-12,142.36	27,987.31
β1	6.51	1.14	5.71	0.00	3.72	9.30	3.72	9.30
β2	89.26	28.88	3.09	0.02	18.59	159.94	18.59	159.94
β3	-0.01	0.00	-2.77	0.03	-0.01	0.00	-0.01	0.00

Gas Well Facilities Costs - Cost Adjustment Factor

The cost adjustment factor for gas well facilities cost was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $1 to $20 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $5 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Gas Price} + \beta 2 * \text{Gas Price}^2 + \beta 3 * \text{Gas Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.995733794
R Square	0.991485789
Adjusted R Square	0.991303341
Standard Error	0.025214281
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.3648558	3.454951933	5434.365566	1.2179E-144
Residual	140	0.089006392	0.00063576		
Total	143	10.45386219			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.276309237	0.008473615	32.60818851	2.86747E-67	0.259556445	0.293062029	0.259556445	0.293062029
β1	0.20599743	0.003739533	55.08640551	8.89871E-97	0.198604173	0.213390688	0.198604173	0.213390688
β2	-0.014457925	0.000449317	-32.17753015	1.48375E-66	-0.015346249	-0.0135696	-0.015346249	-0.0135696
β3	0.000347281	1.46389E-05	23.72318475	6.71084E-51	0.000318339	0.000376223	0.000318339	0.000376223

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.99551629
R Square	0.991052684
Adjusted R Square	0.990860956
Standard Error	0.025683748
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.22936837	3.409789455	5169.05027	3.9254E-143
Residual	140	0.092351689	0.000659655		
Total	143	10.32172006			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.280854163	0.008631386	32.5387085	3.73403E-67	0.263789449	0.297918878	0.263789449	0.297918878
β1	0.204879431	0.00380916	53.78599024	2.17161E-95	0.197348518	0.212410345	0.197348518	0.212410345
β2	-0.014391989	0.000457683	-31.44530093	2.52353E-65	-0.015296854	-0.013487125	-0.015296854	-0.013487125
β3	0.000345909	1.49115E-05	23.19753012	8.21832E-50	0.000316428	0.00037539	0.000316428	0.00037539

Mid-Continent, Applied to OLOGSS Regions 3 and 6:

Regression Statistics	
Multiple R	0.995511275
R Square	0.991042698
Adjusted R Square	0.990850756
Standard Error	0.025690919
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.22356717	3.407855722	5163.235345	4.2442E-143
Residual	140	0.092403264	0.000660023		
Total	143	10.31597043			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.280965064	0.008633796	32.5424714	3.68097E-67	0.263895586	0.298034543	0.263895586	0.298034543
β1	0.204856879	0.003810223	53.7650588	2.28751E-95	0.197323863	0.212389895	0.197323863	0.212389895
β2	-0.014391983	0.000457811	-31.43650889	2.61165E-65	-0.0152971	-0.013486865	-0.0152971	-0.013486865
β3	0.000345929	1.49156E-05	23.19242282	8.42221E-50	0.00031644	0.000375418	0.00031644	0.000375418

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.995452965
R Square	0.990926606
Adjusted R Square	0.990732176
Standard Error	0.025768075
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.15228252	3.384094173	5096.576002	1.0453E-142
Residual	140	0.092959113	0.000663994		
Total	143	10.24524163			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.282511839	0.008659725	32.62364879	2.704E-67	0.265391097	0.299632581	0.265391097	0.299632581
β1	0.204502598	0.003821666	53.51137044	4.3021E-95	0.196946958	0.212058237	0.196946958	0.212058237
β2	-0.014382652	0.000459186	-31.32206064	4.08566E-65	-0.015290487	-0.013474816	-0.015290487	-0.013474816
β3	0.000345898	1.49604E-05	23.12086258	1.18766E-49	0.00031632	0.000375475	0.00031632	0.000375475

Fixed Annual Costs for Crude Oil Wells

The fixed annual cost for crude oil wells was calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Fixed annual costs consist of supervision and overhead costs, auto usage costs, operative supplies, labor costs, supplies and services costs, equipment usage and other costs.

The data was analyzed on a regional level. The independent variable is depth. The form of the equation is given below:

$$Cost = \beta0 + \beta1 * Depth + \beta2 * Depth^2 + \beta3 * Depth^3 \quad (2.B\text{-}11)$$

where Cost = OMO_W
β0 = OMOK
β1 = OMOA
β2 = OMOB
β3 = OMOC
from equation 2-30 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.9895
R Square	0.9792
Adjusted R Square	0.9584
Standard Error	165.6
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1,290,021.8	1,290,021.8	47.0	0.1
Residual	1	27,419.5	27,419.5		
Total	2	1,317,441.3			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	6,026.949	202.804	29.718	0.021	3,450.097	8,603.802	3,450.097	8,603.802
β1	0.263	0.038	6.859	0.092	-0.224	0.750	-0.224	0.750

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.8631
R Square	0.7449
Adjusted R Square	0.6811
Standard Error	2,759.2
Observations	6

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	88,902,026.9	88,902,026.9	11.7	0.0
Residual	4	30,452,068.1	7,613,017.0		
Total	5	119,354,095.0			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	7,171.358	2,389.511	3.001	0.040	536.998	13,805.718	536.998	13,805.718
β1	1.543	0.452	3.417	0.027	0.289	2.797	0.289	2.797

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.9888
R Square	0.9777
Adjusted R Square	0.9554
Standard Error	325.8
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	4,654,650.4	4,654,650.4	43.9	0.1
Residual	1	106,147.3	106,147.3		
Total	2	4,760,797.7			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	5,572.283	399.025	13.965	0.046	502.211	10,642.355	502.211	10,642.355
β1	0.499	0.075	6.622	0.095	-0.459	1.458	-0.459	1.458

Rocky Mountains, applied to OLOGSS regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.9634
R Square	0.9282
Adjusted R Square	0.8923
Standard Error	455.6
Observations	4

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	5,368,949.5	5,368,949.5	25.9	0.0
Residual	2	415,138.5	207,569.2		
Total	3	5,784,088.0			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	6,327.733	447.809	14.130	0.005	4,400.964	8,254.501	4,400.964	8,254.501
β1	0.302	0.059	5.086	0.037	0.046	0.557	0.046	0.557

West Coast, applied to OLOGSS region 6:

Regression Statistics	
Multiple R	0.9908
R Square	0.9817
Adjusted R Square	0.9725
Standard Error	313.1
Observations	4

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	10,498,366.6	10,498,366.6	107.1	0.0
Residual	2	196,056.3	98,028.2		
Total	3	10,694,422.9			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	5,193.399	307.742	16.876	0.003	3,869.291	6,517.508	3,869.291	6,517.508
β1	0.422	0.041	10.349	0.009	0.246	0.597	0.246	0.597

Fixed Annual Costs for Oil Wells - Cost Adjustment Factor

The cost adjustment factor of the fixed annual cost for oil wells was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The

differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.994014283
R Square	0.988064394
Adjusted R Square	0.987808631
Standard Error	0.026960479
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.424110153	2.808036718	3863.203308	2.2587E-134
Residual	140	0.101761442	0.000726867		
Total	143	8.525871595			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.325522735	0.00906045	35.9278779	1.54278E-72	0.30760974	0.343435731	0.30760974	0.343435731
β1	0.019415379	0.000399851	48.55651174	1.74247E-89	0.018624852	0.020205906	0.018624852	0.020205906
β2	-0.000139999	4.80435E-06	-29.14014276	2.63883E-61	-0.000149498	-0.000130501	-0.000149498	-0.000130501
β3	3.41059E-07	1.56527E-08	21.78917295	7.98896E-47	3.10113E-07	3.72006E-07	3.10113E-07	3.72006E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.972995979
R Square	0.946721175
Adjusted R Square	0.945579485
Standard Error	0.052710031
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	6.91165462	2.303884873	829.2285185	6.67464E-89
Residual	140	0.388968632	0.002778347		
Total	143	7.300623252			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.305890757	0.01771395	17.26835352	1.6689E-36	0.270869326	0.340912188	0.270869326	0.340912188
β1	0.019637228	0.000781743	25.11979642	1.01374E-53	0.01809168	0.021182776	0.01809168	0.021182776
β2	-0.000147609	9.39291E-06	-15.71490525	1.03843E-32	-0.000166179	-0.000129038	-0.000166179	-0.000129038
β3	3.60127E-07	3.06024E-08	11.76795581	1.17387E-22	2.99625E-07	4.2063E-07	2.99625E-07	4.2063E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.993998856
R Square	0.988033725
Adjusted R Square	0.987777305
Standard Error	0.02698784
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.419321124	2.806440375	3853.182417	2.7032E-134
Residual	140	0.10196809	0.000728344		
Total	143	8.521289214			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.32545185	0.009069645	35.88363815	1.80273E-72	0.307520675	0.343383025	0.307520675	0.343383025
β1	0.019419103	0.000400257	48.51658921	1.94263E-89	0.018627774	0.020210433	0.018627774	0.020210433
β2	-0.000140059	4.80922E-06	-29.12303298	2.83205E-61	-0.000149567	-0.000130551	-0.000149567	-0.000130551
β3	3.41232E-07	1.56686E-08	21.77807458	8.44228E-47	3.10254E-07	3.72209E-07	3.10254E-07	3.72209E-07

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.977862049
R Square	0.956214186
Adjusted R Square	0.955275919
Standard Error	0.050111949
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	7.677722068	2.559240689	1019.127536	7.26235E-95
Residual	140	0.351569047	0.002511207		
Total	143	8.029291115			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.343679311	0.016840828	20.40750634	8.67459E-44	0.310384089	0.376974533	0.310384089	0.376974533
β1	0.020087054	0.000743211	27.02739293	2.04852E-57	0.018617686	0.021556422	0.018617686	0.021556422
β2	-0.000153877	8.92993E-06	-17.23164844	2.04504E-36	-0.000171532	-0.000136222	-0.000171532	-0.000136222
β3	3.91397E-07	2.9094E-08	13.45286338	5.31787E-27	3.33877E-07	4.48918E-07	3.33877E-07	4.48918E-07

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.993729589
R Square	0.987498496
Adjusted R Square	0.987230606
Standard Error	0.027203598
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.183798235	2.727932745	3686.217436	5.7808E-133
Residual	140	0.103605007	0.000740036		
Total	143	8.287403242			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.330961672	0.009142153	36.20171926	5.90451E-73	0.312887144	0.3490362	0.312887144	0.3490362
β1	0.019295414	0.000403457	47.82521879	1.29343E-88	0.018497758	0.02009307	0.018497758	0.02009307
β2	-0.000139784	4.84767E-06	-28.83529781	9.33567E-61	-0.000149368	-0.0001302	-0.000149368	-0.0001302
β3	3.4128E-07	1.57939E-08	21.60840729	1.96666E-46	3.10055E-07	3.72505E-07	3.10055E-07	3.72505E-07

Fixed Annual Costs for Natural Gas Wells

Fixed annual costs for natural gas wells were calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Fixed annual costs consist of the lease equipment costs for natural gas production for a given year. The data was analyzed on a regional level. The independent variables are depth and Q which is the flow rate of natural gas in million cubic feet. The form of the equation is given below:

$$Cost = \beta 0 + \beta 1 * Depth + \beta 2 * Q + \beta 3 * Depth * Q \qquad (2.B\text{-}12)$$

where Cost = FOAMG_W
β0 = OMGK
β1 = OMGA
β2 = OMGB
β3 = OMGC
Q = PEAKDAILY_RATE
from equation 2-29 in Chapter 2.

Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.928
R Square	0.861
Adjusted R Square	0.815
Standard Error	6,471.68
Observations	13

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	2,344,632,468.49	781,544,156.16	18.66	0.00
Residual	9	376,944,241.62	41,882,693.51		
Total	12	2,721,576,710.11			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	4,450.28	5,219.40	0.85	0.42	-7,356.84	16,257.40	-7,356.84	16,257.40
β1	2.50	0.45	5.58	0.00	1.49	3.51	1.49	3.51
β2	27.65	21.21	1.30	0.22	-20.33	75.63	-20.33	75.63
β3	0.00	0.00	-1.21	0.26	0.00	0.00	0.00	0.00

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.913
R Square	0.834
Adjusted R Square	0.807
Standard Error	6,564.36
Observations	23

ANOVA

	df	SS	MS	F	Significance F
Regression	3	4,100,685,576.61	1,366,895,192.20	31.72	0.00
Residual	19	818,725,806.73	43,090,831.93		
Total	22	4,919,411,383.34			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	11,145.70	3,224.45	3.46	0.00	4,396.85	17,894.55	4,396.85	17,894.55
β1	2.68	0.37	7.17	0.00	1.90	3.46	1.90	3.46
β2	7.67	5.09	1.51	0.15	-2.99	18.33	-2.99	18.33
β3	0.00	0.00	-1.21	0.24	0.00	0.00	0.00	0.00

Mid-Continent, applied to OLOGSS region 3 and 6:

Regression Statistics	
Multiple R	0.934
R Square	0.873
Adjusted R Square	0.830
Standard Error	6,466.88
Observations	13

ANOVA

	df	SS	MS	F	Significance F
Regression	3	2,578,736,610.45	859,578,870.15	20.55	0.00
Residual	9	376,384,484.71	41,820,498.30		
Total	12	2,955,121,095.16			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	8,193.82	5,410.04	1.51	0.16	-4,044.54	20,432.18	-4,044.54	20,432.18
β1	2.75	0.45	6.14	0.00	1.74	3.77	1.74	3.77
β2	21.21	18.04	1.18	0.27	-19.59	62.01	-19.59	62.01
β3	0.00	0.00	-1.12	0.29	0.00	0.00	0.00	0.00

Rocky Mountains, applied to OLOGSS region 1, 5, and 7:

Regression Statistics	
Multiple R	0.945
R Square	0.893
Adjusted R Square	0.840
Standard Error	6,104.84
Observations	10

ANOVA

	df	SS	MS	F	Significance F
Regression	3	1,874,387,985.75	624,795,995.25	16.76	0.00
Residual	6	223,614,591.98	37,269,098.66		
Total	9	2,098,002,577.72			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	7,534.86	6,340.77	1.19	0.28	-7,980.45	23,050.17	-7,980.45	23,050.17
β1	3.81	0.88	4.33	0.00	1.66	5.97	1.66	5.97
β2	32.27	22.33	1.44	0.20	-22.38	86.92	-22.38	86.92
β3	0.00	0.00	-1.18	0.28	-0.01	0.00	-0.01	0.00

Fixed Annual Costs for Gas Wells - Cost Adjustment Factor

The cost adjustment factor of the fixed annual cost for gas wells was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $1 to $20 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $5 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Gas Price} + \beta 2 * \text{Gas Price}^2 + \beta 3 * \text{Gas Price}^3$$

Rocky Mountains, Applied to OLOGSS Region 1, 5, and 7:

Regression Statistics	
Multiple R	0.994836789
R Square	0.989700237
Adjusted R Square	0.989479527
Standard Error	0.029019958
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	11.32916798	3.776389326	4484.181718	7.4647E-139
Residual	140	0.117902114	0.000842158		
Total	143	11.44707009			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.234219858	0.009752567	24.01622716	1.68475E-51	0.21493851	0.253501206	0.21493851	0.253501206
β1	0.216761767	0.004303953	50.36340872	1.37772E-91	0.20825262	0.225270914	0.20825262	0.225270914
β2	-0.015234638	0.000517134	-29.45972427	7.08872E-62	-0.01625704	-0.014212235	-0.01625704	-0.014212235
β3	0.000365319	1.68484E-05	21.68270506	1.3574E-46	0.000332009	0.000398629	0.000332009	0.000398629

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.995657421
R Square	0.991333701
Adjusted R Square	0.991147994
Standard Error	0.02551118
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	10.42258156	3.474193854	5338.176859	4.2055E-144
Residual	140	0.091114842	0.00065082		
Total	143	10.5136964			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.276966489	0.008573392	32.30535588	9.09319E-67	0.260016432	0.293916546	0.260016432	0.293916546
β1	0.205740933	0.003783566	54.37751691	5.03408E-96	0.198260619	0.213221246	0.198260619	0.213221246
β2	-0.014407802	0.000454608	-31.6927929	9.63037E-66	-0.015306587	-0.013509017	-0.015306587	-0.013509017
β3	0.00034576	1.48113E-05	23.34441529	4.06714E-50	0.000316478	0.000375043	0.000316478	0.000375043

Mid-Continent, Applied to OLOGSS Region 3 and 6:

Regression Statistics	
Multiple R	0.995590124
R Square	0.991199695
Adjusted R Square	0.991011117
Standard Error	0.025596313
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.33109303	3.443697678	5256.179662	1.231E-143
Residual	140	0.091723972	0.000655171		
Total	143	10.42281701			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.278704883	0.008602002	32.40000063	6.33409E-67	0.261698262	0.295711504	0.261698262	0.295711504
β1	0.205373482	0.003796192	54.09986358	9.97995E-96	0.197868206	0.212878758	0.197868206	0.212878758
β2	-0.014404563	0.000456125	-31.58028284	1.49116E-65	-0.015306347	-0.013502779	-0.015306347	-0.013502779
β3	0.000345945	1.48607E-05	23.27919988	5.55628E-50	0.000316565	0.000375325	0.000316565	0.000375325

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.995548929
R Square	0.99111767
Adjusted R Square	0.990927334
Standard Error	0.02564864
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	10.27673171	3.425577238	5207.209824	2.3566E-143
Residual	140	0.092099383	0.000657853		
Total	143	10.3688311			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.279731342	0.008619588	32.45298388	5.17523E-67	0.262689954	0.296772729	0.262689954	0.296772729
β1	0.205151971	0.003803953	53.93125949	1.51455E-95	0.197631352	0.21267259	0.197631352	0.21267259
β2	-0.014402579	0.000457058	-31.51151347	1.94912E-65	-0.015306207	-0.013498952	-0.015306207	-0.013498952
β3	0.00034606	1.48911E-05	23.23943141	6.72233E-50	0.00031662	0.000375501	0.00031662	0.000375501

Fixed Annual Costs for Secondary Production

The fixed annual cost for secondary oil production was calculated an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). The data was analyzed on a regional level. The secondary operations costs for each region were determined by multiplying the costs in West Texas by the ratio of primary operating costs. This method was used in the National Petroleum Council's (NPC) EOR study of 1984. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}13)$$

where Cost = OPSEC_W
β0 = OPSECK
β1 = OPSECA
β2 = OPSECB
β3 = OPSECC
from equation 2-31 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.9972
R Square	0.9945
Adjusted R Square	0.9890
Standard Error	1,969.67
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	698,746,493.71	698,746,493.71	180.11	0.05
Residual	1	3,879,582.16	3,879,582.16		
Total	2	702,626,075.87			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	30,509.3	2,412.338	12.647	0.050	-142.224	61,160.827	-142.224	61,160.827
β1	6.118	0.456	13.420	0.047	0.326	11.911	0.326	11.911

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.935260
R Square	0.874710
Adjusted R Square	0.843388
Standard Error	8414.07
Observations	6

ANOVA

	df	SS	MS	F	Significance F
Regression	1	1,977,068,663.41	1,977,068,663.41	27.93	0.01
Residual	4	283,186,316.21	70,796,579.05		
Total	5	2,260,254,979.61			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	55,732.7	7,286.799	7.648	0.002	35,501.310	75,964.186	35,501.310	75,964.186
β1	7.277	1.377	5.285	0.006	3.454	11.101	3.454	11.101

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.998942
R Square	0.997884
Adjusted R Square	0.995768
Standard Error	1329.04
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	833,049,989.02	833,049,989.02	471.62	0.03
Residual	1	1,766,354.45	1,766,354.45		
Total	2	834,816,343.47			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	28,208.7	1,627.738	17.330	0.037	7,526.417	48,890.989	7,526.417	48,890.989
β1	6.680	0.308	21.717	0.029	2.772	10.589	2.772	10.589

Rocky Mountains, applied to OLOGSS regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.989924
R Square	0.979949
Adjusted R Square	0.959899
Standard Error	3639.10
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	647,242,187.96	647,242,187.96	48.87	0.09
Residual	1	13,243,073.43	13,243,073.43		
Total	2	660,485,261.39			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	53,857.06	4,456.973	12.084	0.053	-2,773.909	110,488.034	-2,773.909	110,488.034
β1	5.888	0.842	6.991	0.090	-4.814	16.591	-4.814	16.591

West Coast, applied to OLOGSS region 6:

Regression Statistics	
Multiple R	0.992089
R Square	0.984240
Adjusted R Square	0.968480
Standard Error	5193.40
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1,684,438,248.88	1,684,438,248.88	62.45	0.08
Residual	1	26,971,430.96	26,971,430.96		
Total	2	1,711,409,679.84			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	35,893.465	6,360.593	5.643	0.112	-44,925.189	116,712.119	-44,925.189	116,712.119
β1	9.499	1.202	7.903	0.080	-5.774	24.773	-5.774	24.773

Fixed Annual Costs for Secondary Production - Cost Adjustment Factor

The cost adjustment factor of the fixed annual costs for secondary production was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Regions 1, 5, and 7:

Regression Statistics	
Multiple R	0.994022382
R Square	0.988080495
Adjusted R Square	0.987825078
Standard Error	0.026956819
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.433336986	2.811112329	3868.484883	2.0551E-134
Residual	140	0.101733815	0.00072667		
Total	143	8.535070802			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.325311813	0.00905922	35.90947329	1.646E-72	0.307401249	0.343222377	0.307401249	0.343222377
β1	0.019419982	0.000399797	48.57461816	1.65866E-89	0.018629562	0.020210402	0.018629562	0.020210402
β2	-0.000140009	4.80369E-06	-29.14604996	2.57525E-61	-0.000149506	-0.000130512	-0.000149506	-0.000130512
β3	3.41057E-07	1.56506E-08	21.79195958	7.87903E-47	3.10115E-07	3.71999E-07	3.10115E-07	3.71999E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.993830992
R Square	0.987700041
Adjusted R Square	0.987436471
Standard Error	0.027165964
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.296590955	2.765530318	3747.383987	1.8532E-133
Residual	140	0.103318541	0.00073799		
Total	143	8.399909496			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.321750317	0.009129506	35.24290662	1.74974E-71	0.303700794	0.33979984	0.303700794	0.33979984
β1	0.019369439	0.000402899	48.0752057	6.49862E-89	0.018572887	0.020165992	0.018572887	0.020165992
β2	-0.000140208	4.84096E-06	-28.96291516	5.49447E-61	-0.000149779	-0.000130638	-0.000149779	-0.000130638
β3	3.42483E-07	1.5772E-08	21.71459435	1.15795E-46	3.11301E-07	3.73665E-07	3.11301E-07	3.73665E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994021683
R Square	0.988079106
Adjusted R Square	0.987823658
Standard Error	0.026959706
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.43414809	2.811382697	3868.028528	2.0719E-134
Residual	140	0.101755604	0.000726826		
Total	143	8.535903693			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.325281756	0.00906019	35.90231108	1.68802E-72	0.307369274	0.343194238	0.307369274	0.343194238
β1	0.019420568	0.00039984	48.57088177	1.67561E-89	0.018630063	0.020211072	0.018630063	0.020211072
β2	-0.000140009	4.80421E-06	-29.14305099	2.60734E-61	-0.000149507	-0.000130511	-0.000149507	-0.000130511
β3	3.41049E-07	1.56523E-08	21.7891193	7.99109E-47	3.10103E-07	3.71994E-07	3.10103E-07	3.71994E-07

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.994023418
R Square	0.988082555
Adjusted R Square	0.987827181
Standard Error	0.026956158
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.434398087	2.811466029	3869.161392	2.0304E-134
Residual	140	0.101728825	0.000726634		
Total	143	8.536126912			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.325293493	0.009058998	35.90833165	1.65262E-72	0.307383368	0.343203618	0.307383368	0.343203618
β1	0.019420405	0.000399787	48.57686713	1.64854E-89	0.018630005	0.020210806	0.018630005	0.020210806
β2	-0.000140009	4.80358E-06	-29.14672886	2.56804E-61	-0.000149505	-0.000130512	-0.000149505	-0.000130512
β3	3.41053E-07	1.56502E-08	21.792237	7.86817E-47	3.10111E-07	3.71994E-07	3.10111E-07	3.71994E-07

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.993899019
R Square	0.98783526
Adjusted R Square	0.987574587
Standard Error	0.027222624
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.42499532	2.808331773	3789.557133	8.5487E-134
Residual	140	0.103749972	0.000741071		
Total	143	8.528745292			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.327122709	0.009148547	35.75679345	2.81971E-72	0.30903554	0.345209878	0.30903554	0.345209878
β1	0.019283711	0.000403739	47.76280844	1.53668E-88	0.018485497	0.020081925	0.018485497	0.020081925
β2	-0.000138419	4.85106E-06	-28.53379985	3.28809E-60	-0.00014801	-0.000128828	-0.00014801	-0.000128828
β3	3.36276E-07	1.58049E-08	21.27670912	1.03818E-45	3.05029E-07	3.67523E-07	3.05029E-07	3.67523E-07

Lifting Costs

Lifting costs for crude oil wells were calculated using average an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Lifting costs consist of labor costs for the pumper, chemicals, fuel, power and water costs. The data was analyzed on a regional level. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}14)$$

where Cost = OML_W
β0 = OMLK
β1 = OMLA
β2 = OMLB
β3 = OMLC
from equation 2-32 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.9994
R Square	0.9988
Adjusted R Square	0.9976
Standard Error	136.7
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	15,852,301	15,852,301	849	0
Residual	1	18,681	18,681		
Total	2	15,870,982			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	7,534.515	167.395	45.010	0.014	5,407.565	9,661.465	5,407.565	9,661.465
β1	0.922	0.032	29.131	0.022	0.520	1.323	0.520	1.323

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.8546
R Square	0.7304
Adjusted R Square	0.6764
Standard Error	2263.5
Observations	7

ANOVA

	df	SS	MS	F	Significance F
Regression	1	69,387,339	69,387,339	14	0
Residual	5	25,617,128	5,123,426		
Total	6	95,004,467			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	11,585.191	1,654.440	7.002	0.001	7,332.324	15,838.058	7,332.324	15,838.058
β1	0.912	0.248	3.680	0.014	0.275	1.549	0.275	1.549

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.9997
R Square	0.9995
Adjusted R Square	0.9990
Standard Error	82.0
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	13,261,874	13,261,874	1,972	0
Residual	1	6,726	6,726		
Total	2	13,268,601			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	8,298.339	100.447	82.614	0.008	7,022.045	9,574.634	7,022.045	9,574.634
β1	0.843	0.019	44.403	0.014	0.602	1.084	0.602	1.084

Rocky Mountains, applied to OLOGSS region 1, 5, and 7:

Regression Statistics	
Multiple R	1.0000
R Square	1.0000
Adjusted R Square	0.9999
Standard Error	11.5
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	3,979,238	3,979,238	30,138	0
Residual	1	132	132		
Total	2	3,979,370			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	10,137.398	14.073	720.342	0.001	9,958.584	10,316.212	9,958.584	10,316.212
β1	0.462	0.003	173.603	0.004	0.428	0.495	0.428	0.495

West Coast, applied to OLOGSS region 6:

Regression Statistics	
Multiple R	0.9969
R Square	0.9937
Adjusted R Square	0.9874
Standard Error	1134.3
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	203,349,853	203,349,853	158	0
Residual	1	1,286,583	1,286,583		
Total	2	204,636,436			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	5,147.313	1,389.199	3.705	0.168	-12,504.063	22,798.689	-12,504.063	22,798.689
β1	3.301	0.263	12.572	0.051	-0.035	6.636	-0.035	6.636

Lifting Costs - Cost Adjustment Factor

The cost adjustment factor for lifting costs for was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Region 1, 5, and 7:

Regression Statistics	
Multiple R	0.994419415
R Square	0.988869972
Adjusted R Square	0.988631472
Standard Error	0.026749137
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	8.900010642	2.966670214	4146.195026	1.6969E-136
Residual	140	0.100172285	0.000715516		
Total	143	9.000182927			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.314447949	0.008989425	34.97976138	4.49274E-71	0.296675373	0.332220525	0.296675373	0.332220525
β1	0.019667961	0.000396717	49.57683267	1.11119E-90	0.018883631	0.020452291	0.018883631	0.020452291
β2	-0.000140635	4.76668E-06	-29.50377541	5.91881E-62	-0.000150059	-0.000131211	-0.000150059	-0.000131211
β3	3.41221E-07	1.553E-08	21.97170644	3.23018E-47	3.10517E-07	3.71924E-07	3.10517E-07	3.71924E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.994725637
R Square	0.989479094
Adjusted R Square	0.989253646
Standard Error	0.026400955
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.177423888	3.059141296	4388.946164	3.302E-138
Residual	140	0.097581462	0.00069701		
Total	143	9.275005349			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.307250046	0.008872414	34.62981435	1.58839E-70	0.289708807	0.324791284	0.289708807	0.324791284
β1	0.019843369	0.000391553	50.6786443	6.01683E-92	0.019069248	0.020617491	0.019069248	0.020617491
β2	-0.000141338	4.70464E-06	-30.04217841	6.6318E-63	-0.000150639	-0.000132036	-0.000150639	-0.000132036
β3	3.42235E-07	1.53279E-08	22.32765206	5.59173E-48	3.11931E-07	3.72539E-07	3.11931E-07	3.72539E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994625665
R Square	0.989280214
Adjusted R Square	0.989050504
Standard Error	0.026521235
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.087590035	3.029196678	4306.653909	1.2247E-137
Residual	140	0.09847263	0.000703376		
Total	143	9.186062664			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.309274775	0.008912836	34.69993005	1.23231E-70	0.291653621	0.32689593	0.291653621	0.32689593
β1	0.019797213	0.000393337	50.33145871	1.49879E-91	0.019019565	0.020574861	0.019019565	0.020574861
β2	-0.000141221	4.72607E-06	-29.88132995	1.27149E-62	-0.000150565	-0.000131878	-0.000150565	-0.000131878
β3	3.42202E-07	1.53977E-08	22.22423366	9.29272E-48	3.1176E-07	3.72644E-07	3.1176E-07	3.72644E-07

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.994686146
R Square	0.98940053
Adjusted R Square	0.989173398
Standard Error	0.026467032
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.154328871	3.051442957	4356.069182	5.5581E-138
Residual	140	0.09807053	0.000700504		
Total	143	9.252399401			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.307664081	0.00889462	34.58990756	1.8356E-70	0.29007894	0.325249222	0.29007894	0.325249222
β1	0.019836272	0.000392533	50.53404116	8.79346E-92	0.019060214	0.020612331	0.019060214	0.020612331
β2	-0.000141357	4.71641E-06	-29.97123684	8.83426E-63	-0.000150681	-0.000132032	-0.000150681	-0.000132032
β3	3.42352E-07	1.53662E-08	22.27954719	7.08083E-48	3.11973E-07	3.72732E-07	3.11973E-07	3.72732E-07

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.993880162
R Square	0.987797777
Adjusted R Square	0.987536301
Standard Error	0.027114753
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	8.332367897	2.777455966	3777.77319	1.0603E-133
Residual	140	0.102929375	0.00073521		
Total	143	8.435297272			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.326854136	0.009112296	35.86957101	1.8943E-72	0.308838638	0.344869634	0.308838638	0.344869634
β1	0.019394839	0.000402139	48.22916512	4.26E-89	0.018599788	0.02018989	0.018599788	0.02018989
β2	-0.000140183	4.83184E-06	-29.01231258	4.47722E-61	-0.000149736	-0.00013063	-0.000149736	-0.00013063
β3	3.41846E-07	1.57423E-08	21.71513554	1.15483E-46	3.10722E-07	3.72969E-07	3.10722E-07	3.72969E-07

Secondary Workover Costs

Secondary workover costs were calculated using an average from 2004 – 2007 data from the most recent Cost and Indices data base provided by the U.S. Energy Information Administration (EIA). Secondary workover costs consist of workover rig services, remedial services and equipment repair. The data was analyzed on a regional level. The secondary operations costs for each region were determined by multiplying the costs in West Texas by the ratio of primary operating costs. This method was used in the National Petroleum Council's (NPC) EOR study of 1984. The independent variable is depth. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Depth} + \beta 2 * \text{Depth}^2 + \beta 3 * \text{Depth}^3 \qquad (2.B\text{-}15)$$

where Cost = SWK_W
β0 = OMSWRK
β1 = OMSWRA
β2 = OMSWRB
β3 = OMSWRC
from equation 2-33 in Chapter 2.

The cost is on a per well basis. Parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares. β2 and β3 are statistically insignificant and are therefore zero.

West Texas, applied to OLOGSS region 4:

Regression Statistics	
Multiple R	0.9993
R Square	0.9986
Adjusted R Square	0.9972
Standard Error	439.4
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	136,348,936	136,348,936	706	0
Residual	1	193,106	193,106		
Total	2	136,542,042			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	4,951.059	538.200	9.199	0.069	-1,887.392	11,789.510	-1,887.392	11,789.510
β1	2.703	0.102	26.572	0.024	1.410	3.995	1.410	3.995

South Texas, applied to OLOGSS region 2:

Regression Statistics	
Multiple R	0.9924
R Square	0.9849
Adjusted R Square	0.9811
Standard Error	1356.3
Observations	6

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	480,269,759	480,269,759	261	0
Residual	4	7,358,144	1,839,536		
Total	5	487,627,903			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	10,560.069	1,174.586	8.990	0.001	7,298.889	13,821.249	7,298.889	13,821.249
β1	3.587	0.222	16.158	0.000	2.970	4.203	2.970	4.203

Mid-Continent, applied to OLOGSS region 3:

Regression Statistics	
Multiple R	0.9989
R Square	0.9979
Adjusted R Square	0.9958
Standard Error	544.6
Observations	3

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	140,143,261	140,143,261	473	0
Residual	1	296,583	296,583		
Total	2	140,439,844			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	3,732.510	666.989	5.596	0.113	-4,742.355	12,207.375	-4,742.355	12,207.375
β1	2.740	0.126	21.738	0.029	1.138	4.342	1.138	4.342

Rocky Mountains, applied to OLOGSS region 1, 5, and 7:

Regression Statistics	
Multiple R	0.9996
R Square	0.9991
Adjusted R Square	0.9983
Standard Error	290.9
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	98,740,186	98,740,186	1,167	0
Residual	1	84,627	84,627		
Total	2	98,824,812			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	5,291.954	356.287	14.853	0.043	764.922	9,818.987	764.922	9,818.987
β1	2.300	0.067	34.158	0.019	1.444	3.155	1.444	3.155

West Coast, applied to OLOGSS region 6:

Regression Statistics	
Multiple R	0.9991
R Square	0.9983
Adjusted R Square	0.9966
Standard Error	454.7
Observations	3

ANOVA

	df	SS	MS	F	Significance F
Regression	1	120,919,119	120,919,119	585	0
Residual	1	206,762	206,762		
Total	2	121,125,881			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	4,131.486	556.905	7.419	0.085	-2,944.638	11,207.610	-2,944.638	11,207.610
β1	2.545	0.105	24.183	0.026	1.208	3.882	1.208	3.882

Secondary Workover Costs - Cost Adjustment Factor

The cost adjustment factor for secondary workover costs was calculated using data through 2008 from the Cost and Indices data base provided by EIA. The initial cost was normalized at various prices from $10 to $200 per barrel. This led to the development of a series of intermediate equations and the calculation of costs at specific prices and fixed depths. The differentials between estimated costs across the price range and fixed costs at $50 per barrel were then calculated. The cost factor equation was then estimated using the differentials. The method of estimation used was ordinary least squares. The form of the equation is given below:

$$\text{Cost} = \beta 0 + \beta 1 * \text{Oil Price} + \beta 2 * \text{Oil Price}^2 + \beta 3 * \text{Oil Price}^3$$

Rocky Mountains, Applied to OLOGSS Region 1, 5, and 7:

Regression Statistics	
Multiple R	0.994646805
R Square	0.989322267
Adjusted R Square	0.989093459
Standard Error	0.026416612
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.051925882	3.017308627	4323.799147	9.3015E-138
Residual	140	0.097697232	0.000697837		
Total	143	9.149623114			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.312179978	0.008877675	35.1646082	2.31513E-71	0.294628337	0.329731619	0.294628337	0.329731619
β1	0.019705242	0.000391785	50.29605017	1.64552E-91	0.018930662	0.020479822	0.018930662	0.020479822
β2	-0.000140397	4.70743E-06	-29.82464336	1.6003E-62	-0.000149704	-0.000131091	-0.000149704	-0.000131091
β3	3.4013E-07	1.53369E-08	22.17714344	1.1716E-47	3.09808E-07	3.70452E-07	3.09808E-07	3.70452E-07

South Texas, Applied to OLOGSS Region 2:

Regression Statistics	
Multiple R	0.994648271
R Square	0.989325182
Adjusted R Square	0.989096436
Standard Error	0.026409288
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.049404415	3.016468138	4324.992582	9.1255E-138
Residual	140	0.097643067	0.00069745		
Total	143	9.147047482			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.31224985	0.008875214	35.18223288	2.17363E-71	0.294703075	0.329796624	0.294703075	0.329796624
β1	0.019703773	0.000391676	50.30624812	1.60183E-91	0.018929408	0.020478139	0.018929408	0.020478139
β2	-0.000140393	4.70612E-06	-29.83187838	1.55398E-62	-0.000149697	-0.000131088	-0.000149697	-0.000131088
β3	3.40125E-07	1.53327E-08	22.18299399	1.13834E-47	3.09811E-07	3.70439E-07	3.09811E-07	3.70439E-07

Mid-Continent, Applied to OLOGSS Region 3:

Regression Statistics	
Multiple R	0.994391906
R Square	0.988815263
Adjusted R Square	0.98857559
Standard Error	0.027366799
Observations	144

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	9.269694355	3.089898118	4125.685804	2.3918E-136
Residual	140	0.104851837	0.000748942		
Total	143	9.374546192			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	0.301399555	0.009196999	32.7715099	1.54408E-67	0.283216594	0.319582517	0.283216594	0.319582517
β1	0.020285999	0.000405877	49.980617	3.79125E-91	0.019483558	0.021088441	0.019483558	0.021088441
β2	-0.000145269	4.87675E-06	-29.78803686	1.85687E-62	-0.00015491	-0.000135627	-0.00015491	-0.000135627
β3	3.51144E-07	1.58886E-08	22.10035946	1.71054E-47	3.19731E-07	3.82556E-07	3.19731E-07	3.82556E-07

West Texas, Applied to OLOGSS Region 4:

Regression Statistics	
Multiple R	0.994645783
R Square	0.989320233
Adjusted R Square	0.989091381
Standard Error	0.026422924
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.054508298	3.018169433	4322.966602	9.4264E-138
Residual	140	0.097743924	0.000698171		
Total	143	9.152252223			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.312146343	0.008879797	35.15242029	2.41837E-71	0.294590508	0.329702178	0.294590508	0.329702178
β1	0.019706241	0.000391879	50.28658391	1.68714E-91	0.018931476	0.020481006	0.018931476	0.020481006
β2	-0.000140397	4.70855E-06	-29.81743751	1.64782E-62	-0.000149706	-0.000131088	-0.000149706	-0.000131088
β3	3.4012E-07	1.53406E-08	22.17121727	1.20629E-47	3.09791E-07	3.70449E-07	3.09791E-07	3.70449E-07

West Coast, Applied to OLOGSS Region 6:

Regression Statistics	
Multiple R	0.994644139
R Square	0.989316964
Adjusted R Square	0.989088042
Standard Error	0.026428705
Observations	144

ANOVA

	df	SS	MS	F	Significance F
Regression	3	9.05566979	3.018556597	4321.629647	9.6305E-138
Residual	140	0.097786705	0.000698476		
Total	143	9.153456495			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	0.312123671	0.00888174	35.14217734	2.50872E-71	0.294563994	0.329683347	0.294563994	0.329683347
β1	0.019707015	0.000391964	50.27755672	1.72782E-91	0.01893208	0.020481949	0.01893208	0.020481949
β2	-0.0001404	4.70958E-06	-29.81159891	1.68736E-62	-0.000149711	-0.000131089	-0.000149711	-0.000131089
β3	3.40124E-07	1.5344E-08	22.16666321	1.23366E-47	3.09789E-07	3.7046E-07	3.09789E-07	3.7046E-07

Additional Cost Equations and Factors

The model uses several updated cost equations and factors originally developed for DOE/NETL's Comprehensive Oil and Gas Analysis Model (COGAM). These are:

- The crude oil and natural gas investment factors for tangible and intangible investments as well as the operating costs. These factors were originally developed based upon the 1984 Enhanced Oil Recovery Study completed by the National Petroleum Council.
- The G&A factors for capitalized and expensed costs.
- The limits on impurities, such as N2, CO2, and H2S used to calculate natural gas processing costs.
- Cost equations for stimulation, the produced water handling plant, the chemical handling plant, the polymer handling plant, CO_2 recycling plant, and the steam manifolds and pipelines.

Natural and Industrial CO2 Prices

The model uses regional CO_2 prices for both natural and industrial sources of CO_2. The cost equation for natural CO_2 is derived from the equation used in COGAM and updated to reflect current dollar values. According to University of Wyoming, this equation is applicable to the natural CO_2 in the Permian basin (Southwest). The cost of CO_2 in other regions and states is calculated using state calibration factors which represent the additional cost of transportation.

The industrial CO_2 costs contain two components: cost of capture and cost of transportation. The capture costs are derived using data obtained from Denbury Resources, Inc. and other sources. CO_2 capture costs range between $20 and $63/ton. The transportation costs were derived using an external economic model which calculates pipeline tariff based upon average distance, compression rate, and volume of CO_2 transported.

National Crude Oil Drilling Footage Equation

The equation for crude oil drilling footage was estimated for the time period 1999 - 2008. The drilling footage data was compiled from EIA's Annual Energy Review 2008. The form of the estimating equation is given by:

$$\text{Oil Footage} = \beta 0 + \beta 1 * \text{Oil Price} \qquad (2.B\text{-}16)$$

where $\beta 0$ = OILA0
$\beta 1$ = OILA1
from equation 2-99 in Chapter 2.

Oil footage is the footage of total developmental crude oil wells drilled in the United States in thousands of feet. The crude oil price is a rolling five year average of crude oil prices from 1995 – 2008. The parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares.

Dependent variable: Oil Footage
Current sample: (1999 to 2008)

Regression Statistics	
Multiple R	0.9623
R Square	0.9259
Adjusted R Square	0.9167
Standard Error	5,108.20
Observations	10

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	2,609,812,096.02	2,609,812,096.02	100.02	0.00
Residual	8	208,749,712.88	26,093,714.11		
Total	9	2,818,561,808.90			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	3,984.11	4,377.97	0.91	0.39	-6,111.51	14,079.72	-6,111.51	14,079.72
β1	1,282.45	128.23	10.00	0.00	986.74	1,578.16	986.74	1,578.16

Regional Crude Oil Footage Distribution

The regional drilling distributions for crude oil were estimated using an updated EIA well count file. The percent allocations for each region are calculated using the average footage drilled from 2004 – 2008 for developed crude oil or natural gas fields.

Region Name	States Included	Oil
Northeast	IN,IL,KY,MI,NY,OH,PA,TN,VA,WV	7.6%
Gulf Coast	AL,FL,LA,MS,TX	29.3%
Midcontinent	AR,KS,MO,NE,OK,TX	16.8%
Southwest	TX,NM	18.3%
Rocky Mountains	CO,NV,UT,WY,NM	10.7%
West Coast	CA,WA	9.6%
Northern Great Plains	MT,ND,SD	7.6%

National Natural Gas Drilling Footage Equation

The equation for natural gas drilling footage was estimated for the time period 1999 - 2008. The drilling footage data was compiled from EIA's Annual Energy Review 2008. The form of the estimating equation is given by:

$$\text{Gas Footage} = \beta 0 + \beta 1 * \text{Gas Price} \qquad (2.B\text{-}17)$$

where $\beta 0 = GASA0$

$\beta 1 = GASA1$

from equation 2-100 in Chapter 2.

Gas footage is footage of total developmental natural gas wells drilled in the United States in thousands of feet. The gas price is a rolling five year average of natural gas prices from 1995 – 2008. The parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares.

Dependent variable: Gas Footage
Current sample: (1999 to 2008)

Regression Statistics	
Multiple R	0.9189
R Square	0.8444
Adjusted R Square	0.7666
Standard Error	9,554.63
Observations	4

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	990,785,019.79	990,785,019.79	10.85	0.08
Residual	2	182,581,726.21	91,290,863.10		
Total	3	1,173,366,746.00			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
β0	2,793.29	53,884.13	0.05	0.96	-229,051.57	234,638.14	-229,051.57	234,638.14
β1	30,429.72	9,236.81	3.29	0.08	-9,313.08	70,172.52	-9,313.08	70,172.52

Regional Natural Gas Footage Distribution

The regional drilling distributions for natural gas were estimated using an updated EIA well count file. The percent allocations for each region are calculated using the average footage drilled from 2004 – 2008 for developed crude oil or natural gas fields.

Region Name	States Included	Gas
Northeast	IN,IL,KY,MI,NY,OH,PA,TN,VA,WV	13.2%
Gulf Coast	AL,FL,LA,MS,TX	18.7%
Midcontinent	AR,KS,MO,NE,OK,TX	13.4%
Southwest	TX,NM	34.5%
Rocky Mountains	CO,NV,UT,WY,NM	19.5%
West Coast	CA,WA	0.4%
Northern Great Plains	MT,ND,SD	0.4%

National Exploration Drilling Footage Equation

The equation for exploration well drilling footage was estimated for the time period 1999 - 2008. The drilling footage data was compiled from EIA's Annual Energy Review 2008. The form of the estimating equation is given by:

$$\text{Exploration Footage} = \beta 0 + \beta 1 * \text{Oil Price} \qquad (2.B\text{-}18)$$

where $\beta 0 = \text{EXPA0}$
$\beta 1 = \text{EXPA1}$

Exploration footage is footage of total exploratory crude oil, natural gas and dry wells drilled in the United States in thousands of feet. The crude oil price is a rolling five year average of oil prices from 1995 – 2008. The parameter estimates and regression diagnostics are given below. The method of estimation used was ordinary least squares.

Dependent variable: Exploration Footage
Current sample: (1999 to 2008)

Regression Statistics	
Multiple R	0.9467
R Square	0.8963
Adjusted R Square	0.8834
Standard Error	2,825.10
Observations	10

ANOVA

	df	SS	MS	F	Significance F
Regression	1	552,044,623.08	552,044,623.08	69.17	0.00
Residual	8	63,849,573.82	7,981,196.73		
Total	9	615,894,196.90			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
β0	4,733.91	2,421.24	1.96	0.09	-849.49	10,317.31	-849.49	10,317.31
β1	589.83	70.92	8.32	0.00	426.28	753.37	426.28	753.37

Regional Exploration Footage Distribution

The regional distribution for drilled exploration projects is also estimated using the updated EIA well count file. The percent allocations for each corresponding region are calculated using a 2004 – 2008 average of footage drilled for exploratory fields for both crude oil and natural gas.

Region Name	States Included	Exploration
Northeast	IN,IL,KY,MI,NY,OH,PA,TN,VA,WV	22.3%
Gulf Coast	AL,FL,LA,MS,TX	9.0%
Midcontinent	AR,KS,MO,NE,OK,TX	28.8%
Southwest	TX,NM	14.3%
Rocky Mountains	CO,NV,UT,WY,NM	11.5%
West Coast	CA,WA	0.3%
Northern Great Plains	MT,ND,SD	13.8%

Regional Dryhole Rate for Discovered Projects

The percent allocation for existing regional dryhole rates was estimated using an updated EIA well count file. The percentage is determined by the average footage drilled from 2004 – 2008 for each corresponding region. Existing dryhole rates calculate the projects which have already been discovered. The formula for the percentage is given below:

Existing Dryhole Rate = Developed Dryhole / Total Drilling (2.B-19)

Region Name	States Included	Existing
Northeast	IN,IL,KY,MI,NY,OH,PA,TN,VA,WV	5.8%
Gulf Coast	AL,FL,LA,MS,TX	9.4%
Midcontinent	AR,KS,MO,NE,OK,TX	13.2%
Southwest	TX,NM	9.7%
Rocky Mountains	CO,NV,UT,WY,NM	4.3%
West Coast	CA,WA	1.5%
Northern Great Plains	MT,ND,SD	5.2%

Regional Dryhole Rate for First Exploration Well Drilled

The percent allocation for undiscovered regional exploration dryhole rates was estimated using an updated EIA well count file. The percentage is determined by the average footage drilled from 2004 – 2008 for each region. Undiscovered regional exploration dryhole rates calculate the rate for the first well drilled in an exploration project. The formula for the percentage is given below:

Undiscovered Exploration = Exploration Dryhole / (Exploration Gas + Exploration Oil)

Region Name	States Included	Undisc. Exp
Northeast	IN,IL,KY,MI,NY,OH,PA,TN,VA,WV	30.8%
Gulf Coast	AL,FL,LA,MS,TX	167.8%
Midcontinent	AR,KS,MO,NE,OK,TX	76.4%
Southwest	TX,NM	86.2%
Rocky Mountains	CO,NV,UT,WY,NM	74.0%
West Coast	CA,WA	466.0%
Northern Great Plains	MT,ND,SD	46.9%

Regional Dryhole Rate for Subsequent Exploration Wells Drilled

The percent allocation for undiscovered regional developed dryhole rates was estimated using an updated EIA well count file. The percentage is determined by the average footage drilled from 2004 – 2008 for each corresponding region. Undiscovered regional developed dryhole rates calculate the rate for subsequent wells drilled in an exploration project. The formula for the percentage is given below:

Undiscovered Developed = (Developed Dryhole + Explored Dryhole) / Total Drilling (2.B-20)

Region Name	States Included	Undisc. Dev
Northeast	IN,IL,KY,MI,NY,OH,PA,TN,VA,WV	7.3%
Gulf Coast	AL,FL,LA,MS,TX	11.6%
Midcontinent	AR,KS,MO,NE,OK,TX	16.8%
Southwest	TX,NM	10.8%
Rocky Mountains	CO,NV,UT,WY,NM	6.5%
West Coast	CA,WA	1.8%
Northern Great Plains	MT,ND,SD	10.5%

National Rig Depth Rating

The national rig depth rating schedule was calculated using a three year average based on the Smith Rig Count as reported by *Oil and Gas Journal*. Percentages are applied to determine the cumulative available rigs for drilling.

Appendix 2.C: Play-level Resource Assumptions for Tight Gas, Shale Gas, and Coalbed Methane

The detailed resource assumptions underlying the estimates of remaining unproved technically recoverable resources for tight gas, shale gas, and coalbed methane are presented in the following tables.

Table 2.C-1. Remaining Technically Recoverable Resources (TRR) – Tight Gas

REGION	BASIN	PLAY	AREA (mi^2)	WELL SPACING	DEPTH (ft)	EUR (bcf/well)	OFFICIAL NO ACCESS	TRR (bcf)
1	Appalachian	Berea Sandstone	51863	8	4000	0.18	0%	11401
1	Appalachian	Clinton/Medina High	14773	8	5900	0.25	0%	6786
1	Appalachian	Clinton/Medina Moderate/Low	27281	15	5200	0.08	0%	16136
1	Appalachian	Tuscarora Sandstone	42495	8	8000	0.69	0%	1485
1	Appalachian	Upper Devonian High	12775	10	4600	0.21	0%	10493
1	Appalachian	Upper Devonian Moderate/Low	29808	10	5400	0.06	0%	5492
2	East Texas	Cotton Valley/Bossier	2730	12	12500	1.39	0%	36447
2	Texas-Gulf	Olmos	2500	4	5000	0.44	0%	3624
2	Texas-Gulf	Vicksburg	600	8	11000	2.36	0%	4875
2	Texas-Gulf	Wilcox/Lobo	1500	8	9500	1.60	0%	8532
3	Anadarko	Cherokee/Redfork	1500	4	8500	0.90	0%	1168
3	Anadarko	Cleveland	1500	4	6500	0.91	0%	3690
3	Anadarko	Granite Wash/Atoka	1500	4	13000	1.72	0%	6871
3	Arkoma	Arkoma Basin	1000	8	8000	1.30	0%	2281
4	Permian	Abo	1500	8	3800	1.00	0%	9158
4	Permian	Canyon	6000	8	4500	0.22	0%	11535
5	Denver	Denver/Jules	3500	16	4999	0.24	1%	12953
5	Greater Green River	Deep Mesaverde	16416	4	15100	0.41	8%	2939
5	Greater Green River	Fort Union/Fox Hills	3858	8	5000	0.70	12%	1062
5	Greater Green River	Frontier (Deep)	15619	4	17000	2.58	9%	11303
5	Greater Green River	Frontier (Moxa Arch)	2334	8	9500	1.20	15%	3414
5	Greater Green River	Lance	5500	8	10000	6.60	11%	31541
5	Greater Green River	Lewis	5172	8	9500	1.32	6%	18893
5	Greater Green River	Shallow Mesaverde (1)	5239	4	9750	1.25	8%	12606
5	Greater Green River	Shallow Mesaverde (2)	6814	8	10500	0.67	8%	17874
5	Piceance	Iles/Mesaverde	972	8	8000	0.73	5%	1858
5	Piceance	North Williams Fork/Mesaverde	1008	8	8000	0.65	2%	4278
5	Piceance	South Williams Fork/Mesaverde	1008	32	7000	0.65	9%	22402
5	San Juan	Central Basin/Dakota	3918	6	6500	0.49	7%	15007
5	San Juan	Central Basin/Mesaverde	3689	8	4500	0.72	2%	8737
5	San Juan	Picture Cliffs	6558	4	3500	0.48	2%	4899
5	Uinta	Basin Flank Mesaverde	1708	8	8000	0.99	33%	5767
5	Uinta	Deep Synclinal Mesaverde	2893	8	18000	0.99	2%	3292
5	Uinta	Tertiary East	1600	16	6000	0.58	16%	5910
5	Uinta	Tertiary West	1603	8	6500	4.06	57%	10630
5	Williston	High Potential	2000	4	2300	0.61	4%	2960
5	Williston	Low Potential	3000	4	2500	0.21	1%	1886
5	Williston	Moderate Potential	2000	4	2300	0.33	4%	2071
5	Wind River	Fort Union/Lance Deep	2500	4	14500	0.54	9%	4261
5	Wind River	Fort Union/Lance Shallow	1500	8	11000	1.17	0%	13197
5	Wind River	Mesaverde/Frontier Deep	250	4	17000	1.99	9%	1221
5	Wind River	Mesaverde/Frontier Shallow	250	4	13500	1.25	0%	1037
6	Columbia	Basin Centered	1500	8	13100	1.26	0%	7508

Table 2.C-2. Remaining Technically Recoverable Resources (TRR) – Shale Gas

REGION	BASIN	PLAY	AREA (mi^2)	WELL SPACING	DEPTH (ft)	EUR (bcf/well)	OFFICIAL NO ACCESS	TRR (bcf)
1	Appalachian	Cincinatti Arch	6000	4	1800	0.12	0%	1435
1	Appalachian	Devonian Big Sandy - Active	8675	8	3800	0.32	0%	6490
1	Appalachian	Devonian Big Sandy - Undeveloped	1994	8	3800	0.32	0%	940
1	Appalachian	Devonian Greater Siltstone Area	22914	11	2911	0.20	0%	8463
1	Appalachian	Devonian Low Thermal Maturity	45844	7	3000	0.30	0%	13534
1	Appalachian	Marcellus - Active	10622	8	6750	3.49	0%	177931
1	Appalachian	Marcellus - Undeveloped	84271	8	6750	1.15	0%	232443
1	Illinois	New Albany	1600	8	2750	1.09	0%	10947
1	Michigan	Antrim	12000	7	1400	0.28	0%	20512
2	Black Warrior	Floyd-Neal/Conasauga	2429	2	8000	0.92	0%	4465
2	TX-LA-MS Salt	Haynesville - Active	3574	8	12000	6.48	0%	60615
2	TX-LA-MS Salt	Haynesville - Undeveloped	5426	8	12000	1.50	0%	19408
2	West Gulf Coast	Eagle Ford - Dry	200	4	7000	5.50	0%	4378
2	West Gulf Coast	Eagle Ford - Wet	890	8	7000	2.31	0%	16429
3	Anadarko	Cana Woodford	688	4	13500	3.42	0%	5718
3	Anadarko	Woodford - Central Oklahoma	1800	4	5000	1.01	0%	2946
3	Arkoma	Fayetteville - Central	4000	8	4000	2.29	0%	29505
3	Arkoma	Fayetteville - West	5000	8	4000	1.17	0%	4639
3	Arkoma	Woodford - Western Arkoma	2900	4	9500	4.06	0%	19771
4	Fort Worth	Barnett - Fort Worth Active	2649	5	7500	1.60	0%	15834
4	Fort Worth	Barnett - Fort Worth Undeveloped	477	8	7500	1.20	0%	4094
4	Permian	Barnett - Permian Active	1426	5	7500	1.60	0%	19871
4	Permian	Barnett - Permian Undeveloped	1906	8	7500	1.20	0%	15823
4	Permian	Barnett-Woodford	2691	4	10200	2.99	0%	32152
5	Greater Green River	Hilliard-Baxter-Mancos	16416	8	14750	0.18	0%	3770
5	San Juan	Lewis	7506	3	4500	1.53	0%	11638
5	Uinta	Mancos	6589	8	15250	1.00	0%	21021
5	Williston	Shallow Niobrara	10000	2	1000	0.46	4%	6757

Table 2.C-3. Remaining Technically Recoverable Resources (TRR) – Coalbed Methane

REGION	BASIN	PLAY	AREA (mi^2)	WELL SPACING	DEPTH (ft)	EUR (bcf/well)	OFFICIAL NO ACCESS	TRR (bcf)
1	Appalachian	Central Basin	3870	8	1900	0.18	0%	1709
1	Appalachian	North Appalachia - High	3817	12	1400	0.12	0%	532
1	Appalachian	North Appalachia - Mod/Low	8906	12	1800	0.08	0%	469
1	Illinois	Central Basin	1214	8	1000	0.12	0%	1161
2	Black Warrior	Extention Area	700	8	1900	0.08	0%	931
2	Black Warrior	Main Area	1000	12	1950	0.21	0%	2190
2	Cahaba	Cahaba Coal Field	387	8	3000	0.18	0%	379
3	Midcontinent	Arkoma	2998	8	1500	0.22	0%	3032
3	Midcontinent	Cherokee & Forest City	2750	8	1000	0.06	0%	1308
4	Raton	Southern	386	8	2000	0.37	2%	962
5	Greater Green River	Deep	3600	4	7000	0.60	15%	3879
5	Greater Green River	Shallow	720	8	1500	0.20	20%	1053
5	Piceance	Deep	2000	4	7000	0.60	3%	3677
5	Piceance	Divide Creek	144	8	3800	0.18	13%	194
5	Piceance	Shallow	2000	4	3500	0.30	9%	2230
5	Piceance	White River Dome	216	8	7500	0.41	8%	657
5	Powder River	Big George/Lower Fort Union	2880	16	1100	0.26	1%	5943
5	Powder River	Wasatch	216	8	1100	0.06	1%	92
5	Powder River	Wyodak/Upper Fort Union	3600	20	600	0.14	1%	18859
5	Raton	Northern	470	8	2500	0.35	0%	957
5	Raton	Purgatoire River	360	8	2000	0.31	0%	430
5	San Juan	Fairway NM	670	4	3250	1.14	7%	774
5	San Juan	North Basin	2060	4	3000	0.28	7%	1511
5	San Juan	North Basin CO	780	4	2800	1.51	7%	10474
5	San Juan	South Basin	1190	4	2000	0.20	7%	820
5	San Juan	South Menefee NM	7454	5	2500	0.10	7%	177
5	Uinta	Blackhawk	586	8	3250	0.16	5%	1864
5	Uinta	Ferron	400	8	3000	0.78	11%	1409
5	Uinta	Sego	534	4	3250	0.31	10%	417

3. Offshore Oil and Gas Supply Submodule

Introduction

The Offshore Oil and Gas Supply Submodule (OOGSS) uses a field-based engineering approach to represent the exploration and development of U.S. offshore oil and natural gas resources. The OOGSS simulates the economic decision-making at each stage of development from frontier areas to post-mature areas. Offshore petroleum resources are divided into 3 categories:

- **Undiscovered Fields.** The number, location, and size of the undiscovered fields is based on the Minerals Management Service's (MMS) 2006 hydrocarbon resource assessment.[1] MMS was renamed Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) in 2010.

- **Discovered, Undeveloped Fields.** Any discovery that has been announced but is not currently producing is evaluated in this component of the model. The first production year is an input and is based on announced plans and expectations.

- **Producing Fields.** The fields in this category have wells that have produced oil and/or gas by 2009. The production volumes are from the BOEMRE production database.

Resource and economic calculations are performed at an evaluation unit basis. An evaluation unit is defined as the area within a planning area that falls into a specific water depth category. Planning areas are the Western Gulf of Mexico (GOM), Central GOM, Eastern GOM, Pacific, and Atlantic. There are six water depth categories: 0-200 meters, 200-400 meters, 400-800 meters, 800-1600 meters, 1600-2400 meters, and greater than 2400 meters. The crosswalk between region and evaluation unit is shown in Table 3-1.

Supply curves for crude oil and natural gas are generated for three offshore regions: Pacific, Atlantic, and Gulf of Mexico. Crude oil production includes lease condensate. Natural gas production accounts for both nonassociated gas and associated-dissolved gas. The model is responsive to changes in oil and natural gas prices, royalty relief assumptions, oil and natural gas resource base, and technological improvements affecting exploration and development.

Undiscovered Fields Component

Significant undiscovered oil and gas resources are estimated to exist in the Outer Continental Shelf, particularly in the Gulf of Mexico. Exploration and development of these resources is projected in this component of the OOGSS.

Within each evaluation unit, a field size distribution is assumed based on BOEMRE's latest[1] resource assessment (Table 3-2). The volume of resource in barrels of oil equivalence by field size class as defined by the BOEMRE is shown in Table 3-3. In the OOGSS, the mean estimate represents the size of each field in the field size class. Water depth and field size class are used for specifying many of the technology assumptions in the OOGSS. Fields smaller than field size class 2 are assumed to be uneconomic to develop.

[1]U.S. Department of Interior, Minerals Management Service, *Report to Congress: Comprehensive Inventory of U.S.OCS Oil and Natural Gas Resources*, February 2006.

Table 3-1. Offshore Region and Evaluation Unit Crosswalk

No.	Region Name	Planning Area	Water Depth (meters)	Drilling Depth (feet)	Evaluation Unit Name	Region ID
1	Shallow GOM	Western GOM	0 - 200	< 15,000	WGOM0002	3
2	Shallow GOM	Western GOM	0 - 200	> 15,000	WGOMDG02	3
3	Deep GOM	Western GOM	201 - 400	All	WGOM0204	4
4	Deep GOM	Western GOM	401 - 800	All	WGOM0408	4
5	Deep GOM	Western GOM	801 - 1,600	All	WGOM0816	4
6	Deep GOM	Western GOM	1,601 - 2,400	All	WGOM1624	4
7	Deep GOM	Western GOM	> 2,400	All	WGOM2400	4
8	Shallow GOM	Central GOM	0 - 200	< 15,000	CGOM0002	3
9	Shallow GOM	Central GOM	0 - 200	> 15,000	CGOMDG02	3
10	Deep GOM	Central GOM	201 - 400	All	CGOM0204	4
11	Deep GOM	Central GOM	401 - 800	All	CGOM0408	4
12	Deep GOM	Central GOM	801 - 1,600	All	CGOM0816	4
13	Deep GOM	Central GOM	1,601 – 2,400	All	CGOM1624	4
14	Deep GOM	Central GOM	> 2,400	All	CGOM2400	4
15	Shallow GOM	Eastern GOM	0 - 200	All	EGOM0002	3
16	Deep GOM	Eastern GOM	201 - 400	All	EGOM0204	4
17	Deep GOM	Central GOM	401 - 800	All	EGOM0408	4
18	Deep GOM	Eastern GOM	801 - 1600	All	EGOM0816	4
19	Deep GOM	Eastern GOM	1601 - 2400	All	EGOM1624	4
20	Deep GOM	Eastern GOM	> 2400	All	EGOM2400	4
21	Deep GOM	Eastern GOM	> 200	All	EGOML181	4
22	Atlantic	North Atlantic	0 - 200	All	NATL0002	1
23	Atlantic	North Atlantic	201 - 800	All	NATL0208	1
24	Atlantic	North Atlantic	> 800	All	NATL0800	1
25	Atlantic	Mid Atlantic	0 - 200	All	MATL0002	1
26	Atlantic	Mid Atlantic	201 - 800	All	MATL0208	1
27	Atlantic	Mid Atlantic	> 800	All	MATL0800	1
28	Atlantic	South Atlantic	0 - 200	All	SATL0002	1
29	Atlantic	South Atlantic	201 - 800	All	SATL0208	1
30	Atlantic	South Atlantic	> 800	All	SATL0800	1
31	Atlantic	Florida Straits	0 – 200	All	FLST0002	1
32	Atlantic	Florida Straits	201 - 800	All	FLST0208	1
33	Atlantic	Florida Straits	> 800	All	FLST0800	1
34	Pacific	Pacific Northwest	0-200	All	PNW0002	2
35	Pacific	Pacific Northwest	201-800	All	PNW0208	2
36	Pacific	North California	0-200	All	NCA0002	2
37	Pacific	North California	201-800	All	NCA0208	2
38	Pacific	North California	801-1600	All	NCA0816	2
39	Pacific	North California	1600-2400	All	NCA1624	2
40	Pacific	Central California	0-200	All	CCA0002	2
41	Pacific	Central California	201-800	All	CCA0208	2
42	Pacific	Central California	801-1600	All	CCA0816	2
43	Pacific	South California	0-200	All	SCA0002	2
44	Pacific	South California	201-800	All	SCA0208	2
45	Pacific	South California	801-1600	All	SCA0816	2
46	Pacific	South California	1601-2400	All	SCA1624	2

Source: U.S. Energy Information Administration, Energy Analysis, Office of Petroleum, Gas, and Biofuels Analysis

Table 3-2. Number of Undiscovered Fields by Evaluation Unit and Field Size Class, as of January 1, 2003

Evaluation Unit	Field Size Class (FSC)																Number of Fields	Total Resource (BBOE)
	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17		
WGOM0002	1	5	11	14	20	23	24	27	30	8	6	8	2	0	0	0	179	4.348
WGOMDG02	0	0	2	4	5	6	8	9	9	3	2	2	1	0	0	0	51	1.435
WGOM0204	0	0	0	0	0	0	2	3	3	4	2	1	1	0	0	0	16	1.027
WGOM0408	0	0	0	0	0	1	3	3	7	7	3	2	1	0	0	0	27	1.533
WGOM0816	0	0	0	0	0	0	4	7	16	16	15	9	3	2	1	0	73	8.082
WGOM1624	0	0	0	1	2	6	10	14	18	18	14	10	6	4	1	0	104	10.945
WGOM2400	0	0	0	0	2	3	3	6	7	6	5	3	3	2	0	0	40	4.017
CGOM0002	1	1	6	11	28	52	79	103	81	53	20	1	0	0	0	0	436	8.063
CGOMDG02	0	0	1	1	4	4	4	6	7	6	5	3	1	0	0	0	42	3.406
CGOM0204	0	0	0	0	0	0	1	2	3	2	2	2	1	0	0	0	13	1.102
CGOM0408	0	0	0	0	0	1	1	4	4	4	1	1	1	1	0	0	18	1.660
CGOM0816	0	0	0	0	2	4	8	11	20	22	19	14	7	3	1	0	111	11.973
CGOM1624	0	0	0	1	2	5	9	15	18	19	15	13	8	4	1	0	110	12.371
CGOM2400	0	0	0	0	2	2	3	5	5	5	5	4	3	2	0	0	36	4.094
EGOM0002	4	6	7	11	16	18	18	16	13	10	6	1	0	0	0	0	126	1.843
EGOM0204	0	1	1	2	3	4	4	3	1	1	1	0	0	0	0	0	21	0.233
EGOM0408	0	1	2	3	5	5	5	4	3	2	1	0	0	0	0	0	31	0.348
EGOM0816	0	1	1	3	4	4	4	3	3	2	1	0	0	0	0	0	26	0.326
EGOM1624	0	0	0	0	2	1	1	1	0	1	0	1	0	0	0	0	7	0.250
EGOM2400	0	0	0	1	1	3	5	7	8	9	7	6	3	2	0	0	52	4.922
EGOML181	0	0	0	0	1	3	3	5	8	5	4	2	2	1	1	0	35	1.836
NATL0002	5	7	10	14	16	17	15	11	10	8	3	2	1	0	0	0	119	1.896
NATL0208	1	1	1	2	2	3	3	3	2	1	1	0	0	0	0	0	20	0.246
NATL0800	1	2	3	5	7	10	13	12	7	6	4	1	0	0	0	0	71	1.229
MATL0002	4	6	8	12	13	14	13	11	8	7	5	2	0	0	0	0	103	1.585
MATL0208	1	1	2	3	3	3	3	4	2	2	2	2	0	0	0	0	28	0.377
MATL0800	2	4	5	8	9	10	10	8	5	5	3	2	0	0	0	0	71	1.173
SATL0002	1	2	2	3	5	6	5	5	4	4	1	1	0	0	0	0	39	0.658
SATL0208	4	5	7	10	12	13	12	10	8	7	3	2	0	0	0	0	93	1.382
SATL0800	2	2	4	5	9	15	20	17	11	7	2	1	1	0	0	0	96	1.854
FLST0002	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0.012
FLST0208	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	2	0.009
FLST0800	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000
PNW0002	10	17	24	29	27	21	13	8	5	2	1	0	0	0	0	0	157	0.597
PNW0208	4	6	9	10	11	7	6	3	2	1	0	0	0	0	0	0	59	0.209
NCA0002	1	2	3	5	5	5	5	4	3	3	2	0	0	0	0	0	38	0.485
NCA0208	9	17	24	28	26	22	15	10	5	3	1	1	0	0	0	0	161	0.859
NCA0816	3	6	9	12	12	11	9	7	4	3	2	1	0	0	0	0	79	0.784
NCA1624	1	2	3	5	6	6	7	6	4	2	1	1	0	0	0	0	44	0.595
CCA0002	1	4	6	11	15	19	20	17	12	8	4	2	0	0	0	0	119	1.758
CCA0208	1	2	3	5	8	10	10	8	7	5	2	0	0	0	0	0	61	0.761
CCA0816	0	1	1	2	3	4	5	3	2	2	0	0	0	0	0	0	23	0.218
SCA0002	1	2	4	10	16	21	22	19	12	6	2	1	0	0	0	0	116	1.348
SCA0208	3	6	12	25	38	49	51	43	28	14	5	3	1	0	0	0	278	3.655
SCA0816	1	3	6	9	13	17	18	15	12	8	2	2	1	0	0	0	107	1.906
SCA1624	0	1	2	3	4	5	5	5	4	3	1	1	0	0	0	0	34	0.608

Source: U.S. Energy Information Administration, Energy Analysis, Office of Petroleum, Gas, and Biofuels Analysis

Table 3-3. BOEMRE Field Size Definition (MMBOE)

Field Size Class	Mean
2	0.083
3	0.188
4	0.356
5	0.743
6	1.412
7	2.892
8	5.919
9	11.624
10	22.922
11	44.768
12	89.314
13	182.144
14	371.727
15	690.571
16	1418.883
17	2954.129

Source: Bureau of Ocean Energy Management, Regulation, and Enforcement

Projection of Discoveries

The number and size of discoveries is projected based on a simple model developed by J. J. Arps and T. G. Roberts in 1958[2]. For a given evaluation unit in the OOGSS, the number of cumulative discoveries for each field size class is determined by

$$\text{DiscoveredFields}_{EU,iFSC} = \text{TotalFields}_{EU,iFSC} * (1 - e^{\gamma_{EU,iFSC} * \text{CumNFW}_{EU}}) \quad (3\text{-}1)$$

where,

TotalFields	=	Total number of fields by evaluation unit and field size class
CumNFW	=	Cumulative new field wildcats drilled in an evaluation unit
γ	=	search coefficient
EU	=	evaluation unit
iFSC	=	field size class.

The search coefficient (γ) was chosen to make the Equation 3-1 fit the data. In many cases, however, the sparse exploratory activity in an evaluation unit made fitting the discovery model problematic. To provide reasonable estimates of the search coefficient in every evaluation unit, the data in various field size classes within a region were grouped as needed to obtain enough data points to provide a reasonable fit to the discovery model. A polynomial was fit to all of the relative search coefficients in the region. The polynomial was fit to the resulting search coefficients as follows:

[2]Arps, J. J. and T. G. Roberts, *Economics of Drilling for Cretaceous Oil on the East Flank of the Denver-Julesburg Basin*, Bulletin of the American Association of Petroleum Geologists, November 1958.

$$\gamma_{EU,iFSC} = \beta 1 * iFSC^2 + \beta 2 * iFSC + \beta 3 * \gamma_{EU,10} \quad (3\text{-}2)$$

where

β1	=	0.0243 for Western GOM and 0.0399 for Central and Eastern GOM
β2	=	-0.3525 for Western GOM and -0.6222 for Central and Eastern GOM
β3	=	1.5326 for Western GOM and 2.2477 for Central and 3.0477 for Eastern GOM
iFSC	=	field size class
γ	=	search coefficient for field size class 10.

Cumulative new field wildcat drilling is determined by

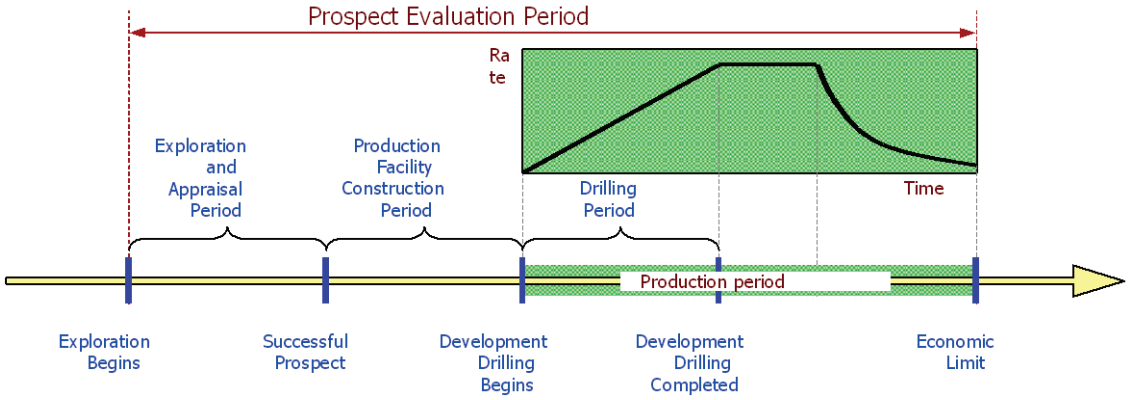
$$CumNFW_{EU,t} = CumNFW_{EU,t-1} + \alpha 1_{EU} + \beta_{EU} * (OILPRICE_{t-nlag1} * GASPRICE_{t-nlag2}) \quad (3\text{-}3)$$

where

OILPRICE	=	oil wellhead price
GASPRICE	=	natural gas wellhead price
α1, β	=	estimated parameter
nlag1	=	number of years lagged for oil price
nlag2	=	number of years lagged for gas price
EU	=	evaluation unit

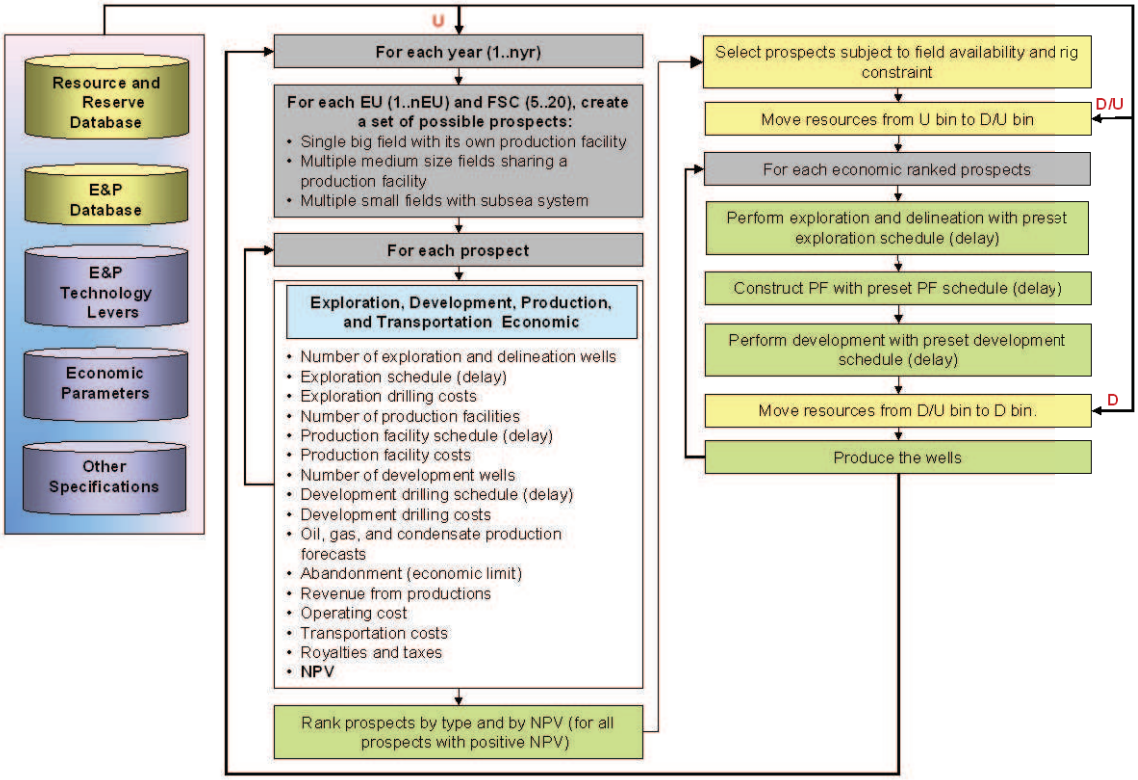
The decision for exploration and development of the discoveries determine from Equation 3-1 is performed at a prospect level that could involve more than one field. A prospect is defined as a potential project that covers exploration, appraisal, production facility construction, development, production, and transportation (Figure 3-1). There are three types of prospects: (1) a single field with its own production facility, (2) multiple medium size fields sharing a production facility, and (3) multiple small fields utilizing nearby production facility. The net present value (NPV) of each possible prospect is generated using the calculated exploration costs, production facility costs, development costs, completion costs, operating costs, flowline costs, transportation costs, royalties, taxes, and production revenues. Delays for exploration, production facility construction, and development are incorporated in this NPV calculation. The possible prospects are then ranked from best (highest NPV) to worst (lowest NPV). The best prospects are selected subject to field availability and rig constraint. The basic flowchart is presented in Figure 3-2.

Figure 3-1. Prospect Exploration, Development, and Production Schedule



Source: ICF Consulting

Figure 3-2. Flowchart for the Undiscovered Field Component of the OOGSS



Note: U = Undiscovered, D/U = Discovered/Undeveloped, D=Developed
Source: ICF Consulting

Calculation of Costs

The technology employed in the deepwater offshore areas to find and develop hydrocarbons can be significantly different than that used in shallower waters, and represents significant challenges for the companies and individuals involved in the deepwater development projects. In many situations in the deepwater OCS, the choice of technology used in a particular situation depends on the size of the prospect being developed. The following base costs are adjusted with the oil price to capture the variation in costs over time as activity level and demand for equipment and other supplies change. The adjustment factor is [1 + (oilprice/baseprice – 1)*0.4], where baseprice = $30/barrel.

Exploration Drilling

During the exploration phase of an offshore project, the type of drilling rig used depends on both economic and technical criteria. Offshore exploratory drilling usually is done using self-contained rigs that can be moved easily. Three types of drilling rigs are incorporated into the OOGSS. The exploration drilling costs per well for each rig type are a function of water depth (WD) and well drilling depth (DD), both in feet.

Jack-up rigs are limited to a water depth of about 600 feet or less. Jack-ups are towed to their location where heavy machinery is used to jack the legs down into the water until they rest on the ocean floor. When this is completed, the platform containing the work area rises above the water. After the platform has risen about 50 feet out of the water, the rig is ready to begin drilling.

$$\text{ExplorationDrillingCosts(\$/well)} = 2{,}000{,}000 + (5.0\text{E-}09)*WD*DD^3 \quad (3\text{-}4)$$

Semi-submersible rigs are floating structures that employ large engines to position the rig over the hole dynamically. This extends the maximum operating depth greatly, and some of these rigs can be used in water depths up to and beyond 3,000 feet. The shape of a semisubmersible rig tends to dampen wave motion greatly regardless of wave direction. This allows its use in areas where wave action is severe.

$$\text{ExplorationDrillingCosts(\$/well)} = 2{,}500{,}000 + 200*(WD+DD) + WD*(400+(2.0\text{E-}05)*DD^2) \quad (3\text{-}5)$$

Dynamically positioned drill ships are a second type of floating vessel used in offshore drilling. They are usually used in water depths exceeding 3,000 feet where the semi-submersible type of drilling rigs can not be deployed. Some of the drillships are designed with the rig equipment and anchoring system mounted on a central turret. The ship is rotated about the central turret using thrusters so that the ship always faces incoming waves. This helps to dampen wave motion.

$$\text{ExplorationDrillingCosts(\$/well)} = 7{,}000{,}000 + (1.0\text{E-}05)*WD*DD^2 \quad (3\text{-}6)$$

Water depth is the primary criterion for selecting a drilling rig. Drilling in shallow waters (up to 1,500 feet) can be done with jack-up rigs. Drilling in deeper water (greater than 1,500 feet) can

be done with semi-submersible drilling rigs or drill ships. The number of rigs available for exploration is limited and varies by water depth levels. Drilling rigs are allowed to move one water depth level lower if needed.

Production and Development Structure

Six different options for development/production of offshore prospects are currently assumed in OOGSS, based on those currently considered and/or employed by operators in Gulf of Mexico OCS. These are the conventional fixed platforms, the compliant towers, tension leg platforms, Spar platforms, floating production systems and subsea satellite well systems. Choice of platform tends to be a function of the size of field and water depth, though in reality other operational, environmental, and/or economic decisions influence the choice. Production facility costs are a function of water depth (WD) and number of slots per structure (SLT).

Conventional Fixed Platform (FP). A fixed platform consists of a jacket with a deck placed on top, providing space for crew quarters, drilling rigs, and production facilities. The jacket is a tall vertical section made of tubular steel members supported by piles driven into the seabed. The fixed platform is economical for installation in water depths up to 1,200 feet. Although advances in engineering design and materials have been made, these structures are not economically feasible in deeper waters.

$$\text{StructureCost}(\$) = 2{,}000{,}000 + 9{,}000 * \text{SLT} + 1{,}500 * \text{WD} * \text{SLT} + 40 * \text{WD}^2 \qquad (3\text{-}7)$$

Compliant Towers (CT). The compliant tower is a narrow, flexible tower type of platform that is supported by a piled foundation. Its stability is maintained by a series of guy wires radiating from the ower and terminating on pile or gravity anchors on the sea floor. The compliant tower can withstand significant forces while sustaining lateral deflections, and is suitable for use in water depths of 1,200 to 3,000 feet. A single tower can accommodate up to 60 wells; however, the compliant tower is constrained by limited deck loading capacity and no oil storage capacity.

$$\text{StructureCost}(\$) = (\text{SLT} + 30) * (1{,}500{,}000 + 2{,}000 * (\text{WD} - 1{,}000)) \qquad (3\text{-}8)$$

Tension Leg Platform (TLP). The tension leg platform is a type of semi-submersible structure which is attached to the sea bed by tubular steel mooring lines. The natural buoyancy of the platform creates an upward force which keeps the mooring lines under tension and helps maintain vertical stability. This type of platform becomes a viable alternative at water depths of 1,500 feet and is considered to be the dominant system at water depths greater than 2,000 feet. Further, the costs of the TLP are relatively insensitive to water depth. The primary advantages of the TLP are its applicability in ultra-deepwaters, an adequate deck loading capacity, and some oil storage capacity. In addition, the field production time lag for this system is only about 3 years.

$$\text{StructureCost}(\$) = (\text{SLT} + 30) * (3{,}000{,}000 + 750 * (\text{WD} - 1{,}000)) \qquad (3\text{-}9)$$

Floating Production System (FPS). The floating production system, a buoyant structure, consists of a semi-submersible or converted tanker with drilling and production equipment anchored in place with wire rope and chain to allow for vertical motion. Because of the movement of this structure in severe environments, the weather-related production downtime is

estimated to be about 10 percent. These structures can only accommodate a maximum of approximately 25 wells. The wells are completed subsea on the ocean floor and are connected to the production deck through a riser system designed to accommodate platform motion. This system is suitable for marginally economic fields in water depths up to 4,000 feet.

$$\text{StructureCost}(\$) = (\text{SLT} + 20) * (7{,}500{,}000 + 250 * (\text{WD} - 1{,}000)) \tag{3-10}$$

Spar Platform (SPAR). A Spar Platform consists of a large diameter single vertical cylinder supporting a deck. It has a typical fixed platform topside (surface deck with drilling and production equipment), three types of risers (production, drilling, and export), and a hull which is moored using a taut caternary system of 6 to 20 lines anchored into the seafloor. Spar platforms are presently used in water depths up to 3,000 feet, although existing technology is believed to be able to extend this to about 10,000 feet.

$$\text{StructureCost}(\$) = (\text{SLT} + 20) * (3{,}000{,}000 + 500 * (\text{WD} - 1{,}000)) \tag{3-11}$$

Subsea Wells System (SS). Subsea systems range from a single subsea well tied back to a nearby production platform (such as FPS or TLP) to a set of multiple wells producing through a common subsea manifold and pipeline system to a distant production facility. These systems can be used in water depths up to at least 7,000 feet. Since the cost to complete a well is included in the development well drilling and completion costs, no cost is assumed for the subsea well system. However, a subsea template is required for all development wells producing to any structure other than a fixed platform.

$$\text{SubseaTemplateCost}(\$ / \text{well}) = 2{,}500{,}000 \tag{3-12}$$

The type of production facility for development and production depends on water depth level as shown in Table 3-4.

Table 3-4. Production Facility by Water Depth Level

Water Depth Range (feet)		Production Facility Type					
Minimum	Maximum	FP	CT	TLP	FPS	SPAR	SS
0	656	X					X
656	2625		X				X
2625	5249			X			X
5249	7874				X	X	X
7874	10000				X	X	X

Source: ICF Consulting

Development Drilling

Pre-drilling of development wells during the platform construction phase is done using the drilling rig employed for exploration drilling. Development wells drilled after installation of the platform which also serves as the development structure is done using the platform itself. Hence, the choice of drilling rig for development drilling is tied to the choice of the production platform.

For water depths less than or equal to 900 meters,

$$\begin{aligned} \text{DevelopmentDrillingCost}(\$ / \text{well}) = {} & 1{,}500{,}000 + (1{,}500 + 0.04 * \text{DD}) * \text{WD} \\ & + (0.035 * \text{DD} - 300) * \text{DD} \end{aligned} \tag{3-13}$$

For water depths greater tan 900 meters,

$$\begin{aligned} \text{DevelopmentDrillingCost}(\$ / \text{well}) = {} & 4{,}500{,}000 + (150 + 0.004 * \text{DD}) * \text{WD} \\ & + (0.035 * \text{DD} - 250) * \text{DD} \end{aligned} \tag{3-14}$$

where

WD = water depth in feet
DD = drilling depth in feet.

Completion and Operating

Completion costs per well are a function of water depth range and drilling depth as shown in Table 3-5.

Table 3-5. Well Completion and Equipment Costs per Well

Water Depth (feet)	Development Drilling Depth (feet)		
	< 10,000	10,001 - 20,000	> 20,000
0 - 3,000	800,000	2,100,000	3,300,000
> 3,000	1,900,000	2,700,000	3,300,000

Platform operating costs for all types of structures are assumed to be a function of water depth (WD) and the number of slots (SLT). These costs include the following items:

- primary oil and gas production costs,
- labor,
- communications and safety equipment,
- supplies and catering services,
- routine process and structural maintenance,
- well service and workovers,
- insurance on facilities, and
- transportation of personnel and supplies.

Annual operating costs are estimated by

$$\text{OperatingCost}(\$ / \text{structure} / \text{year}) = 1{,}265{,}000 + 135{,}000 * SLT + 0.0588 * SLT * WD^2 \quad (3\text{-}15)$$

Transportation

It is assumed in the model that existing trunk pipelines will be used and that the prospect economics must support only the gathering system design and installation. However, in case of small fields tied back to some existing neighboring production platform, a pipeline is assumed to be required to transport the crude oil and natural gas to the neighboring platform.

Structure and Facility Abandonment

The costs to abandon the development structure and production facilities depend on the type of production technology used. The model projects abandonment costs for fixed platforms and compliant towers assuming that the structure is abandoned. It projects costs for tension leg platforms, converted semi-submersibles, and converted tankers assuming that the structures are removed for transport to another location for reinstallation. These costs are treated as intangible capital investments and are expensed in the year following cessation of production. Based on historical data, these costs are estimated as a fraction of the initial structure costs, as follows:

	Fraction of Initial Platform Cost
Fixed Platform	0.45
Compliant Tower	0.45
Tension Leg Platform	0.45
Floating Production Systems	0.15
Spar Platform	0.15

Exploration, Development, and Production Scheduling

The typical offshore project development consists of the following phases:[3]

- Exploration phase,
    - Exploration drilling program
    - Delineation drilling program
- Development phase,
- Fabrication and installation of the development/production platform,
    - Development drilling program
    - Pre-drilling during construction of platform
    - Drilling from platform
    - Construction of gathering system
- Production operations, and
- Field abandonment.

[3]The pre-development activities, including early field evaluation using conventional geological and geophysical methods and the acquisition of the right to explore the field, are assumed to be completed before initiation of the development of the prospect.

The timing of each activity, relative to the overall project life and to other activities, affects the potential economic viability of the undiscovered prospect. The modeling objective is to develop an exploration, development, and production plan which both realistically portrays existing and/or anticipated offshore practices and also allows for the most economical development of the field. A description of each of the phases is provided below.

Exploration Phase

An undiscovered field is assumed to be discovered by a successful exploration well (i.e., a new field wildcat). Delineation wells are then drilled to define the vertical and areal extent of the reservoir.

Exploration drilling. The exploration success rate (ratio of the number of field discovery wells to total wildcat wells) is used to establish the number of exploration wells required to discover a field as follows:

number of exploratory wells = 1/ [exploration success rate]

For example, a 25 percent exploration success rate will require four exploratory wells: one of the four wildcat wells drilled finds the field and the other three are dry holes.

Delineation drilling. Exploratory drilling is followed by delineation drilling for field appraisal (1 to 4 wells depending on the size of the field). The delineation wells define the field location vertically and horizontally so that the development structures and wells may be set in optimal positions. All delineation wells are converted to production wells at the end of the production facility construction.

Development Phase

During this phase of an offshore project, the development structures are designed, fabricated, and installed; the development wells (successful and dry) are drilled and completed; and the product transportation/gathering system is installed.

Development structures. The model assumes that the design and construction of any development structure begins in the year following completion of the exploration and delineation drilling program. However, the length of time required to complete the construction and installation of these structures depends on the type of system used. The required time for construction and installation of the various development structures used in the model is shown in Table 3-6. This time lag is important in all offshore developments, but it is especially critical for fields in deepwater and for marginally economic fields.

Development drilling schedule. The number of development wells varies by water depth and field size class as follows.

$$\text{DevelopmentWells} = \frac{5}{\text{FSC}} * \text{FSIZE}^{\beta_{\text{DepthClass}}} \tag{3-16}$$

where

FSC = field size class
FSIZE = resource volume (MMBOE)

β = 0.8 for water depths < 200 meters; 0.7 for water depths 200-800 meters; 0.65 for water depths > 800 meters.

Table 3-6. Production Facility Design, Fabrication, and Installation Period (Years)

PLATFORMS	Water Depth (Feet)														
Number of Slots	0	100	400	800	1000	1500	2000	3000	4000	5000	6000	7000	8000	9000	10000
2	1	1	1	1	1	1	1	1	2	2	3	3	4	4	4
8	2	2	2	2	2	2	2	2	2	2	3	3	4	4	4
12	2	2	2	2	2	2	2	2	2	2	3	3	4	4	4
18	2	2	2	2	2	2	2	2	2	3	3	3	4	4	4
24	2	2	2	2	2	2	2	2	2	3	3	4	4	4	5
36	2	2	2	2	2	2	2	2	2	3	3	4	4	4	5
48	2	2	2	2	2	2	3	3	3	3	4	4	4	4	5
60	2	2	2	2	2	2	3	3	3	3	4	4	4	4	5
OTHERS															
SS	1	1	1	1	1	1	2	2	2	3	3	3	4	4	4
FPS								3	3	3	4	4	4	4	5

Source: ICF Consulting

The development drilling schedule is determined based on the assumed drilling capacity (maximum number of wells that could be drilled in a year). This drilling capacity varies by type of production facility and water depth. For a platform type production facility (FP, CT, or TLP), the development drilling capacity is also a function of the number of slots. The assumed drilling capacity by production facility type is shown in Table 3-7.

Production transportation/gathering system. It is assumed in the model that the installation of the gathering systems occurs during the first year of construction of the development structure and is completed within 1 year.

Production Operations

Production operations begin in the year after the construction of the structure is complete. The life of the production depends on the field size, water depth, and development strategy. First production is from delineation wells that were converted to production wells. Development drilling starts at the end of the production facility construction period.

Table 3-7. Development Drilling Capacity by Production Facility Type

Maximum Number of Wells Drilled (wells/platform/year, 1 rig)	
Drilling Depth (feet)	**Drilling Capacity (24 slots)**
0	24
6000	24
7000	24
8000	20
9000	20
10000	20
11000	20
12000	16
13000	16
14000	12
15000	8
16000	4
17000	2
18000	2
19000	2
20000	2
30000	2

Maximum Number of Wells Drilled (wells/field/year)			
Water Depth (feet)	**SS**	**FPS**	**FPSO**
0	4		4
1000	4		4
2000	4		4
3000	4	4	4
4000	4	4	4
5000	3	3	3
6000	2	2	2
7000	2	2	2
8000	1	1	1
9000	1	1	1
10000	1	1	1

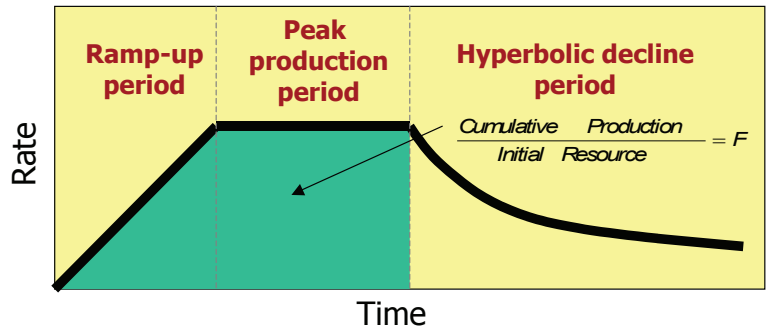
Source: ICF Consulting

Production profiles

The original hydrocarbon resource (in BOE) is divided between oil and natural gas using a user specified proportion. Due to the development drilling schedule, not all wells in the same field will produce at the same time. This yields a ramp-up profile in the early production period (Figure 3-3). The initial production rate is the same for all wells in the field and is constant for a period of time. Field production reaches its peak when all the wells have been drilled and start producing. The production will start to decline (at a user specified rate) when the ratio of cumulative production to initial resource equals a user specified fraction.

Gas (plus lease condensate) production is calculated based on gas resource, and oil (plus associated gas) production is calculated based on the oil resource. Lease condensate production is separated from the gas production using the user specified condensate yield. Likewise, associated-dissolved gas production is separated from the oil production using the user specified associated gas-to-oil ratio. Associated-dissolved gas production is then tracked separately from the nonassociated gas production throughout the projection. Lease condensate production is added to crude oil production and is not tracked separately.

Figure 3-3. Undiscovered Field Production Profile



Source: ICF Consulting

Field Abandonment

All wells in a field are assumed to be shut-in when the net revenue from the field is less than total State and Federal taxes. Net revenue is total revenue from production less royalties, operating costs, transportation costs, and severance taxes.

Discovered Undeveloped Fields Component

Announced discoveries that have not been brought into production by 2002 are included in this component of the OOGSS. The data required for these fields include location, field size class, gas percentage of BOE resource, condensate yield, gas to oil ratio, start year of production, initial production rate, fraction produced before decline, and hyperbolic decline parameters. The BOE resource for each field corresponds to the field size class as specified in Table 3-3.

The number of development wells is the same as that of an undiscovered field in the same water depth and of the same field size class (Equation 3-13). The production profile is also the same as that of an undiscovered field (Figure 3-3).

The assumed field size and year of initial production of the major announced deepwater discoveries that were not brought into production by 2009 are shown in Table 3-8. A field that is announced as an oil field is assumed to be 100 percent oil and a field that is announced as a gas field is assumed to be 100 percent gas. If a field is expected to produce both oil and gas, 70 percent is assumed to be oil and 30 percent is assumed to be gas.

Producing Fields Component

A separate database is used to track currently producing fields. The data required for each producing field include location, field size class, field type (oil or gas), total recoverable resources, historical production (1990-2002), and hyperbolic decline parameters.

Projected production from the currently producing fields will continue to decline if, historically,

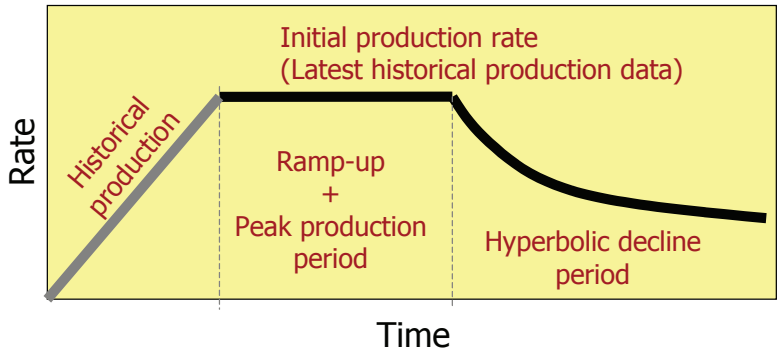
production from the field is declining (Figure 3-4). Otherwise, production is held constant for a period of time equal to the sum of the specified number ramp-up years and number of years at peak production after which it will decline (Figure 3-5). The model assumes that production will decline according to a hyperbolic decline curve until the economic limit is achieved and the field is abandoned. Typical production profile data are shown in Table 3-9. Associated-dissolved gas and lease condensate production are determined the same way as in the undiscovered field component.

Table 3-8. Assumed Size and Initial Production Year of Major Announced Deepwater Discoveries

Field/Project Name	Block	Water Depth (feet)	Year of Discovery	Field Size Class	Field Size (MMBoe)	Start Year of Production
Great White	AC857	8717	2002	14	372	2010
Telemark	AT063	4457	2000	12	89	2010
Ozona	GB515	3000	2008	12	89	2011
West Tonga	GC726	4674	2007	12	89	2011
Gladden	MC800	3116	2008	12	89	2011
Pony	GC468	3497	2006	13	182	2013
Knotty Head	GC512	3557	2005	15	691	2013
Puma	GC823	4129	2003	14	372	2013
Big Foot	WR029	5235	2005	12	89	2013
Cascade	WR206	8143	2002	14	372	2013
Chinook	WR469	8831	2003	14	372	2013
Pyrenees	GB293	2100	2009	12	89	2014
Kaskida	KC292	5860	2006	15	691	2014
Appaloosa	MC503	2805	2008	14	372	2014
Jack	WR759	6963	2004	14	372	2014
Samurai	GC432	3400	2009	12	89	2015
Wide Berth	GC490	3700	2009	12	89	2015
Manny	MC199	2478	2010	13	182	2015
Kodiak	MC771	4986	2008	15	691	2015
St. Malo	WR678	7036	2003	14	372	2015
Mission Deep	GC955	7300	2006	13	182	2016
Tiber	KC102	4132	2009	16	1419	2016
Vito	MC984	4038	2009	13	182	2016
Stones	WR508	9556	2005	12	89	2016
Heidelberg	GB859	5000	2009	13	182	2017
Freedom	MC948	6095	2008	15	691	2017
Shenandoah	WR052	5750	2009	13	182	2017
Buckskin	KC872	6920	2009	13	182	2018
Julia	WR627	7087	2007	12	89	2018
Vicksburg	DC353	7457	2009	14	372	2019
Lucius	KC875	7168	2009	13	182	2019

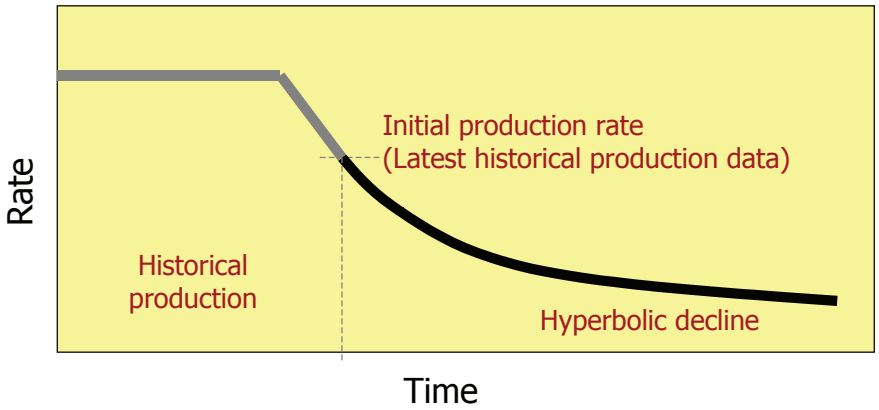
Source: U.S. Energy Information Administration, Energy Analysis, Office of Petroleum, Gas, and Biofuels Analysis

Figure 3-4. Production Profile for Producing Fields - Constant Production Case



Source: ICF Consulting

Figure 3-5. Production Profile for Producing Fields - Declining Production Case



Source: ICF Consulting

Table 3-9. Production Profile Data for Oil & Gas Producing Fields

Region	Crude Oil						Natural Gas					
	FSC 2 - 10			FSC 11 – 17			FSC 2 - 10			FSC 11 - 17		
	Ramp-up (years)	At Peak (years)	Initial Decline Rate	Ramp-up (years)	At Peak (years)	Initial Decline Rate	Ramp-up (years)	At Peak (years)	Initial Decline Rate	Ramp-up (years)	At Peak (years)	Initial Decline Rate
Shallow GOM	2	2	0.15	3	3	0.10	2	1	0.20	3	2	0.10
Deep GOM	2	2	0.20	2	3	0.15	2	2	0.25	3	2	0.20
Atlantic	2	2	0.20	3	3	0.20	2	1	0.25	3	2	0.20
Pacific	2	2	0.10	3	2	0.10	2	1	0.20	3	2	0.20

FSC = Field Size Class
Source: ICF Consulting

Generation of Supply Curves

As mentioned earlier, the OOGSS does not determine the actual volume of crude oil and nonassociated natural gas produced in a given projection year but rather provides the parameters for the short-term supply functions used to determine regional supply and demand market equilibration. For each year, t, and offshore region, r, the OGSM calculates the stock of proved reserves at the beginning of year t+1 and the expected production-to-reserves (PR) ratio for year t+1 as follows.

The volume of proved reserves in any year is calculated as

$$RESOFF_{r,k,t+1} = RESOFF_{r,k,t} - PRDOFF_{r,k,t} + NRDOFF_{r,k,t} + REVOFF_{r,k,t} \quad (3\text{-}17)$$

where

RESOFF	=	beginning- of-year reserves
PRDOFF	=	production
NRDOFF	=	new reserve discoveries
REVOFF	=	reserve extensions, revisions, and adjustments
r	=	region (1=Atlantic, 2=Pacific, 3=GOM)
k	=	fuel type (1=oil; 2=nonassociated gas)
t	=	year.

Expected production, EXPRDOFF, is the sum of the field level production determined in the undiscovered fields component, the discovered, undeveloped fields component, and the producing field component. The volume of crude oil production (including lease condensate), PRDOFF, passed to the PMM is equal to EXPRDOFF. Nonassociated natural gas production in year t is the market equilibrated volume passed to the OGSM from the NGTDM.

Reserves are added through new field discoveries as well as delineation and developmental drilling. Each newly discovered field not only adds proved reserves but also a much larger amount of inferred reserves. The allocation between proved and inferred reserves is based on historical reserves growth statistics provided by the Minerals Management Service. Specifically,

$$NRDOFF_{r,k,t} = NFDISC_{r,k,t-1} * \left(\frac{1}{RSVGRO_k} \right) \quad (3\text{-}18)$$

$$NIRDOFF_{r,k,t} = NFDISC_{r,k,t-1} * \left(1 - \frac{1}{RSVGRO_k} \right) \quad (3\text{-}19)$$

where

NRDOFF	=	new reserve discovery
NIRDOFF	=	new inferred reserve additions
NFDISC	=	new field discoveries
RSVGRO	=	reserves growth factor (8.2738 for oil and 5.9612 for gas)
r	=	region (1=Atlantic, 2=Pacific, 3=GOM)
k	=	fuel type (1=oil; 2=gas)

t = year.

Reserves are converted from inferred to proved with the drilling of other exploratory (or delineation) wells and developmental wells. Since the expected offshore PR ratio is assumed to remain constant at the last historical value, the reserves needed to support the total expected production, EXPRDOFF, can be calculated by dividing EXPRDOFF by the PR ratio. Solving Equation 3-1 for $REVOFF_{r,k,t}$ and writing

gives

$$REVOFF_{r,k,t} = \frac{EXPRDOFF_{r,k,t+1}}{PR_{r,k}} + PRDOFF_{r,k,t} - RESOFF_{r,k,t} - NRDOFF_{r,k,t} \quad (3\text{-}20)$$

The remaining proved reserves, inferred reserves, and undiscovered resources are tracked throughout the projection period to ensure that production from offshore sources does not exceed the assumed resource base. Field level associated-dissolved gas is summed to the regional level and passed to the NGTDM.

Advanced Technology Impacts

Advances in technology for the various activities associated with crude oil and natural gas exploration, development, and production can have a profound impact on the costs associated with these activities. The OOGSS has been designed to give due consideration to the effect of advances in technology that may occur in the future. The specific technology levers and values are presented in Table 3-10.

Table 3-10. Offshore Exploration and Production Technology Levers

Technology Lever	Total Improvement (percent)	Number of Years
Exploration success rates	30	30
Delay to commence first exploration and between exploration	15	30
Exploration & development drilling costs	30	30
Operating cost	30	30
Time to construct production facility	15	30
Production facility construction costs	30	30
Initial constant production rate	15	30
Decline rate	0	30

Source: ICF Consulting

Appendix 3.A. Offshore Data Inventory

VARIABLES				
Variable Name				
Code	Text	Description	Unit	Classification
ADVLTXOFF	PRODTAX	Offshore ad valorem tax rates	Fraction	4 Lower 48 offshore subregions; Fuel (oil, gas)
CPRDOFF	COPRD	Offshore coproduct rate	Fraction	4 Lower 48 offshore subregions; Fuel (oil, gas)
CUMDISC	DiscoveredFields	Cumulative number of dicovered offshore fields	NA	Offshore evaluation unit: Field size class
CUMNFW	CumNFW	Cumulative number of new fields wildcats drilled	NA	Offshore evaluation unit: Field size class
CURPRROFF	omega	Offshore initial P/R ratios	Fraction	4 Lower 48 offshore subregions; Fuel (oil, gas)
CURRESOFF	R	Offshore initial reserves	MMB BCF	4 Lower 48 offshore subregions; Fuel (oil, gas)
DECLOFF	--	Offshore decline rates	Fraction	4 Lower 48 offshore subregions; Fuel (oil, gas)
DEVLCOST	DevelopmentDrilling Cost	Development drilling cost	$ per well	Offshore evaluation unit
DRILLOFF	DRILL	Offshore drilling cost	1987$	4 Lower 48 offshore subregions
DRYOFF	DRY	Offshore dry hole cost	1987$	Class (exploratory, developmental); 4 Lower 48 offshore subregions
DVWELLOFF	--	Offshore development project drilling schedules	wells per year	4 Lower 48 offshore subregions; Fuel (oil, gas)
ELASTOFF	--	Offshore production elasticity values	Fraction	4 Lower 48 offshore subregions
EXPLCOST	ExplorationDrillingCosts	Exploration well drilling cost	$ per wells	Offshore evaluation unit
EXWELLOFF	--	Offshore exploratory project drilling schedules	wells per year	4 Lower 48 offshore subregions
FLOWOFF	--	Offshore flow rates	bls, MCF per year	4 Lower 48 offshore subregions; Fuel (oil, gas)
FRMINOFF	FRMIN	Offshore minimum exploratory well finding rate	MMB BCF per well	4 Lower 48 offshore subregions; Fuel (oil, gas)
FR1OFF	FR1	Offshore new field wildcat well finding rate	MMB BCF per well	4 Lower 48 offshore subregions; Fuel (oil, gas)
FR2OFF	FR3	Offshore developmental well finding rate	MMB BCF per well	4 Lower 48 offshore subregions; Fuel (oil, gas)
FR3OFF	FR2	Offshore other exploratory well finding rate	MMB BCF per well	4 Lower 48 offshore subregions; Fuel (oil, gas)
HISTPRROFF	--	Offshore historical P/R ratios	fraction	4 Lower 48 offshore subregions; Fuel (oil, gas)
HISTRESOFF	--	Offshore historical beginning-of-year reserves	MMB BCF	4 Lower 48 offshore subregions; Fuel (oil, gas)
INFRSVOFF	I	Offshore inferred reserves	MMB BCF	4 Lower 48 offshore subregions; Fuel (oil, gas)
KAPFRCOFF	EXKAP	Offshore drill costs that are tangible & must be depreciated	fraction	Class (exploratory, developmental)
KAPSPNDOFF	KAP	Offshore other capital expenditures	1987$	Class (exploratory, developmental); 4 Lower 48 offshore subregions
LEASOFF	EQUIP	Offshore lease equipment cost	1987$ per project	Class (exploratory, developmental); 4 Lower 48 offshore subregions
NDEVWLS	DevelopmentWells	Number of development wells drilled	NA	Offshore evaluation unit
NFWCOSTOFF	COSTEXP	Offshore new field wildcat cost	1987$	Class (exploratory, developmental); 4 Lower 48 offshore subregions

VARIABLES				
Variable Name				
Code	Text	Description	Unit	Classification
NFWELLOFF	--	Offshore exploratory and developmental project drilling schedules	wells per project per year	Class (exploratory, developmental); r=1
NIRDOFF	NIRDOFF	Offshore new inferred reserves	Oil-MMB per well Gas-BCF per well	Offshore region; Offshore fuel(oil,gas)
NRDOFF	NRDOFF	Offshore new reserve discoveries	Oil-MMB per well Gas-BCF per well	Offshore region; Offshore fuel(oil,gas)
OPEROFF	OPCOST	Offshore operating cost	1987$ per well per year	Class (exploratory, developmental); 4 Lower 48 offshore subregions
OPRCOST	OperatingCost	Operating cost	$ per well	Offshore evaluation unit
PFCOST	StructureCost	Offshore production facility cost	$ per structure	Offshore evaluation unit
PRJOFF	N	Offshore project life	Years	Fuel (oil, gas)
RCPRDOFF	M	Offshore recovery period intangible & tangible drill cost	Years	Lower 48 Offshore
RESOFF	RESOFF	Offshore reserves	Oil-MMB per well Gas-BCF per well	Offshore region; Offshore fuel(oil,gas)
REVOFF	REVOFF	Offshore reserve revisions	Oil-MMB per well Gas-BCF per well	Offshore region; Offshore fuel(oil,gas)
SC	Γ	Search coefficient for discovery model	Fraction	Offshore evaluation unit: Field size class
SEVTXOFF	PRODTAX	Offshore severance tax rates	fraction	4 Lower 48 offshore subregions; Fuel (oil, gas)
SROFF	SR	Offshore drilling success rates	fraction	Class (exploratory, developmental); 4 Lower 48 offshore subregions; Fuel (oil, gas)
STTXOFF	STRT	State tax rates	fraction	4 Lower 48 offshore subregions
TECHOFF	TECH	Offshore technology factors applied to costs	fraction	Lower 48 Offshore
TRANSOFF	TRANS	Offshore expected transportation costs	NA	4 Lower 48 offshore subregions; Fuel (oil, gas)
UNRESOFF	Q	Offshore undiscovered resources	MMB BCF	4 Lower 48 offshore subregions; Fuel (oil, gas)
WDCFOFFIRKLAG	--	1989 offshore exploration & development weighted DCFs	1987$	Class (exploratory, developmental); 4 Lower 48 offshore subregions; Fuel (oil, gas)
WDCFOFFIRLAG	--	1989 offshore regional exploration & development weighted DCFs	1987$	Class (exploratory, developmental); 4 Lower 48 offshore subregions;
WDCFOFFLAG	--	1989 offshore exploration & development weighted DCFs	1987$	Class (exploratory, developmental)
WELLAGOFF	WELLSOFF	1989 offshore wells drilled	Wells per year	Class (exploratory, developmental); 4 Lower 48 offshore subregions; Fuel (oil, gas)
XDCKAPOFF	XDCKAP	Offshore intangible drill costs that must be depreciated	fraction	NA

PARAMETERS		
Parameter	Description	Value
nREG	Region ID (1: CENTRAL & WESTERN GOM; 2: EASTERN GOM; 3: ATLANTIC; 4: PACIFIC)	4
nPA	Planning Area ID (1: WESTERN GOM; 2: CENTRAL GOM; 3: EASTERN GOM; 4: NORTH ATLANTIC; 5: MID ATLANTIC; 6: SOUTH ATLANTIC; 7: FLORIDA STRAITS; 8: PACIFIC; NORTHWEST; 9: CENTRAL CALIFORNIA; 10: SANTA BARBARA - VENTURA BASIN; 11: LOS ANGELES BASIN; 12: INNER BORDERLAND; 13: OUTER BORDERLAND)	13
ntEU	Total number of evaluation units (43)	43
nMaxEU	Maximum number of EU in a PA (6)	6
TOTFLD	Total number of evaluation units	3600
nANN	Total number of announce discoveries	127

PARAMETERS		
Parameter	**Description**	**Value**
nPRD	Total number of producing fields	1132
nRIGTYP	Rig Type (1: JACK-UP 0-1500; 2: JACK-UP 0-1500 (Deep Drilling); 3: SUBMERSIBLE 0-1500; 4: SEMI-SUBMERSIBLE 1500-5000; 5: SEMI-SUBMERSIBLE 5000-7500; 6: SEMI-SUBMERSIBLE 7500-10000; 7: DRILL SHIP 5000-7500; 8: DRILL SHIP 7500-10000)	8
nPFTYP	Production facility type (1: FIXED PLATFORM (FP); 2: COMPLIANT TOWER (CT); 3: TENSION LEG PLATFORM (TLP); 4: FLOATING PRODUCTION SYSTEM (FPS); 5: SPAR; 6: FLOATING PRODUCTION STORAGE & OFFLOADING (FPSO); 7: SUBSEA SYSTEM (SS))	7
nPFWDR	Production facility water depth range (1: 0 - 656 FEET; 2: 656 - 2625 FEET; 3: 2625 - 5249 FEET; 4: 5249 - 7874 FEET; 5: 7874 - 9000 FEET)	5
NSLTIdx	Number of platform slot data points	8
NPFWD	Number of production facility water depth data points	15
NPLTDD	Number of platform water depth data points	17
NOPFWD	Number of other production facitlity water depth data points	11
NCSTWD	Number of water depth data points for production facility costs	39
NDRLWD	Number of water depth data points for well costs	15
NWLDEP	Number of well depth data points	30
TRNPPLNCSTNDIAM	Number of pipeline diameter data points	19
MAXNFIELDS	Maximum number of fields for a project/prospect	10
nMAXPRJ	Maximum number of projects to evaluate per year	500
PRJLIFE	Maximum project life in years	10

INPUT DATA			
Variable	**Description**	**Unit**	**Source**
ann_EU	Announced discoveries - Evaluation unit name	-	PGBA
ann_FAC	Announced discoveries - Type of production facility	-	BOEMRE
ann_FN	Announced discoveries - Field name	-	PGBA
ann_FSC	Announced discoveries - Field size class	integer	BOEMRE
ann_OG	Announced discoveries - fuel type	-	BOEMRE
ann_PRDSTYR	Announced discoveries - Start year of production	integer	BOEMRE
ann_WD	Announced discoveries - Water depth	feet	BOEMRE
ann_WL	Announced discoveries - Number of wells	integer	BOEMRE
ann_YRDISC	Announced discoveries - Year of discovery	integer	BOEMRE
beg_rsva	AD gas reserves	bcf	calculated in model
BOEtoMcf	BOE to Mcf conversion	Mcf/BOE	ICF
chgDrlCstOil	Change of Drilling Costs as a Function of Oil Prices	fraction	ICF
chgOpCstOil	Change of Operating Costs as a Function of Oil Prices	fraction	ICF
chgPFCstOil	Change of Production facility Costs as a Function of Oil Prices	fraction	ICF
cndYld	Condensate yield by PA, EU	Bbl/mmcf	BOEMRE
cstCap	Cost of capital	percent	BOEMRE
dDpth	Drilling depth by PA, EU, FSC	feet	BOEMRE
deprSch	Depreciation schedule (8 year schedule)	fraction	BOEMRE
devCmplCst	Completion costs by region, completion type (1=Single, 2=Dual), water depth range (1=0-3000Ft, 2=>3000Ft), drilling depth index	million 2003 dollars	BOEMRE
devDrlCst	Mean development well drilling costs by region, water depth index, drilling depth index	million 2003 dollars	BOEMRE
devDrlDly24	Maximum number of development wells drilled from a 24-slot PF by drilling depth index	Wells/PF/year	ICF
devDrlDlyOth	Maximum number of development wells drilled for other PF by PF type, water depth index	Wells/field/year	ICF

INPUT DATA			
Variable	Description	Unit	Source
devOprCst	Operating costs by region, water depth range (1=0-3000Ft, 2=>3000Ft), drilling depth index	2003 $/well/year	BOEMRE
devTangFrc	Development Wells Tangible Fraction	fraction	ICF
dNRR	Number of discovered producing fields by PA, EU, FSC	integer	BOEMRE
Drillcap	Drilling Capacity	wells/year/rig	ICF
duNRR	Number of discovered/undeveloped fields by PA, EU, FSC	integer	ICF
EUID	Evaluation unit ID	integer	ICF
EUname	Names of evaluation units by PA	integer	ICF
EUPA	Evaluation unit to planning area x-walk by EU_Total	integer	ICF
exp1stDly	Delay before commencing first exploration by PA, EU	number of years	ICF
exp2ndDly	Total time (Years) to explore and appraise a field by PA, EU	number of years	ICF
expDrlCst	Mean Exploratory Well Costs by region, water depth index, drilling depth index	million 2003 dollars	BOEMRE
expDrlDays	Drilling days/well by rig type	number of days/well	ICF
expSucRate	Exploration success rate by PA, EU, FSC	fraction	ICF
ExpTangFrc	Exploration and Delineation Wells Tangible Fraction	fraction	ICF
fedTaxRate	Federal Tax Rate	percent	ICF
fldExpRate	Maximum Field Exploration Rate	percent	ICF
gasprice	Gas wellhead price by region	2003$/mcf	NGTDM
gasSevTaxPrd	Gas production severance tax	2003$/mcf	ICF
gasSevTaxRate	Gas severance tax rate	percent	ICF
GOprop	Gas proportion of hydrocarbon resource by PA, EU	fraction	ICF
GOR	Gas-to-Oil ratio (Scf/Bbl) by PA, EU	Scf/Bbl	ICF
GORCutOff	GOR cutoff for oil/gas field determination	-	ICF
gRGCGF	Gas Cumulative Growth Factor (CGF) for gas reserve growth calculation by year index	-	BOEMRE
levDelWls	Exploration drilling technology (reduces number of delineation wells to justify development	percent	PGBA
levDrlCst	Drilling costs R&D impact (reduces exploration and development drilling costs)	percent	PGBA
levExpDly	Pricing impact on drilling delays (reduces delays to commence first exploration and between exploration	percent	PGBA
levExpSucRate	Seismic technology (increase exploration success rate)	percent	PGBA
levOprCst	Operating costs R&D impact (reduces operating costs)	percent	PGBA
levPfCst	Production facility cost R&D impact (reduces production facility construction costs	percent	PGBA
levPfDly	Production facility design, fabrication and installation technology (reduces time to construct production facility)	percent	PGBA
levPrdPerf1	Completion technology 1 (increases initial constant production facility)	percent	PGBA
levPrdPerf2	Completion technology 2 (reduces decile rates)	percent	PGBA
nDelWls	Number of delineation wells to justify a production facility by PA, EU, FSC	integer	ICF
nDevWls	Maximum number of development wells by PA, EU, FSC	integer	ICF
nEU	Number of evaluation units in each PA	integer	ICF
nmEU	Names of evaluation units by PA	-	ICF
nmPA	Names of planning areas by PA	-	ICF
nmPF	Name of production facility and subsea-system by PF type index	-	ICF
nmReg	Names of regions by region	-	ICF
ndiroff	Additions to inferred reserves by region and fuel type	oil: MBbls; gas: Bcf	calculated in model
nrdoff	New reserve discoveries by region and fuel type	oil: Mbbls; gas: Bcf	calculated in model
nRigs	Number of rigs by rig type	integer	ICF

INPUT DATA			
Variable	Description	Unit	Source
nRigWlsCap	Number of well drilling capacity (Wells/Rig)	wells/rig	ICF
nRigWlsUtl	Number of wells drilled (Wells/Rig)	wells/rig	ICF
nSlt	Number of slots by # of slots index	integer	ICF
oilPrcCstTbl	Oil price for cost tables	2003$/Bbl	ICF
oilprice	Oil wellhead price by region	2003$/Bbl	PMM
oilSevTaxPrd	Oil production severance tax	2003$/Bbl	ICF
oilSevTaxRate	Oil severance tax rate	percent	ICF
oRGCGF	Oil Cumulative Growth Factor (CGF) for oil reserve growth calculation by year index	fraction	BOEMRE
paid	Planning area ID	integer	ICF
PAname	Names of planning areas by PA	-	ICF
pfBldDly1	Delay for production facility design, fabrication, and installation (by water depth index, PF type index, # of slots index (0 for non platform)	number of years	ICF
pfBldDly2	Delay between production facility construction by water depth index	number of years	ICF
pfCst	Mean Production Facility Costs in by region, PF type, water depth index, # of slots index (0 for non-platform)	million 2003 $	BOEMRE
pfCstFrc	Production facility cost fraction matrix by year index, year index	fraction	ICF
pfMaxNFld	Maximum number of fields in a project by project option	integer	ICF
pfMaxNWls	Maximum number of wells sharing a flowline by project option	integer	ICF
pfMinNFld	Minimum number of fields in a project by project option	integer	ICF
pfOptFlg	Production facility option flag by water depth range index, FSC	-	ICF
pfTangFrc	Production Facility Tangible Fraction	fraction	ICF
pfTypFlg	Production facility type flag by water depth range index, PF type index	-	ICF
platform	Flag for platform production facility	-	ICF
prd_DEPTH	Producing fields - Total drilling depth	feet	BOEMRE
prd_EU	Producing fields - Evaluation unit name	-	ICF
prd_FLAG	Producing fields - Production decline flag	-	ICF
prd_FN	Producing fields - Field name	-	BOEMRE
prd_ID	Producing fields - BOEMRE field ID	-	BOEMRE
prd_OG	Producing fields - Fuel type	-	BOEMRE
prd_YRDISC	Producing fields - Year of discovery	year	BOEMRE
prdDGasDecRatei	Initial gas decline rate by PA, EU, FSC range index	fraction/year	ICF
prdDGasHyp	Gas hyperbolic decline coefficient by PA, EU, FSC range index	fraction	ICF
prdDOilDecRatei	Initial oil decline rate by PA, EU,	fraction/year	ICF
prdDOilHyp	Oil hyperbolic decline coefficient by PA, EU, FSC range index	fraction	ICF
prdDYrPeakGas	Years at peak production for gas by PA, EU, FSC, range index	number of years	ICF
prdDYrPeakOil	Years at peak production for oil by PA, EU, FSC, range index	number of years	ICF
prdDYrRampUpGas	Years to ramp up for gas production by PA, EU, FSC range index	number of years	ICF
prdDYrRampUpOil	Years to ramp up for oil production by PA, EU, FSC range index	number of years	ICF
prdGasDecRatei	Initial gas decline rate by PA, EU	fraction/year	ICF
prdGasFrc	Fraction of gas produced before decline by PA, EU	fraction	ICF
prdGasHyp	Gas hyperbolic decline coefficient by PA, EU	fraction	ICF
prdGasRatei	Initial gas production (Mcf/Day/Well) by PA, EU	Mcf/day/well	ICF
PR	Expected production to reserves ratio by fuel typ	fraction	PGBA
prdoff	Expected production by fuel type	oil:MBbls; gas: Bcf	calculated in model
prdOilDecRatei	Initial oil decline rate by PA, EU	fraction/year	ICF
prdOilFrc	Fraction of oil produced before decline by PA, EU	fraction	ICF

INPUT DATA			
Variable	Description	Unit	Source
prdOilHyp	Oil hyperbolic decline coefficient by PA, EU	fraction	ICF
prdOilRatei	Initial oil production (Bbl/Day/Well) by PA, EU	Bbl/day/well	ICF
prod	Producing fields - annual production by fuel type	oil:MBbls; gas:Mmcf	BOEMRE
prod_asg	AD gas production	bcf	calculated in model
revoff	Extensions, revisions, and adjustments by fuel type	oil:MBbls; gas:Bcf	
rigBldRatMax	Maximum Rig Build Rate by rig type	percent	ICF
rigIncrMin	Minimum Rig Increment by rig type	integer	ICF
RigUtil	Number of wells drilled	wells/rig	ICF
rigUtilTarget	Target Rig Utilization by rig type	percent	ICF
royRateD	Royalty rate for discovered fields by PA, EU, FSC	fraction	BOEMRE
royRateU	Royalty rate for undiscovered fields by PA, EU, FSC	fraction	BOEMRE
stTaxRate	Federal Tax Rate by PA, EU	percent	ICF
trnFlowLineLen	Flowline length by PA, EU	Miles/prospect	ICF
trnPpDiam	Oil pipeline diameter by PA, EU	inches	ICF
trnPplnCst	Pipeline cost by region, pipe diameter index, water depth index	million 2003 $/mile	BOEMRE
trnTrfGas	Gas pipeline tariff ($/Mcf) by PA, EU	2003 $/Bbl	ICF
trnTrfOil	Oil pipeline tariff ($/Bbl) by PA, EU	2003 $/Bbl	ICF
uNRR	Number of undiscovered fields by PA, EU, FSC	integer	calculated in model
vMax	Maximum MMBOE of FSC	MMBOE	BOEMRE
vMean	Geometric mean MMBOE of FSC	MMBOE	BOEMRE
vMin	Minimum MMBOE of FSC	MMBOE	BOEMRE
wDpth	Water depth by PA, EU, FSC	feet	BOEMRE
yrAvl	Year lease available by PA, EU	year	ICF
yrCstTbl	Year of cost tables	year	ICF

Sources: BOEMRE = Bureau of Ocean Energy Management, Regulation, and Enforcement (formerly the Minerals Management Service); ICF = ICF Consulting; PGBA = EIA, Office of Petroleum, Gas, and Biofuels Analysis

4. Alaska Oil and Gas Supply Submodule

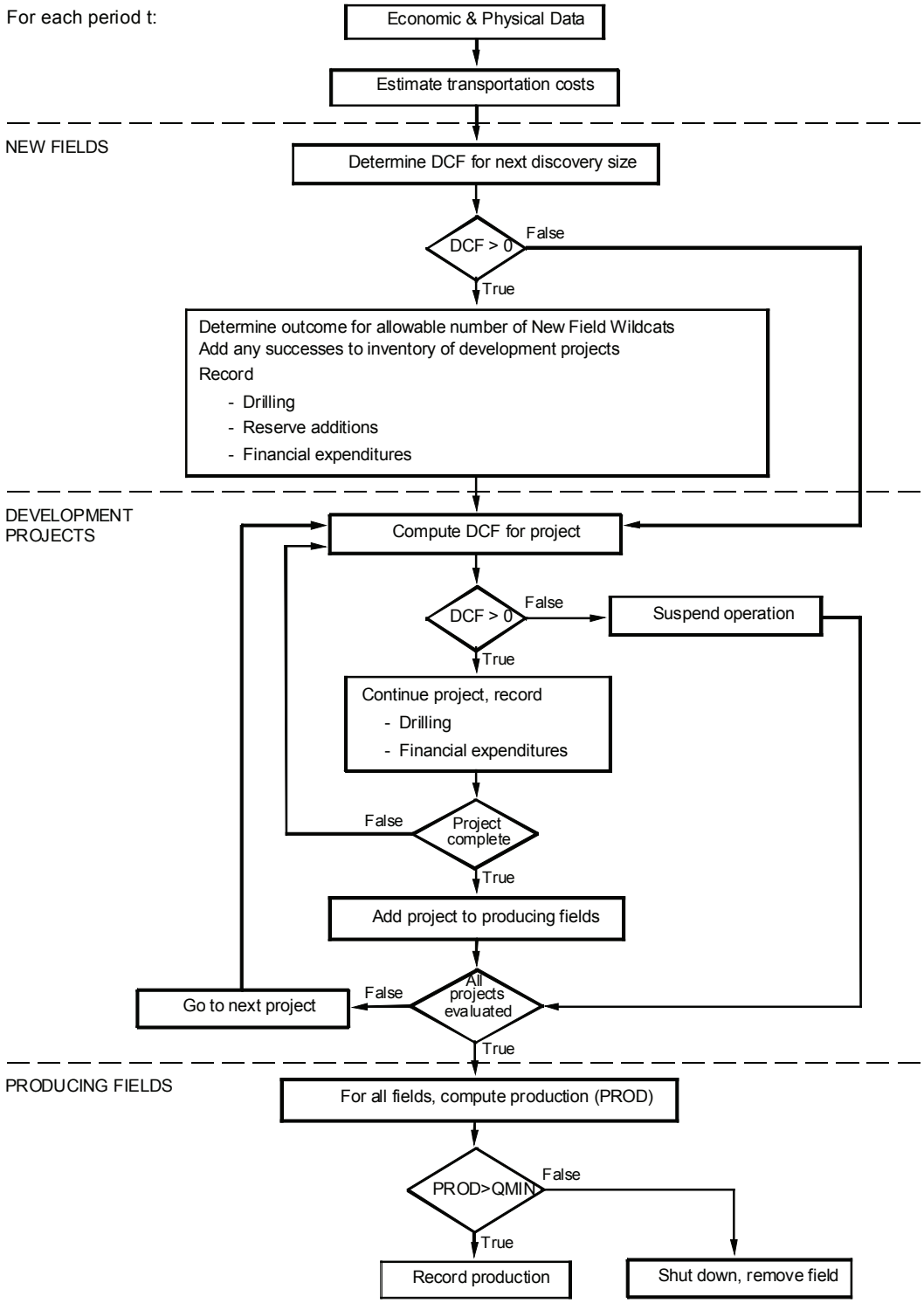
This section describes the structure for the Alaska Oil and Gas Supply Submodule (AOGSS). The AOGSS is designed to project field-specific oil production from the Onshore North Slope, Offshore North Slope, and Other Alaska areas (primarily the Cook Inlet area). The North Slope region encompasses the National Petroleum Reserve Alaska in the west, the State Lands in the middle, and the Arctic National Wildlife Refuge area in the east. This section provides an overview of the basic modeling approach, including a discussion of the discounted cash flow (DCF) method.

Alaska natural gas production is not projected by the AOGSS, but by Natural Gas Transmission and Distribution Module (NGTDM). The NGTDM projects Alaska gas consumption and whether an Alaska gas pipeline is projected to be built to carry Alaska North Slope gas into Canada and U.S. gas markets. As of January 1, 2009, Alaska was estimated to have 7.7 trillion cubic feet of proved reserves, 24.8 trillion cubic feet of inferred resources at existing fields (also known as field appreciation), and 257.5 trillion cubic feet of undiscovered resources, excluding the Arctic National Wildlife Refuge undiscovered gas resources. Over the long term, Alaska natural gas production is determined by and constrained by local consumption and by the capacity of a gas pipeline that might be built to serve Canada and U.S. lower-48 markets. The proven and inferred gas resources alone (i.e. 32.5 trillion cubic feet), plus known but undeveloped resources, are sufficient to satisfy at least 20 years of Alaska gas consumption and gas pipeline throughput. Moreover, large deposits of natural gas have been discovered (e.g., Point Thomson) but remain undeveloped due to a lack of access to gas consumption markets. Because Alaska natural gas production is best determined by projecting Alaska gas consumption and whether a gas pipeline is put into operation, the AOGSS does not attempt to project new gas field discoveries and their development or the declining production from existing fields.

AOGSS Overview

The AOGSS solely focuses on projecting the exploration and development of undiscovered oil resources, primarily with respect to the oil resources expected to be found onshore and offshore in North Alaska. The AOGSS is divided into three components: new field discoveries, development projects, and producing fields (Figure 4-1). Transportation costs are used in conjunction with the crude oil price to Southern California refineries to calculate an estimated wellhead (netback) oil price. A discounted cash flow (DCF) calculation is used to determine the economic viability of Alaskan drilling and production activities. Oil field investment decisions are modeled on the basis of discrete projects. The exploration, discovery, and development of new oil fields depend on the expected exploration success rate and new field profitability. Production is determined on the basis of assumed drilling schedules and production profiles for new fields and developmental projects, along with historical production patterns and announced plans for currently producing fields.

Figure 4-1. Flowchart of the Alaska Oil and Gas Supply Submodule



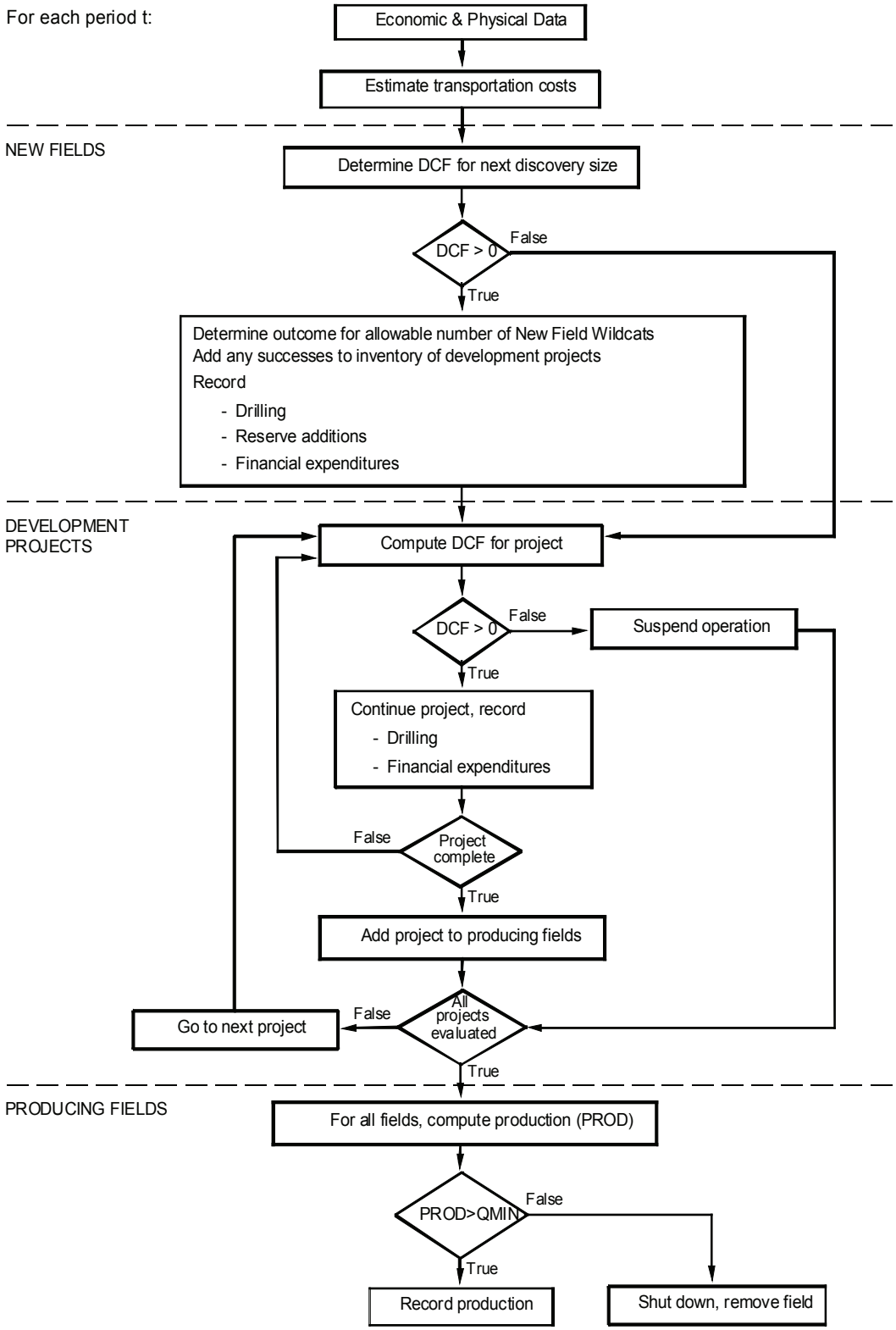
Calculation of Costs

Costs differ within the model for successful wells and dry holes. Costs are categorized functionally within the model as

- Drilling costs,
- Lease equipment costs, and
- Operating costs (including production facilities and general and administrative costs).

All costs in the model incorporate the estimated impact of environmental compliance. Environmental regulations that preclude a supply activity outright are reflected in other adjustments to the model. For example, environmental regulations that preclude drilling in certain locations within a region are modeled by reducing the recoverable resource estimates for that region.

Each cost function includes a variable that reflects the cost savings associated with technological improvements. As a result of technological improvements, average costs decline in real terms



relative to what they would otherwise be. The degree of technological improvement is a user specified option in the model. The equations used to estimate costs are similar to those used for the lower 48 but include cost elements that are specific to Alaska. For example, lease equipment includes gravel pads and ice roads.

Drilling Costs

Drilling costs are the expenditures incurred for drilling both successful wells and dry holes, and for equipping successful wells through the "Christmas tree," the valves and fittings assembled at the top of a well to control the fluid flow. Elements included in drilling costs are labor, material, supplies and direct overhead for site preparation, road building, erecting and dismantling derricks and drilling rigs, drilling, running and cementing casing, machinery, tool changes, and rentals. Drilling costs for exploratory wells include costs of support equipment such as ice pads. Lease equipment required for production is included as a separate cost calculation and covers equipment installed on the lease downstream from the Christmas tree.

The average cost of drilling a well in any field located within region r in year t is given by:

$$DRILLCOST_{i,r,k,t} = DRILLCOST_{i,r,k,T_b} * (1 - TECH1) ** (t - T_b) \quad (4\text{-}1)$$

where

i	=	well class (exploratory=1, developmental=2)
r	=	region (Offshore North Slope = 1, Onshore North Slope = 2, Cook Inlet = 3)
k	=	fuel type (oil=1, gas=2 - but not used)
t	=	forecast year
DRILLCOST	=	drilling costs
T_b	=	base year of the forecast
TECH1	=	annual decline in drilling costs due to improved technology.

The above function specifies that drilling costs decline at the annual rate specified by TECH1. Drilling costs are not modeled as a function of the drilling rig activity level as they are in the Onshore Lower 48 methodology. Drilling rigs and equipment are designed specifically for the harsh Arctic weather conditions. Once drilling rigs are moved up to Alaska and reconfigured for Arctic conditions, they typically remain in Alaska. Company drilling programs in Alaska are planned to operate at a relatively constant level of activity because of the limited number of drilling rigs and equipment available for use. Most Alaska oil rig activity pertains to drilling in-fill wells intended to slow the rate of production decline in the largest Alaska oil fields.

For the *Annual Energy Outlook 2011*, Alaska onshore and offshore drilling and completion costs were updated based on the American Petroleum Institute's (API), *2007 Joint Association Survey on Drilling Costs*, dated December 2008. Based on these API drilling and completion costs and earlier work performed by Advanced Resources International, Inc. in 2002, the following oil well drilling and completion costs were incorporated into the AOGSS database (Table 4.1).

Table 4.1
AOGSS Oil Well Drilling and Completion Costs
By Location and Category
In millions of 2007 dollars

	New Field Wildcat Wells	New Exploration Wells	Developmental Wells
	In millions of 2007 dollars		
Offshore North Slope	206	103	98
Onshore North Slope	150	75	57
South Alaska	73	59	37
	In millions of 1990 dollars		
Offshore North Slope	140	70	67
Onshore North Slope	102	51	39
South Alaska	50	40	25

Table 1 provides both 1990 and 2007 well drilling and completion cost data because the former are used within the context of calculating AOGSS discounted cash flows, while the latter are comparable to the current price environment.

Lease Equipment Costs

Lease equipment costs include the cost of all equipment extending beyond the Christmas tree, directly used to obtain production from a developed lease. Costs include: producing equipment, the gathering system, processing equipment (e.g., oil/gas/water separation), and production related infrastructure such as gravel pads. Producing equipment costs include tubing, pumping equipment. Gathering system costs consist of flowlines and manifolds. The lease equipment cost estimate for a new oil well is given by:

$$EQUIP_{r,k,t} = EQUIP_{r,k,t} * (1 - TECH2)^{r - T_b} \qquad (4\text{-}2)$$

where

r	=	region (Offshore North Slope = 1, Onshore North Slope = 2, Cook Inlet = 3)
k	=	fuel type (oil=1, gas=2 – not used)
t	=	forecast year
EQUIP	=	lease equipment costs
T_b	=	base year of the forecast
TECH2	=	annual decline in lease equipment costs due to improved technology.

Operating Costs

EIA operating cost data, which are reported on a per well basis for each region, include three main categories of costs: normal daily operations, surface maintenance, and subsurface maintenance. Normal daily operations are further broken down into supervision and overhead, labor, chemicals, fuel, water, and supplies. Surface maintenance accounts for all labor and materials necessary to keep the service equipment functioning efficiently and safely. Costs of

stationary facilities, such as roads, also are included. Subsurface maintenance refers to the repair and services required to keep the downhole equipment functioning efficiently.

The estimated operating cost curve is:

$$OPCOST_{r,k,t} = OPCOST_{r,k,t} * (1 - TECH2)^{r - T_b} \quad (4\text{-}3)$$

where

r	=	region (Offshore North Slope = 1, Onshore North Slope = 2, Cook Inlet = 3)
k	=	fuel type (oil=1, gas=2 – not used)
t	=	forecast year
OPCOST	=	operating cost
T_b	=	base year of the forecast
TECH3	=	annual decline in operating costs due to improved technology.

Drilling costs, lease equipment costs, and operating costs are integral components of the following discounted cash flow analysis. These costs are assumed to be uniform across all fields within each of the three Alaskan regions.

Treatment of Costs in the Model for Income Tax Purposes

All costs are treated for income tax purposes as either expensed or capitalized. The tax treatment in the DCF reflects the applicable provisions for oil producers. The DCF assumptions are consistent with standard accounting methods and with assumptions used in similar modeling efforts. The following assumptions, reflecting current tax law, are used in the calculation of costs.

- All dry-hole costs are expensed.
- A portion of drilling costs for successful wells is expensed. The specific split between expensing and amortization is based on the tax code.
- Operating costs are expensed.
- All remaining successful field development costs are capitalized.
- The depletion allowance for tax purposes is not included in the model, because the current regulatory limitations for invoking this tax advantage are so restrictive as to be insignificant in the aggregate for future drilling decisions.

- Successful versus dry-hole cost estimates are based on historical success rates of successful versus dry-hole footage.

- Lease equipment for existing wells is in place before the first forecast year of the model.

Discounted Cash Flow Analysis

A discounted cash flow (DCF) calculation is used to determine the profitability of oil projects.[1] A positive DCF is necessary to initiate the development of a discovered oil field. With all else being equal, large oil fields are more profitable to develop than small and mid-size fields. In Alaska, where developing new oil fields is quite expensive, particularly in the Arctic, the profitable development of small and mid-size oil fields is generally contingent on the pre-existence of infrastructure that was paid for by the development of a nearby large field. Consequently, AOGSS assumes that the largest oil fields will be developed first, followed by the development of ever smaller oil fields. Whether these oil fields are developed, regardless of their size, is projected on the basis of the profitability index, which is measured as the ratio of the expected discounted cash flow to expected capital costs for a potential project.

A key variable in the DCF calculation is the oil transportation cost to southern California refineries. Transportation costs for Alaskan oil include both pipeline and tanker shipment costs. The oil transportation cost directly affects the expected revenues from the production of a field as follows:[2]

$$REV_{f,t} = Q_{f,t} * (MP_t - TRANS_t) \tag{4-4}$$

where

f	=	field
t	=	year
REV	=	expected revenues
Q	=	expected production volumes
MP	=	market price in the lower 48 states
TRANS	=	transportation cost.

The expected discounted cash flow associated with a potential oil project in field f at time t is given by

$$\begin{aligned} DCF_{f,t} = (&PVREV - PVROY - PVDRILLCOST - PVEQUIP - TRANSCAP \\ &- PVOPCOST - PVPRODTAX - PVSIT - PVFIT)_{f,t} \end{aligned} \tag{4-5}$$

where,

PVREV	=	present value of expected revenues

[1]See Appendix 3.A at the end of this chapter for a detailed discussion of the DCF methodology.
[2]This formulation assumes oil production only. It can be easily expanded to incorporate the sale of natural gas.

PVROY	=	present value of expected royalty payments
PVDRILLCOST	=	present value of all exploratory and developmental drilling expenditures
PVEQUIP	=	present value of expected lease equipment costs
TRANSCAP	=	cost of incremental transportation capacity
PVOPCOST	=	present value of operating costs
PVPRODTAX	=	present value of expected production taxes (ad valorem and severance taxes)
PVSIT	=	present value of expected state corporate income taxes
PVFIT	=	present value of expected federal corporate income taxes

The expected capital costs for the proposed field f located in region r are:

$$COST_{f,t} = (PVEXPCOST + PVDEVCOST + PVEQUIP + TRANSCAP)_{f,t} \tag{4-6}$$

where

PVEXPCOST	=	present value exploratory drilling costs
PVDEVCOST	=	present value developmental drilling costs
PVEQUIP	=	present value lease equipment costs
TRANSCAP	=	cost of incremental transportation capacity

The profitability indicator from developing the proposed field is therefore

$$PROF_{f,t} = \frac{DCF_{f,t}}{COST_{f,t}} \tag{4-7}$$

The model assumes that field with the highest positive PROF in time t is eligible for exploratory drilling in the same year. The profitability indices for Alaska also are passed to the basic framework module of the OGSM.

New Field Discovery

Development of estimated recoverable resources, which are expected to be in currently undiscovered fields, depends on the schedule for the conversion of resources from unproved to reserve status. The conversion of resources into field reserves requires both a successful new field wildcat well and a positive discounted cash flow of the costs relative to the revenues. The discovery procedure can be determined endogenously, based on exogenously determined data. The procedure requires the following exogenously determined data:

- new field wildcat success rate,
- any restrictions on the timing of drilling,
- the distribution of technically recoverable field sizes within each region.

The endogenous procedure generates:

- the new field wildcat wells drilled in any year,
- the set of individual fields to be discovered, specified with respect to size and location (relative to the 3 Alaska regions, i.e., offshore North Slope, onshore North Slope, and South-Central Alaska),
- an order for the discovery sequence, and
- a schedule for the discovery sequence.

The new field discovery procedure relies on the U.S. Geological Survey (USGS) and Bureau of Ocean Energy Management, Regulation, and Enforcement (BOEMRE) respective estimates of onshore and offshore technically recoverable oil resources as translated into the expected field size distribution of undiscovered fields. These onshore and offshore field size distributions are used to determine the field size and order of discovery in the AOGSS exploration and discovery process. Thus, the AOGSS oil field discovery process is consistent with the expected geology with respect to expected aggregate resource base and the relative frequency of field sizes.

AOGSS assumes that the largest fields in a region are found first, followed by successively smaller fields. This assumption is based on the following observations: 1) the largest volume fields typically encompass the greatest areal extent, thereby raising the probability of finding a large field relative to finding a smaller field, 2) seismic technology is sophisticated enough to be able to determine the location of the largest geologic structures that might possibly hold oil, 3) producers have a financial incentive to develop the largest fields first both because of their higher inherent rate of return and because the largest fields can pay for the development of expensive infrastructure that affords the opportunity to develop the smaller fields using that same infrastructure, and 4) historically, North Slope and Cook Inlet field development has generally progressed from largest field to smallest field.

Starting with the AEO2011, onshore and offshore North Slope new field wildcat drilling activity is a function of West Texas Intermediate crude oil prices from 1977 through 2008, expressed in 2008 dollars. The new field wildcat exploration function was statistically estimated based on West Texas Intermdiate crude oil prices from 1977 through 2008 and on exploration well drilling data obtained from the Alaska Oil and Gas Conservation Commission (AOGCC) data files for the same period.[3] The North Slope wildcat exploration drilling parameters were estimated using ordinary least squares methodology.

$$NAK_NFW_t = (0.13856 * IT_WOP_t) + 3.77 \qquad (4\text{-}8)$$

where

t	=	year
NAK_NFW_t	=	North Slope Alaska field wildcat exploration wells
IT_WOP_t	=	World oil price in 2008 dollars

[3] A number of alternative functional formulations were tested (e.g., using Alaska crude oil prices, lagged oil prices, etc.), yet none of the alternative formations resulted in statistically more significant relationships.

The summary statistics for the statistical estimation are as follows:

```
Dependent variable: NSEXPLORE
Current sample:  1 to 32
Number of observations:  32

       Mean of dep. var. = 9.81250      LM het. test = .064580 [.799]
  Std. dev. of dep. var. = 4.41725     Durbin-Watson = 2.04186 [<.594]
Sum of squared residuals = 347.747  Jarque-Bera test = .319848 [.852]
   Variance of residuals = 11.5916   Ramsey's RESET2 = .637229E-04 [.994]
Std. error of regression = 3.40464   F (zero slopes) = 22.1824 [.000]
               R-squared = .425094    Schwarz B.I.C. = 87.0436
      Adjusted R-squared = .405930    Log likelihood = -83.5778

           Estimated    Standard
Variable  Coefficient     Error       t-statistic   P-value
C         3.77029       1.41706       2.66065       [.012]
WTIPRICE  .138559       .029419       4.70982       [.000]
```

Because very few offshore North Slope wells have been drilled since 1977, within AOGSS, the total number of exploration wells drilled on the North Slope are shared between the onshore and offshore regions, with the wells being predominantly drilled onshore in the early years of the projections with progressively more wells drilled offshore, such that after 20 years 50 percent of the exploration wells are drilled onshore and 50 percent are drilled offshore.

Based on the AOGCC data for 1977 through 2008, the drilling of South-Central Alaska new field wildcat exploration wells was statistically unrelated to oil prices. On average, 3 exploration wells per year were drilled in South-Central Alaska over the 1977 through 2008 timeframe, regardless of prevailing oil prices. This result probably stems from the fact that most of the South-Central Alaska drilling activity is focused on natural gas rather than oil, and that natural gas prices are determined by the Regulatory Commission of Alaska rather than being "market driven." Consequently, AOGSS specifies that 3 exploration wells are drilled each year.

The execution of the above procedure can be modified to reflect restrictions on the timing of discovery for particular fields. Restrictions may be warranted for enhancements such as delays necessary for technological development needed prior to the recovery of relatively small accumulations or heavy oil deposits. State and Federal lease sale schedules could also restrict the earliest possible date for beginning the development of certain fields. This refinement is implemented by declaring a start date for possible exploration. For example, AOGSS specifies that if Federal leasing in the Arctic National Wildlife Refuge were permitted in 2011, then the earliest possible date at which an ANWR field could begin oil production would be in 2021.[4] Another example is the wide-scale development of the West Sak field that is being delayed until a technology can be developed that will enable the heavy, viscous crude oil of that field to be economically extracted.

[4]The earliest ANWR field is assumed to go into production 10 years after the first projection year; so the first field comes on line in 2020 for the *Annual Energy Outlook 2010* projections. See also *Analysis of Crude Oil Production in the Arctic National Wildlife Refugee*, EIA, SR/OIAF/2008-03, (May 2008).

Development Projects

Development projects are those projects in which a successful new field wildcat has been drilled. As with the new field discovery process, the DCF calculation plays an important role in the timing of development and exploration of these multi-year projects.

Each model year, the DCF is calculated for each potential development project. Initially, the model assumes a drilling schedule determined by the user or by some set of specified rules. However, if the DCF for a given project is negative, then development of this project is suspended in the year in which the negative DCF occurs. The DCF for each project is evaluated in subsequent years for a positive value. The model assumes that development would resume when a positive DCF value is calculated.

Production from developing projects follows the generalized production profile developed for and described in previous work conducted by DOE staff.[5] The specific assumptions used in this work are as follows:

- a 2- to 4-year build-up period from initial production to the peak production rate,
- the peak production rate is sustained for 3 to 8 years, and
- after peak production, the production rate declines by 12 to 15 percent per year.

The production algorithm build-up and peak-rate period are based on the expected size of the undiscovered field, with larger fields having longer build-up and peak-rate periods than the smaller fields. The field production decline rates are also determined by the field size.

The pace of development and the ultimate number of wells drilled for a particular field is based on the historical field-level profile adjusted for field size and other characteristics of the field (e.g. API gravity.)

After all exploratory and developmental wells have been drilled for a given project, development of the project is complete. For this version of the AOGSS, no constraint is placed on the number of exploratory or developmental wells that can be drilled for any project. All completed projects are added to the inventory of producing fields.

Development fields include fields that have already been discovered but have not begun production. These fields include, for example, a series of expansion fields in both the Prudhoe Bay area, the National Petroleum Reserve - Alaska (NPRA), and for various offshore fields. For these fields, the starting date of production and their production rates were not determined by the discovery process outlined above, but are based on public announcements by the company(s) developing those fields.

[5] *Potential Oil Production from the Coastal Plain of the Arctic National Wildlife Refuge: Updated Assessment*, EIA (May 2000) and *Alaska Oil and Gas - Energy Wealth of Vanishing Opportunity?*, DOE/ID/0570-H1 (January 1991).

Producing Fields

Oil production from fields producing as of the initial projection year (e.g., Prudhoe Bay, Kuparuk, Lisburne, Endicott, and Milne Point) are based on historical production patterns, remaining estimated recovery, and announced development plans. The production decline rates of these fields are periodically recalibrated based on recent field-specific production rates.

Natural gas production from the North Slope for sale to end-use markets depends on the construction of a pipeline to transport natural gas to lower 48 markets.[6] North Slope natural gas production is determined by the carrying capacity of a natural gas pipeline to the lower 48.[7] The Prudhoe Bay Field is the largest known deposit of North Slope gas (24.5 Tcf)[8] and currently all of the gas produced from this field is re-injected to maximize oil production. Total known North Slope gas resources equal 35.4 Tcf.[9] Furthermore, the undiscovered onshore central North Slope and NPRA technically recoverable natural gas resource base are respectively estimated to be 33.3 Tcf[10] and 52.8 Tcf.[11] Collectively, these North Slope natural gas reserves and resources equal 121.5 Tcf, which would satisfy the 1.64 Tcf per year gas requirements of an Alaska gas pipeline for almost 75 years, well after the end of the *Annual Energy Outlook* projections. Consequently, North Slope natural gas resources, both discovered and undiscovered, are more than ample to supply natural gas to an Alaska gas pipeline during the *Annual Energy Outlook* projection period.

[6] Initial natural gas production from the North Slope for Lower 48 markets is affected by a delay reflecting a reasonable period for construction. Details of how this decision is made in NEMS are included in the Natural Gas Transmission and Distribution Module documentation.

[7] The determination of whether an Alaska gas pipeline is economically feasible is calculated within the Natural Gas Transmission and Distribution Model.

[8] *Alaska Oil and Gas Report 2009*, Alaska Department of Natural Resources, Division of Oil and Gas, Table I.I, page 8.

[9] Ibid.

[10] U.S. Geological Survey, *Oil and Gas Assessment of Central North Slope, Alaska, 2005*, Fact Sheet 2005-3043, April 2005, page 2 table – mean estimate total.

[11] U.S. Geological Survey, *2010 Updated Assessment of Undiscovered Oil and Gas Resources of the National Petroleum Reserve in Alaska (NPRA)*, Fact Sheet 2010-3102, October 2010, Table 1 – mean estimate total, page 4.

Appendix 4.A. Alaskan Data Inventory

Variable Name		Description	Unit	Classification	Source
Code	Text				
ANGTSMAX	--	ANGTS maximum flow	BCF/D	Alaska	NPC
ANGTSPRC	--	Minimum economic price for ANGTS start up	1987$/MCF	Alaska	NPC
ANGTSRES	--	ANGTS reserves	BCF	Alaska	NPC
ANGTSYR	--	Earliest start year for ANGTS flow	Year	NA	NPC
DECLPRO	--	Alaska decline rates for currently producing fields	Fraction	Field	OPNGBA
DEV_AK	--	Alaska drilling schedule for developmental wells	Wells per year	3 Alaska regions; Fuel (oil, gas)	OPNGBA
DRILLAK	DRILL	Alaska drilling cost (not including new field wildcats)	1990$/well	Class (exploratory, developmental); 3 Alaska regions; Fuel (oil, gas)	OPNGBA
DRLNFWAK	--	Alaska drilling cost of a new field wildcat	1990$/well	3 Alaska regions; Fuel (oil, gas)	OPNGBA
DRYAK	DRY	Alaska dry hole cost	1990$/hole	Class (exploratory, developmental); 3 Alaska regions; Fuel (oil, gas)	OPNGBA
EQUIPAK	EQUIP	Alaska lease equipment cost	1990$/well	Class (exploratory, developmental); 3 Alaska regions; Fuel (oil, gas)	USGS
EXP_AK	--	Alaska drilling schedule for other exploratory wells	wells per year	3 Alaska regions	OPNGBA
FACILAK	--	Alaska facility cost (oil field)	1990$/bls	Field size class	USGS
FSZCOAK	--	Alaska oil field size distributions	MMB	3 Alaska regions	USGS
FSZNGAK	--	Alaska gas field size distributions	BCF	3 Alaska regions	USGS
HISTPRDCO	--	Alaska historical crude oil production	MB/D	Field	AOGCC
KAPFRCAK	EXKAP	Alaska drill costs that are tangible & must be depreciated	fraction	Alaska	U.S. Tax Code
MAXPRO	--	Alaska maximum crude oil production	MB/D	Field	Announced Plans
NAK_NFW	--	Number of new field wildcat wells drilling in Northern AK	wells per year	NA	OPNGBA
NFW_AK	--	Alaska drilling schedule for new field wildcats	wells	NA	OPNGBA
PRJAK	n	Alaska oil project life	Years	Fuel (oil, gas)	OPNGBA
PROYR	--	Start year for known fields in Alaska	Year	Field	Announced Plans

Variable Name		Description	Unit	Classification	Source
Code	Text				
RCPRDAK	m	Alaska recovery period of intangible & tangible drill cost	Years	Alaska	U.S. Tax Code
RECRES	--	Alaska crude oil resources for known fields	MMB	Field	OFE, *Alaska Oil and Gas - Energy Wealth or Vanishing Opportunity*
ROYRT	ROYRT	Alaska royalty rate	fraction	Alaska	USGS
SEVTXAK	PRODTAX	Alaska severance tax rates	fraction	Alaska	USGS
SRAK	SR	Alaska drilling success rates	fraction	Alaska	OPNGBA
STTXAK	STRT	Alaska state tax rate	fraction	Alaska	USGS
TECHAK	TECH	Alaska technology factors	fraction	Alaska	OPNGBA
TRANSAK	TRANS	Alaska transportation cost	1990$	3 Alaska regions; Fuel (oil, gas)	OPNGBA
XDCKAPAK	XDCKAP	Alaska intangible drill costs that must be depreciated	fraction	Alaska	U.S. Tax Code

Source: National Petroleum Council (NPC), EIA Office of Petroleum, Natural Gas, & Biofuels Analysis (OPNGBA), United States Geologic Survey (USGS), Alaska Oil and Gas Conservation Commission (AOGCC)

5. Oil Shale Supply Submodule

Oil shale rock contains a hydrocarbon known as kerogen,[12] which can be processed into a synthetic crude oil (syncrude) by heating the rock. During the 1970s and early 1980s, petroleum companies conducted extensive research, often with the assistance of public funding, into the mining of oil shale rock and the chemical conversion of the kerogen into syncrude. The technologies and processes developed during that period are well understood and well documented with extensive technical data on demonstration plant costs and operational parameters, which were published in the professional literature. The oil shale supply submodule in OGSM relies extensively on this published technical data for providing the cost and operating parameters employed to model the "typical" oil shale syncrude production facility.

In the 1970s and 1980s, two engineering approaches to creating the oil shale syncrude were envisioned. In one approach, which the majority of the oil companies pursued, the producer mines the oil shale rock in underground mines. A surface facility the retorts the rock to create bitumen, which is then further processed into syncrude. Occidental Petroleum Corp. pursued the other approach known as "modified in-situ," in which some of the oil shale rock is mined in underground mines, while the remaining underground rock is "rubblized" using explosives to create large caverns filled with oil shale rock. The rubblized oil shale rock is then set on fire to heat the kerogen and convert it into bitumen, with the bitumen being pumped to the surface for further processing into syncrude. The modified in-situ approach was not widely pursued because the conversion of kerogen into bitumen could not be controlled with any precision and because the leaching of underground bitumen and other petroleum compounds might contaminate underground aquifers.

When oil prices dropped below $15 per barrel in the mid-1990s, demonstrating an abundance of conventional oil supply, oil shale petroleum production became untenable and project sponsors canceled their oil shale research and commercialization programs. Consequently, no commercial-scale oil shale production facilities were ever built or operated. Thus, the technical and economic feasibility of oil shale petroleum production remains untested and unproven.

In 1997, Shell Oil Company started testing a completely in-situ oil shale process, in which the oil shale rock is directly heated underground using electrical resistance heater wells, while petroleum products[13] are produced from separate production wells. The fully in-situ process has significant environmental and cost benefits relative to the other two approaches. The environmental benefits are lower water usage, no waste rock disposal, and the absence of hydrocarbon leaching from surface waste piles. As an example of the potential environmental impact on surface retorting, an industry using 25 gallon per ton oil shale rock to produce 2 million barrels per day would generate about 1.2 billion tons of waste rock per year, which is about 11 percent more than the weight of all the coal mined in the United States in 2010. Other advantages of the in-situ process include: 1) access to deeper oil shale resources, 2) greater oil and gas generated per acre because the process uses multiple oil shale seams within the resource column rather than just a single seam, and 3) direct production of petroleum products rather than

[12] Kerogen is a solid organic compound, which is also found in coal.

[13] Approximately, 30 percent naphtha, 30 percent jet fuel, 30 percent diesel, and 10 percent residual fuel oil.

a synthetic crude oil that requires more refinery processing. Lower production costs are expected for the in-situ approach because massive volumes of rock would not be moved, and because the drilling of heater wells, production wells, and freeze-wall wells can be done in a modular fashion, which allows for a streamlined manufacturing-like process. Personnel safety would be greater and accident liability lower. Moreover, the in-situ process reduces the capital risk, because it involves building self-contained modular production units that can be multiplied to reach a desired total production level. Although the technical and economic feasibility of the in-situ approach has not been commercially demonstrated, there is already a substantial body of evidence from field tests conducted by Shell Oil Co. that the in-situ process is technologically feasible.[14] The current Shell field research program is expected to conclude around the 2014 through 2017 timeframe with the construction of a small scale demonstration plant expected to begin shortly thereafter. The Oil Shale Supply Submodule (OSSS) assumes that the first commercial size oil shale plant cannot be built prior to 2017.

Given the inherent cost and environmental benefits of the in-situ approach, a number of other companies, such as Chevron and ExxonMobil are testing alternative in-situ oil shale techniques. Although small-scale mining and surface retorting of oil shale is currently being developed, by companies such as Red Leaf Resources, the large scale production of oil shale will most likely use the in-situ process. However, because in-situ oil shale projects have never been built, and because companies developing the in-situ process have not publicly released detailed technical parameters and cost estimates, the cost and operational parameters of such in-situ facilities is unknown. Consequently, the Oil Shale Supply Submodule (OSSS) relies on the project parameters and costs associated with the underground mining and surface retorting approach that were designed during the 1970s and 1980s. In this context, the underground mining and surface retorting facility parameters and costs are meant to be a surrogate for the in-situ oil shale facility that is more likely to be built. Although the in-situ process is expected to result in a lower cost oil shale product, this lower cost is somewhat mitigated by the fact that the underground mining and surface retorting processes developed in the 1970s and 1980s did not envision the strict environmental regulations that prevail today, and therefore embody an environmental compliance cost structure that is lower than what would be incurred today by a large-scale underground mining and surface retorting facility. Also, the high expected cost structure of the underground mining/surface retorting facility constrains the initiation of oil shale project production, which should be viewed as a more conservative approach to simulating the market penetration of in-situ oil projects. On the other hand, OSSS oil shale facility costs are reduced by 1 percent per year to reflect technological progress, especially with respect to the improvement of an in-situ oil shale process. Finally, public opposition to building any type of oil shale facility is likely to be great, regardless of the fact that the in-situ process is expected to be more environmentally benign than the predecessor technologies; the cost of building an in-situ oil shale facility is therefore likely to be considerably greater than would be determined strictly by the engineering parameters of such a facility.[15]

The Oil Shale Supply Submodule (OSSS) only represents economic decision making. In the absence of any existing commercial oil shale projects, it was impossible to determine the

[14] *See* "Shell's In-situ Conversion Process," a presentation by Harold Vinegar at the Colorado Energy Research Institute's 26th Oil Shale Symposium held on October 16 – 18, 2006 in Boulder, Colorado.

[15] Project delays due to public opposition can significantly increase project costs and reduce project rates of return.

potential environmental constraints and costs of producing oil on a large scale. Given the considerable technical and economic uncertainty of an oil shale industry based on an in-situ technology, and the infeasibility of the large-scale implementation of an underground mining/surface retorting technology, the oil shale syncrude production projected by the OSSS should be considered highly uncertain.

Given this uncertainty, the construction of commercial oil shale projects is constrained by a linear market penetration algorithm that restricts the oil production rate, which, at best, can reach a maximum of 2 million barrels per day by the end of a 40-year period after commercial oil shale facilities are deemed to be technologically feasible (starting in 2017). Whether domestic oil shale production actually reaches 2 million barrels per day at the end of the 40-year period depends on the relative profitability of oil shale facilities. If oil prices are too low to recover the weighted average cost of capital, no new facilities are built. However, if oil prices are sufficiently high to recover the cost of capital, then the rate of market penetration rises in direct proportion to facility profitability. So as oil prices rise and oil shale facility profitability increases, the model assumes that oil shale facilities are built in greater numbers, as dictated by the market penetration algorithm.

The 2 million barrel per day production limit is based on an assessment of what is feasible given both the oil shale resource base and potential environmental constraints.[16] The 40-year minimum market penetration timeframe is based on the observation that "…an oil shale production level of 1 million barrels per day is probably more than 20 years in the future…"[17] with a linear ramp-up to 2 million barrels per day equating to a 40-year minimum.

The actual rate of market penetration in the OSSS largely depends on projected oil prices, with low prices resulting in low rates of market penetration, and with the maximum penetration rate only occurring under high oil prices that result in high facility profitability. The development history of the Canadian oil sands industry is an analogous situation. The first commercial Canadian oil sands facility began operations in 1967; the second project started operation in 1978; and the third project initiated production in 2003.[18] So even though the Canadian oil sands resource base is vast, it took over 30 years before a significant number of new projects were announced. This slow penetration rate, however, was largely caused by both the low world oil prices that persisted from the mid-1980s through the 1990s and the lower cost of developing conventional crude oil supply.[19] The rise in oil prices that began in 2003 caused 17 new oil sands projects to be announced by year-end 2007.[20] Oil prices subsequently peaked in July 2008,

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[16] *See* U.S. Department of Energy, "Strategic Significance of America's Oil Shale Resource," March 2004, Volume I, page 23 – which speaks of an "aggressive goal" of 2 million barrels per day by 2020; and Volume II, page 7 – which concludes that the water resources in the Upper Colorado River Basin are "more than enough to support a 2 million barrel/day oil shale industry…"

[17] Source: RAND Corporation, "Oil Shale Development in the United States – Prospects and Policy Issues," MG-414, 2005, Summary page xi.

[18] The owner/operator for each of the 3 initial oil sands projects were respectively Suncor, Syncrude, and Shell Canada.

[19] The first Canadian commercial oil sands facility started operations in 1967. It took 30 years later until the mid to late 1990s for a building boom of Canadian oil sands facilities to materialize. Source: Suncor Energy, Inc. internet website at www.suncor.com, under "our business," under "oil sands."

[20] Source: Alberta Employment, Immigration, and Industry, "Alberta Oil Sands Industry Update," December 2007, Table 1, pages 17 – 21.

and declined significantly, such that a number of these new projects were put on hold at that time.

Extensive oil shale resources exist in the United States both in eastern Appalachian black shales and western Green River Formation shales. Almost all of the domestic high-grade oil shale deposits with 25 gallons or more of petroleum per ton of rock are located in the Green River Formation, which is situated in Northwest Colorado (Piceance Basin), Northeast Utah (Uinta Basin), and Southwest Wyoming. It has been estimated that over 400 billion barrels of syncrude potential exists in Green River Formation deposits that would yield at least 30 gallons of syncrude per ton of rock in zones at least 100 feet thick.[21] Consequently, the Oil Shale Supply Submodule assumes that future oil shale syncrude production occurs exclusively in the Rocky Mountains within the 2035 time frame of the projections. Moreover, the immense size of the western oil shale resource base precluded the need for the submodule to explicitly track oil shale resource depletion through 2035.

For each projection year, the oil shale submodule calculates the net present cash flow of operating a commercial oil shale syncrude production facility, based on that future year's projected crude oil price. If the calculated discounted net present value of the cash flow exceeds zero, the submodule assumes that an oil shale syncrude facility would begin construction, so long as the construction of that facility is not precluded by the construction constraints specified by the market penetration algorithm. So the submodule contains two major decision points for determining whether an oil shale syncrude production facility is built in any particular year: first, whether the discounted net present value of a facility's cash flow exceeds zero; second, by a determination of the number of oil shale projects that can be initiated in that year, based on the maximum total oil shale production level that is permitted by the market penetration algorithm.

In any one year, many oil shale projects can be initiated, raising the projected production rates in multiples of the rate for the standard oil shale facility, which is assumed to be 50,000 barrels per day, per project.

Oil Shale Facility Cost and Operating Parameter Assumptions

The oil shale supply submodule is based on underground mining and surface retorting technology and costs. During the late 1970s and early 1980s, when petroleum companies were building oil shale demonstration plants, almost all demonstration facilities employed this technology.[22] The facility parameter values and cost estimates in the OSSS are based on information reported for the Paraho Oil Shale Project, and which are inflated to constant 2004 dollars.[23] Oil shale rock mining costs are based on Western United States underground coal mining costs, which would be representative of the cost of mining oil shale rock, [24] because coal

[21] Source: Culbertson, W. J. and Pitman, J. K. "Oil Shale" in *United States Mineral Resources*, USGS Professional Paper 820, Probst and Pratt, eds. P 497-503, 1973.

[22] Out of the many demonstration projects in the 1970s only Occidental Petroleum tested a modified in-situ approach which used caved-in mining areas to perform underground retorting of the kerogen.

[23] Source: Noyes Data Corporation, *Oil Shale Technical Data Handbook*, edited by Perry Nowacki, Park Ridge, New Jersey, 1981, pages 89-97.

[24] Based on the coal mining cost per ton data provided in coal company 2004 annual reports, particularly those of

mining techniques and technology would be employed to mine oil shale rock. However, the OSSS assumes that oil shale production costs fall at a rate of 1 percent per year, starting in 2005, to reflect the role of technological progress in reducing production costs. This cost reduction assumption results in oil shale production costs being 26 percent lower in 2035 relative to the initial 2004 cost structure.

Although the Paraho cost structure might seem unrealistic, given that the application of the in-situ process is more likely than the application of the underground mining/surface retorting process, the Paraho cost structure is well documented, while there is no detailed public information regarding the expected cost of the in-situ process. Even though the in-situ process might be cheaper per barrel of output than the Paraho process, this should be weighted against the following facts 1) oil and gas drilling costs have increased dramatically since 2005, somewhat narrowing that cost difference, and 2) the Paraho costs were determined at a time when environmental requirements were considerably less stringent. Consequently, the environmental costs that an energy production project would incur today are considerably more than what was envisioned in the late-1970s and early-1980s. It should also be noted that the Paraho process produces about the same volumes of oil and natural gas as the in-situ process does, and requires about the same electricity consumption as the in-situ process. Finally, to the degree that the Paraho process costs reported here are greater than the in-situ costs, the use of the Paraho cost structure provides a more conservative facility cost assessment, which is warranted for a completely new technology.

Another implicit assumption in the OSSS is that the natural gas produced by the facility is sold to other parties, transported offsite, and priced at prevailing regional wellhead natural gas prices. Similarly, the electricity consumed on site is purchased from the local power grid at prevailing industrial prices. Both the natural gas produced and the electricity consumed are valued in the Net Present Value calculations at their respective regional prices, which are determined elsewhere in the NEMS. Although the oil shale facility owner has the option to use the natural gas produced on-site to generate electricity for on-site consumption, building a separate on-site/offsite power generation decision process within OSSS would unduly complicate the OSSS logic structure and would not necessarily provide a more accurate portrayal of what might actually occur in the future.[25] Moreover, this treatment of natural gas and electricity prices automatically takes into consideration any embedded carbon dioxide emission costs associated with a particular NEMS scenario, because a carbon emissions allowance cost is embedded in the regional natural gas and electricity prices and costs.

OSSS Oil Shale Facility Configuration and Costs

The OSSS facility parameters and costs are based on those reported for the Paraho Oil Shale

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Arch Coal, Inc, CONSOL Energy Inc, and Massey Energy Company. Reported underground mining costs per ton range for $14.50 per ton to $27.50 per ton. The high cost figures largely reflect higher union wage rates, than the low cost figures reflect non-union wage rates. Because most of the Western underground mines are currently non-union, the cost used in OSSS was pegged to the lower end of the cost range. For example, the $14.50 per ton cost represents Arch Coal's average western underground mining cost.

[25] The Colorado/Utah/Wyoming region has relatively low electric power generation costs due to 1) the low cost of mining Powder River Basin subbituminous coal, and 2) the low cost of existing electricity generation equipment, which is inherently lower than new generation equipment due cost inflation and facility depreciation.

project. Because the Paraho Oil Shale Project costs were reported in 1976 dollars, the OSSS costs were inflated to constant 2004 dollar values. Similarly, the OSSS converts NEMS oil prices, natural gas prices, electricity costs, and carbon dioxide costs into constant 2004 dollars, so that all facility net present value calculations are done in constant 2004 dollars. Based on the Paraho Oil Shale Project configuration, OSSS oil shale facility parameters and costs are listed in Table 5-1, along the OSSS variable names. For the *Annual Energy Outlook 2009* and subsequent *Outlooks*, oil shale facility construction costs were increased by 50 percent to represent the world-wide increase in steel and other metal prices since the OSSS was initially designed. For the *Annual Energy Outlook 2011*, the oil shale facility plant size was reduced from 100,000 barrels per day to 50,000 barrels per day, based on discussions with industry representatives who believe that the smaller configuration was more likely for in-situ projects because this size captures most of the economies of scale, while also reducing project risk.

Table 5-1. OSSS Oil Shale Facility Configuration and Cost Parameters

Facility Parameters	OSSS Variable Name	Parameter Value
Facility project size	OS_PROJ_SIZE	50,000 barrels per day
Oil shale syncrude per ton of rock	OS_GAL_TON	30 gallons
Plant conversion efficiency	OS_CONV_EFF	90 percent
Average facility capacity factor	OS_CAP_FACTOR	90 percent per year
Facility lifetime	OS_PRJ_LIFE	20 years
Facility construction time	OS_PRJ_CONST	3 year
Surface facility capital costs	OS_PLANT_INVEST	$2.4 billion (2004 dollars)
Surface facility operating costs	OS_PLANT_OPER_CST	$200 million per year (2004 dollars)
Underground mining costs	OS_MINE_CST_TON	$17.50 per ton (2004 dollars)
Royalty rate	OS_ROYALTY_RATE	12.5 percent of syncrude value
Carbon Dioxide Emissions Rate	OS_CO2EMISS	150 metric tons per 50,000 bbl/day of production[26]

The construction lead time for oil shale facilities is assumed to be 3 years, which is less than the 5-year construction time estimates developed for the Paraho Project. The shorter construction period is based on the fact that the drilling of shallow in-situ heating and production wells can be accomplished much more quickly than the erection of a surface retorting facility. Because it is not clear when during the year a new plant will begin operation and achieve full productive capacity, OSSS assumes that production in the first full year will be at half its rated output and that full capacity will be achieved in the second year of operation.

To mimic the fact that an industry's costs decline over time due to technological progress, better management techniques, and so on, the OSSS initializes the oil shale facility costs in the year 2005 at the values shown above (i.e., surface facility construction and operating costs, and underground mining costs). After 2005, these costs are reduced by 1 percent per year through 2035, which is consistent with the rate of technological progress witnessed in the petroleum industry over the last few decades.

[26] Based on the average of the Fischer Assays determined for four oil shale rock samples of varying kerogen content. Op. cit. Noyes Data Corporation, Table 3.8, page 20.

OSSS Oil Shale Facility Electricity Consumption and Natural Gas Production Parameters

Based on the Paraho Oil Shale Project parameters, Table 5-2 provides the level of annual gas production and annual electricity consumption for a 50,000 barrel per day, operating at 100 percent capacity utilization for a full calendar year.[27]

Table 5-2. OSSS Oil Shale Facility Electricity Consumption and Natural Gas Production Parameters and Their Prices and Costs

Facility Parameters	OSSS Variable Name	Parameter Value
Natural gas production	OS_GAS_PROD	16.1 billion cubic feet per year
Wellhead gas sales price	OS_GAS_PRICE	Dollars per Mcf (2004 dollars)
Electricity consumption	OS_ELEC_CONSUMP	0.83 billion kilowatt-hours per year
Electricity consumption price	OS_ELEC_PRICE	Dollars per kilowatt-hour (2004 dollars)

Project Yearly Cash Flow Calculations

The OSSS first calculates the annual revenues minus expenditures, including income taxes and depreciation expenses, which is then discounted to a net present value. In those future years in which the net present value exceeds zero, a new oil shale facility can begin construction, subject to the timing constraints outlined below.

The discounted cash flow algorithm is calculated for a 23 year period, composed of 3 years for construction and 20 years for a plant's operating life. During the first 3 years of the 23-year period, only plant construction costs are considered with the facility investment cost being evenly apportioned across the 3 years. In the fourth year, the plant goes into partial operation, and produces 50 percent of the rated output. In the fifth year, revenues and operating expenses are assumed to ramp up to the full-production values, based on a 90 percent capacity factor that allows for potential production outages. During years 4 through 23, total revenues equal oil production revenues plus natural gas production revenues.[28]

Discounted cash flow oil and natural gas revenues are calculated based on prevailing oil and natural gas prices projected for that future year. In other words, the OSSS assumes that the economic analysis undertaken by potential project sponsors is solely based on the prevailing price of oil and natural gas at that time in the future and is <u>not</u> based either on historical price trends or future expected prices. Similarly, industrial electricity consumption costs are also based on the prevailing price of electricity for industrial consumers in that region at that future time.

As noted earlier, during a plant's first year of operation (year 4), both revenues and costs are half the values calculated for year 5 through year 23.

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[27] Op. cit. Noyes Data Corporation, pages 89-97.

[28] Natural gas production revenues result from the fact that significant volumes of natural gas are produced when the kerogen is retorted in the surface facilities. See prior table regarding the volume of natural gas produced for a 50,000 barrel per day oil shale syncrude facility.

Oil revenues are calculated for each year in the discounted cash flow as follows:

$$OIL_REVENUE_t = OIT_WOP_t * (1.083/0.732) * OS_PRJ_SIZE * OS_CAP_FACTOR * 365 \quad (5\text{-}8)$$

where

OIT_WOP_t	=	World oil price at time t in 1987 dollars
(1.083 / 0.732)	=	GDP chain-type price deflators to convert 1987 dollars into 2004 dollars
OS_PROJ_PRJ_SIZE	=	Facility project size in barrels per day
OS_CAP_FACTOR	=	Facility capacity factor
365	=	Days per year.

Natural gas revenues are calculated for each year in the discounted cash flow as follows:

$$GAS_REVENUE_t = OS_GAS_PROD * OGPRCL48_t * 1.083/0.732) * OS_CAP_FACTOR, \quad (5\text{-}9)$$

where

OS_GAS_PROD	=	Annual natural gas production for 50,000 barrel per day facility
$OGPRCL48_t$	=	Natural gas price in Rocky Mtn. at time t in 1987 dollars
(1.083 / 0.732)	=	GDP chain-type price deflators to convert 1987 dollars into 2004 dollars
OS_CAP_FACTOR	=	Facility capacity factor.

Electricity consumption costs are calculated for each year in the discounted cash flow as follows:

$$ELECT_COST_t = OS_ELEC_CONSUMP * PELIN_t * (1.083/.732) * 0.003412 * OS_CAP_FACTOR \quad (5\text{-}10)$$

where

OS_ELEC_CONSUMP	=	Annual electricity consumption for 50,000 barrel per day facility
$PELIN_t$	=	Electricity price Colorado/Utah/Wyoming at time t
(1.083 / .732)	=	GNP chain-type price deflators to convert 1987 dollars into 2004 dollars
OS_CAP_FACTOR	=	Facility capacity factor.

The carbon dioxide emission tax rate per metric ton is calculated as follows:

$$OS_EMETAX_t = EMETAX_t(1) * 1000.0 * (12.0/44.0) * (1.083/.732) \quad (5\text{-}11)$$

where,

$EMETAX_t(1)$	=	Carbon emissions allowance price/tax per kilogram at time t
1,000	=	Convert kilograms to metric tones
(12.0 / 44.0)	=	Atomic weight of carbon divided by atomic weight of carbon dioxide
(1.083 / .732)	=	GNP chain-type price deflators to convert 1987 dollars into 2004 dollars.

Annual carbon dioxide emission costs per plant are calculated as follows:

$$CO2_COST_t = OS_EMETAX_t * OS_CO2EMISS * 365 * OS_CAP_FACTOR \qquad (5\text{-}12)$$

where

OS_EMETAX_t	=	Carbon emissions allowance price/tax per metric tonne at time t in 2004 dollars
OS_CO2EMISS	=	Carbon dioxide emissions in metric tonnes per day
365	=	Days per year
OS_CAP_FACTOR	=	Facility capacity factor

In any given year, pre-tax project cash flow is:

$$PRETAX_CASH_FLOW_t = TOT_REVENUE_t - TOTAL_COST_t \qquad (5\text{-}13)$$

where

$TOT_REVENUE_t$	=	Total project revenues at time t
TOT_COST_t	=	Total project costs at time t.

Total project revenues are calculated as follows:

$$TOT_REVENUE_t = OIL_REVENUE_t + GAS_REVENUE_t \qquad (5\text{-}14)$$

Total project costs are calculated as follows:

$$\begin{aligned} TOT_COST_t = {} & OS_PLANT_OPER_CST + ROYALTY_t + PRJ_MINE_CST \\ & + ELEC_COST_t + CO2_COST_t + INVEST_t \end{aligned} \qquad (5\text{-}15)$$

where

$OS_PLANT_OPER_CST$	=	Annual plant operating costs per year
$ROYALTY_t$	=	Annual royalty costs at time t
PRJ_MINE_COST	=	Annual plant mining costs
$ELEC_COST_t$	=	Annual electricity costs at time t
$CO2_COST_t$	=	Annual carbon dioxide emissions costs at time t
$INVEST_t$	=	Annual surface facility investment costs.

While the plant is under construction (years 1 through 3) only INVEST has a positive value, while the other four cost elements equal zero. When the plant goes into operation (years 4 through 23), the capital costs (INVEST) are zero, while the other five operating costs take on positive values. The annual investment cost for the three years of construction is calculated as follows, under the assumption that the construction costs are evenly spread over the 3-year construction period:

$$INVEST = OS_PLANT_INVEST / OS_PRJ_CONST \tag{5-16}$$

where the variables are defined as in Table 5-1. Because the plant output is composed of both oil and natural gas, the annual royalty cost (ROYALTY) is calculated by applying the royalty rate to total revenues, as follows:

$$ROYALTY_t = OS_ROYALTY_RATE * TOT_REVENUE_t \tag{5-17}$$

Annual project mining costs are calculated as the mining cost per barrel of syncrude multiplied by the number of barrels produced, as follows:

$$PRJ_MINE_COST = OS_MINE_CST_TON * \frac{42}{OS_GALLON_TON * OS_CONV_EFF} * OS_PROJ_SIZE * OS_CAP_FACTOR * 365 \tag{5-18}$$

where

42	=	gallons per barrel
365	=	days per year.

After the plant goes into operation and after a pre-tax cash flow is calculated, then a post-tax cash flow has to be calculated based on income taxes and depreciation tax credits. When the prevailing world oil price is sufficiently high and the pre-tax cash flow is positive, then the following post-tax cash flow is calculated as

$$CASH_FLOW_t = (PRETAX_CASH_FLOW_t * (1 - OS_CORP_TAX_RATE)) + (OS_CORP_TAX_RATE * OS_PLANT_INVEST / OS_PRJ_LIFE) \tag{5-19}$$

The above depreciation tax credit calculation assumes straight-line depreciation over the operating life of the investment (OS_PRJ_LIFE).

Discount Rate Financial Parameters

The discounted cash flow algorithm uses the following financial parameters to determine the discount rate used in calculating the net present value of the discounted cash flow.

Table 5-3. Discount Rate Financial Parameters

Financial Parameters	OSSS Variable Name	Parameter Value
Corporate income tax rate	OS_CORP_TAX_RATE	38 percent
Equity share of total facility capital	OS_EQUITY_SHARE	60 percent
Facility equity beta	OS_EQUITY_VOL	1.8
Expected market risk premium	OS_EQUITY_PREMIUM	6.5 percent
Facility debt risk premium	OS_DEBT_PREMIUM	0.5 percent

The corporate equity beta (OS_EQUITY_VOL) is the project risk beta, not a firm's volatility of stock returns relative to the stock market's volatility. Because of the technology and construction uncertainties associated with oil shale plants, the project's equity holder's risk is expected to be somewhat greater than the average industry firm beta. The median beta for oil and gas field exploration service firms is about 1.65. Because a project's equity holders' investment risk level is higher, the facility equity beta assumed for oil shale projects is 1.8.

The expected market risk premium (OS_EQUITY_PREMIUM), which is 6.5 percent, is the expected return on market (S&P 500) over the rate of 10-year Treasury note (risk-free rate). A Monte Carlo simulation methodology was used to estimate the expected market return.

Oil shale project bond ratings are expected to be in the Ba-rating range. Since the NEMS macroeconomic module endogenously determines the industrial Baa bond rates for the forecasting period, the cost of debt rates are different in each year. The debt premium (OS_DEBT_PREMIUM) adjusts the bond rating for the project from the Baa to the Ba range, which is assumed to be constant at the average historical differential over the forecasting period.

Discount Rate Calculation

A seminal parameter used in the calculation of the net present value of the cash flow is the discount rate. The calculation of the discount rate used in the oil shale submodule is consistent with the way the discount rate is calculated through the National Energy Modeling System. The discount rate equals the post-tax weighted average cost of capital, which is calculated in the OSSS as follows:

$$OS_DISCOUNT_RATE_t = (((1 - OS_EQUITY_SHARE) * (MC_RMCORPBAA_t / 100 + OS_DEBT_PREMIUM)) * (1 - OS_CORP_TAX_RATE) + (OS_EQUITY_SHARE * ((OS_EQUITY_PREMIUM * OS_EQUITY_VOL) + MC_RMGFCM_10NS_t / 100)) \quad (5\text{-}20)$$

where

OS_EQUITY_SHARE	=	Equity share of total facility capital
$MC_RMCORPBAA_t / 100$	=	BAA corporate bond rate
OS_DEBT_PREMIUM	=	Facility debt risk premium
OS_CORP_TAX_RATE	=	Corporate income tax rate
OS_EQUITY_PREMIUM	=	Expected market risk premium
OS_EQUITY_VOL	=	Facility equity volatility beta
$MC_RMGFCM_10NS_t / 100$	=	10-year Treasury note rate.

In calculating the facility's cost of equity, the equity risk premium (which is a product of the expected market premium and the facility equity beta, is added to a "risk-free" rate of return, which is considered to be the 10-year Treasury note rate.

The nominal discount rate is translated into a constant, real discount rate using the following formula:

$$OS_DISCOUNT_RATE_t = ((1.0 + OS_DISCOUNT_RATE_t) / (1.0 + INFL_t)) - 1.0 \quad (5\text{-}21)$$

where

$INFL_t$ = Inflation rate at time t.

Net Present Value Discounted Cash Flow Calculation

So far a potential project's yearly cash flows have been calculated along with the appropriate discount rate. Using these calculated quantities, the net present value of the yearly cash flow values is calculated as follows:

$$NET_CASH_FLOW_{t-1} = \sum_{t=1}^{OS_PRJ_LIFE + OS_PRJ_CONST} \left[CASH_FLOW_t * \left[\frac{1}{1 + OS_DISCOUNT_RATE_t} \right]^t \right] \quad (5\text{-}22)$$

If the net present value of the projected cash flows exceeds zero, then the potential oil shale facility is considered to be economic and begins construction, so long as this facility construction does not violate the construction timing constraints detailed below.

Oil Shale Facility Market Penetration Algorithm

As noted in the introduction, there is no empirical basis for determining how rapidly new oil shale facilities would be built, once the OSSS determines that surface-retorting oil shale facilities are economically viable, because no full-scale commercial facilities have ever been constructed. However, there are three primary constraints to oil shale facility construction. First, the construction of an oil shale facility cannot be undertaken until the in-situ technology has been sufficiently developed and tested to be deemed ready for its application to commercial size projects (i.e., 50,000 barrels per day). Second, oil shale facility construction is constrained by the maximum oil shale production limit. Third, oil shale production volumes cannot reach the maximum oil shale production limit any earlier than 40 years after the in-situ technology has been deemed to be feasible and available for commercial size facilities. Table 5-4 summarizes the primary market penetration parameters in the OSSS.

Table 5-4. Market Penetration Parameters

Market Penetration Parameters	OSSS Variable Name	Parameter Value
Earliest Facility Construction Start Date	OS_START_YR	2017
Maximum Oil Shale Production	OS_MAX_PROD	2 million barrels per year
Minimum Years to Reach Full Market Penetration	OS_PENETRATE_YR	40

Shell's in-situ oil shale RD&D program is considered to be the most advanced, having begun in 1997. Shell is most likely to be the first party to build and operate a commercial scale oil shale production facility. Based on conversations between Shell personnel and EIA personnel, Shell is likely to conclude its field experiments, which test the various components of a commercial facility sometime during the 2014 through 2017 timeframe. Consequently, the earliest likely initiation of a full-scale commercial plant would be 2017.[29]

As discussed earlier, a 2 million barrel per day oil shale production level at the end of 40-year market penetration period is considered to be reasonable and feasible based on the size of the resource base and the volume and availability of water needed to develop those resources. The actual rate of market penetration in the OSSS, however, is ultimately determined by the projected profitability of oil shale projects. At a minimum, oil and natural gas prices must be sufficiently high to produce a facility revenue stream (i.e., discounted cash flow) that covers all capital and operating costs, including the weighted average cost of capital. When the discounted cash flow exceeds zero (0), then the market penetration algorithm allows oil shale facility construction to commence.

[29] Op. cit. EIA/OIAF/OGD memorandum entitled, "Oil Shale Project Size and Production Ramp-Up," and based on public information and private conversations subsequent to the development of that memorandum.

When project discounted cash flow is greater than zero, the relative project profitability is calculated as follows:

$$OS_PROFIT_t = DCF_t \ / \ OS_PLANT_INVEST \tag{5-23}$$

where

DCF_t = Project discounted cash flow at time t

OS_PLANT_INVEST = Project capital investment

OS_PROFIT is an index of an oil project's expected profitability. The expectation is that, as OS_PROFIT increases, the relative financial attractiveness of producing oil shale also increases.

The level of oil shale facility construction that is permitted in any year depends on the maximum oil shale production that is permitted by the following market penetration algorithm:

$$\begin{aligned} MAX_PROD_t = {} & OS_MAX_PROD * (OS_PROFIT_t \ / \ (1 + OS_PROFIT_t)) \\ & * ((T - (OS_START_YR - 1989)) \ / \ OS_PENETRATE_YR) \end{aligned} \tag{5-24}$$

where,

OS_MAX_PROD	=	Maximum oil shale production limit
OS_PROFIT_t	=	Relative oil shale project profitability at time t
T	=	Time t
OS_START_YR	=	First year that an oil shale facility can be built
OS_PENTRATE_YR	=	Minimum number of years during which the maximum oil shale production can be achieved.

The OS_PROFIT portion of the market penetration algorithm (5-24) rapidly increases market penetration as the DCF numerator of OS_PROFIT increases. However, as OS_PROFIT continues to increase, the rate of increase in market penetration slows as (OS_PROFIT / (1 + OS_PROFIT) asymptotically approaches one (1.0). As this term approaches 1.0, the algorithm's ability to build more oil shale plants is ultimately constrained by OS_MAX_PROD term, regardless of how financially attractive the construction of new oil shale facilities might be. This formulation also prevents MAX_PROD from exceeding OS_MAX_PROD.

The second portion of the market penetration algorithm specifies that market penetration increases linearly over the number of years specified by OS_PENETRATE_YR. As noted earlier OS_PENETRATE_YR specifies the minimum number of years over which the oil shale industry can achieve maximum penetration. The maximum number of years required to achieve full penetration is dictated by the speed at which the OS_PROFIT portion of the equation approaches one (1.0). If OS_PROFIT remains low, then it is possible that MAX_PROD never comes close to reaching the OS_MAX_PROD value.

The number of new oil shale facilities that start construction in any particular year is specified by the following equation:

(5-25)

$$OS_PLANTS_NEW_t = INT((MAX_PROD_t - (OS_PLANTS_t * OS_PRJ_SIZE * OS_CAP_FACTOR)) / (OS_PRJ_SIZE * OS_CAP_FACTOR))$$

where

MAX_PROD_t	=	Maximum oil shale production at time t
OS_PLANT_t	=	Number of existing oil shale plants at time t
OS_PRJ_SIZE	=	Standard oil shale plant size in barrels per day
OS_CAP_FACTOR	=	Annual capacity factor of an oil shale plant in percent per year.

The first portion of the above formula specifies the incremental production capacity that can be built in any year, based on the number of plants already in existence. The latter portion of the equation determines the integer number of new plants that can be initiated in that year, based on the expected annual production rate of an oil shale plant.

Because oil shale production is highly uncertain, not only from a technological and economic perspective, but also from an environmental perspective, an upper limit to oil shale production is assumed within the OSSS. The upper limit on oil shale production is 2 million barrels per day, which is equivalent to 44 facilities of 50,000 barrels per day operating at a 90 percent capacity factor. So the algorithm allows enough plants to be built to fully reach the oil shale production limit, based on the expected plant capacity factor. As noted earlier, the oil shale market penetration algorithm is also limited by the earliest commercial plant construction date, which is assumed to be no earlier than 2017.

While the OSSS costs and performance profiles are based on technologies evaluated in the 1970's and early 1980's, the complete absence of any current commercial-scale oil shale production makes its future economic development highly uncertain. If the technological, environmental, and economic hurdles are as high or higher than those experienced during the 1970's, then the prospects for oil shale development would remain weak throughout the projections. However, technological progress can alter the economic and environmental landscape in unanticipated ways. For example, if an in-situ oil shale process were to be demonstrated to be both technically feasible and commercially profitable, then the prospects for an oil shale industry would improve significantly, and add vast economically recoverable oil resources in the United States and possibly elsewhere in the world.

Appendix A. Discounted Cash Flow Algorithm

Introduction

The basic DCF methodology used in the Oil and Gas Supply Module (OGSM) is applied for a broad range of oil or natural gas projects, including single well projects or multiple well projects within a field. It is designed to capture the effects of multi-year capital investments (e.g., offshore platforms). The expected discounted cash flow value associated with exploration and/or development of a project with oil or gas as the primary fuel in a given region evaluated in year T may be presented in a stylized form (Equation A-1).

$$\begin{aligned} DCF_T = (&PVTREV - PVROY - PVPRODTAX - PVDRILLCOST - PVEQUIP \\ &- PVKAP - PVOPCOST - PVABANDON - PVSIT - PVFIT)_T \end{aligned} \tag{A-1}$$

where

T	=	year of evaluation
PVTREV	=	present value of expected total revenues
PVROY	=	present value of expected royalty payments
PVPRODTAX	=	present value of expected production taxes (ad valorem and severance taxes)
PVDRILLCOST	=	present value of expected exploratory and developmental drilling expenditures
PVEQUIP	=	present value of expected lease equipment costs
PVKAP	=	present value of other expected capital costs (i.e., gravel pads and offshore platforms)
PVOPCOST	=	present value of expected operating costs
PVABANDON	=	present value of expected abandonment costs
PVSIT	=	present value of expected state corporate income taxes
PVFIT	=	present value of expected federal corporate income taxes.

Costs are assumed constant over the investment life but vary across both region and primary fuel type. This assumption can be changed readily if required by the user. Relevant tax provisions also are assumed unchanged over the life of the investment. Operating losses incurred in the initial investment period are carried forward and used against revenues generated by the project in later years.

The following sections describe each component of the DCF calculation. Each variable of Equation A.1 is discussed starting with the expected revenue and royalty payments, followed by the expected costs, and lastly the expected tax payments.

Present Value of Expected Revenues, Royalty Payments, and Production Taxes

Revenues from an oil or gas project are generated from the production and sale of both the primary fuel as well as any co-products. The present value of expected revenues measured at the wellhead from the production of a representative project is defined as the summation of yearly expected net wellhead price[1]

[1]The DCF methodology accommodates price expectations that are myopic, adaptive, or perfect. The default is myopic expectations, so prices are assumed to be constant throughout the economic evaluation period.

times expected production[2] discounted at an assumed rate. The discount rate used to evaluate private investment projects typically represents a weighted average cost of capital (WACC), i.e., a weighted average of both the cost of debt and the cost of equity.

Fundamentally, the formula for the WACC is straightforward.

$$WACC = \frac{D}{D+E} * R_D * (1-t) + \frac{E}{D+E} * R_E \tag{A-2}$$

where D = market value of debt, E = market value of equity, t = corporate tax rate, R_D = cost of debt, and R_E = cost of equity. Because the drilling projects being evaluated are long term in nature, the values for all variables in the WACC formula are long run averages.

The WACC calculated using the formula given above is a nominal one. The real value can be calculated by

$$disc = \frac{(1+WACC)}{(1+\pi_e)} - 1 \tag{A-3}$$

where π_e = expected inflation rate. The expected rate of inflation over the forecasting period is measured as the average annual rate of change in the U.S. GDP deflator over the forecasting period using the forecasts of the GDP deflator from the Macro Module (MC_JPGDP).

The present value of expected revenue for either the primary fuel or its co-product is calculated as follows:

$$PVREV_{T,k} = \sum_{t=T}^{T+n} \left[Q_{t,k} * \lambda * P_{t,k} * \left[\frac{1}{1+disc} \right]^{t-T} \right], \lambda = \begin{cases} 1 \text{ if primary fuel} \\ COPRD \text{ if secondary fuel} \end{cases} \tag{A-4}$$

where,

k	=	fuel type (oil or natural gas)
T	=	time period
n	=	number of years in the evaluation period
disc	=	discount rate
Q	=	expected production volumes
P	=	expected net wellhead price
COPRD	=	co-product factor.[3]

Net wellhead price is equal to the market price minus any transportation costs. Market prices for oil and gas are defined as follows: the price at the receiving refinery for oil, the first purchase price for onshore natural gas, the price at the coastline for offshore natural gas, and the price at the Canadian border for Alaskan gas.

[2]Expected production is determined outside the DCF subroutine. The determination of expected production is described in Chapter 3.

[3]The OGSM determines coproduct production as proportional to the primary product production. COPRD is the ratio of units of coproduct per unit of primary product.

The present value of the total expected revenue generated from the representative project is

$$PVTREV_T = PVREV_{T,1} + PVREV_{T,2} \quad \text{(A-5)}$$

where

$PVREV_{T,1}$ = present value of expected revenues generated from the primary fuel
$PVREV_{T,2}$ = present value of expected revenues generated from the secondary fuel.

Present Value of Expected Royalty Payments

The present value of expected royalty payments (PVROY) is simply a percentage of expected revenue and is equal to

$$PVROY_T = ROYRT_1 * PVREV_{T,1} + ROYRT_2 * PVREV_{T,2} \quad \text{(A-6)}$$

where

ROYRT = royalty rate, expressed as a fraction of gross revenues.

Present Value of Expected Production Taxes

Production taxes consist of ad valorem and severance taxes. The present value of expected production tax is given by

$$PVPRODTAX_T = PRREV_{T,1} * (1 - ROYRT_1) * PRDTAX_1 + PVREV_{T,2} *(1 - ROYRT_2) * PRODTAX_2 \quad \text{(A-7)}$$

where

PRODTAX = production tax rate.

PVPRODTAX is computed as net of royalty payments because the investment analysis is conducted from the point of view of the operating firm in the field. Net production tax payments represent the burden on the firm because the owner of the mineral rights generally is liable for his/her share of these taxes.

Present Value of Expected Costs

Costs are classified within the OGSM as drilling costs, lease equipment costs, other capital costs, operating costs (including production facilities and general/administrative costs), and abandonment costs. These costs differ among successful exploratory wells, successful developmental wells, and dry holes. The present value calculations of the expected costs are computed in a similar manner as PVREV (i.e., costs are discounted at an assumed rate and then summed across the evaluation period).

Present Value of Expected Drilling Costs

Drilling costs represent the expenditures for drilling successful wells or dry holes and for equipping successful wells through the Christmas tree installation.[4] Elements included in drilling costs are labor,

[4]The Christmas tree refers to the valves and fittings assembled at the top of a well to control the fluid flow.

material, supplies and direct overhead for site preparation, road building, erecting and dismantling derricks and drilling rigs, drilling, running and cementing casing, machinery, tool changes, and rentals. The present value of expected drilling costs is given by

$$\begin{aligned} PVDRILLCOST_T = \sum_{t=T}^{T+n} \Big[\Big[& COSTEXP_T * SR_1 * NUMEXP_t + COSTDEV_T * SR_2 * NUMDEV_t \\ & + COSTDRY_{T,1} * (1 - SR_1) * NUMEXP_t \\ & + COSTDRY_{T,2} * (1 - SR_2) * NUMDEV_t \Big] * \left(\frac{1}{1+disc}\right)^{t-T} \Big] \end{aligned} \quad \text{(A-8)}$$

where

COSTEXP	=	drilling cost for a successful exploratory well
SR	=	success rate (1=exploratory, 2=developmental)
COSTDEV	=	drilling cost for a successful developmental well
COSTDRY	=	drilling cost for a dry hole (1=exploratory, 2=developmental).
NUMEXP	=	number of exploratory wells drilled in a given period
NUMDEV	=	number of developmental wells drilled in a given period.

The number and schedule of wells drilled for an oil or gas project are supplied as part of the assumed production profile. This is based on historical drilling activities.

Present Value of Expected Lease Equipment Costs

Lease equipment costs include the cost of all equipment extending beyond the Christmas tree, directly used to obtain production from a drilled lease. Three categories of costs are included: producing equipment, the gathering system, and processing equipment. Producing equipment costs include tubing, rods, and pumping equipment. Gathering system costs consist of flowlines and manifolds. Processing equipment costs account for the facilities utilized by successful wells.

The present value of expected lease equipment cost is

$$PVEQUIP_T = \sum_{t=T}^{T+n} \left[EQUIP_t * (SR_1 * NUMEXP_t + SR_2 * NUMDEV_t) * \left[\frac{1}{1+disc}\right]^{t-T} \right] \quad \text{(A-9)}$$

where

EQUIP	=	lease equipment costs per well.

Present Value of Other Expected Capital Costs

Other major capital expenditures include the cost of gravel pads in Alaska, and offshore platforms. These costs are exclusive of lease equipment costs. The present value of other expected capital costs is calculated as

$$PVKAP_T = \sum_{t=T}^{T+n} \left[KAP_t * \left[\frac{1}{1+disc}\right]^{t-T} \right] \quad \text{(A-10)}$$

where

KAP = other major capital expenditures, exclusive of lease equipment.

Present Value of Expected Operating Costs

Operating costs include three main categories of costs: normal daily operations, surface maintenance, and subsurface maintenance. Normal daily operations are further broken down into supervision and overhead, labor, chemicals, fuel, water, and supplies. Surface maintenance accounts for all labor and materials necessary to keep the service equipment functioning efficiently and safely. Costs of stationary facilities, such as roads, also are included. Subsurface maintenance refers to the repair and services required to keep the downhole equipment functioning efficiently.

Total operating cost in time t is calculated by multiplying the cost of operating a well by the number of producing wells in time t. Therefore, the present value of expected operating costs is as follows:

$$PVOPCOST_T = \sum_{t=T}^{T+n}\left[OPCOST_t * \sum_{k=1}^{t}\left[SR_1 * NUMEXP_k + SR_2 * NUMDEV_k\right] * \left(\frac{1}{1+disc}\right)^{t-T}\right] \quad \text{(A-11)}$$

where

OPCOST = operating costs per well.

Present Value of Expected Abandonment Costs

Producing facilities are eventually abandoned and the cost associated with equipment removal and site restoration is defined as

$$PVABANDON_T = \sum_{t=T}^{T+n}\left[COSTABN_t * \left[\frac{1}{1+disc}\right]^{t-T}\right] \quad \text{(A-12)}$$

where

COSTABN = abandonment costs.

Drilling costs, lease equipment costs, operating costs, abandonment costs, and other capital costs incurred in each individual year of the evaluation period are integral components of the following determination of State and Federal corporate income tax liability.

Present Value of Expected Income Taxes

An important aspect of the DCF calculation concerns the tax treatment. All expenditures are divided into depletable,[5] depreciable, or expensed costs according to current tax laws. All dry hole and operating costs are expensed. Lease costs (i.e., lease acquisition and geological and geophysical costs) are capitalized and then amortized at the same rate at which the reserves are extracted (cost depletion). Drilling costs are split between tangible costs (depreciable) and intangible drilling costs (IDC's) (expensed). IDC's include

[5]The DCF methodology does not include lease acquisition or geological & geophysical expenditures because they are not relevant to the incremental drilling decision.

wages, fuel, transportation, supplies, site preparation, development, and repairs. Depreciable costs are amortized in accord with schedules established under the Modified Accelerated Cost Recovery System (MACRS).

Key changes in the tax provisions under the tax legislation of 1988 include the following:

- Windfall Profits Tax on oil was repealed,
- Investment Tax Credits were eliminated, and
- Depreciation schedules shifted to a Modified Accelerated Cost Recovery System.

Tax provisions vary with type of producer (major, large independent, or small independent) as shown in Table A-1. A major oil company is one that has integrated operations from exploration and development through refining or distribution to end users. An independent is any oil and gas producer or owner of an interest in oil and gas property not involved in integrated operations. Small independent producers are those with less than 1,000 barrels per day of production (oil and gas equivalent). The present DCF methodology reflects the tax treatment provided by current tax laws for large independent producers.

The resulting present value of expected taxable income (PVTAXBASE) is given by:

$$\begin{aligned} \mathrm{PVTAXBASE}_T = \sum_{t=T}^{T+n} \Big[\big(& \mathrm{TREV}_t - \mathrm{ROY}_t - \mathrm{PRODTAX}_t - \mathrm{OPCOST}_t - \mathrm{ABANDON}_t - \mathrm{XIDC}_t \\ & - \mathrm{AIDC}_t - \mathrm{DEPREC}_t - \mathrm{DHC}_t \big) * \left(\frac{1}{1+\mathrm{disc}} \right)^{t-T} \Big] \end{aligned} \tag{A-13}$$

where

T	=	year of evaluation
t	=	time period
n	=	number of years in the evaluation period
TREV	=	expected revenues
ROY	=	expected royalty payments
PRODTAX	=	expected production tax payments
OPCOST	=	expected operating costs
ABANDON	=	expected abandonment costs
XIDC	=	expected expensed intangible drilling costs
AIDC	=	expected amortized intangible drilling costs[6]
DEPREC	=	expected depreciable tangible drilling, lease equipment costs, and other capital expenditures
DHC	=	expected dry hole costs
disc	=	expected discount rate.

TREV_t, ROY_t, $\mathrm{PRODTAX}_t$, OPCOST_t, and $\mathrm{ABANDON}_t$ are the undiscounted individual year values. The following sections describe the treatment of expensed and amortized costs for the purpose of determining corporate income tax liability at the State and Federal level.

[6]This variable is included only for completeness. For large independent producers, all intangible drilling costs are expensed.

Expected Expensed Costs

Expensed costs are intangible drilling costs, dry hole costs, operating costs, and abandonment costs. Expensed costs and taxes (including royalties) are deductible from taxable income.

Expected Intangible Drilling Costs

For large independent producers, all intangible drilling costs are expensed. However, this is not true across the producer category (as shown in Table A-1). In order to maintain analytic flexibility with respect to changes in tax provisions, the variable XDCKAP (representing the portion of intangible drilling costs that must be depreciated) is included.

Table A-1. Tax Treatment in Oil and Gas Production by Category of Company Under Current Tax Legislation

Costs by Tax Treatment	Majors	Large Independents	Small Independents
Depletable Costs	**Cost Depletion** G&G[a] Lease Acquisition	**Cost Depletion**[b] G&G Lease Acquisition	**Maximum of Percentage or Cost Depletion** G&G Lease Acquisition
Depreciable Costs	**MACRS**[c] Lease Acquisition Other Capital Expenditures Successful Well Drilling Costs Other than IDC=s **5-year SLM**[d] 20 percent of IDC=s	**MACRS** Lease Acquisition Other Capital Expenditures Successful Well Drilling Costs Other than IDC=s	**MACRS** Lease Acquisition Other Capital Expenditures Successful Well Drilling Costs Other than IDC=s
Expensed Costs	Dry Hole Costs 80 percent of IDC's Operating Costs	Dry Hole Costs 80 percent of IDC's Operating Costs	Dry Hole Costs 80 percent of IDC's Operating Costs

[a]Geological and geophysical.
[b]Applicable to marginal project evaluation; first 1,000 barrels per day depletable under percentage depletion.
[c]Modified Accelerated Cost Recovery System; the period of recovery for depreciable costs will vary depending on the type of depreciable asset.
[d]Straight Line Method.

Expected expensed IDC's are defined as follows:

$$\begin{aligned} XIDC_t &= COSTEXP_T * (1 - EXKAP) * (1 - XDCKAP) * SR_1 * NUMEXP_t \\ &\quad + COSTDEV_T * (1 - DVKAP) * (1 - XDCKAP) * SR_2 * NUMDEV_t \end{aligned} \tag{A-14}$$

where

COSTEXP	=	drilling cost for a successful exploratory well
EXKAP	=	fraction of exploratory drilling costs that are tangible and must be depreciated
XDCKAP	=	fraction of intangible drilling costs that must be depreciated[7]
SR	=	success rate (1=exploratory, 2=developmental)
NUMEXP	=	number of exploratory wells
COSTDEV	=	drilling cost for a successful developmental well
DVKAP	=	fraction of developmental drilling costs that are tangible and must be depreciated
NUMDEV	=	number of developmental wells.

If only a portion of IDC's are expensed (as is the case for major producers), the remaining IDC's must be depreciated. The model assumes that these costs are recovered at a rate of 10 percent in the first year, 20 percent annually for four years, and 10 percent in the sixth year; this method of estimating the costs is referred to as the 5-year Straight Line Method (SLM) with half-year convention. If depreciable costs accrue when fewer than 6 years remain in the life of the project, the recovered costs are estimated using a simple straight line method over the remaining period.

Thus, the value of expected depreciable IDC's is represented by

$$\begin{aligned} AIDC_t = \sum_{j=\beta}^{t} \Big[\Big(& COSTEXP_T * (1 - EXKAP) * XDCKAP * SR_1 * NUMEXP_j \\ & + COSTDEV_T * (1 - DVKAP) * XDCKAP * SR_2 * NUMDEV_j \Big) \\ & * DEPIDC_t * \left(\frac{1}{1+infl}\right)^{t-j} * \left(\frac{1}{1+disc}\right)^{t-j} \Big], \end{aligned} \tag{A-15}$$

$$\beta = \begin{cases} T & \text{for } t \le T + m - 1 \\ t - m + 1 & \text{for } t > T + m - 1 \end{cases}$$

where,

j	=	year of recovery
β	=	index for write-off schedule
DEPIDC	=	for t # n+T-m, 5-year SLM recovery schedule with half year convention; otherwise, 1/(n+T-t) in each period
infl	=	expected inflation rate[8]
disc	=	expected discount rate
m	=	number of years in standard recovery period.

AIDC will equal zero by default since the DCF methodology reflects the tax treatment pertaining to large independent producers.

[7]The fraction of intangible drilling costs that must be depreciated is set to zero as a default to conform with the tax perspective of a large independent firm.

[8]The write-off schedule for the 5-year SLM give recovered amounts in nominal dollars. Therefore, recovered costs are adjusted for expected inflation to give an amount in expected constant dollars since the DCF calculation is based on constant dollar values for all other variables.

Expected Dry Hole Costs

All dry hole costs are expensed. Expected dry hole costs are defined as

$$DHC_t = COSTDRY_{T,1} * (1 - SR_1) * NUMEXP_t + COSTDRY_{T,2} * (1 - SR_2) * NUMDEV_t \qquad \text{(A-16)}$$

where

COSTDRY = drilling cost for a dry hole (1=exploratory, 2=developmental).

Total expensed costs in any year equals the sum of $XIDC_t$, $OPCOST_t$, $ABANDON_t$, and DHC_t.

Expected Depreciable Tangible Drilling Costs, Lease Equipment Costs and Other Capital Expenditures

Amortization of depreciable costs, excluding capitalized IDC's, conforms to the Modified Accelerated

Table A-2. MACRS Schedules
(Percent)

Year	3-year Recovery Period	5-year Recovery Period	7-year Recovery Period	10-year Recovery Period	15-year Recovery Period	20-year Recovery Period
1	33.33	20.00	14.29	10.00	5.00	3.750
2	44.45	32.00	24.49	18.00	9.50	7.219
3	14.81	19.20	17.49	14.40	8.55	6.677
4	7.41	11.52	12.49	11.52	7.70	6.177
5		11.52	8.93	9.22	6.93	5.713
6		5.76	8.92	7.37	6.23	5.285
7			8.93	6.55	5.90	4.888
8			4.46	6.55	5.90	4.522
9				6.56	5.91	4.462
10				6.55	5.90	4.461
11				3.28	5.91	4.462
12					5.90	4.461
13					5.91	4.462
14					5.90	4.461
15					5.91	4.462
16					2.95	4.461
17						4.462
18						4.461
19						4.462
20						4.461
21						2.231

Source: U.S. Master Tax Guide.

Cost Recovery System (MACRS) schedules. The schedules under differing recovery periods appear in Table A-2. The particular period of recovery for depreciable costs will conform to the specifications of the tax code. These recovery schedules are based on the declining balance method with half year convention. If depreciable costs accrue when fewer years remain in the life of the project than would allow for cost recovery over the standard period, then costs are recovered using a straight line method over the remaining period.

The expected tangible drilling costs, lease equipment costs, and other capital expenditures is defined as

$$\begin{aligned} DEPREC_t = \sum_{j=\beta}^{t} \Big[\Big[& (COSTEXP_T * EXKAP + EQUIP_T) * SR_1 * NUMEXP_j \\ & + (COSTDEV_T * DVKAP + EQUIP_T) * SR_2 * NUMDEV_j + KAP_j \Big] \\ & * DEP_{t-j+1} * \left(\frac{1}{1+infl}\right)^{t-j} * \left(\frac{1}{1+disc}\right)^{t-j} \Big], \end{aligned} \tag{A-17}$$

$$\beta = \begin{cases} T \text{ for } t \le T + m - 1 \\ t - m + 1 \text{ for } t > T + m - 1 \end{cases}$$

where

j	=	year of recovery
β	=	index for write-off schedule
m	=	number of years in standard recovery period
COSTEXP	=	drilling cost for a successful exploratory well
EXKAP	=	fraction of exploratory drilling costs that are tangible and must be depreciated
EQUIP	=	lease equipment costs per well
SR	=	success rate (1=exploratory, 2=developmental)
NUMEXP	=	number of exploratory wells
COSTDEV	=	drilling cost for a successful developmental well
DVKAP	=	fraction of developmental drilling costs that are tangible and must be depreciated
NUMDEV	=	number of developmental wells drilled in a given period
KAP	=	major capital expenditures such as gravel pads in Alaska or offshore platforms, exclusive of lease equipment
DEP	=	for t # n+T-m, MACRS with half year convention; otherwise, 1/(n+T-t) in each period
infl	=	expected inflation rate[9]
disc	=	expected discount rate.

Present Value of Expected State and Federal Income Taxes

The present value of expected state corporate income tax is determined by

$$PVSIT_T = PVTAXBASE_T * STRT \tag{A-18}$$

where

PVTAXBASE	=	present value of expected taxable income (Equation A.14)
STRT	=	state income tax rate.

[9]Each of the write-off schedules give recovered amounts in nominal dollars. Therefore, recovered costs are adjusted for expected inflation to give an amount in expected constant dollars since the DCF calculation is based on constant dollar values for all other variables.

The present value of expected federal corporate income tax is calculated using the following equation:

$$PVFIT_T = PVTAXBASE_T * (1 - STRT) * FDRT \quad \text{(A-19)}$$

where

FDRT = federal corporate income tax rate.

Summary

The discounted cash flow calculation is a useful tool for evaluating the expected profit or loss from an oil or gas project. The calculation reflects the time value of money and provides a good basis for assessing and comparing projects with different degrees of profitability. The timing of a project's cash inflows and outflows has a direct affect on the profitability of the project. As a result, close attention has been given to the tax provisions as they apply to costs.

The discounted cash flow is used in each submodule of the OGSM to determine the economic viability of oil and gas projects. Various types of oil and gas projects are evaluated using the proposed DCF calculation, including single well projects and multi-year investment projects. Revenues generated from the production and sale of co-products also are taken into account.

The DCF routine requires important assumptions, such as assumed costs and tax provisions. Drilling costs, lease equipment costs, operating costs, and other capital costs are integral components of the discounted cash flow analysis. The default tax provisions applied to the costs follow those used by independent producers. Also, the decision to invest does not reflect a firm's comprehensive tax plan that achieves aggregate tax benefits that would not accrue to the particular project under consideration.

Appendix B. Bibliography

Aerospace Corporation. 1976. *Alaska Natural Gas Transportation Systems Economic and Risk Analysis*.

Advanced Resources International: "Naturally Fractured Tight Gas Reservoir Detection Optimization", Quarterly Status Report for US DOE - METC, Contract number DE-AC21-93MC30086, May 23, 1997.

Allied Technology Group, Inc. 1996. "Model Quality Audit Report: Final Report - Oil and Gas Supply Module."

American Petroleum Institute. 1990-2005. *Joint Association Survey on Drilling Costs*, Finance, Accounting, and Statistics Department, Washington D.C.

Argonne National Laboratory, Environmental Assessment and Information Sciences Division. June 7, 1991 (revised draft). *National Energy Strategy Environmental Analysis Model (NESEAM): Documentation and Findings*, prepared for the DOE Office of Policy, Planning, and Analysis under contract W-31-109-Eng-38.

Arps, J.J. and T.G. Roberts. 1958. "Economics of Drilling for Cretaceous Oil on East Flank of Denver-Julesburg Basin," *Bulletin of American Association of Petroleum Geologists*, Vol. 42, No. 11 (November) pp. 2549-2567.

Attanasi, E.D., L.J. Drew, and D.H. Root. 1981. "Physical Variables and the Petroleum Discovery Process" in James Ramsey, ed., *The Economics of Exploration for Energy Resources* (Greenwich: JAI Press).

Attanasi, E.D. and Haynes, J.L. 1983. "*Future Supply of Oil and Gas from the Gulf of Mexico"*, U.S. Geological Survey Professional Paper 1294, U.S. Geological Survey.

Bacigalupi, Suzan M., et al. October 1996. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1995*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Bailey, Ralph E. and Curtis, L.B. June 1984. *Enhanced Oil Recovery*, National Petroleum Council report Submitted to the Secretary of Energy, National Petroleum Council, Washington D.C.

Baker, R.A., Gehman, H.M., James, W.R., and White, D.A. 1984. "Geologic Field Number and Size Assessments of Oil and Gas Plays," *The American Association of Petroleum Geologists Bulletin*, Vol 68, No. 4, pages 426-437.

Beach, C. and MacKimnon, J. 1978. "A Maximum Likelihood Procedure for Regression with Autocorrelated Errors," *Econometrica,* Vol. 46, pages 51-58.

BehrenBruch, Peter. January 1995. *Deepwater Drilling & Production: Floating Production Facilities Key to Lower Cost Deepwater Development*, HP Petroleum, Oil and Gas Journal.

Beltramo, M., Manne a., Weyant J., *The Energy Journal*, 7 (July 1986), pp.15-32.

Bird, K.J. 1986. "A Comparison of the Play Analysis Techniques as Applies in Hydrocarbon Resource Assessments of the National Petroleum Reserve in Alaska and the Arctic National Wildlife Refuge," in Rice, D.D., ed., *Oil and Gas Assessment, Methods and Applications, American Association of Petroleum Geologists Studies in Geology*, No. 21, Tulsa.

Bourgoyne Jr., A.T., et al. 1991. *Applied Drilling Engineering*, Society of Petroleum Engineers (SPE) Textbook Series, Vol. 2, Second Printing, Society of Petroleum Engineers, Richardson, Texas.

Cazalet, E.G. 1977. *Generalized Equilibrium Modeling: The Methodology of the SRI-Gulf Energy Model*, Decision Focus Incorporated, Palo Alto, CA and Stanford Research Institute, Menlo Park, CA.

Chapman, L. Randy, et al. November 1995. *Platform/Pipeline Construction: Containing Field Abandonment Costs in the Gulf of Mexico*, Oil and Gas Journal.

Cherniavsky, E.A., and Juang, L.L. October 1979. *Resource Submodels of the Long-Range Energy Analysis Program: Documentation*, Report to the Division of Long-range Analysis, U.S. Energy Information Administration, Washington.

Cherniavsky, E.A. May 1982. "Oil/Gas Supply Modeling Considerations in Long-range Forecasting," in Gass, S.I., *Oil and Gas Supply Modeling, Proceedings of a Symposium held at the Department of Commerce, Washington, D.C., June 18-20, 1980*, U.S. Department of Commerce, NBS Special Publication 631.

Cox, J., and Wright, A. 1976. "The Determinants of Investment in Petroleum Reserves and Their Implications for Public Policy," *American Economic Review*, Vol. 66, No. 1, pages 153-167.

Cranswick, Deborah and Regg, James. February 1997. *Deepwater in the Gulf of Mexico: America's New Frontier*, OCS Report MMS 97 -0004, U.S. Minerals Management Service, New Orleans.

Davis, J.C., and Harbaugh, J.W. 1981. "A Simulation Model for Oil Exploration Policy on Federal Lands of the U.S. Outer Continental Shelf," in Ramsey, J., ed., *The Economics of Exploration for Energy Resources*, JAI Press, Greenwich.

Deacon, R., et al. 1983. *The Proposed California Crude Oil Severance Tax: An Economic Analysis*, The Economics Group, Inc., Santa Barbara.

Department of Revenue, State of Alaska. 1989, 1990, and 1991. *Petroleum Production Revenue Forecast*. Alaska.

Drew, L.J., Schuenemeyer, J.H., and Bawiec, W.J. 1982. *Estimation of the Future Rate of Oil and Gas Discovery in the Gulf of Mexico*, U.S. Geologic Survey Professional Paper, No. 252, Reston, VA.

DRI/McGraw-Hill, *Energy Review: Natural Gas Market Focus*, Standard & Poor's Corporation, Lexington, Massachusetts, 1990.

Dutton, Shirley P., Clift, Sigrid J., Hamilton, Douglas S., Hamlin, H. Scott, Hantzs, Tucker F., Howard, William E., Akhter, M. Saleem, Laubach, Stephen E.: "Major Low-Permeability-Sandstone Gas Reservoirs in the Continental United States" Bureau of Economic Geology - University of Texas and Gas Research Institute, 1993.

Eckbo, P.L., Jacoby, H.D., and Smith, J.L. 1978. "Oil Supply Forecasting: A Disaggregated Process Approach," *Bell Journal of Economics*, Vol. 9, No. 1, pages 218-235.

Energy and Environmental Analysis Inc., *Costs for LNG Imports Into the United States*, prepared for Gas Research Institute, GRI Contract #5087-800-1474, August 1988.

Energy and Environmental Analysis Inc. 1991. "Import and Supplemental Gas Supply," prepared for the Source and Supply Task Group of the National Petroleum Council Natural Gas Study.

U.S. Energy Information Administration: Annual Energy Outlook 2006 - With Projections to 2030", U.S. Energy Information Administration, Office of Integrated Analysis and Forecasting, U.S. Department of Energy, February, 2006.

U.S. Energy Information Administration: "US Crude Oil, Natural Gas, and Natural Gas Liquids Reserves - Annual Reports", U.S. Energy Information Administration, Office of Oil and Gas, U.S. Department of Energy, December, 1996-2004.

Energy Research Associates, *The Reemergence of LNG - A Global Perspective, Volume I*, 1989.

Epple, D. 1975. *Petroleum Discoveries and Government Policy: An Econometric Study of Supply*, Ballinger Publishing Company, Cambridge, Mass.

Epple, D. 1985. "The Econometrics of Exhaustible Resource Supply: A Theory and an Application," in Sargent, T.J., ed., *Energy Foresight and Strategy*, Resources for the Future, Washington.

Erickson, E.W., and Spann, R.M. 1971. "Supply Response in a Regulated Industry: The Case of Natural Gas," *The Bell Journal of Economics and Management Science*, Vol. 2, No. 1, pages 94-121.

Erickson, E.W., Millsaps, S.W., and Spann, R.M. 1974. "Oil Supply and Tax Incentives," *Brookings Papers on Economic Activity*, Vol. 2, pages 449-493.

Executive Office of the President. 1977. Decision and Report to Congress on the Alaska Natural Gas Transportation System. Energy Policy and Planning.

Eyssell, J.H. "The Supply Response of Crude Petroleum: New and Optimistic Results," *Business Economics*, Vol. 13, No. 3, pages 15-28.

Farmer, Richard D., Harris, Carl M., Murphy, Frederic H., and Damuth, Robert J. 1984. "The Outer continental Shelf Oil and gas Supply model of the U.S. Energy Information Administration," *North-Holland European Journal Of Operation Research*, 18.

Fisher, F.M. 1964. *Supply and Costs in the United States Petroleum Industry*, Johns Hopkins University Press for Resources for the Futures, Baltimore.

Fisher, W.L., *et al*, 1988, *An Assessment of the Natural Gas Resource Base of the United States*, Bureau of Economic Geology, University of Texas at Austin, Austin, Texas.

Gas Research Institute, *Baseline Projection Data Book: The 1989 GRI Baseline Projection of U.S. Energy Supply and Demand to 2010*, Strategic Planning and Analysis Division, Washington, DC, 1990.

Frantz, Joe: ATechnology Applications Improve Antrim Shale Well Recoveries and Economics@, GRI Gas Tips, Gas Research Institute, Winter, 1995/1996, p.5-11.

Gas Research Institute: AAdvanced Stimulation Technology: Success in the Anadarko Basin@, GRI Gas Tips, Gas Research Institute, Baseline / Gas Resource Analytical Center, August, 1996.

Gas Research Institute: ABaseline Projection Data Book - 1998 Edition of the GRI Baseline Projection of US Energy Supply and Demand to 2015", Gas Research Institute, Baseline / Gas Resource Analytical Center, 1997.

Gas Research Institute: ABaseline Projection Data Book - 1997 Edition of the GRI Baseline Projection of US Energy Supply and Demand to 2015", Gas Research Institute, Baseline / Gas Resource Analytical Center, 1996.

Gas Research Institute: AGRI Baseline Projection of US Energy Supply and Demand - 1997 Edition, "The Contribution of Technology,", Gas Research Institute, Baseline / Gas Resource Analytical Center, August, 1996.

Gas Research Institute, "The Long-Term Trends in U.S. Gas Supply and Prices: The 1989 GRI Baseline Projection of U.S. Energy Supply and Demand to 2010," as published in *Gas Research Insights*, Strategic Planning and Analysis Division, Washington, DC, 1990.

Gas Research Institute (GRI). 1990. *Guide to the Hydrocarbon Supply Model*, prepared for the Gas Research Institute by Energy and Environmental Analysis, Inc., Washington, DC.

Goerold, W.T. 1987. Environmental and Petroleum Resource Conflicts: *A Simulation Model to Determine the Benefits of Petroleum Production in the Arctic National Wildlife Refuge, Alaska*. Materials and Society II(3).

Goerold, W.T. 1988. *A Simulation Model to Determine the Probability of Finding Economically Producible Petroleum in the Arctic National Wildlife Refuge, Alaska*, Proceedings Tenth Annual North American Conference. International Association for Energy Economics. Houston TX.

Grecco, M.G. April 1987. *Deepwater Development Economics*. Offshore Technology Conference.

Griffin, James M., and Moroney, John R., *Texas Severance Tax Model - The Economic Impact of Severance Taxes: Results from an Econometric Model of the Texas Oil and Gas Industry*, 1985. Report to the Texas Mid Continent Oil and Gas Association.

Haines, Leslie. July 1996. *Going Deep: Startling New Technologies and High Flow Rates Make the Deepwater Gulf of Mexico a World Class Frontier Play - and Our Last Best Hope*, Oil and Gas Investor.

Hansen, J.J. and Kornbrath, R.W. 1986. *Resource Appraisal Simulation for Petroleum in the Arctic National Wildlife Refuge, Alaska*. State of Alaska, Department of Natural Resources, Division of Geological and Geophysical Surveys, Professional Report 90.

Harkrider, John D., Middlebrook, Mike L., Aud, William W., Marrer, Kenneth D., Teer, George A.: "Advanced Stimulation Technology: Success in the Anadarko Basin", GRI Gas Tips, Gas Research Institute, Spring, 1996, p.24-29.

Helfat, Constance E. September 1989. *Investment in Offshore Oil by Diversified Petroleum Companies*, Journal of Industrial Economics, Volume XXXVIII.

Hendricks, K., Novales, A. 1987. *Estimation of Dynamic Investment Functions in Oil Exploration*, Draft Manuscript.

Herron, E. Hunter. June 1982. *Unconventional-Gas Production Model*, Final Report prepared for the Brookhaven National Laboratory Associated Universities, Inc. by Gruy Federal Inc.

Huntington, H.G., Schuler, Glen E., et al., "North American Natural Gas Markets," *Energy Modeling Forum Stanford University*, February 1989.

Huntington, H.G., Schuler, Glen E., et al., "North American Natural Gas Markets: Selected Technical Studies," *Energy Modeling Forum Stanford University*, April 1989.

Huntington, H.G., Lyon, Thomas P., "Responses To Modeler Questionnaires, EMF 9: North American Natural Gas Markets," *Energy Modeling Forum Stanford University*, May 1987.

ICF-Lewin Energy, Inc. June 1998. *A Model for the Economic Analysis of U.S. Undiscovered Crude Oil Resources in the Lower-48 Offshore*, Prepared for U.S. Department of Energy Under Contract No. DE-AC01-85FE60603.

ICF Resources Incorporated. August 1995. *Primary Recovery Predictive Model for Total Oil Recovery Information System (TORIS)*.

ICF Resources Incorporated. January 1997. *Model Development for the Gas Systems Analysis Model: Draft Topical Report*, Prepared for Federal Energy Technology Center, U.S. Department of Energy, Task 4, DE-AC21-92MC28138.

ICF Resources Incorporated. January 1997. *Internal Survey of Deepwater Offshore Gulf of Mexico Projects Slated for Development, Based on Data Gathered from Various Industry Sources*.

ICF Resources Incorporated. July 1990. *Update and Analysis of Offshore Oil and Gas Exploration, Development, Production and Transportation Costs*, Submitted to U.S. Minerals Management Service Under Contract No. 14-12-0001-30424.

ICF Resources Incorporated. June 1994. *Update of the Regional Cost Functions for the TORIS Predictive Models*, Prepared for BDM-Oklahoma, Inc. Under Contract No. DE-AC22-94PC91008.

International Petroleum Encyclopedia, PennWell Publishing Co., Tulsa, OK, 1989.

Johnson, D. 1985. *Comparison of Alternatives for Deepwater Development in the Gulf of Mexico*, SPE Paper 13779 presented at the Hydrocarbon Economics and Evaluation Symposium, Dallas, Texas, March 14-15.

Johnson, Ronald C., Finn, Thomas M., Crovelli, Robert A., and Balay, Richard H.: AAn Assessment of In-Place Gas Resources in Low-Permeability Upper Cretaceous and Lower Tertiary Sandstone Reservoirs, Wind River Basin, Wyoming@, US Geological Survey Open-File Report 96-264, Us Geological Survey, 1996.

Kalter, R.J., Tyner, W.E., and Hughes, D.W. 1975. *Alternative Energy Leasing Strategies and Schedules for the Outer Continental Shelf*, Cornell University, Department of Agricultural Economics, A.E.RES. 75-33, Ithaca, N.Y.

Kaufman, G.M., and Barouch, E. 1978. "The Interface Between Geostatistical Modeling of Oil and Gas Discovery and Economics," *Mathematical Geology*, 10(5).

Kaufman, G.M., Runggaldier, W., and Livne, Z. 1981. "Predicting the Time Rate of Supply from a Petroleum Play," in Ramsey, J., ed., *The Economics of Exploration for Energy Resources*, JAI Press, Greenwich.

Khazzoom, D.J. "The FPC Staff's Econometric Model of Natural Gas Supply in the United States," *The Bell Journal of Economics and Managements Science*, Vol. 2, No. 1, pages 51-93.

Khodaverdian, Mohamad, McLennan, John, Palmer, Ian, Vaziri, Hans: "Coalbed Cavity Completion Analysis Suggests Improvements", GRI Gas Tips, Gas Research Institute, Winter, 1995/1996, p.22-29.

Kibbee, Stephen. June 1996.*ATLP Technology: SeaStar Minimal Platform For Small Deepwater Reserves@*, Atlantia Corporation, Oil and Gas Journal.

Kuuskraa, Vello A., Boyer, Charles M. III: "Economic and Parametric Analysis of Coalbed Methane", Hydrocarbons from Coal © AAPG Studies in Geology number38, 1993, p.373-394.

Le Blanc, Leonard. December 1995. *FORECAST=96: Operators Moving Into Era of Just-In-Time Production*, Oil and Gas Journal.

Lerch, Chris, et al. February 1997. *Ram-Powell Partners See Big Picture With Integrated Modeling*, The American Oil and Gas Reporter, Shell Offshore.

LNG Digest, Volume 15, Number 11, "News Briefs," Energy Research Associates, New York, November 1989.

Lore, Gary L., et al. August 1996. *Summary of the 1995 Assessment of the Conventionally Recoverable Hydrocarbon Resources of the Gulf of Mexico and Atlantic Outer Continental Shelf: As of January 1, 1995*, U.S. Minerals Management Service, New Orleans.

Luneau, Barbara: "Accelerating Technology Development in the Greater Green River Basin", GRI Gas Tips, Gas Research Institute, Fall, 1995, p.4-10.

MacAvoy, P.W. and Pindyck, R.S. "Alternative Regulatory Policies for Dealing with the Natural Gas Shortage," *The Bell Journal of Economics and Management Science*, Vol. 4, No. 2, pages 454-498.

MacDonald, John J. and Smith, Robert S. February 1997. *Offshore Topsides: Decision Trees Aid Production Facility Design*, Oil and Gas Journal.

Mansvelt Beck, F.W., and Wiig, K.M. 1977. *The Economics of Offshore Oil and Gas Supplies*, Lexington Books, Lexington, Mass.

Megill, R.E. 1988. *Exploration Economics*.

Melancon, J. Michael, et al. January 1997. *Gulf of Mexico Outer Continental Shelf Daily Oil and Gas Production Rate Projections from 1996 through 2000*, OCS Report MMS 97-0006, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Melancon, J. Michael, et al. October 1990. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1989*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Melancon, J. Michael, et al. October 1991. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1990*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Melancon, J. Michael, et al. September 1992. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1991*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Melancon, J. Michael, et al. August 1993. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1992*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Melancon, J. Michael, et al. August 1994. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1993*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Melancon, J. Michael, et al. August 1995. *Outer Continental Shelf: Estimated Oil and Gas Reserves, Gulf of Mexico, December 31, 1994*, Resource Evaluation Office, U.S. Minerals Management Service, New Orleans.

Miers, John H. January 20, 1997. *The Gulf of Mexico=s Revival: Technology Gives Gulf Prospects World-Class Investment Appeal*, Amoco Exploration & Production Co., Houston, Oil and Gas Journal.

Moritis, Guntis. April 20, 1992. "EOR Increases 24% Worldwide; Claims 10% of U.S. production" [Biennial EOR Production Report], *Oil and Gas Journal*, page 51 and following.

Moritis, Guntis. June 29, 1992. "More Enhanced Oil Recovery Project Information Obtained," *Oil and Gas Journal*, page 70 and following pages.

Murphy, Frederic H. and William Trapmann. 1982. “An Evaluation of the Alaskan Hydrocarbon Supply Model," *Oil and Gas Supply Modeling*, published by the National Bureau of Standards. Washington, DC.

National Energy Board, *Canada’s Conventional Natural Gas Resources: A Status Report,* , Canada, April 2004.

National Petroleum Council. 1981. *U.S. Arctic Oil and Gas*. Energy and Environmental Analysis, Inc. Arlington, VA.

National Petroleum Council. December 1980. *Unconventional Gas Sources*, Vols 1-4.

National Petroleum Council. 1984. *Enhanced Oil Recovery*, Washington, D.C.

National Petroleum Council. 1991. *Field Development Assumptions and Costs in the Hydrocarbon Supply Model*, Energy and Environmental Analysis, Inc., Arlington, VA.

National Petroleum Council. December 1999. *Natural Gas: Meeting the Challenges of the Nation=s Growing Natural Gas Demand*, Washington, DC.

National Petroleum Council. 1992. *The Potential for Natural Gas in the United States*, Washington, DC.

National Research Council. 1992. *The National Energy Modeling System*, Committee on the National Energy Modeling System, Washington, DC.

Natural Gas Week, "DOE OKs Gas Import/Export with Mexico," June 12, 1989

Nesbitt, D., and Phillips, R. September 1980. *Financial Statements and Producer Behavior in Generalized Equilibrium Models Such as LEAP*, Decision Focus Incorporated Report.

Nesbitt, D.M. 1988. *Methodology of the GRI North American Regional Gas Supply-Demand Model, Appendix A*, Decision Focus Incorporated, Los Altos, CA.

Nesbitt, D.M. 1991. *Insights from the North American Regional Gas (NARG) Supply-Demand Model*, Presentation to the Imports and Alaska Working Group of the National Petroleum Council Natural Gas Study.

Newendorp, Paul, D. 1975. *Decision Analysis for Petroleum Exploration*, The Petroleum Publishing Company, Tulsa, OK.

Offshore Data Services, Inc. June 1997. *Database of Wells Drilled in the Deepwater Gulf of Mexico*, Houston, Texas .

Offshore Special Report. May 1997. *How Offshore Drilling Units Evolved*, Offshore Magazine, Pennwell Publications.

The Oil Daily Co., “Spot Prices on Interstate Pipeline Systems”, Natural Gas Week, 1996-1997.

Pautz, James F., et al. 1992. *Enhanced Oil Recovery Projects Data Base*, NIPER-583, National Institute for Petroleum and Energy Research, Bartlesville, Oklahoma.

Petroleum Economist, Volume LVI, Number 12, "Gas Set for 1990s Growth," Euromoney Publications pic, London, UK, December 1989.

Petroleum Economist, Volume LVI, Number 12, "Liquefied Natural Gas: Continued Market Expansion," Euromoney Publications pic, London, UK, December 1989.

Petroleum Information/Dwights LLC: “Production Data for the Rocky Mountain, Gulf Coast/Offshore, and Texas/Midcontinent Areas”, Petroleum Information/Dwights LLC (CD-ROM), March 1997.

Petroleum Intelligence Weekly, Special Supplement Issue, "World LNG Trade Entering New Growth Phase," Petroleum & Energy Intelligence Weekly, Inc., November 13, 1989.

Platt's Oilgram News, Volume 68, Number 54, "MARAD Rebuff's Cabot's $45-Million Attempt to Buy 3 LNG Tankers at Center of Dispute," McGraw-Hill, New York, March 19, 1990.

Platt's Oilgram News, Volume 68, Number 201, "LNG Ship Deal Jeopardized by New Lawsuit," McGraw-Hill, New York, October 16, 1990.

Potential Gas Agency: APotential Supply of Natural Gas in the United States - Report of the Potential Gas Committee (December 31, 1996)@, Potential Gas Agency, March 1997.

Potential Gas Committee. 1988a. *Potential Supply of Natural Gas in the United States*, Potential Gas Agency, Colorado School of Mines, Golden, Colorado.

Powell, Stephen G. September 1990. *Arctic National Wildlife Refuge - How Much Oil Can We Expect?*. Resources Policy.

Powell, Stephen G. 1990. *A Risk Analysis of Oil Development in the Arctic National Wildlife Refuge*. The Energy Journal, Volume 12, Number 3.

Prato, A.A., and Miller, R.R. 1981. "Evaluating the Energy Production Potential of the United States Outer Continental Shelf," *Land Economics*, Vol. 57, No. 1, pages 77-90.

Riva, Joseph P., Jr. November 19, 1992. *The Domestic Oil Status and a Projection of Future Production*, CRS Report for Congress, 92-826 SPR, Congressional Research Service, Washington, D.C.

Riva, Joseph P., Jr. October 5, 1992. *Domestic Oil Production*, CRS Issue Brief, Order Code IB87068, Congressional Research Service, Washington, D.C.

Roy, K.J. 1975. "Hydrocarbon Assessment Using Subjective Probability and Monte Carlo Methods," in *First IIASA Conference on Methods and Models for Assessing Energy Resources Conference*, Honolulu.

Roy, K.J., Procter, R.M., and McCrossam, R.G. 1975. "Hydrocarbon Assessment Using Subjective Probability," in Davis, J.C., Doveton, J.H., and Harbaugh, J.W., conveners, *Probability Methods in Oil Exploration: American Association of Petroleum Geologists Research Symposium Notes*, Stanford, University, pages 56-60.

Samuelson, P., "Spatial Price Equilibrium and Linear Programming," *American Economic Review*, 42, 1952.

Stermole, Franklin J. and Stermole, John M. 1993. *Economic Evaluation and Investment Decision Methods*, Eighth Edition, Investment Evaluations Corporation, Golden, Colorado.

Trapmann, William. 1991. "Relating Natural Gas Resource Estimates to the Outlook for the Market," paper presented at the 14th Annual International Conference of the International Association for Energy Economists.

Tyler, Roger, Kaiser, W.R., Scott, A.R., Hamilton, D.S., Ambrose, W.A.: "Geologic and Hydrologic Assessment of Natural Gas from Coal: Greater Green River, Piceance, Powder River, and Raton Basins", Bureau of Economic Geology - University of Texas and Gas Research Institute, Contract number 5091-214-2261, 1995.

U.S. Congress. Office of Technology Assessment. 1989. *Oil Production in the Arctic National Wildlife Refuge: The Technology and the Alaskan Oil Context*. OTA-E-394. Washington, D.C.

U.S. Department of Energy. July 1994. *Costs and Indices for Domestic Oil and Gas Field Equipment and Production Operations: 1990 through 199"*, Technical Report DOE/EIA-TR-0568, U.S. Energy Information Administration, Washington D.C.

U.S. Department of Energy: "GASIS Gas Information System - A National Database of Geological, Engineering, Production and Ultimate Recovery Data for U.S. Oil and Natural Gas Reservoirs", Department of Energy, GASIS Release 1 CD-ROM, March 1997.

U.S. Department of Energy. May 1997. *The National Energy Modeling System: An Overview*, DOE/EIA-0581, U.S. Energy Information Administration.

U.S. Department of Energy. 1978. *Midterm Oil and Gas Supply Modeling System Methodology Description*, DOE/EIA-0103/17 U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. December 1982. *Outer Continental Shelf (OCS) Oil and Gas Supply Model, Volume 1, Model Summary and Methodology Description*, DOE/EIA-0372/1 U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1982. *Outer Continental Shelf (OCS) Oil and Gas Supply Model, Volume 1, Model Summary and Methodology Description*, DOE/EIA-0372/1, U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy, *The Petroleum Resources of Mexico*, DOE/EIA-0423, U.S. Energy Information Administration, Washington, DC, 1983.

U.S. Department of Energy. 1991. *Recommended Design for the National Energy Modeling System*, U.S. Energy Information Administration, NEMS Project Office, Washington, DC.

U.S. Department of Energy. 1986. *An Economic Analysis of Natural Gas Resources and Supply*, DOE/EIA-0481, U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1987. *Potential Oil Production from the Coastal Plain of the Arctic National Wildlife Refuge*. SR/RNGD/87-01. U.S. Energy Information Administration. Washington, DC.

U.S. Department of Energy, 1988, *An Assessment of the Natural Gas Resource Base of the United States*, DOE/W/31109-H1, Office of Policy, Planning & Analysis, Washington, DC.

U.S. Department of Energy, *International Energy Annual 1988*, DOE/EIA-0219(88), U.S. Energy Information Administration, Washington, DC, 1988a.

U.S. Department of Energy, *Natural Gas Annual 1988*, DOE/EIA-0131(88), U.S. Energy Information Administration, Washington, DC, 1988a.

U.S. Department of Energy, *Assessment of Costs and Benefits of Flexible and Alternative Fuel Use in the U.S. Transportation Sector; Technical Report Three: Methanol Production and Transportation Costs*, DOE/PE-0093 Office of Policy Planning and Analysis, November 1989.

U.S. Department Of Energy. 1989. *Abandonment Rates of the Known Domestic Oil Resource*, DOE/BC--89/6/SP, Bartlesville Project Office, Bartlesville, Oklahoma.

U.S. Department of Energy. 1989. *An Examination of Domestic Natural Gas Resource Estimates*, SR/RNGD/89-01, U.S. U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1989. *Federal Oil Research: A Strategy for Maximizing the Producibility of Known U.S. Oil*, DOE/FE-0139, Office of Fossil Energy, Washington, D.C.

U.S. Department of Energy. 1989a. *Annual Energy Review*, DOE/EIA-0384(89), U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1990. *The Domestic Oil and Gas Recoverable Resource Base: Supporting Analysis for the National Energy Strategy*, SR/NES/90-05, U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1990. *United States Crude Oil, Natural Gas, and Natural Gas Liquids Reserves*. DOE/EIA-0216(90). U.S. Energy Information Administration. Washington, DC.

U.S. Department of Energy, *Development Costs of Undeveloped Non-associated Gas Reserves in Selected Countries,* Office of Policy Planning and Analysis, 1990.

U.S. Department of Energy, *Quarterly Sales and Prices Report*, Office of Fossil Energy, Office of Fuels Programs, various issues, 1990.

U.S. Department of Energy. 1990a. *United States Crude Oil, Natural Gas, and Natural Gas Liquids Reserves*, DOE/EIA-0216(90), U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. May 1991. *Intermediate Future Forecasting System: Executive Summary*, DOE/EIA-M023(91) U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1991. *Alaska Oil and Gas Energy Wealth or Vanishing Opportunity?*. DOE/ID/01570-H1. Office of Fossil Energy. Washington, DC.

U.S. Department of Energy. 1991. *The Outlook for Natural Gas Imports: Supporting Analysis for the National Energy Strategy*, SR/NES/90-06, U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. April 1992. *Model Methodology and Data Description of the Production of Onshore Lower 48 Oil and Gas Model*, U.S. Energy Information Administration, Office of Oil and Gas, Washington, DC.

U.S. Department of Energy. 1994-2010. *Documentation of the Oil and Gas Supply Module (OGSM)*, DOE/EIA-M063, U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1994. *Documentation of the Oil and Gas Supply Module (OGSM), Appendix: Model Developers Report*, U.S. Energy Information Administration, Washington, DC.

U.S. Department of Energy. 1992. Component Design Report - *Basic Framework & Onshore Lower 48 Conventional Oil and Gas Supply*. U.S. Energy Information Administration. Washington, DC.

U.S. Department of Energy. 1992. *Model Methodology and Data Description of the Production of Onshore Lower 48 Oil and Gas Model*, Draft Report, U.S. Energy Information Administration, Washington, DC.

U.S. Department of the Interior, 1981, *Estimates of Undiscovered Recoverable Conventional Resources of Oil and Gas in the United States*, United States Geological Survey Circular 860, United States Geological Survey, Reston, Virginia.

U.S. Department of the Interior, 1987, *Economics of Oil and Gas Production from ANWR for the Determination of Minimum Economic Field Size*, PT-87-015-3120-985, Bureau of Land Management, Division of Mineral Resources, Alaska State Office.

U.S. Department of the Interior, 1988, *National Assessment of Undiscovered Conventional Oil and Gas Resources*, USGS-MMS Working Paper, Open File Report 88-373, United States Geological Survey and Minerals Management Service, Reston, Virginia.

U.S. Department of the Interior, 1989, *Estimates of Undiscovered Conventional Oil and Gas Resources in the United States -- A Part of the Nation's Energy Endowment*, United States Geological Survey and Minerals Management Service, Denver, Colorado.

U.S. Department of the Interior, *Federal Offshore Statistics 1990*, Minerals Management Service (MMS).

U.S. Department of the Interior, *Estimates of Undiscovered, Economically Recoverable Oil & Gas Resources: for the Outer Continental Shelf, Revised as of January 199*5 Minerals Management Service.

U.S. Department of the Interior, February 2006, *Report to Congress: Comprehensive Inventory of U.S. OCS Oil and Natural Gas Resources,* Energy Policy Act of 2005*,* Minerals Management Service.

U.S. Department of the Interior, *Estimates of Undiscovered, Economically Recoverable Oil & Gas Resources: for the Outer Continental Shelf, Revised as of January 1999* Minerals Management Service.

U.S. Department of the Interior, 2008, *Inventory of Onshore Federal Oil and Natural Gas Resources and Restrictions to Their Development*, United States Geological Survey.

U.S. Minerals Management Service. April 1996. *Deepwater Royalty Relief for New Leases: Interim Rule*, 30 CFR Part 260, RIN 1010-AC14, Offshore Minerals Analysis Division.

U.S. Minerals Management Service World Wide Web Page. February 1997. *ADatabase of 899 Producing Oil and Gas Fields in the Gulf of Mexico Outer Continental Shelf@*.

Van Meter, John E. May 1995. *Production Technology: Deciding When To Use A MOPU For Field Development*, Paragon Engineering Services, Oil and Gas Journal.

Van Poollen, H.K. and Associates, Inc. 1978. *Documentation of Input Variables: Northern Alaska Hydrocarbon Model*.

Walls, M.A. 1989. *Forecasting Oil Market Behavior: Rational Expectations Analysis of Price Shocks,* Resources for the Future Discussion Paper EM87-03. Washington.

Walls, Margaret A. October 1990. *Analyzing the Determinants of Offshore Oil and Gas Supply: A Factual and Methodological Assessment*, Final Report Prepared for the Reserves and Natural Gas Division of the U.S. Energy Information Administration under ORNL Subcontract No. 90X-SE635V.

Walls, Margaret A. 1990. *A Survey of Oil and Gas Supply Models*, Draft Report, Resources for the Future, Washington, DC.

Wheatley, Richard. January 20, 1997. *Deepwater, Subsalt Prospects Open New Era for Gulf of Mexico Action*, Oil & Gas Journal.

White, D.A., and Gehman, H.M. 1979. "Methods of Estimating Oil and Gas Resources," *The American Association of Petroleum Geologists Bulletin*, Vol. 63, pages 2183-2192.

White, D.A. 1980. "Assessing Oil and Gas Plays in Facies-Cycle Wedges," *The American Association of Petroleum Geologists Bulletin*, Vol 64, pages 1158-1178.

White, D.A. 1981. "A Play Approach to Hydrocarbon Resource Assessment and Evaluation," in Ramsey, J., ed., *The Economics of Exploration for Energy Resources*, JAI Press, Greenwich.

Williams, M.R. and Atkins, P.A. April 1987. *Simple Subsea Trees for Shallow Water: An Economical Alternative*, Offshore Technology Conference.

Young, J.S. and Hauser, W.S. 1986. *Economics of Oil and Gas for ANWR for the Determination of Minimum Economic Field Size*. Bureau of Land Management. Division of Mineral Resource. Alaska State Office.

Appendix C. Model Abstract

1. Model Name
   Oil and Gas Supply Module

2. Acronym
   OGSM

3. Description
   OGSM projects the following aspects of the crude oil and natural gas supply industry:
   - production
   - reserves
   - drilling activity
   - natural gas imports and exports

4. Purpose
   OGSM is used by the Oil and Gas Division in the Office of Integrated Analysis and Forecasting as an analytic aid to support preparation of projections of reserves and production of crude oil and natural gas at the regional and national level. The annual projections and associated analyses appear in the *Annual Energy Outlook* (DOE/EIA-0383) of the U.S. Energy Information Administration. The projections also are provided as a service to other branches of the U.S. Department of Energy, the Federal Government, and non-Federal public and private institutions concerned with the crude oil and natural gas industry.

5. Date of Last Update
   2010

6. Part of Another Model
   National Energy Modeling System (NEMS)

7. Model Interface References
   Coal Module
   Electricity Module
   Industrial Module
   International Module
   Natural Gas Transportation and Distribution Model (NGTDM)
   Macroeconomic Module
   Petroleum Market Module (PMM)

8. Official Model Representative
   Office: Integrating Analysis and Forecasting
   Division: Oil and Gas Analysis
   Model Contact: Dana Van Wagener
   Telephone: (202) 586-4725

9. Documentation Reference
   U.S. Department of Energy. 2009. *Documentation of the Oil and Gas Supply Module (OGSM)*, DOE/EIA-M063, U.S. Energy Information Administration, Washington, DC.

10. Archive Media and Installation Manual
    NEMS2010

11. Energy Systems Described
    The OGSM projects oil and natural gas production activities for six onshore and three offshore regions as well as three Alaskan regions. Exploratory and developmental drilling activities are treated separately, with exploratory drilling further differentiated as new field wildcats or other exploratory wells. New field wildcats are those wells drilled for a new field on a structure or in an environment never before productive. Other exploratory wells are those drilled in already productive locations. Development wells are primarily within or near proven areas and can result in extensions or revisions. Exploration yields new additions to the stock of reserves, and development determines the rate of production from the stock of known reserves.

12. Coverage
    Geographic: Six Lower 48 onshore supply regions, three Lower 48 offshore regions, and three Alaskan regions.
    Time Units/Frequency: Annually 1990 through 2035
    Product(s): Crude oil and natural gas
    Economic Sector(s): Oil and gas field production activities

13. Model Features
    Model Structure: Modular, containing four major components
    - Onshore Lower 48 Oil and Gas Supply Submodule
    - Offshore Oil and Gas Supply Submodule
    - Alaska Oil and Gas Supply Submodule
    - Oil Shale Supply Submodule

    Modeling Technique: The OGSM is a hybrid econometric/discovery process model. Drilling activities in the United States are projected using the estimated discounted cash flow that measures the expected present value profits for the proposed effort and other key economic variables.
    Special Features: Can run stand-alone or within the NEMS. Integrated NEMS runs employ short-term natural gas supply functions for efficient market equilibration.

14. Non-DOE Input Data
    - Alaskan Oil and Gas Field Size Distributions - U.S. Geological Survey
    - Alaska Facility Cost By Oil Field Size - U.S. Geological Survey
    - Alaska Operating cost - U.S. Geological Survey
    - Basin Differential Prices - Natural Gas Week, Washington, DC
    - State Corporate Tax Rate - Commerce Clearing House, Inc. *State Tax Guide*
    - State Severance Tax Rate - Commerce Clearing House, Inc. *State Tax Guide*
    - Federal Corporate Tax Rate, Royalty Rate - U.S. Tax Code
    - Onshore Drilling Costs - (1.) American Petroleum Institute. *Joint Association Survey of Drilling Costs (1970-2008)*, Washington, D.C.; (2.) Additional unconventional gas recovery drilling and operating cost data from operating companies
    - Offshore Technically Recoverable Oil and Gas Undiscovered Resources - Department of Interior. Minerals Management Service (Correspondence from Gulf of Mexico and Pacific OCS regional offices)
    - Offshore Exploration, Drilling, Platform, and Production Costs - Department of Interior. Minerals Management Service (Correspondence from Gulf of Mexico and Pacific OCS regional offices)
    - Canadian Wells drilled - Canadian Association of Petroleum Producers. *Statistical Handbook*.

- Canadian Recoverable Resource Base - National Energy Board. *Canada's Conventional Natural Gas Resources: A Status Report,* Canada, April 2004.
- Canadian Reserves - Canadian Association of Petroleum Producers. *Statistical Handbook*.
- Unconventional Gas Resource Data - (1) USGS *1995 National Assessment of United States Oil and Natural Gas Resources*; (2) Additional unconventional gas data from operating companies
- Unconventional Gas Technology Parameters - (1) Advanced Resources International Internal studies; (2) Data gathered from operating companies

15. DOE Input Data
    - Onshore Lease Equipment Cost – U.S. Energy Information Administration. *Costs and Indexes for Domestic Oil and Gas Field Equipment and Production Operations (1980 - 2008)*, DOE/EIA-0815(80-08)
    - Onshore Operating Cost – U.S. Energy Information Administration. *Costs and Indexes for Domestic Oil and Gas Field Equipment and Production Operations (1980 - 2008)*, DOE/EIA-0815(80-08)
    - Emissions Factors – U.S. Energy Information Administration
    - Oil and Gas Well Initial Flow Rates – U.S. Energy Information Administration, Office of Oil and Gas
    - Wells Drilled – U.S. Energy Information Administration, Office of Oil and Gas
    - Expected Recovery of Oil and Gas Per Well – U.S. Energy Information Administration, Office of Oil and Gas
    - Oil and Gas Reserves – U.S. Energy Information Administration. *U.S. Crude Oil, Natural Gas, and Natural Gas Liquids Reserves*, (1977-2009), DOE/EIA-0216(77-09)

16. Computing Environment
    - Hardware Used: PC
    - Operating System: Windows 95/Windows NT/Windows XP
    - Language/Software Used: FORTRAN
    - Memory Requirement: Unknown
    - Storage Requirement: Unknown
    - Estimated Run Time: 287 seconds

17. Reviews conducted
    - Independent Expert Review of the Offshore Oil and Gas Supply Submodule - Turkay Ertekin from Pennsylvania State University; Bob Speir of Innovation and Information Consultants, Inc.; and Harry Vidas of Energy and Environmental Analysis , Inc., June 2004
    - Independent Expert Review of the Annual Energy Outlook 2003 - Cutler J. Cleveland and Robert K. Kaufmann of the Center for Energy and Environmental Studies, Boston University; and Harry Vidas of Energy and Environmental Analysis, Inc., June-July 2003
    - Independent Expert Reviews, Model Quality Audit; Unconventional Gas Recovery Supply Submodule - Presentations to Mara Dean (DOE/FE - Pittsburgh) and Ray Boswell (DOE/FE - Morgantown), April 1998 and DOE/FE (Washington, DC)

18. Status of Evaluation Efforts
    Not applicable

19. Bibliography
    See Appendix B of this document.

Appendix D. Output Inventory

Variable Name	Description	Unit	Classification	Passed To Module
OGANGTSMX	Maximum natural gas flow through ANGTS	BCF	NA	NGTDM
OGCCAPPRD	Coalbed Methane production from CCAP		17 OGSM/NGTDM regions	NGTDM
OGCOPRD	Crude production by oil category	MMbbl/day	10 OGSM reporting regions	Industrial
OGCOPRDGOM	Gulf of Mexico crude oil production	MMbbl/day	Shallow and deep water regions	Industrial
OGCOWHP	Crude wellhead price by oil category	87$/bbl	10 OGSM reporting regions	Industrial
OGCNQPRD	Canadian production of oil and gas	oil: MMB gas: BCF	Fuel (oil, gas)	NGTDM
OGCNPPRD	Canadian price of oil and gas	oil:87$/ bbl gas:87$/ BCF	Fuel (oil, gas)	NGTDM
OGCORSV	Crude reserves by oil category	Bbbl	5 crude production categories	Industrial
OGCRDSHR	Crude oil shares by OGSM region and crude type	percent	7 OLOGSS regions	PMM
OGDNGPRD	Dry gas production	BCF	57 Lower 48 onshore & 6 Lower 48 offshore districts	PMM
OGELSCO	Oil production elasticity	fraction	6 Lower 48 onshore & 3 Lower 48 offshore regions	PMM
OGELSHALE	Electricity consumed	Trillion Btu	NA	Industrial
OGELSNGOF	Offshore nonassociated dry gas production elasticity	fraction	3 Lower 48 offshore regions	NGTDM
OGELSNGON	Onshore nonassociated dry gas production elasticity	fraction	17 OGSM/NGTDM regions	NGTDM
OGEORFTDRL	Total footage drilled from CO2 projects	feet	7 OLOGSS regions 13 CO2 sources	Industrial
OGEORINJWLS	Number of injector wells from CO2 projects	wells	7 OLOGSS regions 13 CO2 sources	Industrial
OGEORNEWWLS	Number of new wells drilled from CO2 projects	wells	7 OLOGSS regions 13 CO2 sources	Industrial
OGEORPRD	EOR production from CO2 projects	Mbbl	7 OLOGSS regions 13 CO2 sources	Industrial
OGEORPRDWLS	Number of producing wells from CO2 projects	wells	7 OLOGSS regions 13 CO2 sources	Industrial
OGEOYAD	Unproved Associated-Dissolved gas resources	TCF	6 Lower 48 onshore regions	Industrial
OGEOYRSVON	Lower 48 Onshore proved reserves by gas category	TCF	6 Lower 48 onshore regions 5 gas categories	Industrial
OGEOYINF	Inferred oil and conventional NA gas reserves	Oil: Bbbl Gas: TCF	6 Lower 48 onshore & 3 Lower 48 offshore regions	Industrial

Variable Name	Description	Unit	Classification	Passed To Module
OGEOYRSV	Proved Crude oil and natural gas reserves	Oil: Bbbl Gas: TCF	6 Lower 48 onshore & 3 Lower 48 offshore regions	Industrial
OGEOYUGR	Technically recoverable unconventional gas resources	TCF	6 Lower 48 onshore & 3 Lower 48 offshore regions	Industrial
OGEOYURR	Undiscovered technically recoverable oil and conventional NA gas resources	Oil: Bbbl Gas: TCF	6 Lower 48 onshore & 3 Lower 48 offshore regions	Industrial
OGGROWFAC	Factor to reflect expected future cons growth		NA	NGTDM
OGJOBS			NA	Macro
OGNGLAK	Natural Gas Liquids from Alaska	Mbbl/day	NA	PMM
OGNGPRD	Natural Gas production by gas category	TCF	10 OGSM reporting regions	Industrial
OGNGPRDGOM	Gulf of Mexico Natural Gas production	TCF	Shallow and deep water regions	Industrial
OGNGRSV	Natural gas reserves by gas category	TCF	12 oil and gas categories	Industrial
OGNGWHP	Natural gas wellhead price by gas category	87$/MCF	10 OGSM reporting regions	Industrial
OGNOWELL	Wells completed	wells	NA	Industrial
OGPCRWHP	Crude average wellhead price	87$/bbl	NA	Industrial
OGPNGEXP	NG export price by border	87$/MCF	26 Natural Gas border crossings	NGTDM
OGPNGWHP	Natural gas average wellhead price	87$/MCF	NA	Industrial
OGPPNGIMP	NG import price by border	87$/MCF	26 Natural Gas border crossings	NGTDM
OGPRCEXP	Adjusted price to reflect different expectation		NA	NGTDM
OGPRCOAK	Alaskan crude oil production	Mbbl	3 Alaska regions	NGTDM
OGPRDADOF	Offshore AD gas production	BCF	3 Lower 48 offshore regions	NGTDM
OGPRDADON	Onshore AD gas production	BCF	17 OGSM/NGTDM regions	NGTDM
OGPRDUGR	Lower 48 unconventional natural gas production	BCF	6 Lower 48 regions and 3 unconventional gas types	NGTDM
OGPRRCAN	Canadian P/R ratio	fraction	Fuels (oil, gas)	NGTDM
OGPRRCO	Oil P/R ratio	fraction	6 Lower 48 onshore & 3 Lower 48 offshore regions	PMM
OGPRRNGOF	Offshore nonassociated dry gas P/R ratio	fraction	3 Lower 48 offshore regions	NGTDM
OGPRRNGON	Onshore nonassociated dry gas P/R ratio	fraction	17 OGSM/NGTDM regions	NGTDM
OGQANGTS	Gas flow at U.S. border from ANGTS	BCF	NA	NGTDM
OGQCRREP	Crude production by oil category	MMbbl	5 crude production categories	PMM
OGQCRRSV	Crude reserves	Bbbl	NA	Industrial
OGQNGEXP	Natural gas exports	BCF	6 US/Canada & 3 US/Mexico border crossings	NGTDM

Variable Name	Description	Unit	Classification	Passed To Module
OGQNGIMP	Natural gas imports	BCF	3 US/Mexico border crossings; 4 LNG terminals	NGTDM
OGQNGREP	Natural gas production by gas category	TCF	12 oil and gas categories	NGTDM
OGQNGRSV	Natural gas reserves	TCF	NA	Industrial
OGRADNGOF	Non Associated dry gas reserve additions, offshore	BCF	3 Lower 48 offshore regions	NGTDM
OGRADNGON	Non Associated dry gas reserve additions, onshore	BCF	17 OGSM/NGTDM regions	NGTDM
OGRESCAN	Canadian end-of-year reserves	oil: MMB gas: BCF	Fuel (oil, gas)	NGTDM
OGRESCO	Oil reserves	MMB	6 Lower 48 onshore & 3 Lower 48 offshore regions	PMM
OGRESNGOF	Offshore nonassociated dry gas reserves	BCF	3 Lower 48 offshore regions	NGTDM
OGRESNGON	Onshore nonassociated dry gas reserves	BCF	17 OGSM/NGTDM regions	NGTDM
OGSHALENG	Gas produced	BCF	NA	NGTDM
OGTAXPREM	Canadian tax premium	oil: MMB gas: BCF	Fuel (oil, gas)	NGTDM
OGTECHON	Technology factors	BCF	3 cost categories, 6 fuel types	Industrial
OGWPTDM	Natural Gas wellhead price	87$/MCF	17 OGSM/NGTDM regions	NGTDM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

CP13-25
CP13-27

ORIGINAL

March 3, 2014

Kimberly D. Bose,
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 204268

RE: Cameron LNG, LLC and Cameron Interstate Pipeline Draft Environmental Impact Statement (DEIS)

Dear Ms. Bose:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) prepared by the Federal Energy Regulatory Commission (FERC) for the Cameron Liquefaction Project (Project), proposed by Cameron LNG, LLC and Cameron Interstate Pipeline, LLC (collectively Cameron). Cameron requests authorization to export 12 million tons of liquefied natural gas (LNG) per year from its terminal in Cameron and Calcasieu Parishes, Louisiana.

Based on our review, we have rated the DEIS as "Environmental Concerns - Insufficient Information" (EC-2); additional information on EPA's rating system can be found at http://www.epa.gov/compliance/nepa/comments/ratings.html. We have enclosed detailed comments that identify our concerns and recommendations for additional analysis for the Final EIS (FEIS).

EPA appreciates the opportunity to review the DEIS. Please send our office one copy of the FEIS when it is filed using our *e-NEPA Electronic Filing System* at http://www.epa.gov/compliance/nepa/submiteis/index.html. Please note that a copy of this letter will be published on our website, http://www.epa.gov/compliance/nepa/eisdata.html, in order to fulfill our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, please contact Rhonda Smith or Michael Jansky of my staff at (214) 665-8006 or (214) 665-7438 or via email at smith.rhonda@epa.gov or jansky.michael@epa.gov respectively for assistance.

Sincerely,

Debra A. Griffin
Associate Director
Compliance Assurance and
Enforcement Division

Enclosure

SECRETARY OF THE COMMISSION
2014 MAR 11 P 2:41
FEDERAL ENERGY REGULATORY COMMISSION

DETAILED COMMENTS
ON THE FEDERAL ENERGY REGULATORY COMMISSION
CAMERON LNG, LLC AND CAMERON INTERSTATE PIPELINE, LLC
DRAFT ENVIRONMENTAL IMPACT STATEMENT

BACKGROUND

The Federal Energy Regulatory Commission (FERC) prepared this Draft Environmental Impact Statement (DEIS) to assess the environmental impacts associated with the construction of facilities proposed by Cameron LNG, LLC and Cameron Interstate Pipeline, LLC. This project is referred to as the Cameron Liquefaction Project (Project) and consists of the Cameron LNG Terminal Expansion (Terminal Expansion) and the Cameron Pipeline Expansion (Pipeline Expansion).

Cameron proposes to construct and operate onshore natural gas liquefaction and associated facilities to allow the export of liquefied natural gas (LNG), and to construct, own, operate, and maintain a new interstate natural gas pipeline, compressor station, and ancillary facilities in Louisiana.

PROPOSED ACTION

According to Cameron, the Project would transport and liquefy domestic natural gas into LNG for export, and deliver competitively-priced LNG to foreign markets. Cameron designed its project to meet each of the following purposes:

- enable bi-directional flow of natural gas along the Cameron Interstate Pipeline system and allow natural gas to be received from five pipeline interconnections;
- allow natural gas to be received by pipeline at the expanded LNG Terminal that would be treated, liquefied, stored, and loaded from LNG storage tanks into vessels berthed at the terminal's existing marine facility;
- preserve the import and re-gasification capabilities of the Cameron LNG Terminal; and
- preserve export capability of foreign-sourced LNG at the Cameron LNG Terminal.

Terminal Expansion

Cameron LNG would construct the Terminal Expansion on a 502-acre site between Louisiana State Highway 27 (LA-27) and the Calcasieu Ship Channel, about 2 miles north of the community of Hackberry, Louisiana. The proposed site is north of and partially within the existing terminal fence line in Cameron and Calcasieu Parishes, Louisiana. The Terminal Expansion would include the following key facilities:

- three separate systems that liquefy natural gas, each capable of producing 4 million metric tons per year of LNG for export;
- a 160,000-cubic-meter, full-containment LNG storage tank;
- refrigerant make-up and condensate product storage tanks;

- a truck loading/unloading area;
- a marine work dock for delivery of equipment and construction materials;
- utilities and associated systems; and
- minor modifications to existing terminal facilities.

Pipeline Expansion

Cameron proposes to construct and operate about 21 miles of 42-inch-diameter pipeline, a compressor station (Holbrook Compressor Station) totaling about 56,820 horsepower, and associated facilities in Cameron, Calcasieu, and Beauregard Parishes, Louisiana. The pipeline would extend from an existing Cameron Interstate Pipeline interconnection at the Florida Gas Transmission (FGT) pipeline to a new interconnection with Trunkline Gas Pipeline (Trunkline). Cameron would construct and operate a new interconnection with Trunkline; modify existing interconnections and metering facilities with the Transcontinental Gas Pipeline Corporation, Texas Eastern Transmission Company, FGT, and Tennessee Gas Pipeline systems; and construct and operate associated facilities, including metering facilities, pig receivers and launchers,[2] and mainline valves.

COMMENTS

The following comments are offered for FERC's consideration in preparation of the Final EIS (FEIS).

Environmental Justice

While EPA recognizes that FERC is not one of the agencies specified in Executive Order 12898 - Environmental Justice for Low Income and Minority Populations, we appreciate that it is FERC's practice to address environmental justice in its NEPA documents. In this case, however, the DEIS does not provide any analysis to determine whether there are potentially affected low-income or minority populations, and consequently, there is no information provided to determine whether there may be disproportionate high and adverse human health or environmental effects on minority or low-income populations as result of the proposed action.

Recommendation:

EPA recommends that the Final EIS (FEIS) analyze the potential for environmental justice issues, using the methods outlined in the Council on Environmental Quality's guidance ("Environmental Justice: Guidance under the National Environmental Policy Act," December 1977), available at http://energy.gov/nepa/downloads/environmental-justice-guidance-under-nepa. The FEIS should determine whether minority and low-income populations are present that have the potential to be affected by the proposed project. As part of that analysis, for example, we recommend that the FEIS include a comparison of the demographics of the project area and suitable reference areas, like Cameron, Calcasieu and Beauregard Parishes. If potential environmental justice populations are identified, then the FEIS should determine whether there may be

disproportionate high and adverse human health or environmental impacts on these populations, and measures to address those impacts should be considered.

Air Quality

PM_{10} Emissions and Fugitive Dust Control

EPA believes it is especially important that mitigation measures include the use of best management practices for PM_{10} and fugitive dust control (e.g., gravel roads, soil wetting practices, limiting access, traffic and speed reduction). In order to further reduce potential air quality impacts, the FEIS should include a detailed Construction Emissions Mitigation Plan or more fully discuss how the existing Fugitive Dust Control Plan for construction of the project is sufficient.

Section 4.11.1 – Air Quality, Pages 4-121 and 4-122:

This section states that once the construction phase in completed, the fugitive dust and emissions would subside and would be limited. Additionally, the section states that mitigation measures employed by Cameron LNG would meet all Louisiana Department of Environmental Quality (LDEQ) requirements for construction-related vehicle exhaust emissions. EPA recommends that, in addition to all applicable local, state, or federal requirements, the following mitigation measures be included (as applicable) in a construction emissions mitigation plan or similar document in order to reduce air quality impacts associated with emissions of NOx, CO, CO_2, PM, SO_2, and other pollutants from construction-related activities:

The FEIS should more fully discuss specific actions including dust ordinances on the parish level, educational outreach tools, and tools to minimize the residents' exposure to PM_{10}, as applicable. In addition to measures included in the DEIS and all applicable local, state, or federal requirements, the EPA recommends that the following mitigation measures (as applicable) be included in the Plan in order to reduce impacts associated with emissions of PM, and other pollutants from any planned structural and non-structural activities, and possible future modifications to the roadway system:

Recommendations:

- Construction Emissions Mitigation Plan – The FEIS should include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the Record of Decision. In addition to all applicable local, state, or federal requirements, we recommend the following control measures (Fugitive Dust, Mobile and Stationary Source and Administrative) be included (as applicable) in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other pollutants from construction-related activities:
    - Fugitive Dust Source Controls: The FEIS should identify the need for a Fugitive Dust Control Plan to reduce Particulate Matter 10 and Fine

Particulate Matter 2.5 emissions during construction and operations. We recommend that the plan include these general commitments:

- Stabilize heavily used unpaved construction roads with a non toxic soil stabilizer or soil weighting agent that will not result in loss of vegetation, or increase other environmental impacts.
- During grading, use water, as necessary, on disturbed areas in construction sites to control visible plumes.
- Vehicle Speed
    - Limit speeds to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
    - Limit speeds to 10 miles per hour or less on unpaved areas within construction sites on un-stabilized (and unpaved) roads.
    - Post visible speed limit signs at construction site entrances.
- Inspect and wash construction equipment vehicle tires, as necessary, so they are free of dirt before entering paved roadways, if applicable.
- Provide gravel ramps of at least 20 feet in length at tire washing/cleaning stations, and ensure construction vehicles exit construction sites through treated entrance roadways, unless an alternative route has been approved by appropriate lead agencies, if applicable.
- Use sandbags or equivalent effective measures to prevent run off to roadways in construction areas adjacent to paved roadways. Ensure consistency with the project's Storm Water Pollution Prevention Plan, if such a plan is required for the project.
- Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas whenever dirt or runoff from construction activity is visible on paved roads, or at least twice daily (less during periods of precipitation).
- Stabilize disturbed soils (after active construction activities are completed) with a non toxic soil stabilizer, soil weighting agent, or other approved soil stabilizing method.
- Cover or treat soil storage piles with appropriate dust suppressant compounds and disturbed areas that remain inactive for longer than 10 days. Provide vehicles (used to transport solid bulk material on public roadways and that have potential to cause visible emissions) with covers. Alternatively, sufficiently wet and load materials onto the trucks in a manner to provide at least one foot of freeboard.
- Use wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) where soils are disturbed in construction, access and maintenance routes, and materials stock pile areas. Keep related windbreaks in place until the soil is stabilized or permanently covered with vegetation.

- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal[1] or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be
- used for project construction equipment to the maximum extent feasible.
- Where Tier 4 engines are not available, use construction diesel engines with a rating of 50 hp or higher that meet, at a minimum, the Tier 3 Ignition Engines[2], unless such engines are not available.
- Where Tier 3 engine is not available for off road equipment larger than 100 hp, use a Tier 2 engine, or an engine equipped with retrofit controls to reduce
- exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 2 levels.
- Consider using electric vehicles, natural gas, biodiesel, or other alternative fuels during construction and operation phases to reduce the project's criteria and greenhouse gas emissions.
- Plan construction scheduling to minimize vehicle trips.
- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed.

  - Administrative controls:

    - Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips.
    - Identify any sensitive receptors in the project area, such as children, elderly, and the infirm, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).
    - Include provisions for monitoring fugitive dust in the fugitive dust control plan and initiate increased mitigation measures to abate any visible dust plumes.

Greenhouse Gas (GHG) Emissions

[1] EPA's website for nonroad mobile sources is http://www.epa.gov/nonroad/.

The DEIS provides information on the potential greenhouse gas emissions associated with the terminal and pipeline expansion. However, the DEIS does not provide an assessment of the lifecycle GHG emissions associated with the proposed action.

Recommendation:

We recommend that FERC establish reasonable spatial and temporal boundaries for the analysis of GHG emissions, and that the FEIS quantify and consider the lifecycle GHG emissions associated with the proposed action. The methodologies for conducting that analysis are available and well developed; FERC could draw on good examples of lifecycle GHG emissions done in NEPA analyses by other federal agencies.

Indirect Effects

In addition to considering the direct impacts of a proposed action, NEPA requires that agencies also consider indirect effects where there is a reasonably close causal relationship between the action and the environmental effect. With regard to LNG export terminals, we note that the Energy Information Administration's overall analysis of natural gas exports found that natural gas markets in the US balance in response to increased natural gas exports largely through increased natural gas production (http://energy.gov/fe/services/natural-gas-regulation/lng-export-study). However, the DEIS does not consider the potential for increased natural gas production as a result of the proposed export terminal, or the potential for environmental impacts associated with potential increases in natural gas production.

Recommendation:

We recommend the FEIS consider the extent to which implementation of the proposed project could increase the demand for domestic natural gas extraction, as well as potential environmental impacts associated with the potential increased production of natural gas.

Wetlands

<u>Jurisdictional Wetlands</u>

The DEIS states that 99.2 acres of wetlands on the site are jurisdictional under the Clean Water Act Section 404. However, a revised Jurisdictional Determination (JD) for the terminal site was issued by the U.S. Army Corps of Engineers New Orleans District on December 31, 2013. According to the revised JD, there are 335 acres of jurisdictional wetlands located on the property. Construction would impact approximately 213.5 acres of jurisdictional wetlands.

Recommendation:

The FEIS should be revised to accurately quantify the impacts to jurisdictional wetlands and waters of the U.S.

Compensatory Mitigation for Wetland Impacts

Cameron LNG has proposed to mitigate for impacts to wetlands by using dredged material generated by construction of the work dock and maintenance dredging at the existing terminal berthing area to fill shallow open water and create tidal emergent marsh habitat. The DEIS states that approximately 129 acres of open water would be converted to marsh habitat as compensatory mitigation for 99.2 acres of wetland impacts.

Recommendations:

The FEIS should include a mitigation plan for all impacts to jurisdictional wetlands.

EPA requests that the FEIS include a map that identifies proposed mitigation areas, and cross-sections and target elevations for the created tidal marsh based on adjacent healthy reference marsh.

The FEIS should include a mitigation work plan and construction schedule, performance standards, monitoring and reporting plan, long-term and adaptive management plans, and long-term protection measures and financial assurances for this project.

EPA suggests that a wetland functional assessment be performed for both the impact and mitigation sites to determine that the proposed project would not result in a net loss of wetland functions in the project watershed.

EPA suggests that mitigation be conducted prior to or concurrently with the project impacts to reduce temporal loss of wetland functions.

Document Content(s)

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FEDERAL ENERGY REGULATORY COMMISSION

April 4, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

ORIGINAL

Subject: Detailed Scoping Comments for Preparing an Environmental Impact Statement (EIS) for the Proposed Excelerate Liquefaction Solutions, LLC and Lavaca Bay Pipeline System, LLC, Liquefied Natural Gas (LNG) Export Project, located in Calhoun and Jackson Counties, Texas

Dear Ms. Bose:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the March 12, 2013, NOI to prepare an EIS for the proposed Excelerate Liquefaction Solutions, LLC and Lavaca Bay Pipeline System, LLC, LNG Export Project, located in Calhoun and Jackson counties, Texas. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

To assist in the scoping process for this project, we have identified several issues for your attention in the preparation of the EIS and enclosed detailed scoping comments for your consideration. EPA is most concerned about the following issues: mitigation, alternative development, impacts to water and biological resources, invasive species management, habitat protection, air quality, Greenhouse Gas (GHG) and National Pollutant Discharge Elimination System (NPDES) permitting, cumulative impacts, climate change, and environmental justice.

We appreciate the opportunity to review this NOI and are available to discuss our comments. Please send one hard copy of the Draft EIS and four CD ROM copies to this office when completed and submitted for public comment. If you have any questions, please contact Rhonda Smith or Michael Jansky of my staff at (214) 665-8006 or (214) 665-7451; or by e-mail at smith.rhonda@epa.gov or jansky.michael@epa.gov, respectively. You may now electronically file you EIS using our *e-NEPA Electronic Filing* by linking to EPA's web site at http://www.epa.gov/compliance/nepa/submiteis/index.html.

Sincerely,

Debra A. Griffin
Associate Director
Compliance Assurance and
Enforcement Division

Enclosure

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DETAILED SCOPING COMMENTS
ON THE
NOTICE OF INTENT (NOI)
FOR THE FEDERAL ENERGY REGULATORY COMMISSION (FERC)
TO PREPARE AN
ENVIRONMENTAL IMPACT STATEMENT (EIS)
FOR THE PROPOSED
EXCELERATE LIQUEFACTION SOLUTIONS (ELS)
LAVACA BAY PIPELINE SYSTEM
CALHOUN AND JACKSON COUNTIES, TEXAS

Proposed Action

In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, the Federal Energy and Regulatory Commission (FERC) intends to prepare an Environmental Impact Statement (EIS) analyzing the impacts of the proposed Excelerate Liquefaction Solutions, LLC and Lavaca Bay Pipeline System, LLC, Liquefied Natural Gas (LNG) Export Project located in Calhoun and Jackson counties, Texas. This EIS will be used by FERC in its decision making process to determine whether the project is in the public interest. FERC will serve as the lead Federal agency under the NEPA process and is responsible for the preparation of the EIS.

Project Components

ELS plans to develop, construct, and operate LNG terminal facilities that include two purpose-built floating liquefaction, storage, and offloading units (FLSOs) and a 29-mile long pipeline header system to transport natural gas from existing pipeline systems to the LNG terminal facilities. The project would be constructed in two phases:

Phase 1 would include a single FLSO with a storage capacity of about 250,000 cubic meters (m3) of LNG and the capacity to produce up to four million tons per annum (MTPA), nominally of natural gas. Phase 2 would include facilities to support a second FLSO that would double the production to eight MTPA, nominally.

The Lavaca Bay LNG Project would consist of the following facilities:

- Two double-hulled, permanently moored, FLSOs, each containing 10 LNG storage tanks, four 1 MTPA system trains for liquefaction, centrifugal refrigerant compressors, and associated infrastructure;

- Mooring structures and fenders to provide support for the FLSOs and LNG carriers;

- A new 2,218-foot-diameter turning basin dredged to a depth of 45.5 feet below the site datum located adjacent to the existing Matagorda Ship Channel;

- Two berthing pockets each 450 feet wide by 1,310 feet long dredged to a depth of 60.5 feet below the site datum; and

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• A 3,200-foot-long jetty with two reinforced concrete decked piers located adjacent to the turning basins. ELS would deepen and widen the Matagorda Ship Channel to a depth of 44 feet mean low tide and a channel bottom width up to 300 feet.

• A pig 1 launcher and receiver;

• Feed gas metering, compression, and pre-treatment;

• An inlet bulk separator;

• A condensate storage tank;

• A power generation system;

• A cooling water system and instrument air package;

• A cold vent/ground flare;

• A fire water system and water treatment plant; and

• Support buildings, including offices, control room, warehouse, and shop.

• A 29-mile-long, 42-inch-diameter natural gas pipeline extending northward from the shore side facilities to nine natural gas interconnects southwest of Edna, Texas.

The planned LNG terminal facilities (i.e., marine and shore side facilities) would be constructed on about 85 acres of land. Of this amount, about 45 acres includes existing uplands and the remaining 40 acres would be created using dredge spoil from construction of the turning basin and two berthing pockets. Construction of the pipeline header system would require about 327 acres of land for construction and 164 acres for operation. The Project would also require approximately 150 additional acres for temporary use for construction laydown/staging areas and parking areas.

The following detailed comments are offered for your consideration and incorporation into your Draft EIS (DEIS).

DETAILED COMMENTS

Statement of Purpose and Need

The DEIS should clearly identify the underlying purpose and need to which the FERC is responding in proposing the alternatives (40 CFR 1502.13). The purpose of the proposed action is typically the specific objectives of the activity, while the need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.

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Recommendation:
The purpose and need should be a clear, objective statement of the rationale for the proposed project. The DEIS should discuss the proposed project in the context of the LNG supply and the need for an additional export capabilities.

Alternatives Analysis

The National Environmental Policy Act (NEPA) requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency (40 CFR Section 1502.14(c)). A robust range of alternatives will include options for avoiding significant environmental impacts. The DEIS should provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail.

The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14). The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of bay bottom impacted, tons per year of emissions produced).

Recommendations:

The DEIS should describe how each alternative was developed, how it addresses each project objective, and how it will be implemented. The alternatives analysis should include a discussion of alternatives. The DEIS should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. The DEIS should describe the methodology and criteria used for determining project siting. Thresholds of significance should be determined by considering the context and intensity of an action and its effects (40 CFR 1508.27).

Water Supply and Water Quality

Public drinking water supplies and/or their source areas often exist in many watersheds. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act require federal agencies to protect sources of drinking water for communities. The DEIS should address the potential effects of project discharges, if any, on surface water quality. Specific discharges should be identified and potential effects of discharges on designated beneficial uses of affected waters should be analyzed.

Recommendations:

The DEIS should address the potential effects of project discharges, if any, on surface water quality. Specific discharges should be identified and potential effects of discharges on designated beneficial uses of affected waters should be analyzed.

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The DEIS should describe water reliability for the proposed project and clarify how existing and/or proposed sources may be affected by climate change. At a minimum, the EPA expects a qualitative discussion of impacts to water supply and the adaptability of the project to these changes.

Stormwater Considerations

The DEIS should describe the original (natural) drainage patterns in the project locale, as well as the drainage patterns of the area during project operations. Also, the DEIS should identify whether any components of the proposed project are within a 50 or 100-year floodplain. The DEIS should note that, under the Federal Clean Water Act, any construction project disturbing a land area of one or more acres requires a construction stormwater discharge permit.

Recommendations:

The DEIS should document the project's consistency with applicable stormwater permitting requirements. Requirements of a stormwater pollution prevention plan should be reflected as appropriate in the DEIS.

The DEIS should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality and aquatic resources.

Geographic Extent of Waters of the United States

The project applicant should coordinate with the U.S. Army Corps of Engineers to determine if the proposed project requires a Section 404 permit under the Clean Water Act (CWA). Section 404 regulates the discharge of dredged or fill material into waters of the United States (WUS), including wetlands and other *special aquatic sites*.

EPA recommends that FERC include a jurisdictional delineation for all WUS, including ephemeral drainages, in accordance with the 1987 *Corps of Engineers Wetlands Delineation Manual* and the December 2006 *Atlantic and Gulf Coast Region Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual:* A jurisdictional delineation will confirm the presence or absence of WUS in the project area and help determine whether or not the proposed project would require a Section 404 permit.

If a permit is required, the EPA will review the project for compliance with *Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials* (40 CFR 230), promulgated pursuant to Section 404(b)(1) of the CWA. Pursuant to 40 CFR 230, any permitted discharge into WUS must be the *least environmentally damaging practicable alternative* available to achieve the project purpose. The DEIS should include an evaluation of the project alternatives in this context in order to demonstrate the project's compliance with the 404(b)(1) Guidelines. If, under the proposed project, dredged or fill material would be discharged into WUS, the DEIS should discuss alternatives to avoid those discharges.

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Recommendation:

The FERC should consult with the USACE to determine if there are jurisdictional waters of the U.S. present at the project site. If jurisdictional WUS are determined to be on the project site, the DEIS should include a final determination of the extent of WUS at the project site and address any other relevant requirements, pursuant to the CWA Section 404 (b)(1).

Clean Water Act (CWA) Section 303(d)

The CWA requires States to develop a list of impaired waters that do not meet water quality standards, establish priority rankings, and develop action plans, called Total Maximum Daily Loads (TMDL), to improve water quality. The DEIS should provide information on CWA Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise TMDLs. The DEIS should describe existing restoration and enhancement efforts for those waters, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

Recommendation:

The DEIS should provide information on CWA Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise TMDLs. The DEIS should describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

Biological Resources, Habitat and Wildlife

The DEIS should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area, including any areas. The DEIS should identify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and describe possible mitigation for each of the species. EPA recommends that the FERC consultation with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) under Section 7 of the Endangered Species Act include consideration of all impacts related to EPA's Greenhouse Gas (GHG) Prevention of Significant Deterioration (PSD) permitting action and/or National Pollutant Discharge Elimination System (NPDES) permitting actions. We also recommend that the FERC coordinate across field offices and with USFWS, NMFS, and the Texas Parks and Wildlife Department (TPWD) to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts.

Recommendations:

EPA recommends that FERC coordinate across field offices and with the USFWS,

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NMFS and TPWD to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts.

Analysis of impacts and mitigation on covered species should include:

- Baseline conditions of habitats and populations of the covered species.
- A clear description of how avoidance, mitigation and conservation measures will protect and encourage the recovery of the covered species and their habitats in the project area.
- Monitoring, reporting and adaptive management efforts to ensure species and habitat conservation effectiveness.
- A discussion of how the projects potential impacts such as air emissions and/or wasterwater discharges may impact species.

If the applicant is to acquire compensation lands, the location(s) and management plans for these lands should be discussed in the DEIS.

Recommendations:

Incorporate, into the DEIS, information on the compensatory mitigation proposals (including quantification of acreages, estimates of species protected, costs to acquire compensatory lands, etc.) for unavoidable impacts to WUS and biological resources.

Identify compensatory mitigation lands or quantify, in the DEIS, available lands for compensatory habitat mitigation for this project, as well as reasonably foreseeable projects in the area. Specify, in the DEIS, provisions that will ensure habitat selected for compensatory mitigation will be protected in perpetuity.

Incorporate, into the DEIS, mitigation, monitoring, and reporting measures that result from consultation with the USFWS or NMFS that incorporate recently released guidance to avoid and minimize adverse effects to sensitive biological resources.

The DEIS should describe the potential for habitat fragmentation and obstructions for wildlife movement from the construction of this project and other projects in the area.

Discuss the need for monitoring, mitigation, and if applicable, translocation management plans for the sensitive biological resources, approved by the USFWS, NMFS and the biological resource management agencies.

EPA is also concerned about the potential impact of construction, installation, and maintenance activities (deep trenching, grading, filling, and fencing) on habitat. The DEIS should describe the extent of these activities and the associated impacts on habitat and threatened and endangered species, including all interrelated and interdependent facilities. We encourage habitat conservation alternatives that avoid and protect high value habitat and create or preserve linkages between habitat areas to better conserve the covered species.

Recommendations:

The DEIS should describe the extent of potential impacts from construction, installation, and maintenance activities, including all interrelated and interdependent facilities.

The DEIS should describe the ROW vegetation management techniques to be used and potential associated environmental impacts, especially if mechanical methods or herbicides are to be used.

The DEIS should indicate the location of important marine and wildlife habitat areas. The DEIS should describe what measures will be taken to protect important wildlife habitat areas and to preserve linkages between them.

The DEIS should provide detailed information on any proposed fencing design and placement, and its potential effects on drainage systems on the project site. Fencing proposed for this project should meet appropriate hydrologic, wildlife protection and movement, and security performance standards.

Invasive Species

Human actions are the primary means of invasive species introductions. Pipeline construction causes disturbance of ROW soils and vegetation through the movement of people and vehicles along the ROW, access roads, and lay down areas. These activities can contribute to the spread of invasive species. Parts of plants, seeds, and root stocks can contaminate construction equipment and essentially "seed" invasive species wherever the vehicle travels. Invasive species infestations can also occur during periodic ROW maintenance activities especially if these activities include mowing and clearing of vegetation. Once introduced, invasive species will likely spread and impact adjacent properties with the appropriate habitat.

Executive Order 13112, *Invasive Species* (February 3, 1999), mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. Executive Order 13112 also calls for the restoration of native plants and tree species. If the proposed project will entail new landscaping, the DEIS should describe how the project will meet the requirements of Executive Order 13112.

In addition, we encourage alternative management practices that limit herbicide use (as a last resort), focusing instead on other methods to limit invasive species vegetation and decrease fire risk. Possible alternatives include mowing and weed control fabric, which may need a layer of soil to prevent degradation due to ultraviolet light.

Recommendations:

The DEIS should describe the invasive plant management plan used to monitor and control noxious weeds. If herbicides or pesticides will be used to manage vegetation, the DEIS should disclose the projected quantities and types of chemicals. The invasive plant

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management plan should identify methods that can be used to limit the introduction and spread of invasive species during and post-construction. These measures can include marking and avoidance of invasives, timing construction activities during periods that would minimize their spread, proper cleaning of equipment, and proper disposal of woody material removed from the ROW.

Because construction measures may not be completely effective in controlling the introduction and spread of invasives, the DEIS should describe post-construction activities that will be required such as surveying for invasive species following restoration of the construction site and measures that will be taken if infestations are found.

Air Quality

The DEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS) and non-NAAQS pollutants, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). Such an evaluation is necessary to understand the potential impacts from temporary, long-term, or cumulative degradation of air quality.

The DEIS should describe and estimate air emissions from potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. EPA recommends an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics).

Recommendations:

- *Existing Conditions* – The DEIS should provide a detailed discussion of ambient air conditions, National Ambient Air Quality Standards, and criteria pollutant nonattainment areas in the vicinity of the project.

- *Quantify Emissions* – The DEIS should estimate emissions of criteria and hazardous air pollutants (air toxics) from the proposed project and discuss the timeframe for release of these emissions over the lifespan of the project. The EIS should describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions.

- *Specify Emission Sources* – The DEIS should specify all emission sources by pollutant from mobile sources (on and off-road), stationary sources (including portable and temporary emission units), fugitive emission sources, area sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.

- *Construction Emissions Mitigation Plan* – The DEIS should include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the Record

of Decision. In addition to all applicable local, state, or federal requirements, we recommend the following control measures (Fugitive Dust, Mobile and Stationary Source and Administrative) be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from construction-related activities:

- Fugitive Dust Source Controls: The DEIS should identify the need for a Fugitive Dust Control Plan to reduce Particulate Matter 10 and Fine Particulate Matter 2.5 emissions during construction and operations. We recommend that the plan include these general commitments:
    - Stabilize heavily used unpaved construction roads with a non-toxic soil stabilizer or soil weighting agent that will not result in loss of vegetation, or increase other environmental impacts.
    - During grading, use water, as necessary, on disturbed areas in construction sites to control visible plumes.
    - Vehicle Speed
        - Limit speeds to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
        - Limit speeds to 10 miles per hour or less on unpaved areas within construction sites on un-stabilized (and unpaved) roads.
        - Post visible speed limit signs at construction site entrances.
    - Inspect and wash construction equipment vehicle tires, as necessary, so they are free of dirt before entering paved roadways, if applicable.
    - Provide gravel ramps of at least 20 feet in length at tire washing/cleaning stations, and ensure construction vehicles exit construction sites through treated entrance roadways, unless an alternative route has been approved by appropriate lead agencies, if applicable.
    - Use sandbags or equivalent effective measures to prevent run-off to roadways in construction areas adjacent to paved roadways. Ensure consistency with the project's Storm Water Pollution Prevention Plan, if such a plan is required for the project
    - Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas whenever dirt or runoff from construction activity is visible on paved roads, or at least twice daily (less during periods of precipitation).
    - Stabilize disturbed soils (after active construction activities are completed) with a non-toxic soil stabilizer, soil weighting agent, or other approved soil stabilizing method.
    - Cover or treat soil storage piles with appropriate dust suppressant compounds and disturbed areas that remain inactive for longer than 10 days. Provide vehicles (used to transport solid bulk material on public roadways and that have potential to cause visible emissions) with covers. Alternatively, sufficiently wet and load materials onto the trucks in a manner to provide at least one foot of freeboard.

- Use wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) where soils are disturbed in construction, access and maintenance routes, and materials stock pile areas. Keep related windbreaks in place until the soil is stabilized or permanently covered with vegetation.

- Mobile and Stationary Source Controls:
  - If practicable, lease new, clean equipment meeting the most stringent of applicable Federal[1] or State Standards[2]. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible[3].
  - Where Tier 4 engines are not available, use construction diesel engines with a rating of 50 hp or higher that meet, at a minimum, the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines[4], unless such engines are not available.
  - Where Tier 3 engine is not available for off-road equipment larger than 100 hp, use a Tier 2 engine, or an engine equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 2 levels.
  - Consider using electric vehicles, natural gas, biodiesel, or other alternative fuels during construction and operation phases to reduce the project's criteria and greenhouse gas emissions.
  - Plan construction scheduling to minimize vehicle trips.
  - Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections.
  - Maintain and tune engines per manufacturer's specifications to perform at CARB and/or EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed.

- Administrative controls:
  - Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips.
  - Identify any sensitive receptors in the project area, such as children, elderly, and the infirm, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).

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[1] EPA's website for nonroad mobile sources is http://www.epa.gov/nonroad/.

[2] For California, see ARB emissions standards, see: http://www.arb.ca.gov/msprog/offroad/offroad.htm.

[3] Diesel engines < 25 hp rated power started phasing in Tier 4 Model Years in 2008. Larger Tier 4 diesel engines will be phased in depending on the rated power (e.g., 25 hp - <75 hp: 2013; 75 hp - < 175 hp: 2012-2013; 175 hp - < 750 hp: 2011 - 2013; and ≥ 750 hp 2011- 2015).

- Include provisions for monitoring fugitive dust in the fugitive dust control plan and initiate increased mitigation measures to abate any visible dust plumes.

Climate Change

Scientific evidence supports the concern that continued increases in greenhouse gas emissions resulting from human activities will contribute to climate change. Global warming is caused by emissions of carbon dioxide and other heat-trapping gases. On December 7, 2009, the EPA determined that Greenhouse Gases (GHG)s contribute to air pollution that "endangers public health and welfare" within the meaning of the Clean Air Act. Higher temperatures and increased winter rainfall will be accompanied by a reduction in snow pack, earlier snowmelts, and increased runoff. Some of the impacts, such as reduced groundwater discharge, and more frequent and severe drought conditions, may impact the proposed projects. The DEIS should consider how climate change could potentially influence the proposed project, specifically within sensitive areas, and assess how the projected impacts could be exacerbated by climate change.

Recommendation:

The DEIS should consider how climate change could potentially influence the proposed project, specifically within sensitive areas. Also, the DEIS should assess how the projected impacts could be exacerbated by climate change, and strategies for climate change adaptation planning. For example, measures for climate change adaptation should consider potentially increased drainage needs.

Greenhouse Gas (GHG) Emissions

On February 18, 2010, the CEQ issued draft guidance to Federal Agencies on analyzing the effects of Greenhouse Gas (GHG) emissions and climate change when describing the environmental effects of a proposed agency action in accordance with NEPA CEQ's draft guidance defines GHG emissions in accordance with Section 19(i) of *E.O. 13514 Federal Leadership in Environment, Energy, and Economic Performance (October 5, 2009)* to include carbon dioxide ($C0_2$), methane (CH_4), nitrous oxide (N_20), hydrofluorcarbon (HFCs), perfluorcarbon (PFCs), and sulfurhexafluoride (SF_6). Because CO_2 is the reference gas for climate change based on their potential to absorb heat in the atmosphere, measures of non-$C0_2$ GHGs should be reflected as CO_2-equivalent (COre) values. The EPA supports evaluation and disclosure of GHG emissions and climate change effects resulting from the proposed project during all project phases, including (I) pre-construction (e.g., transportation, mobilization, and staging), (2) construction, (3) operation, (4) maintenance, and (5) decommissioning. We recommend that the GHG emission accounting/inventory include each proposed stationary source (e.g., power plant, liquefaction facility, compressor and metering stations, etc.) and mobile emission source (e.g., heavy equipment, supply barges, rail transports, etc.). We also recommend that the DEIS establish reasonable spatial and temporal boundaries for this analysis, and that the DEIS quantify and disclose the expected annual direct and indirect GHG emissions for the proposed action. In the analysis of direct effects, we recommend that the DEIS quantify cumulative emissions over the life of the project, discuss measures to reduce GHG emissions, including consideration of reasonable alternatives. EPA recommends that the DEIS consider mitigation measures and reasonable alternatives to reduce action related GHG emissions, and include

a discussion of cumulative effects of GHG emissions related to the proposed action.

Recommendation:

EPA recommends that this discussion focus on an assessment of annual and cumulative emissions of the proposed action and the difference in emissions associated with the alternatives. In addition, GHG emission sources in the petroleum and natural gas industry are required to report GHG emissions under 40CFR Part 98 (subpart W), the Greenhouse Gas Reporting Program. Consistent with draft CEQ guidance, we recommend that this information be included in the DEIS for consideration by decision makers and the public. Please see http://www.epa.gov/climatechange/emissions/ghgmlemaking.html.

GHG and NPDES Permitting and Informational Needs

We believe there is a potential that Excelerate's proposed project will require a GHG Prevention of Significant Deterioration (PSD) permit under the Clean Air Act and a National Pollutant Discharge Elimination System (NPDES) permit under the Clean Water Act. The NPDES permitting concern relates to operations and any special construction aspects not associated with stormwater such as needed hydrostatic test discharges for related pipelines and tanks; thermal discharges such as cooling waters impacts to receiving streams and their aquatic communities; and impacts of cooling water intake structures to Essential Fish Habitat (EFH). EPA Region 6 is the permitting authority for these permits in Texas, and we would appreciate the opportunity to meet with FERC staff and the applicant to discuss this permitting issues. If it is ultimately decided that these permits are required, we would like to be a Cooperating Agency with FERC in the preparation of this EIS, and to join with FERC in any consultations regarding compliance with the Endangered Species Act, the National Historic Preservation Act, the Magnuson-Stevens Fishery Conservation and Management Act, and the Coastal Zone Management Act in order to help support our permit decisions.

Hazardous Materials/Hazardous Waste/Solid Waste

The DEIS should address potential direct, indirect and cumulative impacts of hazardous waste from construction and operation of the proposed transmission line and other facilities. The document should identify projected hazardous waste types and volumes, and expected storage, disposal, and management plans. It should address the applicability of state and federal hazardous waste requirements. Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste (i.e., hazardous waste minimization). Alternate industrial processes using less toxic materials should be evaluated as mitigation since such processes could reduce the volume or toxicity of hazardous materials requiring management and disposal as hazardous waste.

Indirect Impacts

Per CEQ regulations at CFR 1508.8(b), the indirect effects analysis "may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." The 2012 report from the Energy Information Administrations states that, "natural gas

markets in the United States balance in response to increased natural gas exports largely through increased natural gas production." That report also notes that about three-quarters of that increased production would be from shale resources. We recommend that FERC consider available information about the extent to which drilling activity might be stimulated by the construction of an LNG export facility on the Gulf coast, and any potential environmental effects associated with that drilling expansion.

Cumulative and Indirect Impacts

The cumulative impacts analysis should identify how resources, ecosystems, and communities in the vicinity of the project have already been, or will be, affected by past, present, or future activities in the project area. These resources should be characterized in terms of their response to change and capacity to withstand stresses. Trends data should be used to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components.

For the cumulative impacts assessment, we recommend focusing on resources of concern or resources that are "at risk" and/or are significantly impacted by the proposed project, before mitigation. For this project, the FERC should conduct a thorough assessment of the cumulative impacts, especially in the context of the other developments occurring and proposed in the area, including pending and proposed projects for which EPA may issue permits.

Recommendations:

The DEIS should consider the cumulative impacts associated with other development projects proposed in the area and the potential impacts on various resources including: air quality, water quality, water supply, threatened and endangered species, and terrestrial and aquatic habitats.

Coordination with Tribal Governments

Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes. If applicable, the DEIS should describe the process and outcome of government-to-government consultation between the FERC and with any and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.

Recommendation:

The DEIS should describe the process and outcome of government-to-government consultation between the FERC and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.

National Historic Preservation Act and Executive Order 13007(NRHA)

Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act. Historic properties under the NHPA are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), Indian tribes, or any other interested party. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800.

Recommendation:

The DEIS should address the existence of cultural and historic resources, including Indian sacred sites, in the project areas, and address compliance with Section 106 of the NHPA. It should also address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how the applicant will avoid adversely affecting the physical integrity, accessibility, or use of sacred sites, if they exist. The DEIS should provide a summary of all coordination with Tribes, the SHPO/THPO, or any other party; and identify all NRHP listed or eligible sites, and the development of a Cultural Resource Management Plan.

Environmental Justice and Impacted Communities

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994) and the Interagency Memorandum of Understanding on Environmental Justice (August 4, 2011) direct federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity to participate in the decision-making process. Guidance[5] by CEQ clarifies the terms low-income and minority population (which includes Native Americans) and describes the factors to consider when evaluating disproportionately high and adverse human health effects. The DEIS should include an evaluation of environmental justice populations within the geographic scope of the projects. Assessment of the projects impact on minority and low-income populations should reflect coordination with those affected populations. The DEIS should also describe outreach conducted to all other communities that could be affected by the project, since rural communities may be among the most vulnerable to health risks associated with the project.

Recommendations:

The DEIS should include an evaluation of environmental justice populations within the geographic scope of the projects. If such populations exist, the DEIS should address the

[5] Environmental Justice Guidance under the National Environmental Policy Act, Appendix A (Guidance for Federal Agencies on Key Terms in Executive Order 12898), CEQ, December 10, 1997.

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potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. Assessment of the projects impact on minority and low-income populations should reflect coordination with those affected populations.

The DEIS should describe outreach conducted to all other communities that could be affected by the project, since rural communities may be among the most vulnerable to health risks associated with the project.

Coordination with Land Use Planning Activities

The DEIS should discuss how the proposed action would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the project areas. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. Proposed plans not yet developed should also be addressed if they have been formally proposed by the appropriate government body in a written form (CEQ's Forty Questions, #23b).

Eminent domain

Because eminent domain laws vary from state to state, and the proposed pipeline will require many acres for easements and ROW, the DEIS should consider eminent domain issues during the evaluation of potential corridors. The findings should be documented in the DEIS.

Recommendations:
EPA recommends that the DEIS discuss the applicable eminent domain authority for the pipeline ROW.

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United States Department of the Interior

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SECRETARY OF THE
COMMISSION
2013 APR -9 P 2:02
FEDERAL ENERGY
REGULATORY COMMISSION

IN REPLY REFER TO
2800 (ORV040)

APR 04 2013

Dear Interested Public:

This courtesy letter provides a Notice of Internet Availability that the Malheur Resource Area, Vale District BLM, has completed an Environmental Assessment (DOI-BLM-OR-V040-2012-015-EA), Finding of No Significant Impact (FONSI) and Decision Record (DR) identifying the proposed construction to realign approximately 1700 feet of Beulah Road (County Road #510), 900 of which is on BLM administered land, 12 miles north of Juntura, OR. The proposed action will be implemented in accordance with and subject to the guiding land use plan - the Southeastern Oregon Resource Management Plan and Final EIS.

The EA, FONSI, and DR can be viewed on the Vale District website at the following location: http://www.blm.gov/or/districts/vale/plans/index.php.

Persons named in the *Copies sent to:* sections of this notification are considered to be persons "named in the decision from which the appeal is taken." Thus, copies of a notice of appeal and petition for a stay must also be served on these parties, in addition to any party who is named elsewhere in the decision (see 43 CFR 4.413(a) & 43 CFR 4.21(b) (3)) and the appropriate Office of the Solicitor (see 43 CFR 4.413(a), (c)) at the same time the original documents are filed with this office. For privacy reasons, if the decision is posted on the internet, the *Copies sent to:* section will be attached to a notification of internet availability and persons named in that section are also considered to be persons "named in the decision from which the appeal is taken."

If you wish to receive hard copies of these documents, or wish to be removed from the mailing list please call the District Office at 541-473-3144.

Sincerely,

Thomas Patrick "Pat" Ryan
Field Manager
Malheur Resource Area

ND

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Secretary of Energy Advisory Board

Shale Gas Production Subcommittee Second Ninety Day Report

November 18, 2011

U.S. DEPARTMENT OF ENERGY

The SEAB Shale Gas Production Subcommittee Second Ninety Day Report – November 18, 2011

Executive Summary

The Shale Gas Subcommittee of the Secretary of Energy Advisory Board is charged with identifying measures that can be taken to reduce the environmental impact and to help assure the safety of shale gas production. Shale gas has become an important part of the nation's energy mix. It has grown rapidly from almost nothing at the beginning of the century to near 30 percent of natural gas production. Americans deserve assurance that the full economic, environmental and energy security benefits of shale gas development will be realized without sacrificing public health, environmental protection and safety. On August 18, 2011 the Subcommittee presented its initial Ninety-Day Report[1] including twenty recommendations that the Subcommittee believes, if implemented, would assure that the nation's considerable shale gas resources are being developed responsibly, in a way that protects human health and the environment and is most beneficial to the nation. The Secretary of Energy's charge to the Subcommittee is included in Annex A and members of the Subcommittee are given in Annex B.

In this report the Subcommittee focuses on implementation of the twenty recommendations presented in its Ninety-day report. The Executive Summary of these recommendations is presented in Annex C.

The Second Ninety-Day Report

The Subcommittee recommendations in its initial report were presented without indicating priority or how each recommendation might be implemented. Progress in achieving the Subcommittee's objective of continuous improvement in reducing the environmental impact of shale gas production depends upon implementation of the Subcommittee recommendation; hence this final report focuses on implementation. On October 31, 2011, the Subcommittee held a public meeting at DOE headquarters in Washington, D.C., to learn the views of the Department of Interior, the Environmental Protection Agency, and the Department of Energy about progress and barriers to implementation of the Subcommittee recommendations.

The Subcommittee is mindful that state and federal regulators and companies are already deeply involved in environmental management. Implementing the twenty Subcommittee recommendations will require a great deal of effort, and regulators, public officials, and companies need to decide how to allocate scarce human and financial resources to each recommendation, potentially shifting effort from other valuable existing activities. All of the Subcommittee recommendations in its Ninety-Day report involve actions by one or more parties: federal officials, state officials, and public and private sector entities.

Two criteria are important in deciding on the allocation: the importance and ease of implementation. Early success in implementing some recommendations may stimulate greater effort on other recommendations, which require greater time and effort for progress. Decisions about when, how and whether to proceed with our recommendations are the responsibility of the public and private participants in the process – not the Subcommittee. But, the Subcommittee can be helpful at identifying those recommendations that seem particularly important and particularly amendable to early action. Accordingly this report classifies the twenty recommendations into three categories:

(1) Recommendations ready for implementation, primarily by federal agencies;

(2) Recommendations ready for implementation, primarily by states;

(3) Recommendations that require new partnerships and mechanisms for success.

<u>The Subcommittee recognizes that successful implementation of each of its recommendations will require cooperation among and leadership by federal, state and local entities. In its initial report, the Subcommittee called for a process of continuous improvement and said: "This process should involve discussions and other collaborative efforts among companies involved in shale gas production (including service companies), state and federal regulators, and affected communities and public interest groups."</u>

The Subcommittee also believes it has a responsibility to assess and report progress in implementing the recommendations in its initial report. Too often advisory committee recommendations are ignored, not because of disagreement with substance, but because the implementation path is unclear or because of the press of more immediate

matters on dedicated individuals who are over extended. The Subcommittee does not wish to see this happen to its recommendation, because it believes citizens expect prompt action. Absent action there will be little credible progress in toward reducing in the environmental impact of shale gas production, placing at risk the future of the enormous potential benefits of this domestic energy resource. At this early stage, it is reasonable to assess if initial, constructive, steps are underway; there is no expectation that any of the recommendations could be completely implemented in the three months since the Subcommittee issued its initial report.

(1) Recommendations for implementation, primarily by federal agencies.

The Subcommittee has identified nine recommendations where federal agencies have primary responsibility and that are ready for implementation; these are presented in Table I.

Recommendation #2 Two existing non-profit organizations – the State Review of Oil and Natural Gas Environmental Regulations (STONGER) and the Ground Water Protection Council (GWPC) are two existing organizations that work to share information to improve the quality of regulatory policy and practice in the states. The budgets for these organizations are small, and merit public support. Previously, federal agencies (DOE and EPA) provided funding for STRONGER and GWPC, but federal funding is currently not provided. To maintain credibility to have an ability to set their own agenda these organizations cannot rely exclusively on funding provided by companies of the regulated industry. The Subcommittee has recommended that $5 million per year would provide the resources to STRONGER and the GWCPC needed to strengthen and broaden its activities as discussed in the Subcommittees previous report, for example, updating hydraulic fracturing guidelines and well construction guidelines, and developing guidelines for water supply, air emissions and cumulative impacts. Additionally, DOE and/or EPA should consider making grants to those states that volunteer to have their regulations and practices peer-reviewed by STRONGER, as an incentive for states to undergo updated reviews and to implement recommended actions.

Table 1. Recommendations ready for immediate implementation

Rec.#	Recommendation	Comment & Status
1.	Improve public information about shale gas operations	Federal responsibility to begin planning for public website. Some discussion between DOE and White House offices about possible hosting sites but no firm plan. States should also consider establishing sites.
2.	Improve communication among federal and state regulators and provide federal funding for STRONGER and the Ground Water Protection Council	Federal funding at $5m/y will allow state regulators/NGOs/industry to plan activities. Possible minor DOE FY2012 funding; no multi-year commitment. See discussion below.
3	Measures should be taken to reduce emissions of air pollutants, ozone precursors, and methane as quickly as practicable.	We encourage EPA to complete its current rule making as it applies to shale gas production quickly, and explicitly include methane, a greenhouse gas, and controls from existing shale gas production sources. Additionally, some states have taken action in this area, and others could do so as well. See discussion below.
4	Enlisting a subset of producers in different basins to design and field a system to collect air emissions data.	Industry initiative in advance of regulation. Several companies have shown interest. Possible start in Marcellus and Eagle Ford. See discussion below.
5	Immediately launching a federal interagency planning effort to acquire data and analyze the overall greenhouse gas footprint of natural gas use.	OSTP has not committed to leading an interagency effort, but the Administration is taking steps to collect additional data, including through the EPA air emissions rulemaking.
6	Encouraging shale-gas production companies and regulators to expand immediately efforts to reduce air emissions using proven technologies and practices.	A general statement of the importance the Subcommittee places on reducing air emissions. Federal funding at $5m/y for state regulators/NGOs/industry will encourage planning. Some states have taken action in this area, and others could do so as well.
11	Launch addition field studies on possible methane migration from shale gas wells to water reservoirs.	No new studies launched; funding required from fed agencies or from states.[2]
14	Disclosure of Fracturing fluid composition	DOI has announced its intent to propose requirement. Industry appears ready to agree to mandatory stricter disclosure. See discussion below.
15	Elimination of diesel use in fracturing fluids	EPA is developing permitting guidance under the UIC program. The Subcommittee reiterates its recommendation that diesel fuel should be eliminated in hydraulic fracturing fluids.
20	R&D needs	OMB/OSTP must define proper limits for unconventional gas R&D and budget levels for DOE, EPA, and USGS. See discussion below.

Funding for the GWPC would allow the association to extend and expand its *Risk Based Data Management System,* which helps states collected and publicly share data associated with their oil and gas regulatory programs – for example, sampling and monitoring programs for surface waters, water wells, sediments and isotopic activity in and around areas of shale gas operations. Likewise, funding could go toward integrating the RBDMS into the national data portal discussed in Recommendation #1. Funding

would also allow GWPC to upgrade its fracturing fluid chemical disclosure registry, *Frac Focus*, so that information can be searched, sorted and aggregated by chemical, by well, by company and by geography – as recommended by the Subcommittee in its 90-Day report.

Recommendation #3 On July 28th the U.S. EPA proposed New Source Performance Standards and National Emissions Standards for Hazardous Air Pollutants (NSPS/NESHAPs) for the oil and natural gas sector. The proposed rules, which are currently under comment and review, are scheduled to be finalized by April 3, 2012, represent a critical step forward in reducing emissions of smog-forming pollutants and air toxics. The Subcommittee commends EPA for taking this important step and encourages timely implementation. However, the proposed rules fall short of the recommendations made in the Subcommittee's Ninety-Day Report because the rules do not directly control methane emissions and the NSPS rules as proposed do not cover existing shale gas sources except for fractured or re-fractured existing gas wells.

Additionally, in its Ninety-Day report the Subcommittee recommended that companies be required to measure and disclose air emissions from shale gas sources. Recently, in response to a challenge, the EPA took two final actions that compromise the ability to get accurate emissions data from the oil and gas sector under the Greenhouse Gas Reporting Rule.[3] The Subcommittee reiterates its recommendation that the federal government or state agencies require companies to measure and disclose air emissions from shale gas sources.

Recommendation #4 The Subcommittee is aware that operating companies are considering projects to collect and disclose air emissions data from shale gas production sites. Discussions are underway to define the data to be collected, appropriate instrumentation, and subsequent analysis and disclosure of the data. The Subcommittee welcomes this development and underscores its earlier recommendation for disclosure, including independent technical review of the methodology.

Recommendation #14 The Subcommittee welcomes the announcement of the DOI of its intent to require disclosure of fracturing fluid composition on federal lands. The Subcommittee was pleased to learn from the DOI at its October 31, 2011 public hearing that the agency intends to follow the disclosure recommendations in its Ninety-Day Report that disclosure should include all chemicals, not just those that appear on

Material Safety Data Sheets, and that chemicals should be reported on a well-by-well basis and posted on a publicly available website that includes tools for searching and aggregating data by chemical, by well, by company and by geography. The Subcommittee recognized the need for protection of legitimate trade secrets but believes that the bar for trade secret protection should be high. The Subcommittee believes the DOI disclosure policy should meet the Subcommittee's criteria and that it can serve as a model for the states. The Ground Water Protection Council and the Interstate Oil and Gas Compact Commission have taken an important step in announcing their intent to require disclosure of all chemicals by operators who utilize their voluntary chemical disclosure registry, FracFocus. The Subcommittee welcomes this progress and encourages those organizations to continue their work toward upgrading FracFocus to meet the Subcommittee's recommended disclosure criteria.

Recommendation #20 As set out in its Ninety-day report, the Subcommittee believes there is a legitimate role for the federal government in supporting R&D on shale gas, arguably the country's most important domestic energy resource. To be effective such an R&D program must be pursued for several years, at a relatively modest level. The Subcommittee is aware that discussions have taken place between OMB and the involved agencies, DOI/USGS, DOE, and EPA about funding for unconventional gas R&D. The Subcommittee understands that agreement has been reached that the administration will seek funding for "priority items" for FY2012 in its discussions with Congress, but the "priority items" and the level of this funding is not decided. The Subcommittee welcomes the agencies effort to coordinate their planned out-year research effort for FY2013 and beyond, as described by DOI, DOE, and EPA at its public meeting on October 31, 2011. But, as yet, there has been no agreement with OMB on the scale and composition of a continuing unconventional gas R&D program. Failure to provide adequate funding for R&D would be deleterious and undermine achieving the policy objectives articulated by the President.

Note: after the Subcommittee completed its deliberations the Office of Management and Budget sent a letter setting forth the efforts underway to find funding for the Subcommittee recommendations; **see Annex D**. While the letter does not settle the matter, it is an important and welcome, positive step.

(2) Recommendations ready for implementation, primarily by states.

The Subcommittee has identified four recommendations in this category; all address water quality related issues.

Table 2. Recommendations requiring cooperation between regulators and industry

Rec.#	Recommendation	Comment & Status
8	Measure and publicly report the composition of water stocks and flow throughout the fracturing and cleanup process.	Awaits EPA's study underway on the Impacts of hydraulic fracturing on drinking water resources. See discussion below. States should also determine a way forward to measure and record data from flow back operations as many issues will be local issues.
9	Manifest all transfers of water among different locations	
10	Adopt best practices in well development and construction, especially casing, cementing, and pressure management	Widely recognized as a key practice by companies and regulators but no indication of a special initiative on field measurement and reporting.
12	Adopt requirements for background water quality measurements	The value of background measurements is recognized. Jurisdiction for access to private wells differs widely

Recommendation #8 and 9 EPA has a number of regulatory actions in process. On October 20, 2011 EPA announced a schedule setting waste water discharge standards that will affect some shale gas production activities.[4] Further water quality regulatory developments will benefit from the results of EPA's study on the impact of hydraulic fracturing on drinking water that will not be complete until 2014 and will likely initiate significant negotiation between EPA and state regulators on the scope and responsibility for water regulations. The Subcommittee observes that there will be a tremendous amount of activity in the field before EPA completes its study (and any potential regulatory actions that flow from it) and urges the EPA to take action as appropriate during the course of its process.

Recommendation #12 In its initial report, the Subcommittee called for background water measurements at wells surrounding planned production sites to establish an objective benchmark to assess potential damage to water resources. All stakeholders agree that such measurements can be helpful in establishing facts and verifying disputed contamination claims. The lack of a clear pattern of state, local, and federal authority for access to private water wells to make such measurements is an impediment to policy development.

(3) Recommendations that require new partnerships or mechanisms for success

The following recommendations require development of new partnerships or mechanisms and hence the implementation challenge can be quite significant. These recommendations do, however, signal significant concerns shared by members of the Subcommittee that are noted in Table 3. The challenge is to devise new mechanisms for addressing these significant environmental problems.

Table 3. Recommendations that require new mechanisms for success

Rec.#	Recommendation	Comment & Status
7	Protection of water quality through a systems approach.	At present neither EPA or the states are engaged in developing a systems/lifecycle approach to water management.
13	Agencies should review field experience and modernize rules and enforcement practices to ensure protection of drinking and surface waters.	Reflects Subcommittee unease that the present arrangement of shared federal and state responsibility for cradle-to-grave water quality is not working smoothly or as well as it should.
16	Managing short-term and cumulative impacts on communities, land use, wildlife, and ecologies.	No new studies launched; funding required from federal agencies or from states. See discussion below.
17	Organizing for best practice.	Industry intends to establish 'centers of excellence' regionally, that involve public interest groups, state and local regulatory and local colleges and universities.
18	Air	
19	Water	

Recommendation #16 Shale gas production brings both benefits and cost of economic development to a community, often rapidly and in a region that it is unfamiliar with oil and gas operations. Short and long term community impact range from traffic, noise, land use, disruption of wildlife and habitat, with little or no allowance for planning or effective mechanisms to bring companies, regulators, and citizens to deliberate about how best to deal with near term and cumulative impacts. The Subcommittee does not believe that these issues will solve themselves or be solved by prescriptive regulation or in the courts. State and local governments should take the lead in experimenting with different mechanisms for engaging these issues in a constructive way, seeking to be beyond discussion to practical mitigation. Successful models should be disseminated.

The U.S. Department of Interior, however, is somewhat unique in having tools at its disposal that could be used to address cumulative and community impacts. For example, Master Leasing and Development Plans, a relatively new tool, might help improve planning for production on federal lands through requirements for phased

leasing and development, multi-well pad drilling, limitations on surface disturbance, centralization of infrastructure, land and roadway reclamation, etc.

Recommendation 17, 18 & 19 Industry has always been interested in best practices. The Subcommittee has called for industry to increase their best practices process for field engineering and environmental control activities by adopting the objective of continuous improvement, validated by measurement and disclosure of key operating metrics.[5] Leadership for this initiative lies with industry but also involves regulators and public interest groups. Best practices involves the entire range of shale gas operations including: (a) well design and siting, (b) drilling and well completion, including importantly casing and cementing, (c) hydraulic fracturing, (d) surface operations, (e) collection and distribution of gas and land liquids, (f) well abandonment and sealing, and (g) emergency response. Developing reliable metrics for best practices is a major task and must take into account regional differences of geology and regulatory practice. A properly trained work force is an important element in achieving best practice. Thus, organizing for best practice should include better mechanisms for training of oil field workers. Such training should utilize local community college and vocational education resources.

Industry is taking a regional approach to best practice, building on local organizations, such as the Marcellus Shale Coalition. Shale companies understand the importance of involving non-industry stakeholders in their efforts and are beginning to take initiatives that engage the public in a meaningful way. Industry is showing increased interest in engineering practice as indicated by the recent workshop on hydraulic fracturing sponsored by the American Petroleum Institute on October 4 and 5, 2011 in Pittsburgh PA.[6] The Subcommittee urges leading companies to adopt a more visible commitment to using quantitative measures as a means of achieving best practice and demonstrating to the public that there is continuous improvement in reducing the environmental impact of shale gas production.

Concluding remarks

The Subcommittee was gratified with the generally favorable, but not universally favorable, response to its initial report. In particular there was overwhelming agreement on two points: (1) If the country is to enjoy the economic and other benefits of shale gas

production over the coming years disciplined attention must be devoted to reducing the environmental impact that accompanies this development, and (2) a prudent balance between development and environmental protection is best struck by establishing a strong foundation of regulation and enforcement, and adopting a policy and practice that measures, discloses, and continuously improves shale gas operations.

The Subcommittee believes that if action is not taken to reduce the environmental impact accompanying the very considerable expansion of shale gas production expected across the country – perhaps as many as 100,000 wells over the next several decades – there is a real risk of serious environmental consequences causing a loss of public confidence that could delay or stop this activity. Thus, the Subcommittee has an interest in assessing and reporting on, the progress that is being made on implementing its recommendations or some sensible variations of these recommendations.

The Subcommittee has the impression that its initial report stimulated interest in taking action to reduce the environmental impact of shale gas production by the administration, state governments, industry, and public interest groups. However, the progress to date is less than the Subcommittee hoped and it is not clear how to catalyze action at a time when everyone's attention is focused on economic issues, the press of daily business, and an upcoming election. The Subcommittee cautions that whether its approach is followed or not, some concerted and sustained action is needed to avoid excessive environmental impacts of shale gas production and the consequent risk of public opposition to its continuation and expansion.

ANNEX A – CHARGE TO THE SUBCOMMITTEE

From: Secretary Chu

To: William J. Perry, Chairman, Secretary's Energy Advisory Board (SEAB)

On March 30, 2011, President Obama announced a plan for U.S. energy security, in which he instructed me to work with other agencies, the natural gas industry, states, and environmental experts to improve the safety of shale gas development. The President also issued the Blueprint for a Secure Energy Future ("Energy Blueprint"), which included the following charge:

> **"Setting the Bar for Safety and Responsibility:** To provide recommendations from a range of independent experts, the Secretary of Energy, in consultation with the EPA Administrator and Secretary of Interior, should task the Secretary of Energy Advisory Board (SEAB) with establishing a subcommittee to examine fracking issues. The subcommittee will be supported by DOE, EPA and DOI, and its membership will extend beyond SEAB members to include leaders from industry, the environmental community, and states. The subcommittee will work to identify, within 90 days, any immediate steps that can be taken to improve the safety and environmental performance of fracking and to develop, within six months, consensus recommended advice to the agencies on practices for shale extraction to ensure the protection of public health and the environment." *Energy Blueprint (page 13).*

The President has charged us with a complex and urgent responsibility. I have asked SEAB and the Natural Gas Subcommittee, specifically, to begin work on this assignment immediately and to give it the highest priority.

This memorandum defines the task before the Subcommittee and the process to be used.

Membership:

In January of 2011, the SEAB created a Natural Gas Subcommittee to evaluate what role natural gas might play in the clean energy economy of the future. Members of the Subcommittee include John Deutch (chair), Susan Tierney, and Dan Yergin. Following consultation with the Environmental Protection Agency and the Department of the Interior, I have appointed the following additional members to the Subcommittee: Stephen Holditch, Fred Krupp, Kathleen McGinty, and Mark Zoback.

The varied backgrounds of these members satisfies the President's charge to include individuals with industry, environmental community, and state expertise. To facilitate an expeditious start, the Subcommittee will consist of this small group, but additional members may be added as appropriate.

Consultation with other Agencies:

The President has instructed DOE to work in consultation with EPA and DOI, and has instructed all three agencies to provide support and expertise to the Subcommittee. Both agencies have independent regulatory authority over certain aspects of natural gas production, and considerable expertise that can inform the Subcommittee's work.

- The Secretary and Department staff will manage an interagency working group to be available to consult and provide information upon request of the Subcommittee.
- The Subcommittee will ensure that opportunities are available for EPA and DOI to present information to the Subcommittee.
- The Subcommittee should identify and request any resources or expertise that lies within the agencies that is needed to support its work.
- The Subcommittee's work should at all times remain independent and based on sound science and other expertise held from members of the Subcommittee.
- The Subcommittee's deliberations will involve only the members of the Subcommittee.
- The Subcommittee will present its final report/recommendations to the full SEAB Committee.

Public input:

In arriving at its recommendations, the Subcommittee will seek timely expert and other advice from industry, state and federal regulators, environmental groups, and other stakeholders.

- To assist the Subcommittee, DOE's Office of Fossil Energy will create a website to describe the initiative and to solicit public input on the subject.
- The Subcommittee will meet with representatives from state and federal regulatory agencies to receive expert information on subjects as the Subcommittee deems necessary.
- The Subcommittee or the DOE (in conjunction with the other agencies) may hold one or more public meetings when appropriate to gather input on the subject.

Scope of work of the Subcommittee:

The Subcommittee will provide the SEAB with recommendations as to actions that can be taken to improve the safety and environmental performance of shale gas extraction processes, and other steps to ensure protection of public health and safety, on topics such as:

- well design, siting, construction and completion;
- controls for field scale development;
- operational approaches related to drilling and hydraulic fracturing;
- risk management approaches;
- well sealing and closure;
- surface operations;
- waste water reuse and disposal, water quality impacts, and storm water runoff;
- protocols for transparent public disclosure of hydraulic fracturing chemicals and other information of interest to local communities;
- optimum environmentally sound composition of hydraulic fracturing chemicals, reduced water consumption, reduced waste generation, and lower greenhouse gas emissions;

- emergency management and response systems;
- metrics for performance assessment; and
- mechanisms to assess performance relating to safety, public health and the environment.

The Subcommittee should identify, at a high level, the best practices and additional steps that could enhance companies' safety and environmental performance with respect to a variety of aspects of natural gas extraction. Such steps may include, but not be limited to principles to assure best practices by the industry, including companies' adherence to these best practices. Additionally, the Subcommittee may identify high-priority research and technological issues to support prudent shale gas development.

Delivery of Recommendations and Advice:

- Within 90 days of its first meeting, the Subcommittee will report to SEAB on the "immediate steps that can be taken to improve the safety and environmental performance of fracking."
- Within 180 days of its first meeting, the Subcommittee will report to SEAB "consensus recommended advice to the agencies on practices for shale extraction to ensure the protection of public health and the environment."
- At each stage, the Subcommittee will report its findings to the full Committee and the SEAB will review the findings.
- The Secretary will consult with the Administrator of EPA and the Secretary of the Interior, regarding the recommendations from SEAB.

Other:

- The Department will provide staff support to the Subcommittee for the purposes of meeting the requirements of the Subcommittee charge. The Department will also engage the services of other agency Federal employees or contractors to provide staff services to the Subcommittee, as it may request.
- DOE has identified $700k from the Office of Fossil Energy to fund this effort, which will support relevant studies or assessments, report writing, and other costs related to the Subcommittee's process.
- The Subcommittee will avoid activity that creates or gives the impression of giving undue influence or financial advantage or disadvantage for particular companies involved in shale gas exploration and development.
- The President's request specifically recognizes the unique technical expertise and scientific role of the Department and the SEAB. As an agency not engaged in regulating this activity, DOE is expected to provide a sound, highly credible evaluation of the best practices and best ideas for employing these practices safely that can be made available to companies and relevant regulators for appropriate action. Our task does not include making decisions about regulatory policy.

ANNEX B – MEMBERS OF THE SUBCOMMITTEE

John Deutch, Institute Professor at MIT (Chair) **-** John Deutch served as Director of Energy Research, Acting Assistant Secretary for Energy Technology and Under Secretary of Energy for the U.S. Department of Energy in the Carter Administration and Undersecretary of Acquisition & Technology, Deputy Secretary of Defense and Director of Central Intelligence during the first Clinton Administration. Dr. Deutch also currently serves on the Board of Directors of Raytheon and Cheniere Energy and is a past director of Citigroup, Cummins Engine Company and Schlumberger. A chemist who has published more than 140 technical papers in physical chemistry, he has been a member of the MIT faculty since 1970, and has served as Chairman of the Department of Chemistry, Dean of Science and Provost. He is a member of the Secretary of Energy Advisory Board.

Stephen Holditch, Head of the Department of Petroleum Engineering at Texas A&M University and has been on the faculty since 1976 - Stephen Holditch, who is a member of the National Academy of Engineering, serves on the Boards of Directors of Triangle Petroleum Corporation and Matador Resources Corporation. In 1977, Dr. Holditch founded S.A. Holditch & Associates, a petroleum engineering consulting firm that specialized in the analysis of unconventional gas reservoirs. Dr. Holditch was the 2002 President of the Society of Petroleum Engineers. He was the Editor of an SPE Monograph on hydraulic fracturing treatments, and he has taught short courses for 30 years on the design of hydraulic fracturing treatments and the analyses of unconventional gas reservoirs. Dr. Holditch worked for Shell Oil Company prior to joining the faculty at Texas A&M University.

Fred Krupp, President, Environmental Defense Fund **-** Fred Krupp has overseen the growth of EDF into a recognized worldwide leader in the environmental movement. Krupp is widely acknowledged as the foremost champion of harnessing market forces for environmental ends. He also helped launch a corporate coalition, the U.S. Climate Action Partnership, whose Fortune 500 members - Alcoa, GE, DuPont and dozens more - have called for strict limits on global warming pollution. Mr. Krupp is coauthor, with Miriam Horn, of New York Times Best Seller, *Earth: The Sequel*. Educated at Yale and the University of Michigan Law School, Krupp was among 16 people named as America's Best Leaders by U.S. News and World Report in 2007.

Kathleen McGinty, Kathleen McGinty is a respected environmental leader, having served as President Clinton's Chair of the White House Council on Environmental Quality and Legislative Assistant and Environment Advisor to then-Senator Al Gore. More recently, she served as Secretary of the Pennsylvania Department of Environmental Protection. Ms. McGinty also has a strong background in energy. She is Senior Vice President of Weston Solutions where she leads the company's clean energy development business. She also is an Operating Partner at Element Partners, an investor in efficiency and renewables. Previously, Ms. McGinty was Chair of the Pennsylvania Energy Development Authority, and currently she is a Director at NRG Energy and Iberdrola USA.

Susan Tierney, Managing Principal, Analysis Group **-** Susan Tierney is a consultant on energy and environmental issues to public agencies, energy companies, environmental organizations, energy consumers, and tribes. She chairs the Board of the Energy Foundation, and serves on the Boards of Directors of the World Resources Institute, the Clean Air Task Force, among others. She recently, co-chaired the National Commission on Energy Policy, and chairs the Policy Subgroup of the National Petroleum Council's study of North American natural gas and oil resources. Dr. Tierney served as Assistant Secretary for Policy at the U.S. Department of Energy during the Clinton Administration. In Massachusetts, she served as Secretary of Environmental Affairs, Chair of the Board of the Massachusetts Water Resources Agency, Commissioner of the Massachusetts Department of Public Utilities and executive director of the Massachusetts Energy Facilities Siting Council.

Daniel Yergin, Chairman, IHS Cambridge Energy Research Associates **-** Daniel Yergin is the co-founder and chairman of IHS Cambridge Energy Research Associates. He is a member of the U.S. Secretary of Energy Advisory Board, a board member of the Board of the United States Energy Association and a member of the U.S. National Petroleum Council. He was vice chair of the 2007 National Petroleum Council study, *Hard Truths* and is vice chair of the new National Petroleum Council study of North American natural gas and oil resources. He chaired the U.S. Department of Energy's Task Force on Strategic Energy Research and Development. Dr. Yergin currently chairs the Energy Security Roundtable at the Brookings Institution, where he is a trustee, and is member of the advisory board of the MIT Energy Initiative. Dr. Yergin is also CNBC's Global Energy Expert. He is the author of the Pulitzer Prize-winning book, *The Prize: The Epic Quest for Oil, Money and Power.* His new book – *The Quest: Energy, Security, and the Remaking of the Modern World* – will be published in September 2011..

Mark Zoback, Professor of Geophysics, Stanford University - Mark Zoback is the Benjamin M. Page Professor of Geophysics at Stanford University. He is the author of a textbook, *Reservoir Geomechanics*, and author or co-author of over 300 technical research papers. He was co-principal investigator of the San Andreas Fault Observatory at Depth project (SAFOD) and has been serving on a National Academy of Engineering committee investigating the Deepwater Horizon accident. He was the chairman and co-founder of GeoMechanics International and serves as a senior adviser to Baker Hughes, Inc. Prior to joining Stanford University, he served as chief of the Tectonophysics Branch of the U.S. Geological Survey Earthquake Hazards Reduction Program.

Annex C – Subcommittee Recommendations

A list of the Subcommittee's findings and recommendations follows.

1. Improve public information about shale gas operations: Create a portal for access to a wide range of public information on shale gas development, to include current data available from state and federal regulatory agencies. The portal should be open to the public for use to study and analyze shale gas operations and results.

2. Improve communication among state and federal regulators: Provide continuing annual support to STRONGER (the State Review of Oil and Natural Gas Environmental Regulation) and to the Ground Water Protection Council for expansion of the *Risk Based Data Management System* and similar projects that can be extended to all phases of shale gas development.

3. Improve air quality: Measures should be taken to reduce emissions of air pollutants, ozone precursors, and methane as quickly as practicable. The Subcommittee supports adoption of rigorous standards for new and existing sources of methane, air toxics, ozone precursors and other air pollutants from shale gas operations. The Subcommittee recommends:

    4. Enlisting a subset of producers in different basins to design and rapidly implement measurement systems to collect comprehensive methane and other air emissions data from shale gas operations and make these data publically available;

    5. Immediately launching a federal interagency planning effort to acquire data and analyze the overall greenhouse gas footprint of shale gas operations throughout the lifecycle of natural gas use in comparison to other fuels; and

    6. Encouraging shale-gas production companies and regulators to expand immediately efforts to reduce air emissions using proven technologies and practices.

7. Protection of water quality: The Subcommittee urges adoption of a systems approach to water management based on consistent measurement and public disclosure of the flow and composition of water at every stage of the shale gas production process. The Subcommittee recommends the following actions by shale gas companies and regulators – to the extent that such actions have not already been undertaken by particular companies and regulatory agencies:

    8. Measure and publicly report the composition of water stocks and flow throughout the fracturing and clean-up process.

    9. Manifest all transfers of water among different locations.

    10. Adopt best practices in well development and construction, especially casing, cementing, and pressure management. Pressure testing of cemented casing and state-of-the-art cement bond logs should be used to confirm formation isolation. Microseismic surveys should be carried out to assure that

hydraulic fracture growth is limited to the gas producing formations. Regulations and inspections are needed to confirm that operators have taken prompt action to repair defective cementing jobs. The regulation of shale gas development should include inspections at safety-critical stages of well construction and hydraulic fracturing.

11. Additional field studies on possible methane leakage from shale gas wells to water reservoirs.

12. Adopt requirements for background water quality measurements (e.g., existing methane levels in nearby water wells prior to drilling for gas) and report in advance of shale gas production activity.

13. Agencies should review field experience and modernize rules and enforcement practices to ensure protection of drinking and surface waters.

14. Disclosure of fracturing fluid composition: The Subcommittee shares the prevailing view that the risk of fracturing fluid leakage into drinking water sources through fractures made in deep shale reservoirs is remote.[7] Nevertheless the Subcommittee believes there is no economic or technical reason to prevent public disclosure of all chemicals in fracturing fluids, with an exception for genuinely proprietary information. While companies and regulators are moving in this direction, progress needs to be accelerated in light of public concern.

15. Reduction in the use of diesel fuel: The Subcommittee believes there is no technical or economic reason to use diesel in shale gas production and recommends reducing the use of diesel engines for surface power in favor of natural gas engines or electricity where available.

16. Managing short-term and cumulative impacts on communities, land use, wildlife, and ecologies. Each relevant jurisdiction should pay greater attention to the combination of impacts from multiple drilling, production and delivery activities (e.g., impacts on air quality, traffic on roads, noise, visual pollution), and make efforts to plan for shale development impacts on a regional scale. Possible mechanisms include:

    (1) Use of multi-well drilling pads to minimize transport traffic and need for new road construction.

    (2) Evaluation of water use at the scale of affected watersheds.

    (3) Formal notification by regulated entities of anticipated environmental and community impacts.

    (4) Preservation of unique and/or sensitive areas as off-limits to drilling and support infrastructure as determined through an appropriate science-based process.

    (5) Undertaking science-based characterization of important landscapes, habitats and corridors to inform planning, prevention, mitigation and reclamation of surface impacts.

    (6) Establishment of effective field monitoring and enforcement to inform on-going assessment of cumulative community and land use impacts.

The process for addressing these issues must afford opportunities for affected communities to participate and respect for the rights of surface and mineral rights owners.

17. Organizing for best practice: The Subcommittee believes the creation of a shale gas industry production organization dedicated to continuous improvement of best practice, defined as improvements in techniques and methods that rely on measurement and field experience, is needed to improve operational and environmental outcomes. The Subcommittee favors a national approach including regional mechanisms that recognize differences in geology, land use, water resources, and regulation. The Subcommittee is aware that several different models for such efforts are under discussion and the Subcommittee will monitor progress during its next ninety days. The Subcommittee has identified several activities that deserve priority attention for developing best practices:

    18. Air: (a) Reduction of pollutants and methane emissions from all shale gas production/delivery activity. (b) Establishment of an emission measurement and reporting system at various points in the production chain.

    19. Water: (a) Well completion – casing and cementing including use of cement bond and other completion logging tools. (b) Minimizing water use and limiting vertical fracture growth.

20. Research and Development needs. The public should expect significant technical advances associated with shale gas production that will significantly improve the efficiency of shale gas production and that will reduce environmental impact. The move from single well to multiple-well pad drilling is one clear example. Given the economic incentive for technical advances, much of the R&D will be performed by the oil and gas industry. Nevertheless the federal government has a role especially in basic R&D, environment protection, and safety. The current level of federal support for unconventional gas R&D is small, and the Subcommittee recommends that the Administration and the Congress set an appropriate mission for R&D and level funding.

Annex D Letter from the Office of Management and Budget

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

THE DIRECTOR

November 8, 2011

Dr. John Deutch
Chairman
Secretary of Energy Advisory Board on Natural Gas
Washington, DC 20585

Dear John:

Thank you for your letter on Tuesday, November 1 about the Subcommittee of the Secretary of Energy Advisory Board on Natural Gas (SEAB). I am sorry that I could not attend the SEAB meeting earlier this week. Your work on this issue has been very helpful and it is a high priority of the Administration.

As you are aware, the Office of Management and Budget (OMB) is running an interagency working group to coordinate the research budget proposals on hydraulic fracturing and has received some preliminary suggestions from the agencies for FY 2013 activities. Over the course of the next few weeks, the interagency budget working group will review agencies' research proposals taking into consideration core competencies, which I understand was discussed with you on Monday, October 31. We will be looking carefully at the research and development (R&D) recommendations of the SEAB report as we put together the President's FY 2013 Budget.

As you know, all discretionary funding is capped in FY 2012 and FY 2013. Hydraulic fracturing R&D is a priority that we are seeking to fund as we make tough choices within these constraints. As your report acknowledges, the industry has a strong incentive to fund and carry out production-related R&D. To the degree that environmental constraints could impede continued growth, industry also has an interest in R&D to improve environmental performance and safety. Thus, finding the correct balance between public and private investment, within the broader Federal budget constraints is challenging, but important. As part of the R&D budget review, we are identifying existing programs across the government to avoid redundancies and to optimize budgetary resources. As a general matter, OMB does not announce budget decisions prior to the full presentation to the Congress in February of each year.

I am concerned there has been some confusion around OMB's position on funding this research. The Administration has opposed subsidies for conventional fossil energy exploration and production, just as the Bush Administration did. But hydraulic fracturing R&D that adheres to the framework set forth in the SEAB 90-day interim report – for air, water, induced seismicity

or other public information needed to set appropriate regulatory boundaries – we strongly support, and we agree that the Environmental Protection Agency, Department of the Interior, and Department of Energy all have roles to play. However, we need to carefully articulate those roles and structure the President's Budget to most efficiently deliver the R&D funding needed to address environmental and safety concerns.

The SEAB 90-day interim report supports the existing Ultradeepwater and Unconventional Natural Gas and Other Petroleum Research Program (Sec. 999) which is funded through mandatory appropriations authorized by the Energy Policy Act of 2005. On this point, we disagree. Mandatory R&D funding from Sec. 999 is too inflexible a mechanism to adequately address environmental and safety concerns in the dynamic and rapidly evolving hydraulic fracturing space, and the President's Budgets have proposed eliminating this mandatory R&D program. Absent Congressional action to repeal Sec. 999, the Administration has sought to refocus this funding to support R&D with significant potential public benefits, including activities consistent with the SEAB recommendations.

Thank you again for reaching out to me on this important issue. Please do not assume that because we are busy, that this issue is not important to the Administration, and feel free to be in touch moving forward.

Hope all is well with you and would look forward to catching up.

Best regards,

Jacob J. Lew

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To: Jack Lew, Director Office of Management and Budget

Dear Jack, November 1, 2011

In March, President Obama directed Steve Chu to establish a Subcommittee of the Secretary of Energy Advisory Board on Hydraulic Fracturing tasked to identify steps that should be taken to reduce the environmental impact of shale gas production. I am the chair of this Subcommittee, which released its initial report on August 18, 2011.

One of the Subcommittee's twenty recommendations called on the administration to adopt a unconventional gas R&D program to perform R&D that merits public funding such as environmental studies on methane leakage, assessing the relative greenhouse gas foot print of natural gas production, seismicity, inventing new techniques for real time monitoring and control of hydraulic fluid injection, and development of environmentally friendly stimulation fluids. The Subcommittee did not ask for "new" money, or suggest a particular level of funding, or how responsibilities should be distributed between the DOE, EPA, and the USGS.

On October 5, 2011, I wrote to you requesting that you or a designated representative come and speak with the Subcommittee (in open or closed session) about this matter. You designated Sally Ericsson, Associate Director for Natural Resources, who I understand participated in an interagency meeting on this subject and agreed to attend the Subcommittee's October 31 meeting. Unfortunately, Ms Ericsson had to cancel her attendance, inevitably leaving the Subcommittee, as it prepares its second and final report, with the impression that the administration has not yet been able to formulate a position on the level of distribution of federal support for unconventional gas R&D, arguably the most important near term domestic energy supply option for the country. The Subcommittee did learn that the administration will seek funds for "priority" items for FY2012 in its discussions with Congress and that EPA, DOE, and DOI are coordinating their research plans, but evidently an effective R&D program requires consistent multi-year funding.

I know that you are totally consumed by the budget deficit and countless other matters. Nevertheless, I urge you to devote a few minutes to resolving the issue of federal support for R&D on unconventional gas. President Obama in his *Blue Print for Secure Energy Future* recognized that realizing the enormous economic benefits of shale case requires improving the environmental performance of shale gas production and the *Blue Print* explicitly identified a role for federally sponsored research. It will be a shame if the administration does not take the initial steps necessary to establish a modest, but steady R&D effort by the participating agencies.

Sincerely

John Deutch

Cc: Steven Chu,
Heather Zichal,
Michael Froman

ENDNOTES

[1] The Subcommittee report is available at:
http://www.shalegas.energy.gov/resources/081811_90_day_report_final.pdf

[2] Duke University has launched a follow-on study effort to its initial methane migration study. NETL, in cooperation with other federal agencies and with PA state agencies, Penn State, and major producers is launching a study limited to two wells. More needs to be done by federal agencies.

[3] First, EPA has finalized a deferral that will prevent the agency from collecting inputs to emissions equations data until 2015 for Subpart W sources. These inputs are critical to verify emissions information calculated using emission equations. Second, EPA has finalized a rule allowing more widespread use of Best Available Monitoring Methods ("BAMM") in 2011 and beyond. This action allows reporters to use more relaxed, non-standard methods when monitoring under Subpart W.
See: Change to the Reporting Date for Certain Data Elements Required Under the Mandatory Reporting of Greenhouse Gases Rule, 76 Fed. Reg. 53,057 (Aug. 25, 2011); and Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems: Revisions to Best Available Monitoring Method Provisions, 76 Fed. Reg. 59,533 (Sept. 27, 2011).

[4] The EPA announcement of the schedule to Develop Natural Gas Wastewater Standards can be found on the EPA home web site: http://www.epa.gov/newsroom/. It states:

> **Shale Gas Standards:**Currently, wastewater associated with shale gas extraction is prohibited from being directly discharged to waterways and other waters of the U.S. While some of the wastewater from shale gas extraction is reused or re-injected, a significant amount still requires disposal. As a result, some shale gas wastewater is transported to treatment plants, many of which are not properly equipped to treat this type of wastewater. EPA will consider standards based on demonstrated, economically achievable technologies, for shale gas wastewater that must be met before going to a treatment facility.

[5] Since the release of the Subcommittee's Ninety-Day Report, the National Petroleum Council issued its "Prudent Development" report on September 15, 2011, with its recommendation that:

> "Natural gas and oil companies should establish regionally focused council(s) of excellence in effective environmental, health, and safety practices. These councils should be forums in which companies could identify and disseminate effective environmental, health, and safety practices and technologies that are appropriate to the particular region. These may include operational risk management approaches, better environmental management techniques, and methods for measuring environmental performance. The governance structures, participation processes, and transparency should be designed to: promote engagement of industry and other interested parties; and enhance the credibility of a council's products and the likelihood they can be relied upon by regulators at the state and federal level."

NPC, "Prudent Development: Realizing the Potential of North America's Abundant Natural Gas and Oil Resources," Executive Summary Section II.A.1.

[6] See: http://www.energyfromshale.org/commitment-excellence-hydraulic-fracturing-workshop

[7] An interesting Society of Petroleum Engineers paper sheds light on this point: *Hydraulic Fracture-Height Growth: Real Data,* Kevin Fisher and Norm Warpinski, SPE 145949 available at:
http://www.spe.org/atce/2011/pages/schedule/tech_program/documents/spe145949%201.pdf .

Secretary of Energy Advisory Board

Source: U.S. Energy Information Administration based on data from various published studies. Canada and Mexico plays from ARI.
Updated: May 9, 2011

Shale Gas Production Subcommittee 90-Day Report

August 18, 2011

U.S. DEPARTMENT OF ENERGY

The SEAB Shale Gas Production Subcommittee
Ninety-Day Report – August 18, 2011

Executive Summary

The Shale Gas Subcommittee of the Secretary of Energy Advisory Board is charged with identifying measures that can be taken to reduce the environmental impact and improve the safety of shale gas production.

Natural gas is a cornerstone of the U.S. economy, providing a quarter of the country's total energy. Owing to breakthroughs in technology, production from shale formations has gone from a negligible amount just a few years ago to being almost 30 percent of total U.S. natural gas production. This has brought lower prices, domestic jobs, and the prospect of enhanced national security due to the potential of substantial production growth. But the growth has also brought questions about whether both current and future production can be done in an environmentally sound fashion that meets the needs of public trust.

This 90-day report presents recommendations that if implemented will reduce the environmental impacts from shale gas production. The Subcommittee stresses the importance of a process of continuous improvement in the various aspects of shale gas production that relies on best practices and is tied to measurement and disclosure. While many companies are following such a process, much-broader and more extensive adoption is warranted. The approach benefits all parties in shale gas production: regulators will have more complete and accurate information; industry will achieve more efficient operations; and the public will see continuous, measurable improvement in shale gas activities.

A list of the Subcommittee's findings and recommendations follows.

- <u>Improve public information about shale gas operations</u>: Create a portal for access to a wide range of public information on shale gas development, to include current data available from state and federal regulatory agencies. The portal should be open to the public for use to study and analyze shale gas operations and results.

- Improve communication among state and federal regulators: Provide continuing annual support to STRONGER (the State Review of Oil and Natural Gas Environmental Regulation) and to the Ground Water Protection Council for expansion of the *Risk Based Data Management System* and similar projects that can be extended to all phases of shale gas development.

- Improve air quality: Measures should be taken to reduce emissions of air pollutants, ozone precursors, and methane as quickly as practicable. The Subcommittee supports adoption of rigorous standards for new and existing sources of methane, air toxics, ozone precursors and other air pollutants from shale gas operations. The Subcommittee recommends:

  (1) Enlisting a subset of producers in different basins to design and rapidly implement measurement systems to collect comprehensive methane and other air emissions data from shale gas operations and make these data publically available;

  (2) Immediately launching a federal interagency planning effort to acquire data and analyze the overall greenhouse gas footprint of shale gas operations through out the lifecycle of natural gas use in comparison to other fuels; and

  (3) Encouraging shale-gas production companies and regulators to expand immediately efforts to reduce air emissions using proven technologies and practices.

- Protection of water quality: The Subcommittee urges adoption of a systems approach to water management based on consistent measurement and public disclosure of the flow and composition of water at every stage of the shale gas production process. The Subcommittee recommends the following actions by shale gas companies and regulators – to the extent that such actions have not already been undertaken by particular companies and regulatory agencies:

  (1) Measure and publicly report the composition of water stocks and flow throughout the fracturing and clean-up process.

  (2) Manifest all transfers of water among different locations.

  (3) Adopt best practices in well development and construction, especially casing, cementing, and pressure management. Pressure testing of cemented casing and state-of-the-art cement bond logs should be used to confirm formation isolation. Microseismic surveys should be carried out to assure that hydraulic fracture growth is limited to the gas producing formations. Regulations and inspections are needed to confirm that operators

have taken prompt action to repair defective cementing jobs. The regulation of shale gas development should include inspections at safety-critical stages of well construction and hydraulic fracturing.

(4) Additional field studies on possible methane leakage from shale gas wells to water reservoirs.

(5) Adopt requirements for background water quality measurements (e.g., existing methane levels in nearby water wells prior to drilling for gas) and report in advance of shale gas production activity.

(6) Agencies should review field experience and modernize rules and enforcement practices to ensure protection of drinking and surface waters.

- Disclosure of fracturing fluid composition: The Subcommittee shares the prevailing view that the risk of fracturing fluid leakage into drinking water sources through fractures made in deep shale reservoirs is remote. Nevertheless the Subcommittee believes there is no economic or technical reason to prevent public disclosure of all chemicals in fracturing fluids, with an exception for genuinely proprietary information. While companies and regulators are moving in this direction, progress needs to be accelerated in light of public concern.

- Reduction in the use of diesel fuel: The Subcommittee believes there is no technical or economic reason to use diesel in shale gas production and recommends reducing the use of diesel engines for surface power in favor of natural gas engines or electricity where available.

- Managing short-term and cumulative impacts on communities, land use, wildlife, and ecologies. Each relevant jurisdiction should pay greater attention to the combination of impacts from multiple drilling, production and delivery activities (e.g., impacts on air quality, traffic on roads, noise, visual pollution), and make efforts to plan for shale development impacts on a regional scale. Possible mechanisms include:

  (1) Use of multi-well drilling pads to minimize transport traffic and need for new road construction.

  (2) Evaluation of water use at the scale of affected watersheds.

  (3) Formal notification by regulated entities of anticipated environmental and community impacts.

(4) Preservation of unique and/or sensitive areas as off-limits to drilling and support infrastructure as determined through an appropriate science-based process.

(5) Undertaking science-based characterization of important landscapes, habitats and corridors to inform planning, prevention, mitigation and reclamation of surface impacts.

(6) Establishment of effective field monitoring and enforcement to inform on-going assessment of cumulative community and land use impacts.

The process for addressing these issues must afford opportunities for affected communities to participate and respect for the rights of surface and mineral rights owners.

- Organizing for best practice: The Subcommittee believes the creation of a shale gas industry production organization dedicated to continuous improvement of best practice, defined as improvements in techniques and methods that rely on measurement and field experience, is needed to improve operational and environmental outcomes. The Subcommittee favors a national approach including regional mechanisms that recognize differences in geology, land use, water resources, and regulation. The Subcommittee is aware that several different models for such efforts are under discussion and the Subcommittee will monitor progress during its next ninety days. The Subcommittee has identified several activities that deserve priority attention for developing best practices:

  Air: (a) Reduction of pollutants and methane emissions from all shale gas production/delivery activity. (b) Establishment of an emission measurement and reporting system at various points in the production chain.

  Water: (a) Well completion – casing and cementing including use of cement bond and other completion logging tools. (b) Minimizing water use and limiting vertical fracture growth.

- Research and Development needs. The public should expect significant technical advances associated with shale gas production that will significantly improve the efficiency of shale gas production and that will reduce environmental impact. The move from single well to multiple-well pad drilling is one clear example. Given the economic incentive for technical advances, much of the R&D will be performed by the oil and gas industry. Nevertheless the federal government has a role especially in basic R&D, environment protection, and

> safety. The current level of federal support for unconventional gas R&D is small, and the Subcommittee recommends that the Administration and the Congress set an appropriate mission for R&D and level funding.

The Subcommittee believes that these recommendations, combined with a continuing focus on and clear commitment to measurable progress in implementation of best practices based on technical innovation and field experience, represent important steps toward meeting public concerns and ensuring that the nation's resources are responsibly being responsibly developed.

Introduction

On March 31, 2011, President Barack Obama declared that "recent innovations have given us the opportunity to tap large reserves – perhaps a century's worth" of shale gas. In order to facilitate this development, ensure environmental protection, and meet public concerns, he instructed Secretary of Energy Steven Chu to form a subcommittee of the Secretary of Energy Advisory Board (SEAB) to make recommendations to address the safety and environmental performance of shale gas production.[1] The Secretary's charge to the Subcommittee, included in Annex A, requested that:

> Within 90 days of its first meeting, the Subcommittee will report to SEAB on the "immediate steps that can be taken to improve the safety and environmental performance of fracturing.

This is the 90-day report submitted by the Subcommittee to SEAB in fulfillment of its charge. There will be a second report of the Subcommittee after 180 days. Members of the Subcommittee are given in Annex B.

Context for the Subcommittee's deliberations

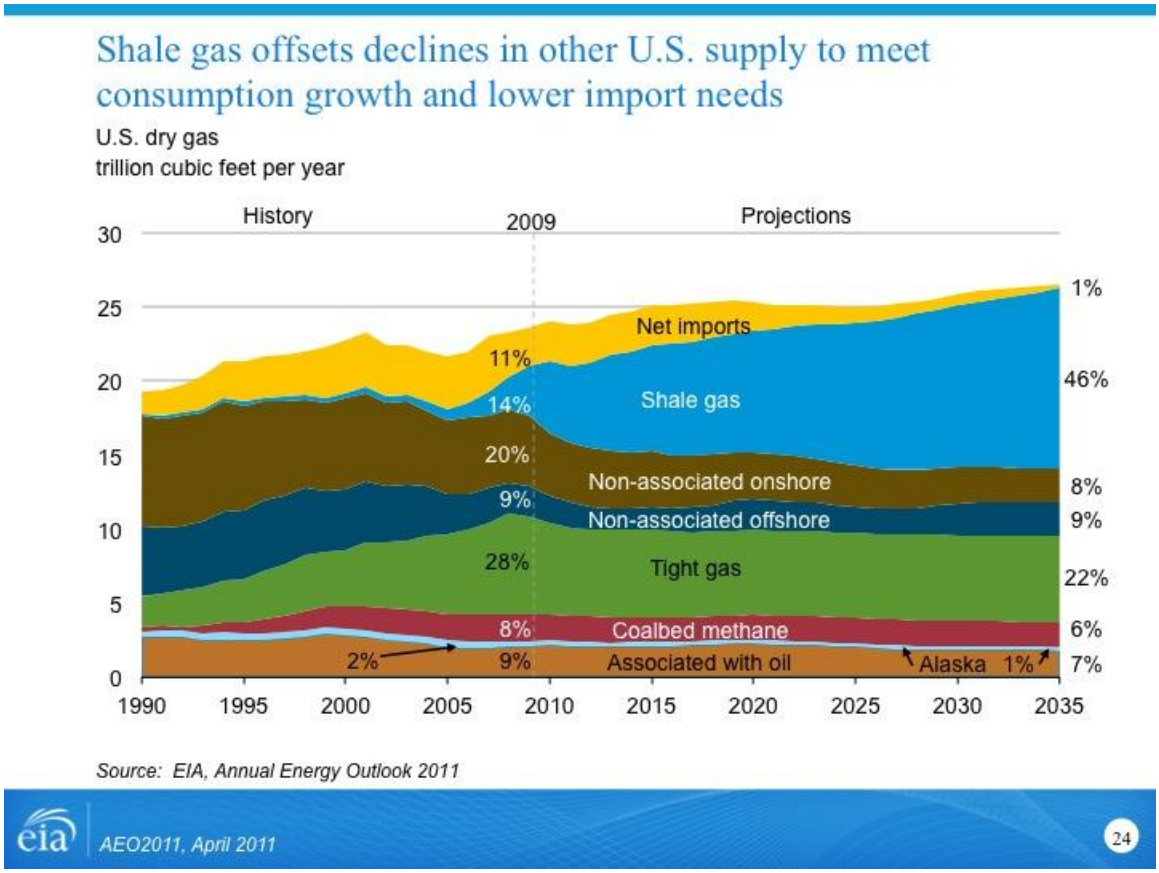
The Subcommittee believes that the U.S. shale gas resource has enormous potential to provide economic and environmental benefits for the county. Shale gas is a widely distributed resource in North America that can be relatively cheaply produced, creating jobs across the country. Natural gas – if properly produced and transported – also offers climate change advantages because of its low carbon content compared to coal.

Source: U.S. Energy Information Administration based on data from various published studies. Canada and Mexico plays from ARI.
Updated: May 9, 2011

Domestic production of shale gas also has the potential over time to reduce dependence on imported oil for the United States. International shale gas production will increase the diversity of supply for other nations. Both these developments offer important national security benefits.[2]

The development of shale gas in the United States has been very rapid. Natural gas from all sources is one of America's major fuels, providing about 25 percent of total U.S. energy. Shale gas, in turn, was less than two percent of total U.S. natural gas production in 2001. Today, it is approaching 30 percent.[3] But it was only around 2008 that the significance of shale gas began to be widely recognized. Since then, output has increased four-fold. It has brought new regions into the supply mix. Output from the Haynesville shale, mostly in Louisiana, for example, was negligible in 2008; today, the Haynesville shale alone produces eight percent of total U.S. natural gas output. According to the U.S. Energy Information Administration (EIA), the rapid expansion of shale gas production is expected to continue in the future. The EIA projects shale gas to

be 46 percent of domestic production by 2035. The following figure shows the stunning change.



The economic significance is potentially very large. While estimates vary, well over 200,000 of jobs (direct, indirect, and induced) have been created over the last several years by the development of domestic production of shale gas, and tens of thousands more will be created in the future.[4] As late as 2007, before the impact of the shale gas revolution, it was assumed that the United States would be importing large amounts of liquefied natural gas from the Middle East and other areas. Today, the United States is essentially self-sufficient in natural gas, with the only notable imports being from Canada, and expected to remain so for many decades. The price of natural gas has fallen by more than a factor of two since 2008, benefiting consumers in the lower cost of home heating and electricity.

The rapid expansion of production is rooted in change in applications of technology and field practice. It had long been recognized that substantial supplies of natural gas were embedded in shale rock. But it was only in 2002 and 2003 that the combination of two technologies working together – hydraulic fracturing and horizontal drilling – made shale gas commercial.

These factors have brought new regions into the supply mix. Parts of the country, such as regions of the Appalachian mountain states where the Marcellus Shale is located, which have not experienced significant oil and gas development for decades, are now undergoing significant development pressure. Pennsylvania, for example, which produced only one percent of total dry gas production in 2009, is one of the most active new areas of development. Even states with a history of oil and gas development, such as Wyoming and Colorado, have experienced significant development pressures in new areas of the state where unconventional gas is now technically and economically accessible due to changes in drilling and development technologies.

The urgency of addressing environmental consequences

As with all energy use, shale gas must be produced in a manner that prevents, minimizes and mitigates environmental damage and the risk of accidents and protects public health and safety. Public concern and debate about the production of shale gas has grown as shale gas output has expanded.

The Subcommittee identifies four major areas of concern: (1) Possible pollution of drinking water from methane and chemicals used in fracturing fluids; (2) Air pollution; (3) Community disruption during shale gas production; and (4) Cumulative adverse impacts that intensive shale production can have on communities and ecosystems.

There are serious environmental impacts underlying these concerns and these adverse environmental impacts need to be prevented, reduced and, where possible, eliminated as soon as possible. Absent effective control, public opposition will grow, thus putting continued production at risk. Moreover, with anticipated increase in U.S. hydraulically fractured wells, if effective environmental action is not taken today, the potential environmental consequences will grow to a point that the country will be faced a more

serious problem. Effective action requires both strong regulation and a shale gas industry in which all participating companies are committed to continuous improvement.

The rapid expansion of production and rapid change in technology and field practice, requires federal and state agencies to adapt and evolve their regulations. Industry's pursuit of more efficient operations often has environmental as well as economic benefits, including waste minimization, greater gas recovery, less water usage, and a reduced operating footprint. So there are many reasons to be optimistic that continuous improvement of shale gas production in reducing existing and potential undesirable impacts can be a cooperative effort among the public, companies in the industry, and regulators.

Subcommittee scope, procedure and outline of this report

Scope: The Subcommittee has focused exclusively on production of natural gas (and some liquid hydrocarbons) from shale formations with hydraulic fracturing stimulation in either vertical or horizontal wells. The Subcommittee is aware that some of the observations and recommendations in this report could lead to extension of its findings to other oil and gas operations, but our intention is to focus singularly on issues related to shale gas development. We caution against applying our findings to other areas, because the Subcommittee has not considered the different development practices and other types of geology, technology, regulation and industry practice.

These shale plays in different basins have different geological characteristics and occur in areas with very different water resources. In the Eagle Ford, in Texas, there is almost no flow-back water from an operating well following hydraulic fracturing, while in the Marcellus, primarily in Ohio, New York, Pennsylvania and West Virginia, the flow-back water is between 20 and 40 percent of the injected volume. This geological diversity means that engineering practice and regulatory oversight will differ widely among regions of the country.

The Subcommittee describes in this report a comprehensive and collaborative approach to managing risk in shale gas production. The Subcommittee believes that a more systematic commitment to a process of *continuous improvement* to identify and

implement best practices is needed, and should be embraced by all companies in the shale gas industry. Many companies already demonstrate their commitment to the kind of process we describe here, but the public should be confident that this is the practice across the industry.

This process should involve discussions and other collaborative efforts among companies involved in shale gas production (including service companies), state and federal regulators, and affected communities and public interests groups. The process should identify best practices that evolve as operational experience increases, knowledge of environmental effects and effective mitigation grows, and know-how and technology changes. It should also be supported by technology peer reviews that report on individual companies' performance and should be seen as a compliment to, not a substitute for, strong regulation and effective enforcement. There will be three benefits:

- For industry: As all firms move to adopt identified best practices, continuous improvement has the potential to both enhance production efficiency and reduce environmental impacts over time.
- For regulators: Sharing data and best practices will better inform regulators and help them craft policies and regulations that will lead to sounder and more efficient environmental practices than are now in place.
- For the public: Continuous improvement coupled with rigorous regulatory oversight can provide confidence that processes are in place that will result in improved safety and less environmental and community impact.

The realities of regional diversity of shale gas resources and rapid change in production practices and technology mean that a single best engineering practice cannot set for all locations and for all time. Rather, the appropriate starting point is to understand what are regarded as "best practices" today, how the current regulatory system works in the context of those operating in different parts of the country, and establishing a culture of continuous improvement.

The Subcommittee has considered the safety and environmental impact of all steps in shale gas production, not just hydraulic fracturing.[5] Shale gas production consists of

several steps, from well design and surface preparation, to drilling and cementing steel casing at multiple stages of well construction, to well completion. The various steps include perforation, water and fracturing fluid preparation, multistage hydraulic fracturing, collection and handling of flow-back and produced water, gas collection, processing and pipeline transmission, and site remediation.[6] Each of these activities has safety and environmental risks that are addressed by operators and by regulators in different ways according to location. In light of these processes, the Subcommittee interprets its charge to assess this entire system, rather than just hydraulic fracturing.

The Subcommittee's charge is not to assess the balance of the benefits of shale gas use against these environmental costs. Rather, the Subcommittee's charge is to identify steps that can be taken to reduce the environmental and safety risks associated with shale gas development and, importantly, give the public concrete reason to believe that environmental impacts will be reduced and well managed on an ongoing basis, and that problems will be mitigated and rapidly corrected, if and when they occur.

It is not within the scope of the Subcommittee's 90-day report to make recommendations about the proper regulatory roles for state and federal governments. However, the Subcommittee emphasizes that effective and capable regulation is essential to protect the public interest. The challenges of protecting human health and the environment in light of the anticipated rapid expansion of shale gas production require the joint efforts of state and federal regulators. This means that resources dedicated to oversight of the industry must be sufficient to do the job and that there is adequate regulatory staff at the state and federal level with the technical expertise to issue, inspect, and enforce regulations. Fees, royalty payments and severance taxes are appropriate sources of funds to finance these needed regulatory activities.

The nation has important work to do in strengthening the design of a regulatory system that sets the policy and technical foundation to provide for continuous improvement in the protection of human health and the environment. While many states and several federal agencies regulate aspects of these operations, the efficacy of the regulations is far from clear. Raw statistics about enforcement actions and compliance are not sufficient to draw conclusions about regulatory effectiveness. Informed conclusions about the state of shale gas operations require analysis of the vast amount of data that

is publically available, but there are surprisingly few published studies of this publically available data. Benchmarking is needed for the efficacy of existing regulations and consideration of additional mechanisms for assuring compliance such as disclosure of company performance and enforcement history, and operator certification of performance subject to stringent fines, if violated.

Subcommittee Procedure: In the ninety days since its first meeting, the Subcommittee met with representatives of industry, the environmental community, state regulators, officials of the Environmental Protection Agency, the Department of Energy, the Department of the Interior, both the United States Geologic Survey (USGS) and the Bureau of Land Management (BLM), which has responsibility for public land regulation,[7] and a number of individuals from industry and not-for-profit groups with relevant expertise and interest. The Subcommittee held a public meeting attended by over four hundred citizens in Washington Country, PA, and visited several Marcellus shale gas sites. The Subcommittee strove to hold all of its meeting in public although the Subcommittee held several private working sessions to review what it had learned and to deliberate on its course of action. A website is available that contains the Subcommittee meeting agendas, material presented to the Subcommittee, and numerous public comments.[8]

Outline of this report: The Subcommittee findings and recommendations are organized in four sections:

- Making information about shale gas production operations more accessible to the public – an immediate action.
- Immediate and longer term actions to reduce environmental and safety risks of shale gas operations
- Creation of a Shale Gas Industry Operation organization, on national and/or regional basis, committed to continuous improvement of best operating practices.
- R&D needs to improve safety and environmental performance – immediate and long term opportunities for government and industry.

The common thread in all these recommendations is that measurement and disclosure are fundamental elements of good practice and policy for all parties. Data enables companies to identify changes that improve efficiency and environmental performance and to benchmark against the performance of different companies. Disclosure of data permits regulators to identify cost/effective regulatory measures that better protect the environment and public safety, and disclosure gives the public a way to measure progress on reducing risks.

Making shale gas information available to the public

The Subcommittee has been struck by the enormous difference in perception about the consequences of shale gas activities. Advocates state that fracturing has been performed safety without significant incident for over 60 years, although modern shale gas fracturing of two mile long laterals has only been done for something less than a decade. Opponents point to failures and accidents and other environmental impacts, but these incidents are typically unrelated to hydraulic fracturing *per se* and sometimes lack supporting data about the relationship of shale gas development to incidence and consequences.[9] An industry response that hydraulic fracturing has been performed safely for decades rather than engaging the range of issues concerning the public will not succeed.

Some of this difference in perception can be attributed to communication issues. Many in the concerned public use the word “fracking” to describe all activities associated with shale gas development, rather than just the hydraulic fracturing process itself. Public concerns extend to accidents and failures associated with poor well construction and operation, surface spills, leaks at pits and impoundments, truck traffic, and the cumulative impacts of air pollution, land disturbance and community disruption.

The Subcommittee believes there is great merit to creating a national database to link as many sources of public information as possible with respect to shale gas development and production. Much information has been generated over the past ten years by state and federal regulatory agencies. Providing ways to link various databases and, where possible, assemble data in a comparable format, which are now in perhaps a hundred different locations, would permit easier access to data sets by interested parties.

Members of the public would be able to assess the current state of environmental protection and safety and inform the public of these trends. Regulatory bodies would be better able to assess and monitor the trends in enforcement activities. Industry would be able to analyze data on production trends and comparative performance in order to identify effective practices.

The Subcommittee recommends creation of this national database. A rough estimate for the initial cost is $20 million to structure and construct the linkages necessary for assembling this virtual database, and about $5 million annual cost to maintain it. This recommendation is not aimed at establishing new reporting requirements. Rather, it focuses on creating linkages among information and data that is currently collected and technically and legally capable of being made available to the public. What analysis of the data should be done is left entirely for users to decide.[10]

There are other important mechanisms for improving the availability and usefulness of shale gas information among various constituencies. The Subcommittee believes two such mechanisms to be exceptionally meritorious (and would be relatively inexpensive to expand).

The first is an existing organization known as STRONGER – the State Review of Oil and Natural Gas Environmental Regulation. STRONGER is a not-for-profit organization whose purpose is to accomplish genuine peer review of state regulatory activities. The peer reviews (conducted by a panel of state regulators, industry representatives, and environmental organization representatives with respect to the processes and policies of the state under review) are published publicly, and provide a means to share information about environmental protection strategies, techniques, regulations, and measures for program improvement. Too few states participate in STRONGER's voluntary review of state regulatory programs. The reviews allow for learning to be shared by states and the expansion of the STRONGER process should be encouraged. The Department of Energy, the Environmental Protection Agency, and the American Petroleum Institute have supported STRONGER over time.[11]

The second is the Ground Water Protection Council's project to extend and expand the *Risk Based Data Management System, which* allows states to exchange information about defined parameters of importance to hydraulic fracturing operations.[12]

The Subcommittee recommends that these two activities be funded at the level of $5 million per year beginning in FY2012. Encouraging these multi-stakeholder mechanisms will help provide greater information to the public, enhancing regulation and improving the efficiency of shale gas production. It will also provide support for STRONGER to expand its activities into other areas such as air quality, something that the Subcommittee encourages the states to do as part of the scope of STRONGER peer reviews.

Recommendations for immediate and longer term actions to reduce environmental and safety risks of shale gas operations

1. Improvement in air quality by reducing emissions of regulated pollutants and methane.

Shale gas production, including exploration, drilling, venting/flaring, equipment operation, gathering, accompanying vehicular traffic, results in the emission of ozone precursors (volatile organic compounds (VOCs), and nitrogen oxides), particulates from diesel exhaust, toxic air pollutants and greenhouse gases (GHG), such as methane.

As shale gas operations expand across the nation these air emissions have become an increasing matter of concern at the local, regional and national level. Significant air quality impacts from oil and gas operations in Wyoming, Colorado, Utah and Texas are well documented, and air quality issues are of increasing concern in the Marcellus region (in parts of Ohio, Pennsylvania, West Virginia and New York).[13]

The Environmental Protection Agency has the responsibility to regulate air emissions and in many cases delegate its authority to states. On July 28, 2011, EPA proposed amendments to its regulations for air emissions for oil and gas operations. If finalized and fully implemented, its proposal will reduce emissions of VOCs, air toxics and, collaterally, methane. EPA's proposal does not address many existing types of sources in the natural gas production sector, with the notable exception of hydraulically fractured well re-completions, at which "green" completions must be used. ("Green" completions use equipment that will capture methane and other air contaminants, avoiding its release.) EPA is under court order to take final action on these clean air measures in 2012. In addition, a number of states – notably, Wyoming and Colorado – have taken proactive steps to address air emissions from oil and gas activities.

The Subcommittee supports adoption of emission standards for both new and existing sources for methane, air toxics, ozone-forming pollutants, and other major airborne contaminants resulting from natural gas exploration, production, transportation and distribution activities. The Subcommittee also believes that companies should be required, as soon as practicable, to measure and disclose air pollution emissions, including greenhouse gases, air toxics, ozone precursors and other pollutants. Such disclosure should include direct measurements wherever feasible; include characterization of chemical composition of the natural gas measured; and be reported on a publically accessible website that allows for searching and aggregating by pollutant, company, production activity and geography.

Methane emissions from shale gas drilling, production, gas processing, transmission and storage are of particular concern because methane is a potent greenhouse gas: 25 to 72 times greater warming potential than carbon dioxide on 100-year and 20-year time scales respectively.[14] Currently, there is great uncertainty about the scale of methane emissions.

The Subcommittee recommends three actions to address the air emissions issue.

First, inadequate data are available about how much methane and other air pollutants are emitted by the consolidated production activities of a shale gas operator in a given area, with such activities encompassing drilling, fracturing, production, gathering, processing of gas and liquids, flaring, storage, and dispatch into the pipeline transmission and distribution network. Industry reporting of greenhouse gas emissions in 2012 pursuant to EPA's reporting rule will provide new insights, but will not eliminate key uncertainties about the actual amount and variability in emissions.

The Subcommittee recommends enlisting a subset of producers in different basins, on a voluntary basis, to immediately launch projects to design and rapidly implement measurement systems to collect comprehensive methane and other air emissions data.

These pioneering data sets will be useful to regulators and industry in setting benchmarks for air emissions from this category of oil and gas production, identifying cost-effective procedures and equipment changes that will reduce emissions; and guiding practical regulation and potentially avoid burdensome and contentious regulatory

procedures. Each project should be conducted in a transparent manner and the results should be publicly disclosed.

There needs to be common definitions of the emissions and other parameters that should be measured and measurement techniques, so that comparison is possible between the data collected from the various projects. Provision should be made for an independent technical review of the methodology and results to establish their credibility. The Subcommittee will report progress on this proposal during its next phase.

The second recommendation regarding air emissions concerns the need for a thorough assessment of the greenhouse gas footprint for cradle-to-grave use of natural gas. This effort is important in light of the expectation that natural gas use will expand and substitute for other fuels. There have been relatively few analyses done of the question of the greenhouse gas footprint over the entire fuel-cycle of natural gas production, delivery and use, and little data are available that bear on the question. A recent peer-reviewed article reaches a pessimistic conclusion about the greenhouse gas footprint of shale gas production and use – a conclusion not widely accepted.[15] DOE's National Energy Technology Laboratory has given an alternative analysis.[16] Work has also been done for electric power, where natural gas is anticipated increasingly to substitute for coal generation, reaching a more favorable conclusion that natural gas results in about one-half the equivalent carbon dioxide emissions.[17]

The Subcommittee believes that additional work is needed to establish the extent of the footprint of the natural gas fuel cycle in comparison to other fuels used for electric power and transportation because it is an important factor that will be considered when formulating policies and regulations affecting shale gas development. These data will help answer key policy questions such as the time scale on which natural gas fuel switching strategies would produce real climate benefits through the full fuel cycle and the level of methane emission reductions that may be necessary to ensure such climate benefits are meaningful.

The greenhouse footprint of the natural gas fuel cycle can be either estimated indirectly by using surrogate measures or preferably by collecting actual data where it is practicable to do so. In the selection of methods to determine actual emissions,

preference should be given to direct measurement wherever feasible, augmented by emissions factors that have been empirically validated. Designing and executing a comprehensive greenhouse gas footprint study based on actual data – the Subcommittee's recommended approach -- is a major project. It requires agreement on measurement equipment, measurement protocols, tools for integrating and analyzing data from different regions, over a multiyear period. Since producer, transmission and distribution pipelines, end-use storage and natural gas many different companies will necessarily be involved. A project of this scale will be expensive. Much of the cost will be borne by firms in the natural gas enterprise that are or will be required to collect and report air emissions. These measurements should be made as rapidly as practicable. Aggregating, assuring quality control and analyzing these data is a substantial task involving significant costs that should be underwritten by the federal government.

It is not clear which government agency would be best equipped to manage such a project. The Subcommittee recommends that planning for this project should begin immediately and that the Office of Science and Technology Policy, should be asked to coordinate an interagency effort to identify sources of funding and lead agency responsibility. This is a pressing question so a clear blueprint and project timetable should be produced within a year.

Third, the Subcommittee recommends that industry and regulators immediately expand efforts to reduce air emissions using proven technologies and practices. Both methane and ozone precursors are of concern. Methane leakage and uncontrolled venting of methane and other air contaminants in the shale gas production should be eliminated except in cases where operators demonstrate capture is technically infeasible, or where venting is necessary for safety reasons and where there is no alternative for capturing emissions. When methane emissions cannot be captured, they should be flared whenever volumes are sufficient to do so.

Ozone precursors should be reduced by using cleaner engine fuel, deploying vapor recovery and other control technologies effective on relevant equipment." Wyoming's emissions rules represent a good starting point for establishing regulatory frameworks and for encouraging industry best practices.

2. Protecting water supply and water quality.

The public understandably wants implementation of standards to ensure shale gas production does not risk polluting drinking water or lakes and streams. The challenge to proper understanding and regulation of the water impacts of shale production is the great diversity of water use in different regional shale gas plays and the different pattern of state and federal regulation of water resources across the country. The U.S. EPA has certain authorities to regulate water resources and it is currently undertaking a two-year study under congressional direction to investigate the potential impacts of hydraulic fracturing on drinking water resources.[18]

Water use in shale gas production passes through the following stages: (1) water acquisition, (2) drilling and hydraulic fracturing (surface formulation of water, fracturing chemicals and sand followed by injection into the shale producing formation at various locations), (3) collection of return water, (4) water storage and processing, and (5) water treatment and disposal.

The Subcommittee offers the following observations with regard to these water issues:

(1) Hydraulic fracturing stimulation of a shale gas well requires between 1 and 5 million gallons of water. While water availability varies across the country, in most regions water used in hydraulic fracturing represents a small fraction of total water consumption. Nonetheless, in some regions and localities there are significant concerns about consumptive water use for shale gas development.[19] There is considerable debate about the water intensity of natural gas compared to other fuels for particular applications such as electric power production.[20]

One of the commonly perceived risks from hydraulic fracturing is the possibility of leakage of fracturing fluid through fractures into drinking water. Regulators and geophysical experts agree that the likelihood of properly injected fracturing fluid reaching drinking water through fractures is remote where there is a large depth separation between drinking water sources and the producing zone. In the great majority of regions where shale gas is being produced, such separation exists and there are few, if any, documented examples of such migration. An improperly executed fracturing fluid injection can, of course, lead to surface spills

and leakage into surrounding shallow drinking water formations. Similarly, a well with poorly cemented casing could potentially leak, regardless of whether the well has been hydraulically fractured.

With respect to stopping surface spills and leakage of contaminated water, the Subcommittee observes that extra measures are now being taken by some operators and regulators to address the public's concern that water be protected. The use of mats, catchments and groundwater monitors as well as the establishment of buffers around surface water resources help ensure against water pollution and should be adopted.

Methane leakage from producing wells into surrounding drinking water wells, exploratory wells, production wells, abandoned wells, underground mines, and natural migration is a greater source of concern. The presence of methane in wells surrounding a shale gas production site is not *ipso facto* evidence of methane leakage from the fractured producing well since methane may be present in surrounding shallow methane deposits or the result of past conventional drilling activity.

However, a recent, credible, peer-reviewed study documented the higher concentration of methane originating in shale gas deposits (through isotopic abundance of C-13 and the presence of trace amounts of higher hydrocarbons) into wells surrounding a producing shale production site in northern Pennsylvania.[21] The Subcommittee recommends several studies be commissioned to confirm the validity of this study and the extent of methane migration that may take place in this and other regions.

(2) Industry experts believe that methane migration from shale gas production, when it occurs, is due to one or another factors: drilling a well in a geological unstable location; loss of well integrity as a result of poor well completion (cementing or casing) or poor production pressure management. Best practice can reduce the risk of this failure mechanism (as discussed in the following section). Pressure tests of the casing and state-of-the-art cement bond logs should be performed to confirm that the methods being used achieve the desired degree of

formation isolation. Similarly, frequent microseismic surveys should be carried out to assure operators and service companies that hydraulic fracture growth is limited to the gas-producing formations. Regulations and inspections are needed to confirm that operators have taken prompt action to repair defective cementing (squeeze jobs).

(3) A producing shale gas well yields flow-back and other produced water. The flow-back water is returned fracturing water that occurs in the early life of the well (up to a few months) and includes residual fracturing fluid as well as some solid material from the formation. Produced water is the water displaced from the formation and therefore contains substances that are found in the formation, and may include brine, gases (e.g. methane, ethane), trace metals, naturally occurring radioactive elements (e.g. radium, uranium) and organic compounds. Both the amount and the composition of the flow-back and produced water vary substantially among shale gas plays – for example, in the Eagle Ford area, there is very little returned water after hydraulic fracturing whereas, in the Marcellus, 20 to 40 percent of the fracturing fluid is produced as flow-back water. In the Barnett, there can significant amounts of saline water produced with shale gas if hydraulic fractures propagate downward into the Ellenburger formation.

(4) The return water (flow-back + produced) is collected (frequently from more than a single well), processed to remove commercially viable gas and stored in tanks or an impoundment pond (lined or unlined). For pond storage evaporation will change the composition. Full evaporation would ultimately leave precipitated solids that must be disposed in a landfill. <u>Measurement of the composition of the stored return water should be a routine industry practice</u>.

(5) There are four possibilities for disposal of return water: <u>reuse</u> as fracturing fluid in a new well (several companies, operating in the Marcellus are recycling over 90 percent of the return water); <u>underground injection into disposal wells</u> (this mode of disposal is regulated by the EPA); <u>waste water treatment</u> to produce clean water (though at present, most waste water treatment plants are not equipped with the capability to treat many of the contaminants associated with shale gas waste water); and <u>surface runoff</u> which is forbidden.

Currently, the approach to water management by regulators and industry is not on a "systems basis" where all aspect of activities involving water use is planned, analyzed, and managed on an integrated basis. The difference in water use and regulation in different shale plays means that there will not be a single water management integrated system applicable in all locations. Nevertheless, the Subcommittee believes certain common principles should guide the development of integrated water management and identifies three that are especially important:

- Adoption of a life cycle approach to water management from the beginning of the production process (acquisition) to the end (disposal): all water flows should be tracked and reported quantitatively throughout the process.
- Measurement and public reporting of the composition of water stocks and flow throughout the process (for example, flow-back and produced water, in water ponds and collection tanks).
- Manifesting of all transfers of water among locations.

Early case studies of integrated water management are desirable so as to provide better bases for understanding water use and disposition and opportunities for reduction of risks related to water use. The Subcommittee supports EPA's retrospective and prospective case studies that will be part of the EPA study of hydraulic fracturing impacts on drinking water resources, but these case studies focus on identification of possible consequences rather than the definition of an integrated water management system, including the measurement needs to support it. The Subcommittee believes that development and use of an integrated water management system has the potential for greatly reducing the environmental footprint and risk of water use in shale gas production and recommends that regulators begin working with industry and other stakeholders to develop and implement such systems in their jurisdictions and regionally.

Additionally, agencies should review field experience and modernize rules and enforcement practices – especially regarding well construction/operation, management of flow back and produced water, and prevention of blowouts and surface spills – to ensure robust protection of drinking and surface waters. Specific best practice matters that should receive priority attention from regulators and industry are described below.

3. Background water quality measurements.

At present there are widely different practices for measuring the water quality of wells in the vicinity of a shale gas production site. Availability of measurements in advance of drilling would provide an objective baseline for determining if the drilling and hydraulic fracturing activity introduced any contaminants in surrounding drinking water wells.

The Subcommittee is aware there is great variation among states with respect to their statutory authority to require measurement of water quality of private wells, and that the process of adopting practical regulations that would be broadly acceptable to the public would be difficult. Nevertheless, the value of these measurements for reassuring communities about the impact of drilling on their community water supplies leads the Subcommittee to recommend that states and localities adopt systems for measurement and reporting of background water quality in advance of shale gas production activity. These baseline measurements should be publicly disclosed, while protecting landowner's privacy.

4. Disclosure of the composition of fracturing fluids.

There has been considerable debate about requirements for reporting all chemicals (both composition and concentrations) used in fracturing fluids. Fracturing fluid refers to the slurry prepared from water, sand, and some added chemicals for high pressure injection into a formation in order to create fractures that open a pathway for release of the oil and gases in the shale. Some states (such as Wyoming, Arkansas and Texas) have adopted disclosure regulations for the chemicals that are added to fracturing fluid, and the U.S. Department of Interior has recently indicated an interest in requiring disclosure for fracturing fluids used on federal lands.

The DOE has supported the establishment and maintenance of a relatively new website, FracFocus.org (operated jointly by the Ground Water Protection Council and the Interstate Oil and Gas Compact Commission) to serve as a voluntary chemical registry for individual companies to report all chemicals that would appear on Material Safety Data Sheets (MSDS) subject to certain provisions to protect "trade secrets." While FracFocus is off to a good start with voluntary reporting growing rapidly, the restriction to MSDS data means that a large universe of chemicals frequently used in hydraulic

fracturing treatments goes unreported. MSDS only report chemicals that have been deemed to be hazardous in an occupational setting under standards adopted by OSHA (the Occupational Safety and Health Administration); MSDA reporting does not include other chemicals that might be hazardous if human exposure occurs through environmental pathways. Another limitation of FracFocus is that the information is not maintained as a database. As a result, the ability to search for data is limited and there are no tools for aggregating data.

The Subcommittee believes that the high level of public concern about the nature of fracturing chemicals suggests that the benefit of immediate and complete disclosure of all chemical components and composition of fracturing fluid completely outweighs the restriction on company action, the cost of reporting, and any intellectual property value of proprietary chemicals. The Subcommittee believes that public confidence in the safety of fracturing would be significantly improved by complete disclosure and that the barrier to shield chemicals based on trade secret should be set very high. Therefore the Subcommittee recommends that regulatory entities immediately develop rules to require disclosure of all chemicals used in hydraulic fracturing fluids on both public and private lands. Disclosure should include all chemicals, not just those that appear on MSDS. It should be reported on a well-by-well basis and posted on a publicly available website that includes tools for searching and aggregating data by chemical, well, by company, and by geography.

5. Reducing the use of diesel in shale gas development

Replacing diesel with natural gas or electric power for oil field equipment will decrease harmful air emissions and improve air quality. Although fuel substitution will likely happen over time because of the lower cost of natural gas compared diesel and because of likely future emission restrictions, the Subcommittee recommends conversion from diesel to natural gas for equipment fuel or to electric power where available, as soon as practicable. The process of conversion may be slowed because manufacturers of compression ignition or spark ignition engines may not have certified the engine operating with natural gas fuel for off-road use as required by EPA air emission regulations.[22]

Eliminating the use of diesel as an additive to hydraulic fracturing fluid**.** The Subcommittee believes there is no technical or economic reason to use diesel as a stimulating fluid. Diesel is a refinery product that consists of several components possibly including some toxic impurities such as benzene and other aromatics. (EPA is currently considering permitting restrictions of the use of diesel fuels in hydraulic fracturing under Safe Drinking Water Act (SDWA) Underground Injection Control (UIC) Class II.) Diesel is convenient to use in the oil field because it is present for use fuel for generators and compressors.

Diesel has two uses in hydraulic fracturing and stimulation. In modest quantities diesel is used to solubilize other fracturing chemical such as guar. Mineral oil (a synthetic mixture of C-10 to C-40 hydrocarbons) is as effective at comparable cost. Infrequently, diesel is use as a fracturing fluid in water sensitive clay and shale reservoirs. In these cases, light crude oil that is free of aromatic impurities picked up in the refining process, can be used as a substitute of equal effectiveness and lower cost compared to diesel, as a non-aqueous fracturing fluid.

6. Managing short-term and cumulative impacts on communities, land use, wildlife and ecologies.

Intensive shale gas development can potentially have serious impacts on public health, the environment and quality of life – even when individual operators conduct their activities in ways that meet and exceed regulatory requirements. The combination of impacts from multiple drilling and production operations, support infrastructure (pipelines, road networks, etc.) and related activities can overwhelm ecosystems and communities.

The Subcommittee believes that federal, regional, state and local jurisdictions need to place greater effort on examining these cumulative impacts in a more holistic manner; discrete permitting activity that focuses narrowly on individual activities does not reach to these issues. Rather than suggesting a simple prescription that every jurisdiction should follow to assure adequate consideration of these impacts, the Subcommittee believes that each relevant jurisdiction should develop and implement processes for community engagement and for preventing, mitigating and remediating surface impacts and

community impacts from production activities. There are a number of threshold mechanisms that should be considered:

- Optimize use of multi-well drilling pads to minimize transport traffic and needs for new road construction.
- Evaluate water use at the scale of affected watersheds.
- Provide formal notification by regulated entities of anticipated environmental and community impacts.
- Declare unique and/or sensitive areas off-limits to drilling and support infrastructure as determined through an appropriate science-based process.
- Undertake science-based characterization of important landscapes, habitats and corridors to inform planning, prevention, mitigation and reclamation of surface impacts.
- Establish effective field monitoring and enforcement to inform on-going assessment of cumulative community and land use impacts.
- Mitigate noise, air and visual pollution.

The process for addressing these issues must afford opportunities for affected communities to participate and respect for the rights of mineral rights owners.

Organizing for continuous improvement of "best practice"

In this report, the term "Best Practice" refers to industry techniques or methods that have proven over time to accomplish given tasks and objectives in a manner that most acceptably balances desired outcomes and avoids undesirable consequences. Continuous best practice in an industry refers to the evolution of best practice by adopting process improvements as they are identified, thus progressively improving the level and narrowing the distribution of performance of firms in the industry. Best practice is a particularly helpful management approach in a field that is growing rapidly, where technology is changing rapidly, and involves many firms of different size and technical capacity.

Best practice does not necessarily imply a single process or procedure; it allows for a range of practice that is believed to be equally effective at achieving desired out comes. This flexibility is important because it acknowledges the possibility that different operators in different regions will select different solutions.

The Subcommittee believes the creation of a shale gas industry production organization dedicated to continuous improvement of best practice through development of standards, diffusion of these standards, and assessing compliance among its members can be an important mechanism for improving shale gas companies' commitment to safety and environmental protection as it carries out its business. The Subcommittee envisions that the industry organization would be governed by a board of directors composed of member companies, on a rotating basis, along with external members, for example from non-governmental organizations and academic institutions, as determined by the board.

Strong regulations and robust enforcement resources and practices are a prerequisite to protecting health, safety and the environment, but the job is easier where companies are motivated and committed to adopting best engineering and environmental practice. Companies have economic incentives to adopt best practice, because it improves operational efficiency and, if done properly, improves safety and environmental protection.

Achievement of best practice requires management commitment, adoption and dissemination of standards that are widely disseminated and periodically updated on the basis of field experience and measurements. A trained work force, motivated to adopt best practice, is also necessary. Creation of an industry organization dedicated to excellence in shale gas operations intended to advance knowledge about best practice and improve the interactions among companies, regulators and the public would be a major step forward.

The Subcommittee is aware that shale gas producers and other groups recognize the value of a best practice management approach and that industry is considering creating a mechanism for encouraging best practice. The design of such a mechanism involves many considerations including the differences in the shale production and regulations in different basins, making most effective use of mechanisms that are currently in place, and respecting the different capabilities of large and smaller operators. The Subcommittee will monitor progress on this important matter and continue to make its views known about the characteristics that such a mechanism and supporting organization should possess to maximize its effectiveness.

It should be stressed that any industry best practice mechanism would need to comply with anti-trust laws and would not replace any existing state or federal regulatory authority.

Priority best practice topics

Air

- Measurement and disclosure of air emissions including VOCs, methane, air toxics, and other pollutants.
- Reduction of methane emission from all shale gas operations

Water

- Integrated water management systems
- Well completion – casing and cementing
- Characterization and disclosure of flow back and other produced water

The Subcommittee has identified a number of promising best practice opportunities. Five examples are given in the call-out box. Two examples are discussed below to give a sense of the opportunities that presented by best practice focus.

Well integrity: an example. Well integrity is an example of the potential power of best practice for shale gas production. Well integrity encompasses the planning, design and execution of a well completion (cementing, casing and well head placement). It is fundamental to good outcomes in drilling oil and gas wells.

Methane leakage to water reservoirs is widely believed to be due to poor well completion, especially poor casing and cementing. Casing and cementing programs should be designed to provide optimal isolation of the gas-producing zone from overlaying formations. The number of cemented casings and the depth ranges covered will depend on local geologic and hydrologic conditions. However, there need to be multiple engineered barriers to prevent communication between hydrocarbons and potable aquifers. In addition, the casing program needs to be designed to optimize the potential success of cementing operations. Poorly cemented cased wells offer pathways for leakage; properly cemented and cased wells do not.

Well integrity is an ideal example of where a best practice approach, adopted by the industry, can stress best practice and collect data to validate continuous improvement. The American Petroleum Institute, for example, has focused on well completion in its standards activity for shale gas production.[23]

At present, however, there is a wide range in procedures followed in the field with regard to casing placement and cementing for shale gas drilling. There are different practices with regard to completion testing and different regulations for monitoring possible gas leakage from the annulus at the wellhead. In some jurisdictions, regulators insist that gas leakage can be vented; others insist on containment with periodic pressure testing. There are no common leakage criteria for intervention in a well that exhibits damage or on the nature of the intervention. It is very likely that over time a focus on best practice in well completion will result in safer operations and greater environmental protection. The best practice will also avoid costly interruptions to normal operations. The regulation of shale gas development should also include inspections at safety-critical stages of well construction and hydraulic fracturing.

Limiting water use by controlling vertical fracture growth: – a second example. While the vertical growth of hydraulic fractures does not appear to have been a causative factor in reported cases where methane from shale gas formations has migrated to the near surface, it is in the best interest of operators and the public to limit the vertical extent of hydraulic fractures to the gas bearing shale formation being exploited. By improving the efficiency of hydraulic fractures, more gas will be produced using less water for fracturing – which has economic value to operators and environmental value for the public.

The vertical propagation of hydraulic fractures results from the variation of earth stress with depth and the pumping pressure during fracturing. The variation of earth stress with depth is difficult to predict, but easy to measure in advance of hydraulic fracturing operations. Operators and service companies should assure that through periodic direct measurement of earth stresses and microseismic monitoring of hydraulic fracturing operations, everything possible is being done to limit the amount of water and additives used in hydraulic fracturing operations.

Evolving best practices must be accompanied by metrics that permit tracking of the progress in improving shale gas operations performance and environmental impacts. The Subcommittee has the impression that the current standard- setting processes do not utilize metrics. Without such metrics and the collection of relevant measured data,

operators lack the ability to track objectively the progress of the extensive process of setting and updating standards.

Research and development needs

The profitability, rapid expansion, and the growing recognition of the scale of the resource mean that oil and gas companies will mount significant R&D efforts to improve performance and lower cost of shale gas exploration and production. In general the oil and gas industry is a technology-focused and technology-driven industry, and it is safe to assume that there will be a steady advance of technology over the coming years.

In these circumstances the federal government has a limited role in supporting R&D. The proper focus should be on sponsoring R&D and analytic studies that address topics that benefit the public or the industry but which do not permit individual firms to attain a proprietary position. Examples are environmental and safety studies, risk assessments, resource assessments, and longer-term R&D (such as research on methane hydrates). Across many administrations, the Office of Management and Budget (OMB) has been skeptical of any federal support for oil and gas R&D, and many Presidents' budget have not included any request for R&D for oil and gas. Nonetheless Congress has typically put money into the budget for oil & gas R&D.

The following table summarizes the R&D outlays of the DOE, EPA, and USGS for unconventional gas:

Unconventional Gas R&D Outlays for Various Federal Agencies ($ millions)					
	FY2008	**FY2009**	**FY2010**	**FY2011**	**FY2012 request**
DOE Unconventional Gas					
EPAct Section 999 Program Funds					
RPSEA Administered	$14	$14	$14	$14	0
NETL Complementary	$9	$9	$9	$4	0
Annual Appropriated Program Funds					
Environmental	$2	$4	$2	0	0
Unconventional Fossil Energy	0	0	$6	0	0
Methane Hydrate projects	$15	$15	$15	$5	$10
Total Department of Energy	$40	$42	$46	$23	$10
Environmental Protection Agency	$0	$0	$1.9	$4.3	$6.1
USGS	$4.5	$4.6	$5.9	$7.4	$7.6
Total Federal R&D	**$44.5**	**$46.6**	**$53.8**	**$34.7**	**$23.7**

Near Term Actions:

The Subcommittee believes that given the scale and rapid growth of the shale gas resource in the nation's energy mix, the federal government should sponsor some R&D for unconventional gas, focusing on areas that have public and industry wide benefit and addresses public concern. The Subcommittee, at this point, is only in a position to offer some initial recommendations, not funding levels or to assignment of responsibility to particular government agencies. The DOE, EPA, the USGS, and DOI Bureau of Land Management all have mission responsibility that justify a continuing, tailored, federal R&D effort.

RPSEA is the Research Partnership to Secure Energy for America, a public/private research partnership authorized by the 2005 Energy Policy Act at a level of $50 million from offshore royalties. Since 2007, the RPSEA program has focused on unconventional gas. The Subcommittee strongly supports the RPSEA program at its authorized level.[24]

The Subcommittee recommends that the relevant agencies, the Office of Science and Technology Policy (OSTP), and OMB discuss and agree on an appropriate mission and level of funding for unconventional natural gas R&D. If requested, the Subcommittee, in the second phase of its work, could consider this matter in greater detail and make recommendations for the Administration's consideration.

In addition to the studies mentioned in the body of the report, the Subcommittee mentions several additional R&D projects where results could reduce safety risk and environmental damage for shale gas operations:

1. Basic research on the relationship of fracturing and micro-seismic signaling.
2. Determination of the chemical interactions between fracturing fluids and different shale rocks – both experimental and predictive.
3. Understanding induced seismicity triggered by hydraulic fracturing and injection well disposal.[25]
4. Development of "green" drilling and fracturing fluids.
5. Development of improved cement evaluation and pressure testing wireline tools assuring casing and cementing integrity.

Longer term prospects for technical advance

The public should expect significant technical advance on shale gas production that will substantially improve the efficiency of shale gas production and that will in turn reduce environmental impact. The expectation of significant production expansion in the future offers a tremendous incentive for companies to undertake R&D to improve efficiency and profitability. The history of the oil and gas industry supports such innovation, in particular greater extraction of the oil and gas in place and reduction in the unit cost of drilling and production.

The original innovations of directional drilling and formation fracturing plausibly will be extended by much more accurate placement of fracturing fluid guided by improved interpretation of micro-seismic signals and improved techniques of reservoir testing. As

an example, oil services firms are already offering services that provide near-real-time monitoring to avoid excessive vertical fracturing growth, thus affording better control of fracturing fluid placement. Members of the Subcommittee estimate that an improvement in in efficiency of water use could be between a factor of two and four. There will be countless other innovations as well.

There has already been a major technical innovation – the switch from single well to pad-based drilling and production of multiple wells (up to twenty wells per pad have been drilled). The multi-well pad system allows for enhanced efficiency because of repeating operations at the same site and a much smaller footprint (e.g. concentrated gas gathering systems; many fewer truck trips associated with drilling and completion, especially related to equipment transport; decreased needs for road and pipeline constructions, etc.). It is worth noting that these efficiencies may require pooling acreage into large blocks.

Conclusion

The public deserves assurance that the full economic, environmental and energy security benefits of shale gas development will be realized without sacrificing public health, environmental protection and safety. Nonetheless, accidents and incidents have occurred with shale gas development, and uncertainties about impacts need to be quantified and clarified. Therefore the Subcommittee has highlighted important steps for more thorough information, implementation of best practices that make use of technical innovation and field experience, regulatory enhancement, and focused R&D, to ensure that shale operations proceed in the safest way possible, with enhanced efficiency and minimized adverse impact. If implemented these measures will give the public reason to believe that the nation's considerable shale gas resources are being developed in a way that is most beneficial to the nation.

ANNEX A – CHARGE TO THE SUBCOMMITTEE

From: Secretary Chu

To: William J. Perry, Chairman, Secretary's Energy Advisory Board (SEAB)

On March 30, 2011, President Obama announced a plan for U.S. energy security, in which he instructed me to work with other agencies, the natural gas industry, states, and environmental experts to improve the safety of shale gas development. The President also issued the Blueprint for a Secure Energy Future ("Energy Blueprint"), which included the following charge:

> **"Setting the Bar for Safety and Responsibility:** To provide recommendations from a range of independent experts, the Secretary of Energy, in consultation with the EPA Administrator and Secretary of Interior, should task the Secretary of Energy Advisory Board (SEAB) with establishing a subcommittee to examine fracking issues. The subcommittee will be supported by DOE, EPA and DOI, and its membership will extend beyond SEAB members to include leaders from industry, the environmental community, and states. The subcommittee will work to identify, within 90 days, any immediate steps that can be taken to improve the safety and environmental performance of fracking and to develop, within six months, consensus recommended advice to the agencies on practices for shale extraction to ensure the protection of public health and the environment." *Energy Blueprint (page 13).*

The President has charged us with a complex and urgent responsibility. I have asked SEAB and the Natural Gas Subcommittee, specifically, to begin work on this assignment immediately and to give it the highest priority.

This memorandum defines the task before the Subcommittee and the process to be used.

Membership:

In January of 2011, the SEAB created a Natural Gas Subcommittee to evaluate what role natural gas might play in the clean energy economy of the future. Members of the Subcommittee include John Deutch (chair), Susan Tierney, and Dan Yergin. Following consultation with the Environmental Protection Agency and the Department of the Interior, I have appointed the following additional members to the Subcommittee: Stephen Holditch, Fred Krupp, Kathleen McGinty, and Mark Zoback.

The varied backgrounds of these members satisfies the President's charge to include individuals with industry, environmental community, and state expertise. To facilitate an expeditious start, the Subcommittee will consist of this small group, but additional members may be added as appropriate.

Consultation with other Agencies:

The President has instructed DOE to work in consultation with EPA and DOI, and has instructed all three agencies to provide support and expertise to the Subcommittee. Both agencies have independent regulatory authority over certain aspects of natural gas production, and considerable expertise that can inform the Subcommittee's work.

- The Secretary and Department staff will manage an interagency working group to be available to consult and provide information upon request of the Subcommittee.
- The Subcommittee will ensure that opportunities are available for EPA and DOI to present information to the Subcommittee.
- The Subcommittee should identify and request any resources or expertise that lies within the agencies that is needed to support its work.
- The Subcommittee's work should at all times remain independent and based on sound science and other expertise held from members of the Subcommittee.
- The Subcommittee's deliberations will involve only the members of the Subcommittee.
- The Subcommittee will present its final report/recommendations to the full SEAB Committee.

Public input:

In arriving at its recommendations, the Subcommittee will seek timely expert and other advice from industry, state and federal regulators, environmental groups, and other stakeholders.

- To assist the Subcommittee, DOE's Office of Fossil Energy will create a website to describe the initiative and to solicit public input on the subject.
- The Subcommittee will meet with representatives from state and federal regulatory agencies to receive expert information on subjects as the Subcommittee deems necessary.
- The Subcommittee or the DOE (in conjunction with the other agencies) may hold one or more public meetings when appropriate to gather input on the subject.

Scope of work of the Subcommittee:

The Subcommittee will provide the SEAB with recommendations as to actions that can be taken to improve the safety and environmental performance of shale gas extraction processes, and other steps to ensure protection of public health and safety, on topics such as:

- well design, siting, construction and completion;
- controls for field scale development;
- operational approaches related to drilling and hydraulic fracturing;
- risk management approaches;
- well sealing and closure;
- surface operations;
- waste water reuse and disposal, water quality impacts, and storm water runoff;

- protocols for transparent public disclosure of hydraulic fracturing chemicals and other information of interest to local communities;
- optimum environmentally sound composition of hydraulic fracturing chemicals, reduced water consumption, reduced waste generation, and lower greenhouse gas emissions;
- emergency management and response systems;
- metrics for performance assessment; and
- mechanisms to assess performance relating to safety, public health and the environment.

The Subcommittee should identify, at a high level, the best practices and additional steps that could enhance companies' safety and environmental performance with respect to a variety of aspects of natural gas extraction. Such steps may include, but not be limited to principles to assure best practices by the industry, including companies' adherence to these best practices. Additionally, the Subcommittee may identify high-priority research and technological issues to support prudent shale gas development.

Delivery of Recommendations and Advice:

- Within 90 days of its first meeting, the Subcommittee will report to SEAB on the "immediate steps that can be taken to improve the safety and environmental performance of fracking."
- Within 180 days of its first meeting, the Subcommittee will report to SEAB "consensus recommended advice to the agencies on practices for shale extraction to ensure the protection of public health and the environment."
- At each stage, the Subcommittee will report its findings to the full Committee and the SEAB will review the findings.
- The Secretary will consult with the Administrator of EPA and the Secretary of the Interior, regarding the recommendations from SEAB.

Other:

- The Department will provide staff support to the Subcommittee for the purposes of meeting the requirements of the Subcommittee charge. The Department will also engage the services of other agency Federal employees or contractors to provide staff services to the Subcommittee, as it may request.
- DOE has identified $700k from the Office of Fossil Energy to fund this effort, which will support relevant studies or assessments, report writing, and other costs related to the Subcommittee's process.
- The Subcommittee will avoid activity that creates or gives the impression of giving undue influence or financial advantage or disadvantage for particular companies involved in shale gas exploration and development.
- The President's request specifically recognizes the unique technical expertise and scientific role of the Department and the SEAB. As an agency not engaged in regulating this activity, DOE is expected to provide a sound, highly credible evaluation of the best practices and best ideas for employing these practices safely that can be made available to companies and relevant regulators for appropriate action. Our task does not include making decisions about regulatory policy.

ANNEX B – MEMBERS OF THE SUBCOMMITTEE

John Deutch, Institute Professor at MIT (Chair) **-** John Deutch served as Director of Energy Research, Acting Assistant Secretary for Energy Technology and Under Secretary of Energy for the U.S. Department of Energy in the Carter Administration and Undersecretary of Acquisition & Technology, Deputy Secretary of Defense and Director of Central Intelligence during the first Clinton Administration. Dr. Deutch also currently serves on the Board of Directors of Raytheon and Cheniere Energy and is a past director of Citigroup, Cummins Engine Company and Schlumberger. A chemist who has published more than 140 technical papers in physical chemistry, he has been a member of the MIT faculty since 1970, and has served as Chairman of the Department of Chemistry, Dean of Science and Provost. He is a member of the Secretary of Energy Advisory Board.

Stephen Holditch, Head of the Department of Petroleum Engineering at Texas A&M University and has been on the faculty since 1976 - Stephen Holditch, who is a member of the National Academy of Engineering, serves on the Boards of Directors of Triangle Petroleum Corporation and Matador Resources Corporation. In 1977, Dr. Holditch founded S.A. Holditch & Associates, a petroleum engineering consulting firm that specialized in the analysis of unconventional gas reservoirs. Dr. Holditch was the 2002 President of the Society of Petroleum Engineers. He was the Editor of an SPE Monograph on hydraulic fracturing treatments, and he has taught short courses for 30 years on the design of hydraulic fracturing treatments and the analyses of unconventional gas reservoirs. Dr. Holditch worked for Shell Oil Company prior to joining the faculty at Texas A&M University.

Fred Krupp, President, Environmental Defense Fund **-** Fred Krupp has overseen the growth of EDF into a recognized worldwide leader in the environmental movement. Krupp is widely acknowledged as the foremost champion of harnessing market forces for environmental ends. He also helped launch a corporate coalition, the U.S. Climate Action Partnership, whose Fortune 500 members - Alcoa, GE, DuPont and dozens more - have called for strict limits on global warming pollution. Mr. Krupp is coauthor, with Miriam Horn, of New York Times Best Seller, *Earth: The Sequel*. Educated at Yale and the University of Michigan Law School, Krupp was among 16 people named as America's Best Leaders by U.S. News and World Report in 2007.

Kathleen McGinty, Kathleen McGinty is a respected environmental leader, having served as President Clinton's Chair of the White House Council on Environmental Quality and Legislative Assistant and Environment Advisor to then-Senator Al Gore.

More recently, she served as Secretary of the Pennsylvania Department of Environmental Protection. Ms. McGinty also has a strong background in energy. She is Senior Vice President of Weston Solutions where she leads the company's clean energy development business. She also is an Operating Partner at Element Partners, an investor in efficiency and renewables. Previously, Ms. McGinty was Chair of the Pennsylvania Energy Development Authority, and currently she is a Director at NRG Energy and Iberdrola USA.

Susan Tierney, Managing Principal, Analysis Group **-** Susan Tierney is a consultant on energy and environmental issues to public agencies, energy companies, environmental organizations, energy consumers, and tribes. She chairs the Board of the Energy Foundation, and serves on the Boards of Directors of the World Resources Institute, the Clean Air Task Force, among others. She recently, co-chaired the National Commission on Energy Policy, and chairs the Policy Subgroup of the National Petroleum Council's study of North American natural gas and oil resources. Dr. Tierney served as Assistant Secretary for Policy at the U.S. Department of Energy during the Clinton Administration. In Massachusetts, she served as Secretary of Environmental Affairs, Chair of the Board of the Massachusetts Water Resources Agency, Commissioner of the Massachusetts Department of Public Utilities and executive director of the Massachusetts Energy Facilities Siting Council.

Daniel Yergin, Chairman, IHS Cambridge Energy Research Associates **-** Daniel Yergin is the co-founder and chairman of IHS Cambridge Energy Research Associates. He is a member of the U.S. Secretary of Energy Advisory Board, a board member of the Board of the United States Energy Association and a member of the U.S. National Petroleum Council. He was vice chair of the 2007 National Petroleum Council study, *Hard Truths* and is vice chair of the new National Petroleum Council study of North American natural gas and oil resources. He chaired the U.S. Department of Energy's Task Force on Strategic Energy Research and Development. Dr. Yergin currently chairs the Energy Security Roundtable at the Brookings Institution, where he is a trustee, and is member of the advisory board of the MIT Energy Initiative. Dr. Yergin is also CNBC's Global Energy Expert. He is the author of the Pulitzer Prize-winning book, *The Prize: The Epic Quest for Oil, Money and Power.* His new book – *The Quest: Energy, Security, and the Remaking of the Modern World* – will be published in September 2011..

Mark Zoback, Professor of Geophysics, Stanford University - Mark Zoback is the Benjamin M. Page Professor of Geophysics at Stanford University. He is the author of a textbook, *Reservoir Geomechanics*, and author or co-author of over 300 technical research papers. He was co-principal investigator of the San Andreas Fault Observatory at Depth project (SAFOD) and has been serving on a National Academy of Engineering committee investigating the Deepwater Horizon accident. He was the chairman and co-founder of GeoMechanics International and serves as a senior adviser to Baker Hughes,

Inc. Prior to joining Stanford University, he served as chief of the Tectonophysics Branch of the U.S. Geological Survey Earthquake Hazards Reduction Program.

ENDNOTES

[1] http://www.whitehouse.gov/sites/default/files/blueprint_secure_energy_future.pdf

[2] The James Baker III Institute for Public Policy at Rice University has recently released a report on *Shale Gas and U.S. National Security,* Available at: http://bakerinstitute.org/publications/EF-pub-DOEShaleGas-07192011.pdf.

[3] As a shale of total dry gas production in the "lower '48", shale gas was 6 percent in 2006, 8 percent in 2007, at which time its share began to grow rapidly – reaching 12 percent in 2008, 16 percent in 2009, and 24 percent in 2010. In June 2011, it reached 29 percent. Source: Energy Information Adminstration and Lippman Consulting.

[4] Timothy Considine, Robert W. Watson, and Nicholas B. Considine, "The Economy Opportunities of Shale Energy Development," Manhattan Institute, May 2011, Table 2, page 6.

[5] Essentially all fracturing currently uses water at the working fluid. The possibility exists of using other fluids, such as nitrogen, carbon dioxide or foams as the working fluid.

[6] The Department of Energy has a shale gas technology primer available on the web at: http://www.netl.doe.gov/technologies/oil-gas/publications/brochures/Shale_Gas_March_2011.pdf

[7] See the Bureau of Land Management *Gold Book* for a summary description of the DOI's approach: http://www.blm.gov/pgdata/etc/medialib/blm/wo/MINERALS__REALTY__AND_RESOURCE_PROTECTION_/energy/oil_and_gas.Par.18714.File.dat/OILgas.pdf

[8] http://www.shalegas.energy.gov/

[9] The 2011 *MIT Study on the Future of Natural Gas,* gives an estimate of about 50 widely reported incidents between 2005 and 2009 involving groundwater contamination, surface spills, off-site disposal issues, water issues, air quality and blow outs, Table 2.3 and Appendix 2E. http://web.mit.edu/mitei/research/studies/naturalgas.html

[10] The Ground Water Protection Council and the Interstate Oil and Gas Compact Commission are considering a project to create a *National Oil and Gas Data Portal* with similar a objective, but broader scope to encompass all oil and gas activities.

[11] Information about STRONGER can be found at: http://www.strongerinc.org/

[12] The RBMS project is supported by the DOE Office of Fossil Energy, DOE grant #DE-FE0000880 at a cost of $1.029 million. The project is described at: http://www.netl.doe.gov/technologies/oil-gas/publications/ENVreports/FE0000880_GWPC_Kickoff.pdf

[13] See, for example: John Corra, "Emissions from Hydrofracking Operations and General Oversight Information for Wyoming," presented to the U.S. Department of Energy Natural Gas Subcommittee of the Secretary of Energy Advisory Board, July 13, 2011; Al Armendariz, "Emissions from Natural Gas Production in the Barnett Shale Area and Opportunities for Cost-Effective Improvements," Southern Methodist University, January 2009; Colorado Air Quality Control Commission, "Denver Metro Area & North Front Range Ozone Action Plan," December 12, 2008; Utah Department of Environmental Quality, "2005 Uintah Basin Oil and Gas Emissions Inventory," 2005.

[14] IPCC 2007 –The Physical Science Basis, Section 2.10.2).

[15] Robert W. Howarth, Renee Santoro, and Anthony Ingraffea, *Methane and the greenhouse-gas*

footprint of natural gas from shale formations, Climate Change, The online version of this article (doi:10.1007/s10584-011-0061-5) contains supplementary material.

[16] Timothy J. Skone, *Life Cycle Greenhouse Gas Analysis of Natural Gas Extraction & Delivery in the United States,* DOE, NETL, May 2011, available at: http://www.netl.doe.gov/energy-analyses/pubs/NG_LC_GHG_PRES_12MAY11.pdf

[17] Paulina Jaramillo, W. Michael Griffin, and H. Scott Mathews, *Comparative Life-Cycle Air Emissions of Coal, Domestic Natural Gas, LNG, and SNG for Electricity Generation*, Environmental Science & Technology, 41, 6290-6296 (2007).

[18] The EPA draft hydraulic fracturing study plan is available along with other information about EPA hydraulic fracturing activity at:
http://water.epa.gov/type/groundwater/uic/class2/hydraulicfracturing/index.cfm

[19] See, for example, "South Texas worries over gas industry's water use during drought," Platts, July 5, 2011, found at:
http://www.platts.com/RSSFeedDetailedNews/RSSFeed/NaturalGas/3555776; "Railroad Commission, Halliburton officials say amount of water used for fracking is problematic," Abeline Reporter News, July 15, 2011, found at: http://www.reporternews.com/news/2011/jul/15/railroad-commission-halliburton-officials-say-of/?print=1; "Water Use in the Barnett Shale," Texas Railroad Commission Website, updated January 24, 2011, found at:
http://www.rrc.state.tx.us/barnettshale/wateruse_barnettshale.php.

[20] See, for example, *Energy Demands on Water Resources, DOE Report to Congress,* Dec 2006, http://www.sandia.gov/energy-water/docs/121-RptToCongress-EWwEIAcomments-FINAL.pdf

[21] Stephen G. Osborna, Avner Vengoshb, Nathaniel R. Warnerb, and Robert B. Jackson, *Methane contamination of drinking water accompanying gas-well drilling and hydraulic fracturing*, Proceedings of the National Academy of Science, 108, 8172-8176, (2011).

[22] See EPA Certification Guidance for Engines Regulated Under: 40 CFR Part 86 (On-Highway Heavy-Duty Engines) and 40 CFR Part 89 (Nonroad CI Engines); available at:
http://www.epa.gov/oms/regs/nonroad/equip-hd/420b98002.pdf

[23] API standards documents addressing hydraulic fracturing are: API HF1, Hydraulic Fracturing Operations-Well Construction and Integrity Guidelines, First Edition/October 2009, API HF2, Water Management Associated with Hydraulic Fracturing, First Edition/June 2010, API HF3, Practices for Mitigating Surface Impacts Associated with Hydraulic Fracturing, First Edition/January 2011, available at:
http://www.api.org/policy/exploration/hydraulicfracturing/index.cfm

[24] Professor Steven Holditch, one of the Subcommittee members, is chair of the RPSEA governing committee.

[25] Extremely small microearthquakes are triggered as an integral part of shale gas development. While essentially all of these earthquakes are so small as to pose no hazard to the public or facilities (they release energy roughly equivalent to a gallon of milk falling of a kitchen counter), earthquakes of larger (but still small) magnitude have been triggered during hydraulic fracturing operations and by the injection of flow-back water after hydraulic fracturing. It is important to develop a hazard assessment and remediation protocol for triggered earthquakes to allow operators and regulators to know what steps need to be taken to assess risk and modify, as required, planned field operations.

United States Environmental Protection Agency

Oil and Natural Gas Sector: Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution.

Background Technical Support Document for Proposed Standards

EPA-453/R-11-002
July 2011

Oil and Natural Gas Sector: Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution.

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Contract No. EP-D-07-061
Work Order No. 4-06

U.S. Environmental Protection Agency
Office of Air and Radiation
Office of Air Quality Planning and Standards
Research, Triangle Park, North Carolina

DISCLAIMER

This report has been reviewed by EPA's Office of Air Quality Planning and Standards and has been approved for publication. Mention of trade names or commercial products is not intended to constitute endorsement or recommendation for use.

FOREWORD

This background technical support document (TSD) provides information relevant to the proposal of New Source Performance Standards (NSPS) for limiting VOC emissions from the Oil and Natural Gas Sector. The proposed standards were developed according to section 111(b)(1)(B) under the Clean Air Act, which requires EPA to review and revise, is appropriate, NSPS standards. The NSPS review allows EPA to identify processes in the oil and natural sector that are not regulated under the existing NSPS but may be appropriate to regulate under NSPS based on new information. This would include processes that emit the current regulated pollutants, VOC and SO_2, as well as any additional pollutants that are identified. This document is the result of that review process. Chapter 1 provides introduction on NSPS regulatory authority. Chapter 2 presents an overview of the oil and natural gas sector. Chapter 3 discusses the entire NSPS review process undertaken for this review. Finally, Chapters 4-8 provide information on previously unregulated emissions sources. Each chapter describes the emission source, the estimated emissions (on average) from these sources, potential control options identified to reduce these emissions and the cost of each control option identified. In addition, secondary impacts are estimated and the rationale for the proposed NSPS for each emission source is provided.

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APPENDIX A

1.0 NEW SOURCE PERFORMANCE STANDARD BACKGROUND

Standards of performance for new stationary sources are established under section 111 of the Clean Air Act (42 U.S.C. 7411), as amended in 1977. Section 111 directs the Administrator to establish standards of performance for any category of new stationary sources of air pollution which "…causes or contributes significantly to air pollution which may reasonably be anticipated to endanger public health or welfare." This technical support document (TSD) supports the proposed standards, which would control volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from the oil and natural gas sector.

1.1 Statutory Authority

Section 111 of the Clean Air Act (CAA) requires the Environmental Protection Agency Administrator to list categories of stationary sources, if such sources cause or contribute significantly to air pollution which may reasonably be anticipated to endanger public health or welfare. The EPA must then issue performance standards for such source categories. A performance standard reflects the degree of emission limitation achievable through the application of the "best system of emission reduction" (BSER) which the EPA determines has been adequately demonstrated. The EPA may consider certain costs and nonair quality health and environmental impact and energy requirements when establishing performance standards. Whereas CAA section 112 standards are issued for existing and new stationary sources, standards of performance are issued for new and modified stationary sources. These standards are referred to as new source performance standards (NSPS). The EPA has the authority to define the source categories, determine the pollutants for which standards should be developed, identify the facilities within each source category to be covered and set the emission level of the standards.

CAA section 111(b)(1)(B) requires the EPA to "at least every 8 years review and, if appropriate, revise" performance standards unless the "Administrator determines that such review is not appropriate in light of readily available information on the efficacy" of the standard. When conducting a review of an existing performance standard, the EPA has discretion to revise that standard to add emission limits for pollutants or emission sources not currently regulated for that source category.

In setting or revising a performance standard, CAA section 111(a)(1) provides that performance standards are to "reflect the degree of emission limitation achievable through the application of the best system of emission reduction which (taking into account the cost of achieving such reduction and any

non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated." This level of control is referred to as the best system of emission reduction (BSER). In determining BSER, a technology review is conducted that identifies what emission reduction systems exist and how much the identified systems reduce air pollution in practice. For each control system identified, the costs and secondary air benefits (or disbenefits) resulting from energy requirements and non-air quality impacts such as solid waste generation are also evaluated. This analysis determines BSER. The resultant standard is usually a numerical emissions limit, expressed as a performance level (i.e., a rate-based standard or percent control), that reflects the BSER. Although such standards are based on the BSER, the EPA may not prescribe a particular technology that must be used to comply with a performance standard, except in instances where the Administrator determines it is not feasible to prescribe or enforce a standard of performance. Typically, sources remain free to elect whatever control measures that they choose to meet the emission limits. Upon promulgation, a NSPS becomes a national standard to which all new, modified or reconstructed sources must comply.

1.2 History of Oil and Natural Gas Source Category

In 1979, the EPA listed crude oil and natural gas production on its priority list of source categories for promulgation of NSPS (44 FR 49222, August 21, 1979). On June 24, 1985 (50 FR 26122), the EPA promulgated a NSPS for the source category that addressed volatile organic compound (VOC) emissions from leaking components at onshore natural gas processing plants (40 CFR part 60, subpart KKK). On October 1, 1985 (50 FR 40158), a second NSPS was promulgated for the source category that regulates sulfur dioxide (SO_2) emissions from natural gas processing plants (40 CFR part 60, subpart LLL). Other than natural gas processing plants, EPA has not previously set NSPS for a variety of oil and natural gas operations. These NSPS are relatively narrow in scope as they address emissions only at natural gas processing plants. Specifically, subpart KKK addresses VOC emissions from leaking equipment at onshore natural gas processing plants, and subpart LLL addresses SO_2 emissions from natural gas processing plants.

1.3 NSPS Review Process Overview

CAA section 111(b)(1)(B) requires EPA to review and revise, if appropriate, NSPS standards. First, the existing NSPS were evaluated to determine whether it reflects BSER for the emission affected sources. This review was conducted by examining control technologies currently in use and assessing whether

these technologies represent advances in emission reduction techniques compared to the technologies upon which the existing NSPS are based. For each new control technology identified, the potential emission reductions, costs, secondary air benefits (or disbenefits) resulting from energy requirements and non-air quality impacts such as solid waste generation are evaluated. The second step is evaluating whether there are additional pollutants emitted by facilities in the oil and natural gas sector that contribute significantly to air pollution and may reasonably be anticipated to endanger public health or welfare. The final review step is to identify additional processes in the oil and natural gas sector that are not covered under the existing NSPS but may be appropriate to develop NSPS based on new information. This would include processes that emit the current regulated pollutants, VOC and SO_2, as well as any additional pollutants that are identified. The entire review process is described in Chapter 3.

2.0 OIL AND NATURAL GAS SECTOR OVERVIEW

The oil and natural gas sector includes operations involved in the extraction and production of oil and natural gas, as well as the processing, transmission and distribution of natural gas. Specifically for oil, the sector includes all operations from the well to the point of custody transfer at a petroleum refinery. For natural gas, the sector includes all operations from the well to the customer. The oil and natural gas operations can generally be separated into four segments: (1) oil and natural gas production, (2) natural gas processing, (3) natural gas transmission and (4) natural gas distribution. Each of these segments is briefly discussed below.

Oil and natural gas production includes both onshore and offshore operations. Production operations include the wells and all related processes used in the extraction, production, recovery, lifting, stabilization, separation or treating of oil and/or natural gas (including condensate). Production components may include, but are not limited to, wells and related casing head, tubing head and "Christmas tree" piping, as well as pumps, compressors, heater treaters, separators, storage vessels, pneumatic devices and dehydrators. Production operations also include well drilling, completion and recompletion processes; which includes all the portable non-self-propelled apparatus associated with those operations. Production sites include not only the "pads" where the wells are located, but also include stand-alone sites where oil, condensate, produced water and gas from several wells may be separated, stored and treated. The production sector also includes the low pressure, small diameter, gathering pipelines and related components that collect and transport the oil, gas and other materials and wastes from the wells to the refineries or natural gas processing plants. None of the operations upstream of the natural gas processing plant (i.e. from the well to the natural gas processing plant) are covered by the existing NSPS. Offshore oil and natural gas production occurs on platform structures that house equipment to extract oil and gas from the ocean or lake floor and that process and/or transfer the oil and gas to storage, transport vessels or onshore. Offshore production can also include secondary platform structures connected to the platform structure, storage tanks associated with the platform structure and floating production and offloading equipment.

There are three basic types of wells: Oil wells, gas wells and associated gas wells. Oil wells can have "associated" natural gas that is separated and processed or the crude oil can be the only product processed. Once the crude oil is separated from the water and other impurities, it is essentially ready to be transported to the refinery via truck, railcar or pipeline. The oil refinery sector is considered

separately from the oil and natural gas sector. Therefore, at the point of custody transfer at the refinery, the oil leaves the oil and natural gas sector and enters the petroleum refining sector.

Natural gas is primarily made up of methane. However, whether natural gas is associated gas from oil wells or non-associated gas from gas or condensate wells, it commonly exists in mixtures with other hydrocarbons. These hydrocarbons are often referred to as natural gas liquids (NGL). They are sold separately and have a variety of different uses. The raw natural gas often contains water vapor, hydrogen sulfide (H_2S), carbon dioxide (CO_2), helium, nitrogen and other compounds. Natural gas processing consists of separating certain hydrocarbons and fluids from the natural gas to produced "pipeline quality" dry natural gas. While some of the processing can be accomplished in the production segment, the complete processing of natural gas takes place in the natural gas processing segment. Natural gas processing operations separate and recover natural gas liquids or other non-methane gases and liquids from a stream of produced natural gas through components performing one or more of the following processes: Oil and condensate separation, water removal, separation of natural gas liquids, sulfur and CO_2 removal, fractionation of natural gas liquid and other processes, such as the capture of CO_2 separated from natural gas streams for delivery outside the facility. Natural gas processing plants are the only operations covered by the existing NSPS.

The pipeline quality natural gas leaves the processing segment and enters the transmission segment. Pipelines in the natural gas transmission segment can be interstate pipelines that carry natural gas across state boundaries or intrastate pipelines, which transport the gas within a single state. While interstate pipelines may be of a larger diameter and operated at a higher pressure, the basic components are the same. To ensure that the natural gas flowing through any pipeline remains pressurized, compression of the gas is required periodically along the pipeline. This is accomplished by compressor stations usually placed between 40 and 100 mile intervals along the pipeline. At a compressor station, the natural gas enters the station, where it is compressed by reciprocating or centrifugal compressors.

In addition to the pipelines and compressor stations, the natural gas transmission segment includes underground storage facilities. Underground natural gas storage includes subsurface storage, which typically consists of depleted gas or oil reservoirs and salt dome caverns used for storing natural gas. One purpose of this storage is for load balancing (equalizing the receipt and delivery of natural gas). At an underground storage site, there are typically other processes, including compression, dehydration and flow measurement.

The distribution segment is the final step in delivering natural gas to customers. The natural gas enters the distribution segment from delivery points located on interstate and intrastate transmission pipelines to business and household customers. The delivery point where the natural gas leaves the transmission segment and enters the distribution segment is often called the "citygate." Typically, utilities take ownership of the gas at the citygate. Natural gas distribution systems consist of thousands of miles of piping, including mains and service pipelines to the customers. Distribution systems sometimes have compressor stations, although they are considerably smaller than transmission compressor stations. Distribution systems include metering stations, which allow distribution companies to monitor the natural gas in the system. Essentially, these metering stations measure the flow of gas and allow distribution companies to track natural gas as it flows through the system.

Emissions can occur from a variety of processes and points throughout the oil and natural gas sector. Primarily, these emissions are organic compounds such as methane, ethane, VOC and organic hazardous air pollutants (HAP). The most common organic HAP are n-hexane and BTEX compounds (benzene, toluene, ethylbenzene and xylenes). Hydrogen sulfide and SO_2 are emitted from production and processing operations that handle and treat sour gas[i]

In addition, there are significant emissions associated with the reciprocating internal combustion engines and combustion turbines that power compressors throughout the oil and natural gas sector. However, emissions from internal combustion engines and combustion turbines are covered by regulations specific to engines and turbines and, thus, are not addressed in this action.

[i] Sour gas is defined as natural gas with a maximum H_2S content of 0.25 gr/100 scf (4ppmv) along with the presence of CO_2

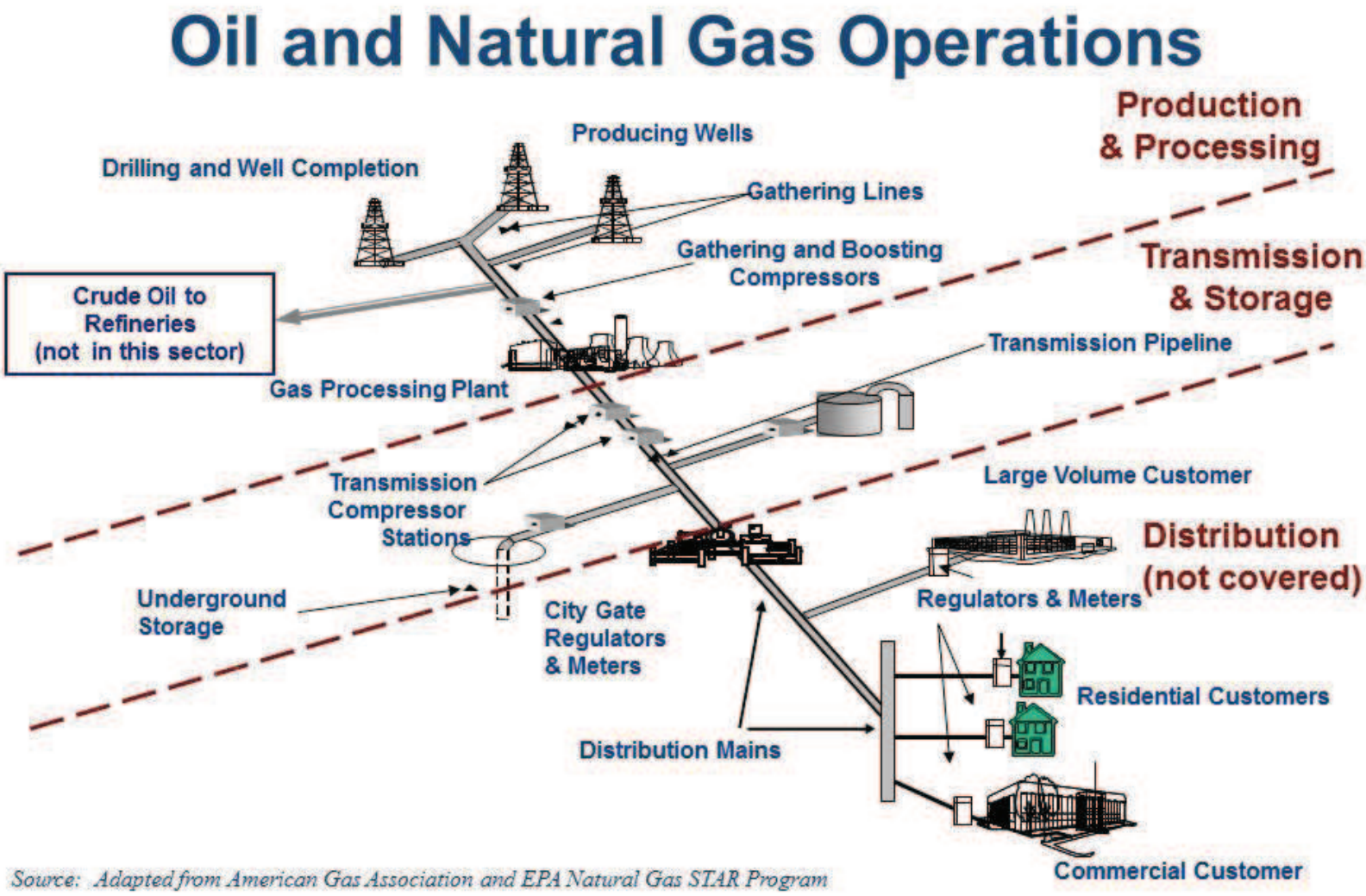

Figure 2-1. Oil and Natural Gas Operations

3.0 NEW SOURCE PERFORMANCE STANDARD REVIEW

As discussed in section 1.2, there are two NSPS that impact the oil and natural gas sector: (1) the NSPS for equipment leaks of VOC at natural gas processing plants (subpart KKK) and (2) the NSPS for SO_2 emissions from sweetening units located at natural gas processing plants (subpart LLL). Because they only address emissions from natural gas processing plants, these NSPS are relatively narrow in scope.

Section 111(b)(1) of the CAA requires the EPA to review and revise, if appropriate, NSPS standards. This review process consisted of the following steps:

1. Evaluation of the existing NSPS to determine whether they continue to reflect the BSER for the emission sources that they address;
2. Evaluation of whether there were additional pollutants emitted by facilities in the oil and natural gas sector that warrant regulation and for which there is adequate information to promulgate standards of performance; and
3. Identification of additional processes in the oil and natural gas sector for which it would be appropriate to develop performance standards, including processes that emit the currently regulated pollutants as well as any additional pollutants identified in step two.

The following sections detail each of these steps.

3.1 Evaluation of BSER for Existing NSPS

Consistent with the obligations under CAA section 111(b), control options reflected in the current NSPS for the Oil and Natural Gas source category were evaluated in order to distinguish if these options still represent BSER. To evaluate the BSER options for equipment leaks the following was reviewed: EPA's current leak detection and repair (LDAR) programs, the Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse (RBLC) database, and emerging technologies that have been identified by partners in the Natural Gas STAR program.[1]

3.1.1 BSER for VOC Emissions from Equipment Leaks at Natural Gas Processing Plants

The current NSPS for equipment leaks of VOC at natural gas processing plants (40 CFR part 60, subpart KKK) requires compliance with specific provisions of 40 CFR part 60, subpart VV, which is a LDAR program, based on the use of EPA Method 21 to identify equipment leaks. In addition to the subpart VV requirements, the LDAR requirements in 40 CFR part 60, subpart VVa were also reviewed. This LDAR

program is considered to be more stringent than the subpart VV requirements, because it has lower component leak threshold definitions and more frequent monitoring, in comparison to the subpart VV program. Furthermore, subpart VVa requires monitoring of connectors, while subpart VV does not. Options based on optical gas imaging were also reviewed.

The currently required LDAR program for natural gas processing plants (40 CFR part 60, subpart KKK) is based on EPA Method 21, which requires the use of an organic vapor analyzer to monitor components and to measure the concentration of the emissions in identifying leaks. Although there have been advancements in the use of optical gas imaging to detect leaks from these same types of components, these instruments do not yet provide a direct measure of leak concentrations. The instruments instead provide a measure of a leak relative to an instrument specific calibration point. Since the promulgation of 40 CFR part 60, subpart KKK (which requires Method 21 leak measurement monthly), the EPA has updated the 40 CFR part 60 General Provisions to allow the use of advanced leak detection tools, such as optical gas imaging and ultrasound equipment as an alternative to the LDAR protocol based on Method 21 leak measurements (see 40 CFR 60.18(g)). The alternative work practice allowing use of these advanced technologies includes a provision for conducting a Method 21-based LDAR check of the regulated equipment annually to verify good performance.

In considering BSER for VOC equipment leaks at natural gas processing plants, four options were evaluated. One option evaluated consists of changing from a 40 CFR part 60, subpart VV-level program, which is what 40 CFR part 60, subpart KKK currently requires, to a 40 CFR part 60, subpart VVa program, which applies to new synthetic organic chemical plants after 2006. Subpart VVa lowers the leak definition for valves from 10,000 parts per million (ppm) to 500 ppm, and requires the monitoring of connectors. In our analysis of these impacts, it was estimated that, for a typical natural gas processing plant, the incremental cost effectiveness of changing from the current subpart VV-level program to a subpart VVa-level program using Method 21 is $3,352 per ton of VOC reduction.

In evaluating 40 CFR part 60, subpart VVa-level LDAR at processing plants, the individual types of components (valves, connectors, pressure relief devices and open-ended lines) were also analyzed separately to determine cost effectiveness for individual components. Detailed discussions of these component-by-component analyses are provided in Chapter 8. Cost effectiveness ranged from $144 per ton of VOC (for valves) to $4,360 per ton of VOC (for connectors), with no change in requirements for pressure relief devices and open-ended lines.

Another option evaluated for gas processing plants was the use of optical gas imaging combined with an annual EPA Method 21 check (i.e., the alternative work practice for monitoring equipment for leaks at 40 CFR 60.18(g)). It was previously determined that the VOC reduction achieved by this combination of optical gas imaging and Method 21 would be equivalent to reductions achieved by the 40 CFR part 60, subpart VVa-level program. Based on the emission reduction level, the cost effectiveness of this option was estimated to be $6,462 per ton of VOC reduction. This analysis was based on the facility purchasing an optical gas imaging system costing $85,000. However, at least one manufacturer was identified that rents the optical gas imaging systems. That manufacturer rents the optical gas imaging system for $3,950 per week. Using this rental cost in place of the purchase cost, the VOC cost effectiveness of the monthly optical gas imaging combined with annual Method 21 inspection visits is $4,638 per ton of VOC reduction.[i]

A third option evaluated consisted of monthly optical gas imaging without an annual Method 21 check. The annual cost of the monthly optical gas imaging LDAR program was estimated to be $76,581 based on camera purchase, or $51,999 based on camera rental. However, it is not possible to quantify the VOC emission reductions achieved by an optical imaging program alone, therefore the cost effectiveness of this option could not be determined. Finally, a fourth option was evaluated that was similar to the third option, except that the optical gas imaging would be performed annually rather than monthly. For this option, the annual cost was estimated to be $43,851, based on camera purchase, or $18,479, based on camera rental.

Because the cost effectiveness of options 3 and 4 could not be estimated, these options could not be identified as BSER for reducing VOC leaks at gas processing plants. Because options 1 and 2 achieve equivalent VOC reduction and are both cost effective, both options 1 and 2 reflect BSER for LDAR for natural gas processing plants. As mentioned above, option 1 is the LDAR in 40 CFR part 60, subpart VVa and option 2 is the alternative work practice at 40 CFR 60.18(g) and is already available to use as an alternative to subpart VVa LDAR.

3.1.2 BSER for SO_2 Emissions from Sweetening Units at Natural Gas Processing Plants

For 40 CFR part 60, subpart LLL, control systems for SO_2 emissions from sweetening units located at natural gas processing plants were evaluated, including those followed by a sulfur recovery unit. Subpart

[i] Because optical gas imaging is used to view multiple pieces of equipment at a facility during one leak survey, options involving imaging are not amenable to a component by component analysis.

LLL provides specific standards for SO_2 emission reduction efficiency, on the basis of sulfur feed rate and the sulfur content of the natural gas.

According to available literature, the most widely used process for converting H_2S in acid gases (i.e., H_2S and CO_2) separated from natural gas by a sweetening process (such as amine treating) into elemental sulfur is the Claus process. Sulfur recovery efficiencies are higher with higher concentrations of H_2S in the feed stream due to the thermodynamic equilibrium limitation of the Claus process. The Claus sulfur recovery unit produces elemental sulfur from H_2S in a series of catalytic stages, recovering up to 97-percent recovery of the sulfur from the acid gas from the sweetening process. Further, sulfur recovery is accomplished by making process modifications or by employing a tail gas treatment process to convert the unconverted sulfur compounds from the Claus unit.

In addition, process modifications and tail gas treatment options were also evaluated at the time 40 CFR part 60, subpart LLL was proposed.[ii] As explained in the preamble to the proposed subpart LLL, control through sulfur recovery with tail gas treatment may not always be cost effective, depending on sulfur feed rate and inlet H_2S concentrations. Therefore, other methods of increasing sulfur recovery via process modifications were evaluated.

As shown in the original evaluation for the proposed subpart LLL, the performance capabilities and costs of each of these technologies are highly dependent on the ratio of H_2S and CO_2 in the gas stream and the total quantity of sulfur in the gas stream being treated. The most effective means of control was selected as BSER for the different stream characteristics. As a result, separate emissions limitations were developed in the form of equations that calculate the required initial and continuous emission reduction efficiency for each plant. The equations were based on the design performance capabilities of the technologies selected as BSER relative to the gas stream characteristics.[iii] The emission limit for sulfur feed rates at or below 5 long tons per day, regardless of H_2S content, was 79 percent. For facilities with sulfur feed rates above 5 long tons per day, the emission limits ranged from 79 percent at an H_2S content below 10 percent to 99.8 percent for H_2S contents at or above 50 percent.

To review these emission limitations, a search was performed of the RBLC database[1] and state regulations. No State regulations were identified that included emission limitations more stringent than 40 CFR part 60, subpart LLL. However, two entries in the RBLC database were identified having SO_2

[ii] 49 FR 2656, 2659-2660 (1984).
[iii] 49 FR 2656, 2663-2664 (1984).

emission reductions of 99.9 percent. One entry is for a facility in Bakersfield, California, with a 90 long ton per day sulfur recovery unit followed by an amine-based tailgas treating unit. The second entry is for a facility in Coden, Alabama, with a sulfur recovery unit with a feed rate of 280 long tons of sulfur per day, followed by selective catalytic reduction and a tail gas incinerator. However, neither of these entries contained information regarding the H_2S contents of the feed stream. Because the sulfur recovery efficiency of these large sized plants was greater than 99.8 percent, the original data was reevaluated. Based on the available cost information, a 99.9 percent efficiency is cost effective for facilities with a sulfur feed rate greater than 5 long tons per day and H_2S content equal to or greater than 50 percent. Based on this review, the maximum initial and continuous efficiency for facilities with a sulfur feed rate greater than 5 long tons per day and a H_2S content equal to or greater than 50 percent is raised to 99.9 percent.

The search of the RBLC database did not uncover information regarding costs and achievable emission reductions to suggest that the emission limitations for facilities with a sulfur feed rate less than 5 long tons per day or H_2S content less than 50 percent should be modified. Therefore, there were not any identifiable changes to the emissions limitations for facilities with sulfur feed rate and H_2S content less than 5 long tons per day and 50 percent, respectively.[1]

3.2 Additional Pollutants

The two current NSPS for the Oil and Natural Gas source category address emissions of VOC and SO_2. In addition to these pollutants, sources in this source category also emit a variety of other pollutants, most notably, air toxics. However, there are NESHAP that address air toxics from the oil and natural gas sector, specifically 40 CFR subpart HH and 40 CFR subpart HHH.

In addition, processes in the Oil and Natural Gas source category emit significant amounts of methane. The 1990 - 2009 U.S. GHG Inventory estimates 2009 methane emissions from Petroleum and Natural Gas Systems (not including petroleum refineries) to be 251.55 MMtCO2e (million metric tons of CO2-equivalents (CO2e)).[iv] The emissions estimated from well completions and recompletions exclude a significant number of wells completed in tight sand plays, such as the Marcellus, due to availability of data when the 2009 Inventory was developed. The estimate in this proposal includes an adjustment for tight sand plays (being considered as a planned improvement in development of the 2010 Inventory).

[iv] U.S. EPA. Inventory of U.S. Greenhouse Gas Inventory and Sinks. 1990 - 2009. http://www.epa.gov/climatechange/emissions/downloads10/US-GHGInventory2010_ExecutiveSummary.pdf

This adjustment would increase the 2009 Inventory estimate by 76.74 MMtCO2e. The total methane emissions from Petroleum and Natural Gas Systems, based on the 2009 Inventory, adjusted for tight sand plays and the Marcellus, is 328.29 MMtCO2e.

Although this proposed rule does not include standards for regulating the GHG emissions discussed above, EPA continues to assess these significant emissions and evaluate appropriate actions for addressing these concerns. Because many of the proposed requirements for control of VOC emissions also control methane emissions as a co-benefit, the proposed VOC standards would also achieve significant reduction of methane emissions.

Significant emissions of oxides of nitrogen (NO_x) also occur at oil and natural gas sites due to the combustion of natural gas in reciprocating engines and combustion turbines used to drive the compressors that move natural gas through the system, and from combustion of natural gas in heaters and boilers. While these engines, turbines, heaters and boilers are co-located with processes in the oil and natural gas sector, they are not in the Oil and Natural Gas source category and are not being addressed in this action. The NO_x emissions from engines and turbines are covered by the Standards of Performance for Stationary Spark Internal Combustion Engines (40 CFR part 60, subpart JJJJ) and Standards of Performance for Stationary Combustion Turbines (40 CFR part 60, subpart KKKK), respectively.

An additional source of NO_x emissions would be pit flaring of VOC emissions from well completions. As discussed in Chapter 4 Well completions, pit flaring is one option identified for controlling VOC emissions. Because there is no way of directly measuring the NO_x produced, nor is there any way of applying controls other than minimizing flaring, flaring would only be required for limited conditions.

3.3 Additional Processes

The current NSPS only cover emissions of VOC and SO_2 from one type of facility in the oil and natural gas sector, which is the natural gas processing plant. This is the only type of facility in the Oil and Natural Gas source category where SO_2 is expected to be emitted directly; although H_2S contained in sour gas[v] forms SO_2 as a product of oxidation when oxidized in the atmosphere or combusted in boilers and heaters in the field. These field boilers and heaters are not part of the Oil and Natural Gas source category and are generally too small to be regulated by the NSPS covering boilers (i.e., they have a heat

[v] Sour gas is defined as natural gas with a maximum H_2S content of 0.25 gr/100 scf (4ppmv) along with the presence of CO_2.

input of less than 10 million British Thermal Units per hour). They may, however, be included in future rulemakings.

In addition to VOC emissions from gas processing plants, there are numerous sources of VOC throughout the oil and natural gas sector that are not addressed by the current NSPS. Pursuant to CAA section 111(b), a modification of the listed category will now include all segments of the oil and natural gas industry for regulation. In addition, VOC standards will now cover additional processes at oil and natural gas operations. These include NSPS for VOC from gas well completions and recompletions, pneumatic controllers, compressors and storage vessels. In addition, produced water ponds may also be a potentially significant source of emissions, but there is very limited information available regarding these emissions. Therefore, no options could be evaluated at this time. The remainder of this document presents the evaluation for each of the new processes to be included in the NSPS.

3.4 References

1 Memorandum to Bruce Moore from Brad Nelson and Phil Norwood. Crude Oil and Natural Gas Production NSPS Technology Reviews. EC/R Incorporated. July 28, 2011.

4.0 WELL COMPLETIONS AND RECOMPLETIONS

In the oil and natural gas sector, well completions and recompletions contain multi-phase processes with various sources of emissions. One specific emission source during completion and recompletion activities is the venting of natural gas to the atmosphere during flowback. Flowback emissions are short-term in nature and occur as a specific event during completion of a new well or during recompletion activities that involve re-drilling or re-fracturing an existing well. This chapter describes completions and recompletions, and provides estimates for representative wells in addition to nationwide emissions. Control techniques employed to reduce emissions from flowback gas venting during completions and recompletions are presented, along with costs, emission reductions, and secondary impacts. Finally, this chapter discusses considerations in developing regulatory alternatives for reducing flowback emissions during completions and recompletions.

4.1 Process Description

4.1.1 Oil and Gas Well Completions

All oil and natural gas wells must be "completed" after initial drilling in preparation for production. Oil and natural gas completion activities not only will vary across formations, but can vary between wells in the same formation. Over time, completion and recompletion activities may change due to the evolution of well characteristics and technology advancement. Conventional gas reservoirs have well defined formations with high resource allocation in permeable and porous formations, and wells in conventional gas reservoirs have generally not required stimulation during production. Unconventional gas reservoirs are more dispersed and found in lower concentrations and may require stimulation (such as hydraulic fracturing) to extract gas.[1]

Well completion activities include multiple steps after the well bore hole has reached the target depth. These steps include inserting and cementing-in well casing, perforating the casing at one or more producing horizons, and often hydraulically fracturing one or more zones in the reservoir to stimulate production. Surface components, including wellheads, pumps, dehydrators, separators, tanks, and gathering lines are installed as necessary for production to begin. The flowback stage of a well completion is highly variable but typically lasts between 3 and 10 days for the average well.[2]

Developmental wells are drilled within known boundaries of a proven oil or gas field, and are located near existing well sites where well parameters are already recorded and necessary surface equipment is in place. When drilling occurs in areas of new or unknown potential, well parameters such as gas composition, flow rate, and temperature from the formation need to be ascertained before surface facilities required for production can be adequately sized and brought on site. In this instance, exploratory (also referred to as "wildcat") wells and field boundary delineation wells typically either vent or combust the flowback gas.

One completion step for improving gas production is to fracture the reservoir rock with very high pressure fluid, typically a water emulsion with a proppant (generally sand) that "props open" the fractures after fluid pressure is reduced. Natural gas emissions are a result of the backflow of the fracture fluids and reservoir gas at high pressure and velocity necessary to clean and lift excess proppant to the surface. Natural gas from the completion backflow escapes to the atmosphere during the reclamation of water, sand, and hydrocarbon liquids during the collection of the multi-phase mixture directed to a surface impoundment. As the fracture fluids are depleted, the backflow eventually contains a higher volume of natural gas from the formation. Due to the additional equipment and resources involved and the nature of the backflow of the fracture fluids, completions involving hydraulic fracturing have higher costs and vent substantially more natural gas than completions not involving hydraulic fracturing.

Hydraulic fracturing can and does occur in some conventional reservoirs, but it is much more common in "tight" formations. Therefore, this analysis assumes hydraulic fracturing is performed in tight sand, shale, and coalbed methane formations. This analysis defines tight sand as sandstones or carbonates with an in situ permeability (flow rate capability) to gas of less than 0.1 millidarcy.[i]

"Energized fractures" are a relatively new type of completion method that injects an inert gas, such as carbon dioxide or nitrogen, before the fracture fluid and proppant. Thus, during initial flowback, the gas stream will first contain a high proportion of the injected gas, which will gradually decrease overtime.

4.1.2 Oil and Gas Well Recompletions

Many times wells will need supplementary maintenance, referred to as recompletions (these are also referred to as workovers). Recompletions are remedial operations required to maintain production or minimize the decline in production. Examples of the variety of recompletion activities include

[i] A darcy (or darcy unit) and millidarcies (mD) are units of permeability Converted to SI units, 1 darcy is equivalent to 9.869233×10^{-13} m² or 0.9869233 (μm)². This conversion is usually approximated as 1 (μm)².

completion of a new producing zone, re-fracture of a previously fractured zone, removal of paraffin buildup, replacing rod breaks or tubing tears in the wellbore, and addressing a malfunctioning downhole pump. During a recompletion, portable equipment is conveyed back to the well site temporarily and some recompletions require the use of a service rig. As with well completions, recompletions are highly specialized activities, requiring special equipment, and are usually performed by well service contractors specializing in well maintenance. Any flowback event during a recompletion, such as after a hydraulic fracture, will result in emissions to the atmosphere unless the flowback gas is captured.

When hydraulic re-fracturing is performed, the emissions are essentially the same as new well completions involving hydraulic fracture, except that surface gas collection equipment will already be present at the wellhead after the initial fracture. The backflow velocity during re-fracturing will typically be too high for the normal wellhead equipment (separator, dehydrator, lease meter), while the production separator is not typically designed for separating sand.

Backflow emissions are not a direct result of produced water. Backflow emissions are a result of free gas being produced by the well during well cleanup event, when the well also happens to be producing liquids (mostly water) and sand. The high rate backflow, with intermittent slugs of water and sand along with free gas, is typically directed to an impoundment or vessels until the well is fully cleaned up, where the free gas vents to the atmosphere while the water and sand remain in the impoundment or vessels. Therefore, nearly all of the backflow emissions originate from the recompletion process but are vented as the backflow enters the impoundment or vessels. Minimal amounts of emissions are caused by the fluid (mostly water) held in the impoundment or vessels since very little gas is dissolved in the fluid when it enters the impoundment or vessels.

4.2. Emission Data and Emissions Factors

4.2.1 Summary of Major Studies and Emission Factors

Given the potential for significant emissions from completions and recompletions, there have been numerous recent studies conducted to estimate these emissions. In the evaluation of the emissions and emission reduction options for completions and recompletions, many of these studies were consulted. Table 4-1 presents a list of the studies consulted along with an indication of the type of information contained in the study.

Table 4-1. Major Studies Reviewed for Consideration of Emissions and Activity Data

Report Name	Affiliation	Year of Report	Activity Factor(s)	Emission Information	Control Information
Greenhouse Gas Mandatory Reporting Rule and Technical Supporting Documents [3]	EPA	2010	Nationwide	X	
Inventory of Greenhouse Gas Emissions and Sinks: 1990-2008 [4,5]	EPA	2010	Nationwide	X	
Methane Emissions from the Natural Gas Industry [6, 7, 8, 9]	Gas Research Institute /US Environmental Protection Agency	1996	Nationwide	X	X
Methane Emissions from the US Petroleum Industry (Draft) [10]	EPA	1996	Nationwide	X	
Methane Emissions from the US Petroleum Industry [11]	EPA	1999	Nationwide	X	
Oil and Gas Emission Inventories for Western States [12]	Western Regional Air Partnership	2005	Regional	X	X
Recommendations for Improvements to the Central States Regional Air Partnership's Oil and Gas Emission Inventories [13]	Central States Regional Air Partnership	2008	Regional	X	X
Oil and Gas Producing Industry in Your State[14]	Independent Petroleum Association of America	2009	Nationwide		
Emissions from Natural Gas Production in the Barnett Shale and Opportunities for Cost-effective Improvements [15]	Environmental Defense Fund	2009	Regional	X	X
Emissions from Oil and Natural Gas Production Facilities [16]	Texas Commission for Environmental Quality	2007	Regional	X	X
Availability, Economics and Production of North American Unconventional Natural Gas Supplies 1	Interstate Natural Gas Association of America	2008	Nationwide		

Table 4-1. Major Studies Reviewed for Consideration of Emissions and Activity Data

Report Name	Affiliation	Year of Report	Activity Factor(s)	Emission Information	Control Information
Petroleum and Natural Gas Statistical Data[17]	U.S. Energy Information Administration	2007-2009	Nationwide		
Preferred and Alternative Methods for Estimating Air Emissions from Oil and Gas Field Production and Processing Operations [18]	EPA	1999		X	
Supplemental Generic Environmental Impact Statement on the Oil, Gas and Solution Mining Regulatory Program [19]	New York State Department of Environmental Conservation	2009	Regional	X	X
Natural Gas STAR Program [20, 21, 22, 23, 24, 25]	EPA	2000-2010	Nationwide/ Regional	X	X

4.2.2 Representative Completion and Recompletion Emissions

As previously mentioned, one specific emission source during completion and recompletion activities is the venting of natural gas to the atmosphere during flowback. Flowback emissions are short-term in nature and occur as a specific event during the completion of a new well or during recompletion activities that involve re-drilling or re-fracturing of an existing well. For this analysis, well completion and recompletion emissions are estimated as the venting of emissions from the well during the initial phases of well preparation or during recompletion maintenance and/or re-fracturing of an existing well.

As previously stated, this analysis assumes wells completed/recompleted with hydraulic fracturing are found in tight sand, shale, or coal bed methane formations. A majority of the available emissions data for recompletions is for vertically drilled wells. It is projected that in the future, a majority of completions and recompletions will predominantly be performed on horizontal wells. However, there is not enough history of horizontally drilled wells to make a reasonable estimation of the difference in emissions from recompletions of horizontal versus vertical wells. Therefore, for this analysis, no distinction was made between vertical and horizontal wells.

As shown in Table 4-1, methane emissions from oil and natural gas operations have been measured, analyzed and reported in studies spanning the past few decades. The basic approach for this analysis was to approximate methane emissions from representative oil and gas completions and recompletions and then estimate volatile organic compounds (VOC) and hazardous air pollutants (HAP) using a representative gas composition.[26] The specific gas composition ratios used for gas wells were 0.1459 pounds (lb) VOC per lb methane (lb VOC/lb methane) and 0.0106 lb HAP/lb methane. The specific gas composition ratios used for oil wells were 0.8374 pounds lb VOC/lb methane and 0.0001 lb HAP/lb methane.

The EPA's analysis to estimate methane emissions conducted in support of the Greenhouse Gas Mandatory Reporting Rule (Subpart W), which was published in the *Federal Register* on November 30, 2010 (75 FR 74458), was the foundation for methane emission estimates from natural gas completions with hydraulic fracturing and recompletions with hydraulic fracturing. Methane emissions from oil well completions, oil well recompletions, natural gas completions without hydraulic fracturing, and natural gas recompletions without hydraulic fracturing were derived directly from the EPA's Inventory of Greenhouse Gas Emissions and Sinks: 1990-2008 (Inventory).[4] A summary of emissions for a representative model well completion or recompletion is found in Table 4-2.

Table 4-2. Uncontrolled Emissions Estimates from Oil and Natural Gas Well Completions and Recompletions

Well Completion Category	Emissions (Mcf/event)	Emissions (tons/event)		
	Methane	Methane[a]	VOC[b]	HAP[c]
Natural Gas Well Completion without Hydraulic Fracturing	38.6	0.8038	0.12	0.009
Natural Gas Well Completion with Hydraulic Fracturing	7,623	158.55	23.13	1.68
Oil Well Completions	0.34	0.0076	0.00071	0.0000006
Natural Gas Well Recompletion without Hydraulic Fracturing	2.59	0.0538	0.0079	0.0006
Natural Gas Well Recompletion with Hydraulic Fracturing	7,623	158.55	23.13	1.68
Oil Well Recompletions	0.057	0.00126	0.001	0.0000001

Minor discrepancies may exist due to rounding.

a. Reference 4, Appendix B., pgs 84-89. The conversion used to convert methane from volume to weight is 0.0208 tons methane is equal to 1 Mcf of methane. It is assumed methane comprises 83.081 percent by volume of natural gas from gas wells and 46.732 percent by volume of methane from oil wells.

b. Assumes 0.1459 lb VOC /lb methane for natural gas wells and 0.8374 lb VOC/lb methane for oil wells.

c. Assumes 0.0106 lb HAP/lb methane for natural gas wells and 0.0001 lb HAP/lb methane for oil wells.

4.3 Nationwide Emissions from New Sources

4.3.1 Overview of Approach

The first step in this analysis is to estimate nationwide emissions in absence of the proposed rulemaking, referred to as the baseline emissions estimate. In order to develop the baseline emissions estimate, the number of completions and recompletions performed in a typical year was estimated and then multiplied by the expected uncontrolled emissions per well completion listed in Table 4-2. In addition, to ensure no emission reduction credit was attributed to sources already controlled under State regulations, it was necessary to account for the number of completions/recompletions already subject to State regulations as detailed below. In order to estimate the number of wells that are already controlled under State regulations, existing well data was analyzed to estimate the percentage of currently controlled wells. This percentage was assumed to also represent the wells that would have been controlled in absence of a federal regulation and applied to the number of well completions estimated for future years.

4.3.2 Number of Completions and Recompletions

The number of new well completions was estimated using the National Energy Modeling System (NEMS). NEMS is a model of U.S. energy economy developed and maintained by the Energy Information Administration (EIA). NEMS is used to produce the Annual Energy Outlook, a reference publication that provides detailed forecasts of the energy economy from the current year to 2035. EIA is legally required to make the NEMS source code available and fully documented for the public. The source code and accompanying documentation is released annually when a new Annual Energy Outlook is produced. Because of the availability of NEMS, numerous agencies, national laboratories, research institutes, and academic and private-sector researchers have used NEMS to analyze a variety of issues. NEMS models the dynamics of energy markets and their interactions with the broader U.S. economy. The system projects the production of energy resources such as oil, natural gas, coal, and renewable fuels, the conversion of resources through processes such as refining and electricity generation, and the quantity and prices for final consumption across sectors and regions.

New well completion estimates are based on predictions from the NEMS Oil and Gas Supply Model, drawing upon the same assumptions and model used in the Annual Energy Outlook 2011 Reference Case. New well completions estimates were based on total successful wells drilled in 2015 (the year of analysis for regulatory impacts) for the following well categories: natural gas completions without hydraulic fracturing, natural gas completions with hydraulic fracturing, and oil well completions.

Successful wells are assumed to be equivalent to completed wells. Meanwhile, it was assumed that new dry wells would be abandoned and shut in and would not be completed. Therefore estimates of the number of dry wells were not included in the activity projections or impacts discussion for exploratory and developmental wells. Completion estimates are based on successful developmental and exploratory wells for each category defined in NEMS that includes oil completions, conventional gas completions and unconventional gas completions. The NEMS database defines unconventional reservoirs as those in shale, tight sand, and coalbed methane formations and distinguishes those from wells drilled in conventional reservoirs. Since hydraulic fracturing is most common in unconventional formations, this analysis assumes new successful natural gas wells in shale, tight sand, and coalbed methane formations are completed with hydraulic fracturing. New successful natural gas wells in conventional formations are assumed to be completed without hydraulic fracturing.

The number of natural gas recompletions with hydraulic fracturing (also referred to as a re-fracture), natural gas recompletions without hydraulic fracturing and oil well recompletions was based on well count data found in the HPDI® database.[ii, iii] The HPDI database consists of oil and natural gas well information maintained by a private organization that provides parameters describing the location, operator, and production characteristics. HPDI® collects information on a well basis such as the operator, state, basin, field, annual gas production, annual oil production, well depth, and shut-in pressure, all of which is aggregated from operator reports to state governments. HPDI was used to estimate the number of recompleted wells because the historical well data from HPDI is a comprehensive resource describing existing wells. Well data from 2008 was used as a base year since it was the most recent available data at the time of this analysis and is assumed to represent the number of recompletions that would occur in a representative year. The number of hydraulically fractured natural gas recompletions was estimated by estimating each operator and field combination found in the HPDI database and multiplying by 0.1 to represent 10 percent of the wells being re-fractured annually (as assumed in Subpart W's Technical Supporting Document3). This results in 14,177 total natural gas recompletions with hydraulic fracturing in the U.S. for the year 2008; which is assumed to depict a representative year. Non-fractured

[ii] HPDI, LLC is a private organization specializing in oil and gas data and statistical analysis. The HPDI database is focused on historical oil and gas production data and drilling permit data.

[iii] For the State of Pennsylvania, the most recent drilling information available from HPDI was for 2003. Due to the growth of oil and gas operations occurring in the Marcellus region in Pennsylvania, this information would not accurately represent the size of the industry in Pennsylvania for 2006 through 2008. Therefore, information from the Pennsylvania's Department of Environmental Protection was used to estimate well completion activities for this region. Well data from remaining states were based on available information from HPDI. From <http://www.marcellusreporting.state.pa.us/OGREReports/Modules/DataExports/DataExports.aspx

recompletions were based on well data for 2008 in HPDI. The number of estimated well completions and recompletions for each well source category is listed in Table 4-3.

4.3.3 Level of Controlled Sources in Absence of Federal Regulation

As stated previously, to determine the impact of a regulation, it is first necessary to determine the current level of emissions from the sources being evaluated, or baseline emissions. To more accurately estimate baseline emissions for this analysis, and to ensure no emission reduction credit was attributed for sources already being controlled, it was necessary to evaluate the number of completions and recompletions already subject to regulation. Therefore, the number of completions and recompletions already being controlled in the absence of federal regulation was estimated based on the existing State regulations that require control measures for completions and recompletions. Although there may be regulations issued by other local ordinances for cities and counties throughout the U.S., wells impacted by these regulations were not included in this analysis because well count data are not available on a county or local ordinance level. Therefore, the percentage calculated based on the identified State regulations should be considered a conservative estimate.

In order to determine the number of completions and recompletions that are already controlled under State regulations, EIA historical well count data was analyzed to determine the percentage of new wells currently undergoing completion and recompletion in the States identified as having existing controls.[iv] Colorado (CO) and Wyoming (WY) were the only States identified as requiring controls on completions prior to NSPS review. The State of Wyoming's Air Quality Division (WAQD) requires operators to complete wells without flaring or venting where the following criteria are met: (1) the flowback gas meets sales line specifications and (2) the pressure of the reservoir is high enough to enable REC. If the above criteria are not met, then the produced gas is to be flared. [27] The WAQD requires that, "emissions of VOC and HAP associated with the flaring and venting of hydrocarbon fluids (liquids and gas) associated with well completion and recompletion activities shall be eliminated to the extent practicable by routing the recovered liquids into storage tanks and routing the recovered gas into a gas sales line or collection system." Similar to WY, the Colorado Oil and Gas Conservation Commission (COOGCC) requires REC for both oil and natural gas wells.[28] It was assumed for this analysis that the ratio of natural wells in CO and WY to the total number of wells in the U.S. represents the percentage of controlled wells for well completions. The ratio of wells in WY to the number of total nationwide wells

[iv] See EIA's The Number of Producing Wells, http://www.eia.gov/dnav/ng/ng_prod_wells_s1_a.htm

Table 4-3: Estimated Number of Total Oil and Natural Gas Completions and Recompletions for a Typical Year

Well Completion Category	Estimated Number of Total Completions and Recompletions[a]	Estimated Number of Controlled Completions and Recompletions	Estimated Number of Uncontrolled Completions and Recompletions[b]
Natural Gas Well Completions without Hydraulic Fracturing*	7,694		7,694
Exploratory Natural Gas Well Completions with Hydraulic Fracturing**	446		446
Developmental Natural Gas Well Completions with Hydraulic Fracturing[c]	10,957	1,644	9,313
Oil Well Completions[d]	12,193		12,193
Natural Gas Well Recompletions without Hydraulic Fracturing	42,342		42,342
Natural Gas Well Recompletions with Hydraulic Fracturing‡‡	14,177	2,127	12,050
Oil Well Recompletions‡	39,375		39,375

a. Natural gas completions and recompletions without hydraulic fracturing are assumed to be uncontrolled at baseline.
b. Fifteen percent of natural gas well completions with hydraulic fracturing are assumed as controlled at baseline.
c. Oil well completions and recompletions are assumed to be uncontrolled at baseline.
d. Fifteen percent of natural gas well recompletions with hydraulic fracturing are assumed to be controlled at baseline.

was assumed to represent the percentage of controlled well recompletions as it was the only State identified as having regulations directly regulated to recompletions.

From this review it was estimated that 15 percent of completions and 15 percent of recompletions are controlled in absence of federal regulation. It is also assumed for this analysis that only natural gas wells undergoing completion or recompletion with hydraulic fracturing are controlled in these States. Completions and recompletions that are performed without hydraulic fracturing, in addition to oil well completions and recompletions were assumed to not be subject to State regulations and therefore, were assumed to not be regulated at baseline. Baseline emissions for the controlled completions and recompletions covered by regulations are assumed to be reduced by 95 percent from the use of both REC and combustion devices that may be used separately or in tandem, depending on the individual State regulation.[v] The final activity factors for uncontrolled completions and uncontrolled recompletions are also listed in Table 4-3.

4.3.4 Emission Estimates

Using the estimated emissions, number of uncontrolled and controlled wells at baseline, described above, nationwide emission estimates for oil and gas well completions and recompletions in a typical year were calculated and are summarized in Table 4-4. All values have been independently rounded to the nearest ton for estimation purposes. As the table indicates, hydraulic fracturing significantly increases the magnitude of emissions. Completions and recompletions without hydraulic fracturing have lower emissions, while oil completions and recompletions have even lower emissions in comparison.

4.4 Control Techniques

4.4.1 Potential Control Techniques

Two techniques were considered that have been proven to reduce emissions from well completions and recompletions: REC and completion combustion. One of these techniques, REC, is an approach that not only reduces emissions but delivers natural gas product to the sales meter that would typically be vented. The second technique, completion combustion, destroys the organic compounds. Both of these techniques are discussed in the following sections, along with estimates of the impacts of their application for a representative well. Nationwide impacts of chosen regulatory options are discussed in

[v] Percentage of controls by flares versus REC were not determined, so therefore, the count of controlled wells with REC versus controlled wells with flares was not determined and no secondary baseline emission impacts were calculated.

Table 4-4. Nationwide Baseline Emissions from Uncontrolled Oil and Gas Well Completions and Recompletions

Well Completion Category	Uncontrolled Methane Emissions per event (tpy)	Number of Uncontrolled Wells[a]	Baseline Nationwide Emissions (tons/year)[a]		
			Methane[b]	VOC[c]	HAP[d]
Natural Gas Well Completions without Hydraulic Fracturing	0.8038	7,694	6,185	902	66
Exploratory Natural Gas Well Completions with Hydraulic Fracturing	158.55	446	70,714	10,317	750
Developmental Natural Gas Well Completions with Hydraulic Fracturing	158.55	9,313	1,476,664	215,445	15,653
Oil Well Completions	0.0076	12,193	93	87	.008
Natural Gas Well Recompletions without Hydraulic Fracturing	0.0538	42,342	2,279	332	24
Natural Gas Well Recompletions with Hydraulic Fracturing	158.55	12,050	1,910,549	278,749	20,252
Oil Well Recompletions	0.00126	39,375	50	47	.004

Minor discrepancies may be due to rounding.

a. Baseline emissions include emissions from uncontrolled wells plus five percent of emissions from controlled sources. The Baseline emission reductions listed in the Regulatory Impacts (Table 4-9) represents only emission reductions from uncontrolled sources.
b. The number of controlled and uncontrolled wells estimated based on State regulations.
c. Based on the assumption that VOC content is 0.1459 pounds VOC per pound methane for natural gas wells and 0.8374 pounds VOC per pound methane for oil wells This estimate accounts for 5 percent of emissions assumed as vented even when controlled. Does not account for secondary emissions from portion of gas that is directed to a combustion device.
d. Based on the assumption that HAP content is 0.0106 pounds HAP per pound methane for natural gas wells and 0.0001 pounds HAP per pound methane for oil wells. This estimate accounts for 5 percent of emissions assumed as vented even when controlled. Does not account for secondary emissions from portion of gas that is directed to a combustion device.

section 4.5.

4.4.2 Reduced Emission Completions and Recompletions

4.4.2.1 Description

Reduced emission completions, also referred to as "green" or "flareless" completions, use specially designed equipment at the well site to capture and treat gas so it can be directed to the sales line. This process prevents some natural gas from venting and results in additional economic benefit from the sale of captured gas and, if present, gas condensate. Additional equipment required to conduct a REC may include additional tankage, special gas-liquid-sand separator traps, and a gas dehydrator.[29] In many cases, portable equipment used for RECs operate in tandem with the permanent equipment that will remain after well drilling is completed. In other instances, permanent equipment is designed (e.g. oversized) to specifically accommodate initial flowback. Some limitations exist for performing RECs since technical barriers fluctuate from well to well. Three main limitations include the following for RECs:

- Proximity of pipelines. For exploratory wells, no nearby sales line may exist. The lack of a nearby sales line incurs higher capital outlay risk for exploration and production companies and/or pipeline companies constructing lines in exploratory fields. The State of Wyoming has set a precedent by stating proximity to gathering lines for wells is not a sufficient excuse to avoid RECs unless they are deemed exploratory, or the first well drilled in an area that has never had oil and gas well production prior to that drilling instance (i.e., a wildcat well).[30] In instances where formations are stacked vertically and horizontal drilling could take place, it may be possible that existing surface REC equipment may be located near an exploratory well, which would allow for a REC.

- Pressure of produced gas. During each stage of the completion/recompletion process, the pressure of flowback fluids may not be sufficient to overcome the sales line backpressure. This pressure is dependent on the specific sales line pressure and can be highly variable. In this case, combustion of flowback gas is one option, either for the duration of the flowback or until a point during flowback when the pressure increases to flow to the sales line. Another control option is compressor applications. One application is gas lift which is accomplished by withdrawing gas from the sales line, boosting its pressure, and routing it down the well

casing to push the fracture fluids up the tubing. The increased pressure facilitates flow into the separator and then the sales line where the lift gas becomes part of the normal flowback that can be recovered during a REC. Another potential compressor application is to boost pressure of the flowback gas after it exits the separator. This technique is experimental because of the difficulty operating a compressor on widely fluctuating flowback rate.

- Inert gas concentration. If the concentration of inert gas, such as nitrogen or carbon dioxide, in the flowback gas exceeds sales line concentration limits, venting or combustion of the flowback may be necessary for the duration of flowback or until the gas energy content increases to allow flow to the sales line. Further, since the energy content of the flowback gas may not be high enough to sustain a flame due to the presence of the inert gases, combustion of the flowback stream would require a continuous ignition source with its own separate fuel supply.

4.4.2.2. Effectiveness

RECs are an effective emissions reduction method for only natural gas completions and recompletions performed with hydraulic fracturing based on the estimated flowback emissions described in Section 4.2. The emissions reductions vary according to reservoir characteristics and other parameters including length of completion, number of fractured zones, pressure, gas composition, and fracturing technology/technique. Based on several experiences presented at Natural Gas STAR technology transfer workshops, this analysis assumes 90 percent of flowback gas can be recovered during a REC.[31] Any amount of gas that cannot be recovered can be directed to a completion combustion device in order to achieve a minimum 95 percent reduction in emissions.

4.4.2.3 Cost Impacts

All completions incur some costs to a company. Performing a REC will add to these costs. Equipment costs associated with RECs vary from well to well. High production rates may require larger equipment to perform the REC and will increase costs. If permanent equipment, such as a glycol dehydrator, is already installed or is planned to be in place at the well site as normal operations, costs may be reduced as this equipment can be used or resized rather than installing a portable dehydrator for temporary use during the completion. Some operators normally install equipment used in RECs, such as sand traps and three-phase separators, further reducing incremental REC costs.

Costs of performing a REC are projected to be between $700 and $6,500 per day, with representative well completion flowback lasting 3 to 10 days.2 This cost range is the incremental cost of performing a REC over a traditional completion, where typically the gas is vented or combusted because there is an absence of REC equipment. Since RECs involve techniques and technologies that are new and continually evolving, and these cost estimates are based on the state of the industry in 2006 (adjusted to 2008 US dollars). [vi] Cost data used in this analysis are qualified below:

- $700 per day (equivalent to $806 per day in 2008 dollars) represents completion and recompletion costs where key pieces of equipment, such as a dehydrator or three phase separator, are already found on site and are of suitable design and capacity for use during flowback.

- $6,500 per day (equivalent to $7,486 in 2008 dollars) represents situations where key pieces of equipment, such as a dehydrator or three-phase separator, are temporarily brought on site and then relocated after the completion.

Costs were assessed based on an average of the above data (for costs and number of days per completion), resulting in an average incremental cost for a REC of $4,146 per day (2008 dollars) for an average of 7 days per completion. This results in an overall incremental cost of $29,022 for a REC versus an uncontrolled completion. An additional $691 (2008 dollars) was included to account for transportation and placement of equipment, bringing total incremental costs estimated at $29,713. Reduced emission completions are considered one-time events per well; therefore annual costs were conservatively assumed to be the same as capital costs. Dividing by the expected emission reductions, cost-effectiveness for VOC is $1,429 per ton, with a methane co-benefit of $208 per ton. Table 4-5 provides a summary of REC cost-effectiveness.

Monetary savings associated with additional gas captured to the sales line was also estimated based on a natural gas price of $4.00[vii] per thousand cubic feet (Mcf).[32] It was assumed that all gas captured would be included as sales gas. Therefore, assuming that 90 percent of the gas is captured and sold, this equates

[vi] The Chemical Engineering Cost Index was used to convert dollar years. For REC, the 2008 value equals 575.4 and the 2006 value equals 499.6.

[vii] The average market price for natural gas in 2010 was approximately $4.16 per Mcf. This is much less compared to the average price in 2008 of $7.96 per Mcf. Due to the volatility in the price, a conservative savings of $4.00 per Mcf estimate was projected for the analysis in order to not overstate savings. The value of natural gas condensate recovered during the REC would also be significant depending on the gas composition. This value was not incorporated into the monetary savings in order to not overstate savings.

Table 4-5. Reduced Emission Completion and Recompletion Emission Reductions and Cost Impacts Summary

Well Completion Category	Emission Reduction Per Completion/Recompletion (tons/year)[a]			Total Cost Per Completion/ Recompletion[b] ($/event)	VOC Cost Effectiveness ($/ton)[c]		Methane Cost Effectiveness ($/ton)	
	VOC	Methane	HAP		without savings	with savings	without savings	with savings
Natural Gas Completions and Recompletions with Hydraulic Fracturing	20.8	142.7	1.5	29,713	1,429	net savings	208	net savings

Minor discrepancies may be due to rounding.

a. This represents a ninety percent reduction from baseline for the average well.

b. Total cost for reduced emission completion is expressed in terms of incremental cost versus a completion that vents emissions. This is based on an average incremental cost of $4,146 per day for an average length of completion flowback lasting 7 days and an additional $691 for transportation and set up.

c. Cost effectiveness has been rounded to the nearest dollar.

to a total recovery of 8,258 Mcf of natural gas per completion or recompletion with hydraulic fracturing. The estimated value of the recovered natural gas for a representative natural gas well with hydraulic fracturing is approximately $33,030. In addition we estimate an average of 34 barrels of condensate is recovered per completion or recompletion. Assuming a condensate value of $70 per barrel (bbl), this result is an income due to condensate sales around $2,380.[33] When considering these savings from REC, for a completion or recompletion with hydraulic fracturing, there is a net savings on the order of $5,697 per completion.

4.4.2.4 Secondary Impacts

A REC is a pollution prevention technique that is used to recover natural gas that would otherwise be emitted. No secondary emissions (e.g., nitrogen oxides, particulate matter, etc.) would be generated, no wastes should be created, no wastewater generated, and no electricity needed. Therefore, there are no secondary impacts expected due to REC.

4.4.3 Completion Combustion Devices

4.4.3.1 Description

Completion combustion is a high-temperature oxidation process used to burn combustible components, mostly hydrocarbons, found in waste streams.[34] Completion combustion devices are used to control VOC in many industrial settings, since the completion combustion device can normally handle fluctuations in concentration, flow rate, heating value, and inert species content.[35] Completion combustion devices commonly found on drilling sites are rather crude and portable, often installed horizontally due to the liquids that accompany the flowback gas. These flares can be as simple as a pipe with a basic ignition mechanism and discharge over a pit near the wellhead. However, the flow directed to a completion combustion device may or may not be combustible depending on the inert gas composition of flowback gas, which would require a continuous ignition source. Sometimes referred to as pit flares, these types of combustion devices do not employ an actual control device, and are not capable of being tested or monitored for efficiency. They do provide a means of minimizing vented gas and is preferable to venting. For the purpose of this analysis, the term completion combustion device represents all types of combustion devices including pit flares.

4.4.3.2 Effectiveness

The efficiency of completion combustion devices, or exploration and production flares, can be expected to achieve 95 percent, on average, over the duration of the completion or recompletion. If the energy content of natural gas is low, then the combustion mechanism can be extinguished by the flowback gas. Therefore, it is more reliable to install an igniter fueled by a consistent and continuous ignition source. This scenario would be especially true for energized fractures where the initial flowback concentration will be extremely high in inert gases. This analysis assumes use of a continuous ignition source with an independent external fuel supply is assumed to achieve an average of 95 percent control over the entire flowback period. Additionally, because of the nature of the flowback (i.e., with periods of water, condensate, and gas in slug flow), conveying the entire portion of this stream to a flare or other control device is not always feasible. Because of the exposed flame, open pit flaring can present a fire hazard or other undesirable impacts in some situations (e.g., dry, windy conditions, proximity to residences, etc.). As a result, we are aware that owners and operators may not be able to flare unrecoverable gas safely in every case.

Federal regulations require industrial flares meet a combustion efficiency of 98 percent or higher as outlined in 40 CFR 60.18. This statute does not apply to completion combustion devices. Concerns have been raised on applicability of 40 CFR 60.18 within the oil and gas industry including for the production segment.[30, 36, 37] The design and nature of completion combustion devices must handle multiphase flow and stream compositions that vary during the flowback period. Thus, the applicability criterion that specifies conditions for flares used in highly industrial settings may not be appropriate for flares typically used to control emissions from well completions and recompletions.

4.4.3.3 Cost Impacts

An analysis depicting the cost for wells including completion combustion devices was conducted for the Petroleum Services Association of Canada (PSAC) [38] in 2009 by N.L. Fisher Supervision and Engineering, Ltd.[viii] The data corresponds to 34 gas wells for various types of formations, including coal bed methane and shale. Multiple completion methods were also examined in the study including hydraulic and energized fracturing. Using the cost data points from these natural gas well completions,

[viii] It is important to note that outliers were excluded from the average cost calculation. Some outliers estimated the cost of production flares to be as low as $0 and as high as $56,000. It is expected that these values are not representative of typical flare costs and were removed from the data set. All cost data found in the PSAC study were aggregated values of the cost of production flares and other equipment such as tanks. It is possible the inclusion of the other equipment is not only responsible for the outliers, but also provides a conservatively high estimate for completion flares.

an average completion combustion device cost is approximately $3,523 (2008 dollars).[ix] As with the REC, because completion combustion devices are purchased for these one-time events, annual costs were conservatively assumed to be equal to the capital costs.

It is assumed that the cost of a continuous ignition source is included in the combustion completion device cost estimations. It is understood that multiple completions and recompletions can be controlled with the same completion combustion device, not only for the lifetime of the combustion device but within the same yearly time period. However, to be conservative, costs were estimated as the total cost of the completion combustion device itself, which corresponds to the assumption that only one device will control one completion per year. The cost impacts of using a completion combustion device to reduce emissions from representative completions/recompletions are provided in Table 4-6. Completion combustion devices have a cost-effectiveness of $161 per ton VOC and a co-benefit of $23 per ton methane for completions and recompletions with hydraulic fracturing.

4.4.3.4 Secondary Impacts

Noise and heat are the two primary undesirable outcomes of completion combustion device operation. In addition, combustion and partial combustion of many pollutants also create secondary pollutants including nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x, carbon dioxide (CO_2), and smoke/particulates (PM). The degree of combustion depends on the rate and extent of fuel mixing with air and the temperature maintained by the flame. Most hydrocarbons with carbon-to-hydrogen ratios greater than 0.33 are likely to smoke.[34] Due to the high methane content of the gas stream routed to the completion combustion device, it suggests that there should not be smoke except in specific circumstances (e.g., energized fractures). The stream to be combusted may also contain liquids and solids that will also affect the potential for smoke. Soot can typically be eliminated by adding steam. Based on current industry trends in the design of completion combustion devices and in the decentralized nature of completions, virtually no completion combustion devices include steam assistance.[34]

Reliable data for emission factors from flare operations during natural gas well completions are limited. Guidelines published in AP-42 for flare operations are based on tests from a mixture containing

[ix] The Chemical Engineering Cost Index was used to convert dollar years. For the combustion device the 2009 value equals 521.9. The 2009 average value for the combustion device is $3,195.

Table 4-6. Emission Reduction and Cost-effectiveness Summary for Completion Combustion Devices

Well Completion Category	Emission Reduction Per Completion/Workover (tons/year)[a]			Total Capital Cost Per Completion Event ($)*	VOC Cost Effectiveness	Methane Cost Effectiveness
	VOC	Methane	HAP		($/ton)[b]	($/ton)
Natural Gas Well Completions without Hydraulic Fracturing	0.11	0.76	0.0081	3,523	31,619	4,613
Natural Gas Well Completions with Hydraulic Fracturing	21.9	150.6	1.597		160	23
Oil Well Completions	0.01	0.007	0.0000007		520,580	488,557
Natural Gas Well Recompletions without Hydraulic Fracturing	0.007	0.051	0.0005		472,227	68,889
Natural Gas Well Recompletions with Hydraulic Fracturing	21.9	150.6	1.597		160	23
Oil Well Recompletions	0.00	0.001	0.0000001		3,134,431	2,941,615

Minor discrepancies may be due to rounding.

a. This assumes one combustion device will control one completion event per year. This should be considered a conservative estimate, since it is likely multiple completion events will be controlled with the same combustion unit in any given year. Costs are stated in 2008 dollars.

80 percent propylene and 20 percent propane.[34] These emissions factors, however, are the best indication for secondary pollutants from flare operations currently available. These secondary emission factors are provided are provided in Table 4-7.

Since this analysis assumed pit flares achieve 95 percent efficiency over the duration of flowback, it is likely the secondary emission estimations are lower than actuality (i.e. AP-42 assumes 98 percent efficiency). In addition due, to the potential for the incomplete combustion of natural gas across the pit flare plume, the likelihood of additional NO_x formulating is also likely. The degree of combustion is variable and depends on the on the rate and extent of fuel mixing with air and on the flame temperature. Moreover, the actual NO_x (and CO) emissions may be greatly affected when the raw gas contains hydrocarbon liquids and water. For these reasons, the nationwide impacts of combustion devices discussed in Section 4.5 should be considered minimum estimates of secondary emissions from combustion devices.

4.5 Regulatory Options

The REC pollution prevention approach would not result in emissions of CO, NO_x, and PM from the combustion of the completion gases in the flare, and would therefore be the preferred option. As discussed above, REC is only an option for reducing emissions from gas well completions/workovers with hydraulic fracturing. Taking this into consideration, the following regulatory alternatives were evaluated:

- Regulatory Option 1: Require completion combustion devices for conventional natural gas well completions and recompletions;
- Regulatory Option 2: Require completion combustion devices for oil well completions and recompletions;
- Regulatory Option 3: Require combustion devices for all completions and recompletions;
- Regulatory Option 4: Require REC for all completions and recompletions of hydraulically fractured wells;
- Regulatory Option 5: Require REC and combustion operational standards for natural gas well completions with hydraulic fracturing, with the exception of exploratory, and delineation wells;
- Regulatory Option 6: Require combustion operational standards for exploratory and delineation wells; and

Table 4-7. Emission Factors from Flare Operations from AP-42 Guidelines Table 13.4-1[a]

Pollutant	Emission Factor ($lb/10^6$ Btu)
Total Hydrocarbon[b]	0.14
Carbon Monoxide	0.37
Nitrogen Oxides	0.068
Particular Matter[c]	0-274
Carbon Dioxide[d]	60

a. Based on combustion efficiency of 98 percent.
b. Measured as methane equivalent.
c. Soot in concentration values: nonsmoking flares, 0 micrograms per liter (µg/L); lightly smoking flares, 40 µg/L; average smoking flares, 177 µg/L; and heavily smoking flares, 274 µg/L.
d. Carbon dioxide is measured in kg CO2/MMBtu and is derived from the carbon dioxide emission factor obtained from 40 CFR Part 98, subpart Y, Equation Y-2.

- Regulatory Option 7: Require REC and combustion operational standards for all natural gas well recompletions with hydraulic fracturing.

The following sections discuss these regulatory options.

4.5.1 Evaluation of Regulatory Options

The first two regulatory options (completion combustion devices for conventional natural gas well completions and recompletions and completion combustion devices for oil well completions and recompletions) were evaluated first. As shown in Table 4-6, the cost effectiveness associated with controlling conventional natural gas and oil well completions and recompletions ranges from $31,600 per ton VOC to over $3.7 million per ton VOC. Therefore, Regulatory Options 1 and 2 were rejected due to the high cost effectiveness.

The next regulatory option, to require completion combustion devices for all completions and recompletions, was considered. Under Regulatory Option 3, all of the natural gas emitted from the well during flowback would be destroyed by sending flowback gas through a combustion unit. Not only would this regulatory option result in the destruction of a natural resource with no recovery of salable gas, it also would result in an increase in emissions of secondary pollutants (e.g., nitrogen oxides, carbon monoxide, etc.). Therefore, Regulatory Option 3 was also rejected.

The fourth regulatory option would require RECs for all completions and recompletions of hydraulically fractured wells. As stated previously, RECs are not feasible for all well completions, such as exploratory wells, due to their distance from sales lines, etc. Further, RECs are also not technically feasible for each well at all times during completion and recompletion activities due to the variability of the pressure of produced gas and/or inert gas concentrations. Therefore, Regulatory Option 4 was rejected.

The fifth regulatory option was to require an operational standard consisting of a combination of REC and combustion for natural gas well completions with hydraulic fracturing. As discussed for Regulatory Option 4, RECs are not feasible for every well at all times during completion or recompletion activities due to variability of produced gas pressure and/or inert gas concentrations. In order to allow for wellhead owners and operators to continue to reduce emissions when RECs are not feasible due to well characteristics (e.g, wellhead pressure or inert gas concentrations), Regulatory Option 5 also allows for the use of a completion combustion device in combination with RECs.

Under Regulatory Option 5, a numerical limit was considered, but was rejected in favor of an operational standard. Under section 111(h)(2) of the CAA, EPA can set an operational standard which represents the best system of continuous emission reduction, provided the following criteria are met:

> "(A) a pollutant or pollutants cannot be emitted through a conveyance designed and constructed to emit or capture such pollutant, or that any requirement for, or use of, such a conveyance would be inconsistent with any Federal, State, or local law, or
>
> (B) the application of measurement methodology to a particular class of sources is not practicable due to technological or economic limitations."

As discussed in section 4.4.3, emissions from a completion combustion device cannot be measured or monitored to determine efficiency making an operational standard appropriate. Therefore, an operational standard under this regulatory option consists of a combination of REC and a completion combustion device to minimize the venting of natural gas and condensate vapors to the atmosphere, but allows venting in lieu of combustion for situations in which combustion would present safety hazards, other concerns, or for periods when the flowback gas is noncombustible due to high concentrations of inert gases. Sources would also be required, under this regulatory option, to maintain documentation of the overall duration of the completion event, duration of recovery using REC, duration of combustion, duration of venting, and specific reasons for venting in lieu of combustion. It was also evaluated whether Regulatory Option 5 should apply to all well completions, including exploratory and delineation wells.

As discussed previously, one of the technical limitations of RECs is that they are not feasible for use at some wells due to their proximity to pipelines. Section 111(b)(2) of the CAA allows EPA to "…distinguish among classes, types, and sizes within categories of new sources for the purpose of establishing…." performance standards. Due to their distance from sales lines, and the relatively unknown characteristics of the formation, completion activities occurring at exploratory or delineation wells were considered to be a different "type" of activity than the types of completion activities occurring at all other gas wells. Therefore, two subcategories of completions were identified: *Subcategory 1* wells are all natural gas wells completed with hydraulic fracturing that do not fit the definition of exploratory or delineation wells. *Subcategory 2* wells are natural gas wells that meet the following definitions of exploratory or delineation wells:

- Exploratory wells are wells outside known fields or the first well drilled in an oil or gas field where no other oil and gas production exists or

- Delineation wells means a well drilled in order to determine the boundary of a field or producing reservoir.

Based on this subcategorization, Regulatory Option 5 would apply to the Subcategory 1 wells and a sixth regulatory option was developed for Subcategory 2 wells.

Regulatory Option 6 requires an operational standard for combustion for the Subcategory 2 wells. As described above, REC is not an option for exploratory and delineation wells due to their distance from sales lines. As with the Regulatory Option 5, a numerical limitation is not feasible. Therefore, this regulatory option requires an operational standard where emissions are minimized using a completion combustion device during completion activities at Subcategory 2 wells, with an allowance for venting in situations where combustion presents safety hazards or other concerns or for periods when the flowback gas is noncombustible due to high concentrations of inert gases. Consistent with Regulatory Option 5, records would be required to document the overall duration of the completion event, the duration of combustion, the duration of venting, and specific reasons for venting in lieu of combustion.

The final regulatory option was considered for recompletions. Regulatory Option 7 requires an operational standard for a combination of REC and a completion combustion device for all recompletions with hydraulic fracturing performed on new and existing natural gas wells. Regulatory Option 7 has the same requirements as Regulatory Option 5. Subcategorization similar to Regulatory Option 5 was not necessary for recompletions because it was assumed that RECs would be technically feasible for recompletions at all types of wells since they occur at wells that are producing and thus proximity to a sales line is not an issue. While evaluating this regulatory option, it was considered whether or not recompletions at existing wells should be considered modifications and subject to standards.

The affected facility under the New Source Performance Standards (NSPS) is considered to be the wellhead. Therefore, a new well drilled after the proposal date of the NSPS would be subject to emission control requirements. Likewise, wells drilled prior to the proposal date of the NSPS would not be subject to emission control requirements unless they underwent a modification after the proposal date. Under section 111(a) of the Clean Air Act, the term “modification” means:

> "any physical change in, or change in the method of operation of, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted."

The wellhead is defined as the piping, casing, tubing, and connected valves protruding above the earth's surface for an oil and/or natural gas well. The wellhead ends where the flow line connects to a wellhead valve. In order to fracture an existing well during recompletion, the well would be re-perforated, causing physical change to the wellbore and casing and therefore a physical change to the wellhead, the affected facility. Additionally, much of the emissions data on which this analysis is based demonstrates that hydraulic fracturing results in an increase in emissions. Thus, recompletions using hydraulic fracturing result in an increase in emissions from the existing well producing operations. Based on this understanding of the work performed in order to recomplete the well, it was determined that a recompletion would be considered a modification under CAA section 111(a) and thus, would constitute a new wellhead affected facility subject to NSPS. Therefore, Regulatory Option 7 applies to recompletions using hydraulic fracturing at new and existing wells.

In summary, Regulatory Options 1, 2, 3, and 4 were determined to be unreasonable due to cost considerations, other impacts or technical feasibility and thereby rejected. Regulatory Options 5, 6, and 7 were determined to be applicable to natural gas wells and were evaluated further.

4.5.2 Nationwide Impacts of Regulatory Options

This section provides an analysis of the primary environmental impacts (i.e., emission reductions), cost impacts and secondary environmental impacts related to Regulatory Options 5, 6, and 7 which were selected as viable options for setting standards for completions and recompletions.

4.5.2.1 Primary Environmental Impacts of Regulatory Options

Regulatory Options 5, 6, and 7 were selected as options for setting standards for completions and regulatory options as follows:

- Regulatory Option 5: Operational standard for completions with hydraulic fracturing for Subcategory 1 wells (i.e., wells which do not meet the definition of exploratory or delineation wells), which requires a combination of REC with combustion, but allows for venting during specified situations.

- Regulatory Option 6: An operational standard for completions with hydraulic fracturing for exploratory and delineation wells (i.e., Subcategory 2 wells) which requires completion combustion devices with an allowance for venting during specified situations.

- Regulatory Option 7: An operational standard equivalent to Regulatory Option 5 which applies to recompletions with hydraulic fracturing at new and existing wells.

The number of completions and recompletions that would be subject to the regulatory options listed above was presented in Table 4-3. It was estimated that there would be 9,313 uncontrolled developmental natural gas well completions with hydraulic fracturing subject to Regulatory Option 5. Regulatory Option 6 would apply to 446 uncontrolled exploratory natural gas well completions with hydraulic fracturing, and 12,050 uncontrolled recompletions at existing wells would be subject to Regulatory Option 7.[x]

Table 4-8 presents the nationwide emission reduction estimates for each regulatory option. It was estimated that RECs in combination with the combustion of gas unsuitable for entering the gathering line, can achieve an overall 95 percent VOC reduction over the duration of the completion operation. The 95 percent recovery was estimated based on 90 percent of flowback being captured to the sales line and assuming an additional 5 percent of the remaining flowback would be sent to the combustion device. Nationwide emission reductions were estimated by applying this 95 percent VOC reduction to the uncontrolled baseline emissions presented in Table 4-4.

4.5.2.2 Cost Impacts

Cost impacts of the individual control techniques (RECs and completion combustion devices) were presented in section 4.4. For Regulatory Option 6, the costs for completion combustion devices presented in Table 4-6 for would apply to Subcategory 2 completions. The cost per completion event was estimated to be $3,523. Applied to the 446 estimated Subcategory 2 completions, the nationwide costs were estimated to be $1.57 million. Completion combustion devices are assumed to achieve an overall 95 percent combustion efficiency. Since the operational standards for Regulatory Options 5 and 7 include both REC and completion combustion devices, an additional cost impact analysis was

[x] The number of uncontrolled recompletions at new wells is not included in this analysis. Based on the assumption that wells are recompleted once every 10 years, any new wells that are drilled after the date of proposal of the standard would not likely be recompleted until after the year 2015, which is the date of this analysis. Therefore, impacts were not estimated for recompletion of new wells, which will be subject to the standards.

Table 4-8. Nationwide Emission and Cost Analysis of Regulatory Option

Well Completion Category	Number of Sources subject to NSPS[a]	Annual Cost Per Completion Event ($)[b]	Nationwide Emission Reductions (tpy)[c]			VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)		Total Nationwide Costs (million $/year)		
			VOC	Methane	HAP	without savings	with savings	without savings	with savings	Capital Cost	Annual without savings	Annual with savings
Regulatory Option 5 (operational standard for REC and combustion)												
Subcategory 1: Natural gas Completions with Hydraulic Fracturing	9,313	33,237	204,134	1,399,139	14,831	1,516	net savings	221	net savings	309.5	309.5	(20.24)
Regulatory Option 6 (operational standard for combustion)												
Subcategory 2: Natural gas Completions with Hydraulic Fracturing	446	3,523	9,801	67,178	712	160	160	23	23	1.57	1.57	1.57
Regulatory Option 7 (operational standard for REC and combustion)												
Natural Gas Well Recompletions with Hydraulic Fracturing	12,050	33,237	264,115	1,810,245	19,189	1,516	net savings	221	net savings	400.5	400.5	(26.18)

Minor discrepancies may be due to rounding.

a. Number of sources in each well completion category that are uncontrolled at baseline as presented in Table 4-3.

b. Costs per event for Regulatory Options 5 and 7 are calculated by adding the costs for REC and completion combustion device presented in Tables 4-5 and 4-6, respectively. Cost per event for Regulatory Option 6 is presented for completion combustion devices in Table 4-6.

c. Nationwide emission reductions calculated by applying the 95 percent emission reduction efficiency to the uncontrolled nationwide baseline emissions in Table 4-4.

performed to analyze the nationwide cost impacts of these regulatory options. The total incremental cost of the operational standard for Subcategory 1 completions and for recompletions is estimated at around $33,237, which includes the costs in Table 4-5 for the REC equipment and transportation in addition to the costs in Table 4-6 for the completion combustion device. Applying the cost for the combined REC and completion combustion device to the estimated 9,313 Subcategory 1 completions, the total nationwide cost was estimated to be $309.5 million, with a net annual savings estimated around $20 million when natural gas savings are considered. A cost of $400.5 million was estimated for recompletions, with an overall savings of around $26 million when natural gas savings are considered. The VOC cost effectiveness for Regulatory Options 5 and 7 was estimated at around $1,516 per ton, with a methane co-benefit of $221 per ton.

4.5.2.3 Secondary Impacts

Regulatory Options 5, 6 and 7 all require some amount of combustion; therefore the estimated nationwide secondary impacts are a direct result of combusting all or partial flowback emissions. Although, it is understood the volume of gas captured, combusted and vented may vary significantly depending on well characteristics and flowback composition, for the purpose of estimating secondary impacts for Regulatory Options 5 and 7, it was assumed that ninety percent of flowback is captured and an additional five percent of the remaining gas is combusted. For both Subcategory 1 natural gas well completions with hydraulic fracturing and for natural gas well recompletions with hydraulic fracturing, it is assumed around 459 Mcf of natural gas is combusted on a per well basis. For Regulatory Option 6, Subcategory 2 natural gas completions with hydraulic fracturing, it is assumed that 95 percent (8,716 Mcf) of flowback emissions are consumed by the combustion device. Tons of pollutant per completion event was estimated assuming 1,089.3 Btu/scf saturated gross heating value of the "raw" natural gas and applying the AP-42 emissions factors listed in Table 4-7.

From category 1 well completions and from recompletions, it is estimated 0.02 tons of NO_x are produced per event. This is based on assumptions that 5 percent of the flowback gas is combusted by the combustion device. From category 2 well completions, it is estimated 0.32 tons of NO_x are produced in secondary emissions per event. This is based on the assumption 95 percent of flowback gas is combusted by the combustion device. Based on the estimated number of completions and recompletions, the proposed regulatory options are estimated to produce around 507 tons of NO_x in secondary emissions nationwide from controlling all or partial flowback by combustion. Table 4-9 summarizes the estimated secondary emissions of the selected regulatory options.

Table 4-9 Nationwide Secondary Impacts of Selected Regulatory Options[a]

Pollutant	Regulatory Options 5[b]		Regulatory Option 6[c]		Regulatory Options 7[b]	
	Subcategory 1 Natural Gas Well Completions with Hydraulic Fracturing		Subcategory 2 Natural Gas Well Completions with Hydraulic Fracturing		Natural Gas Well Recompletions with Hydraulic Fracturing	
	tons per event[d]	Nationwide Annual Secondary Emissions (tons/year)	tons per event[d]	Nationwide Annual Secondary Emissions (tons/year)	tons per event[d]	Nationwide Annual Secondary Emissions (tons/year)
Total Hydrocarbons	0.03	326	0.66	296	0.03	422
Carbon Monoxide	0.09	861	1.76	783	0.09	1,114
Nitrogen Oxides	0.02	158	0.32	144	0.02	205
Particulate Matter	0.00000002	0.0002	0.011	5	0.00000002	0.0003
Carbon Dioxide	33.06	307,863	628	280,128	33.06	398,341

a. Nationwide impacts are based on AP-42 Emission Guidelines for Industrial Flares as outlined in Table 4-7. As such, these emissions should be considered the minimum level of secondary emissions expected.

b. The operational standard (Regulatory Options 5 and 7) combines REC and combustion is assumed to capture 90 percent of flowback gas. Five percent of the remaining flowback is assumed to be consumed in the combustion device. Therefore, it is estimated 459 Mcf is sent to the combustion device per completion event. This analysis assumes there are 9,313 Subcategory 1 wells and 12,050 recompletions.

c. Assumes 8,716 Mcf of natural gas is sent to the combustion unit per completion. This analysis assumes 446 exploratory wells fall into this category.

d. Based on 1,089.3 Btu/scf saturated gross heating value of the "raw" natural gas.

4.6 References

1. ICF Consulting. Availability, Economics, and Production Potential of North American Unconventional Natural Gas Supplies. Prepared for INGAA Foundation, Inc. November 2008. www.ingaa.org/File.aspx?id=7878.

2. U.S. Environmental Protection Agency. Lessons Learned: Reduced Emissions Completions. Office of Air and Radiation: Natural Gas Star Program. Washington, DC. 2011.

3. U.S. Environmental Protection Agency. Greenhouse Gas Emissions Reporting From the Petroleum and Natural Gas Industry: Background Technical Support Document. Climate Change Division. Washington, DC. November 2010. 84-89 pp.

4 U.S Environmental Protection Agency. Methodology for Estimating CH_4 and CO_2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks 1990-2008. Washington, DC. 2010.

5. U.S Environmental Protection Agency. Methodology for Estimating CH_4 and CO_2 Emissions from Natural Gas Systems. Greenhouse Gas Inventory: Emission and Sinks 1990-2008. Washington, DC. 2010.

6. Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 2: Technical Report. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080b. June 1996.

7. Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 3: General Methodology. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080c. June 1996.

8. Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 5: Activity Factors. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080e. June 1996

9. Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 6: Vented and Combustion Source Summary Emissions. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080f. June 1996.

10. Radian International LLC, Methane Emissions from the U.S. Petroleum Industry, draft report for the U.S. Environmental Protection Agency, June 14, 1996.

11. ICF Consulting. Estimates of Methane Emissions from the U.S. Oil Industry. Prepared for the U.S. Environmental Protection Agency. 1999.

12. ENVIRON International Corporation. Oil and Gas Emission Inventories for the Western States. Prepared for Western Governors' Association. December 27, 2005.

13. ENVIRON International Corporation. Recommendations for Improvements to the Central States Regional Air Partnership's Oil and Gas Emission Inventories Prepared for Central States Regional Air Partnership. November 2008.

14. Independent Petroleum Association of America. Oil and Gas Producing Industry in Your State. 2008.

15. Armendariz, Al. Emissions from Natural Gas Production in the Barnett Shale Area and Opportunities for Cost-Effective Improvements. Prepared for Environmental Defense Fund. January 2009.

16. Eastern Research Group, Inc. Emissions from Oil and Gas Production Facilities. Prepared for the Texas Commission on Environmental Quality. August 31, 2007.

17. U.S. Energy Information Administration. Annual U.S. Natural Gas Wellhead Price. Energy Information Administration. Natural Gas Navigator. Retrieved December 12, 2010. http://www.eia.doe.gov/dnav/ng/hist/n9190us3a.htm.

18. Eastern Research Group, Inc. Preferred and Alternative Methods for Estimating Air Emissions from Oil and Gas Field Production and Processing Operation. Prepared for the U.S. Environmental Protection Agency. September 1999.

19. New York State Department of Environmental Conservation. Supplemental Generic Environmental Impact Statement on the Oil, Gas and Solution Mining Regulatory Program (DRAFT). September 2009.

20. U.S. Environmental Protection Agency. Reduced Emission Completions (Green Completions). Natural Gas STAR. Producers Technology Transfer Workshop. 2005. Slide 12.

21. Anadarko Petroleum Corporation. Reduced Emission Completions in DJ Basin and Natural Buttes. Producers Technology Transfer Workshop. Rock Springs, WY. 2008. http://www.epa.gov/gasstar/documents/workshops/2008-tech-transfer/rocksprings5.pdf

22. Ellwood, B. Reduced Emissions Completions Jonah Case Study. EnCana. Denver, CO. 2009. http://www.epa.gov/gasstar/documents/workshops/2009-annual-conf/08ellwood.pdf

23. Marathon. Excape Completion Process Reduces Gas Emissions and Speeds Well Completions. 14th Annual Natural Gas Star Workshop. Houston, TX. 2007 http://www.epa.gov/gasstar/documents/workshops/2007-annual-conf/06_phil_snider.pdf

24. Werline, R. Natural Gas Star Workshop. Oklahoma City, OK. 2009. http://www.epa.gov/gasstar/documents/workshops/okcity2009/devon_completions.pdf

25. US Environmental Protection Agency. Reducing Methane Emissions During Completion Operations. Natural Gas STAR. Annual Implementation Workshop. Houston, TX. 2006. http://www.epa.gov/gasstar/documents/vincent.pdf

26. Memorandum to Bruce Moore from Heather Brown. Composition of Natural Gas for Use in the Oil and Natural Gas Sector Rulemaking. EC/R, Incorporated. June 29, 2011.

27 State of Wyoming Department of Environmental Quality, Air Quality Division. *Well Completions/Re-completions Permit Application*. Page 2. August 2010. http://deq.state.wy.us/aqd/Oil%20and%20Gas/AQD-OG11_Green%20Completion%20Application.pdf

28 Colorado Oil and Gas Conservation Commission. 2 CCR-404-1. http://oil-gas.state.co.us/RuleMaking/FinalDraftRules/COGCCFinalDraftRules_110708.pdf

29. U.S. Environmental Protection Agency Fact Sheet No. 703: Green Completions. Office of Air and Radiation: Natural Gas Star Program. Washington, DC. September 2004.

30. Memorandum to Bruce Moore from Denise Grubert. American Petroleum Institute Meeting Minutes. EC/R, Incorporated. July 2010.

31 Memorandum to Bruce Moore from ICF Consulting. Percent of Emissions Recovered by Reduced Emission Completions. May 2011.

32. U.S. Energy Information Administration. Annual U.S. Natural Gas Wellhead Price. Energy Information Administration. Natural Gas Navigator. Retrieved online on Dec 12, 2010. http://www.eia.doe.gov/dnav/ng/hist/n9190us3a.htm

33 Memorandum to Bruce Moore from ICF Consulting. NSPS Unconventional Well Completions Condensate Recovery Analysis – Recovered Volumes and Value. July 28, 2011.

34. U.S. Environmental Protection Agency. AP 42, Fifth Edition, Volume I, Chapter 13.5 Industrial Flares. Office of Air Quality Planning & Standards. 1991

35. U.S. Environmental Protection Agency. Air Pollution Control Technology Fact Sheet: FLARES. Clean Air Technology Center.

36. Memorandum to Bruce Moore from Denise Grubert. American Petroleum Institute Meeting Minutes. EC/R, Incorporated. October 2010.

37. Memorandum to Bruce Moore from Denise Grubert. American Petroleum Institute Meeting Minutes Attachment 1: Review of Federal Air Regulations for the Oil and Natural Gas Sector 40 CFR Part 60, Subparts KKK and LLL; 40 CFR Part 63 Subparts HH and HHH. EC/R, Incorporated. February 2011.

38. Petroleum Services Association of Canada. 2009 Well Cost Study. Upcoming Summer Costs. Well Cost Data and Consulting by N.L. Fisher Supervision & Engineering Ltd. April 30, 2009.

5.0 PNEUMATIC CONTROLLERS

The natural gas industry uses a variety of process control devices to operate valves that regulate pressure, flow, temperature, and liquid levels. Most instrumentation and control equipment falls into one of three categories: (1) pneumatic; (2) electrical; or (3) mechanical. Of these, only pneumatic devices are direct sources of air emissions. Pneumatic controllers are used throughout the oil and natural gas sector as part of the instrumentation to control the position of valves. This chapter describes pneumatic devices including their function and associated emissions. Options available to reduce emissions from pneumatic devices are presented, along with costs, emission reductions, and secondary impacts. Finally, this chapter discusses considerations in developing regulatory alternatives for pneumatic devices.

5.1 Process Description

For the purpose of this document, a pneumatic controller is a device that uses natural gas to transmit a process signal or condition pneumatically and that may also adjust a valve position based on that signal, with the same bleed gas and/or a supplemental supply of power gas. In the vast majority of applications, the natural gas industry uses pneumatic controllers that make use of readily available high-pressure natural gas to provide the required energy and control signals. In the production segment, an estimated 400,000 pneumatic devices control and monitor gas and liquid flows and levels in dehydrators and separators, temperature in dehydrator regenerators, and pressure in flash tanks. There are around 13,000 gas pneumatic controllers located in the gathering, boosting and processing segment that control and monitor temperature, liquid, and pressure levels. In the transmission segment, an estimated 85,000 pneumatic controllers actuate isolation valves and regulate gas flow and pressure at compressor stations, pipelines, and storage facilities.[1]

Pneumatic controllers are automated instruments used for maintaining a process condition such as liquid level, pressure, pressure differential, and temperature. In many situations across all segments of the oil and gas industry, pneumatic controllers make use of the available high-pressure natural gas to operate control of a valve. In these “gas-driven” pneumatic controllers, natural gas may be released with every valve movement and/or continuously from the valve control pilot. The rate at which the continuous release occurs is referred to as the bleed rate. Bleed rates are dependent on the design and operating characteristics of the device. Similar designs will have similar steady-state rates when operated under similar conditions. There are three basic designs: (1) continuous bleed devices are used to modulate flow, liquid level, or pressure, and gas is vented continuously at a rate that may vary over time; (2) snap-

acting devices release gas only when they open or close a valve or as they throttle the gas flow; and (3) self-contained devices release gas to a downstream pipeline instead of to the atmosphere. This analysis assumes self-contained devices that release natural gas to a downstream pipeline instead of to the atmosphere have no emissions. Furthermore, it is recognized "closed loop" systems are applicable only in instances with very low pressure[2] and may not be suitable to replace many applications of bleeding pneumatic devices. Therefore, these devices are not further discussed in this analysis.

Snap-acting controllers are devices that only emit gas during actuation and do not have a continuous bleed rate. The actual amount of emissions from snap-acting devices is dependent on the amount of natural gas vented per actuation and how often it is actuated. Bleed devices also vent an additional volume of gas during actuation, in addition to the device's bleed stream. Since actuation emissions serve the device's functional purpose and can be highly variable, the emissions characterized for high-bleed and low-bleed devices in this analysis (as described in section 5.2.2) account for only the continuous flow of emissions (i.e. the bleed rate) and do not include emissions directly resulting from actuation. Snap-acting controllers are assumed to have zero bleed emissions. Most applications (but not all), snap-acting devices serve functionally different purposes than bleed devices. Therefore, snap-acting controllers are not further discussed in this analysis.

In addition, not all pneumatic controllers are gas driven. At sites without electrical service sufficient to power an instrument air compressor, mechanical or electrically powered pneumatic devices can be used. These "non-gas driven" pneumatic controllers can be mechanically operated or use sources of power other than pressurized natural gas, such as compressed "instrument air." Because these devices are not gas driven, they do not directly release natural gas or VOC emissions. However, electrically powered systems have energy impacts, with associated secondary impacts related to generation of the electrical power required to drive the instrument air compressor system. Instrument air systems are feasible only at oil and natural gas locations where the devices can be driven by compressed instrument air systems and have electrical service sufficient to power an air compressor. This analysis assumes that natural gas processing plants are the only facilities in the oil and natural gas sector highly likely to have electrical service sufficient to power an instrument air system, and that most existing gas processing plants use instrument air instead of gas driven devices.[9] The application of electrical controls is further elaborated in Section 5.3.

5.2 Emissions Data and Information

5.2.1 Summary of Major Studies and Emissions

In the evaluation of the emissions from pneumatic devices and the potential options available to reduce these emissions, numerous studies were consulted. Table 5-1 lists these references with an indication of the type of relevant information contained in each study.

5.2.2 Representative Pneumatic Device Emissions

Bleeding pneumatic controllers can be classified into two types based on their emissions rates: (1) high-bleed controllers and (2) low-bleed controllers. A controller is considered to be high-bleed when the continuous bleed emissions are in excess of 6 standard cubic feet per hour (scfh), while low-bleed devices bleed at a rate less than or equal to 6 scfh.[i]

For this analysis, EPA consulted information in the appendices of the Natural Gas STAR Lessons Learned document on pneumatic devices, Subpart W of the Greenhouse Gas Reporting rule, as well as obtained updated data from major vendors of pneumatic devices. The data obtained from vendors included emission rates, costs, and any other pertinent information for each pneumatic device model (or model family). All pneumatic devices that a vendor offered were itemized and inquiries were made into the specifications of each device and whether it was applicable to oil and natural gas operations. High-bleed and low-bleed devices were differentiated using the 6 scfh threshold.

Although by definition, a low-bleed device can emit up to 6 scfh, through this vendor research, it was determined that the typical low-bleed device available currently on the market emits lower than the maximum rate allocated for the device type. Specifically, low-bleed devices on the market today have emissions from 0.2 scfh up to 5 scfh. Similarly, the available bleed rates for a high bleed device vary significantly from venting as low as 7 scfh to as high as 100 scfh.[3,ii] While the vendor data provides useful information on specific makes and models, it did not yield sufficient information about the

[i] The classification of high-bleed and low-bleed devices originated from a report by Pacific Gas & Electric (PG&E) and the Gas Research Institute (GRI) in 1990 titled "Unaccounted for Gas Project Summary Volume." This classification was adopted for the October 1993 Report to Congress titled "Opportunities to Reduce Anthropogenic Methane Emissions in the United States". As described on page 2-16 of the report, "devices with emissions or 'bleed' rates of 0.1 to 0.5 cubic feet per minute are considered to be 'high-bleed' types (PG&E 1990)." This range of bleed rates is equivalent to 6 to 30 cubic feet per hour.

[ii] All rates are listed at an assumed supply gas pressure of 20 psig.

Table 5-1. Major Studies Reviewed for Consideration of Emissions and Activity Data

Report Name	Affiliation	Year of Report	Number of Devices	Emissions Information	Control Information
Greenhouse Gas Mandatory Reporting Rule and Technical Supporting Document [3]	EPA	2010	Nationwide	X	
Inventory of Greenhouse Gas Emissions and Sinks: 1990-2009 [4, 5]	EPA	2011	Nationwide/ Regional	X	
Methane Emissions from the Natural Gas Industry [6, 7, 8, 9]	Gas Research Institute / EPA	1996	Nationwide	X	
Methane Emissions from the Petroleum Industry (draft) [10]	EPA	1996	Nationwide	X	
Methane Emissions from the Petroleum Industry [11]	EPA	1999	Nationwide	X	
Oil and Gas Emission Inventories for Western States [12]	Western Regional Air Partnership	2005	Regional	X	
Natural Gas STAR Program[1]	EPA	2000-2010		X	X

prevalence of each model type in the population of devices; which is an important factor in developing a representative emission factor. Therefore, for this analysis, EPA determined that best available emissions estimates for pneumatic devices are presented in Table W-1A and W-1B of the Greenhouse Gas Mandatory Reporting Rule for the Oil and Natural Gas Industry (Subpart W). However, for the natural gas processing segment, a more conservative approach was assumed since it has been determined that natural gas processing plants would have sufficient electrical service to upgrade to non-gas driven controls. Therefore, to quantify representative emissions from a bleed-device in the natural gas processing segment, information from Volume 12 of the EPA/GRI report[iii] was used to estimate the methane emissions from a single pneumatic device by type.

The basic approach used for this analysis was to first approximate methane emissions from the average pneumatic device type in each industry segment and then estimate VOC and hazardous air pollutants (HAP) using a representative gas composition.[13] The specific ratios from the gas composition were 0.278 pounds VOC per pound methane and 0.0105 pounds HAP per pound methane in the production and processing segments, and 0.0277 pounds VOC per pound methane and 0.0008 pounds HAP per pound methane in the transmission segment. Table 5-2 summarizes the estimated bleed emissions for a representative pneumatic controller by industry segment and device type.

5.3 Nationwide Emissions from New Sources

5.3.1 Approach

Nationwide emissions from newly installed natural gas pneumatic devices for a typical year were calculated by estimating the number of pneumatic devices installed in a typical year and multiplying by the estimated annual emissions per device listed in Table 5-2. The number of new pneumatic devices installed for a typical year was determined for each segment of the industry including natural gas production, natural gas processing, natural gas transmission and storage, and oil production. The methodologies that determined the estimated number of new devices installed in a typical year is provided in section 5.3.2 of this chapter.

5.3.2 Population of Devices Installed Annually

In order to estimate the average number of pneumatic devices installed in a typical year, each industry

[iii] Table 4-11. page 56. epa.gov/gasstar/tools/related.html

Table 5-2. Average Bleed Emission Estimates per Pneumatic Device in the Oil and Natural Gas Sector (tons/year)[a]

Industry Segment	High-Bleed			Low-Bleed		
	Methane	VOC	HAP	Methane	VOC	HAP
Natural Gas Production[b]	6.91	1.92	0.073	0.26	0.072	0.003
Natural Gas Transmission and Storage[c]	3.20	0.089	0.003	0.24	0.007	0.0002
Oil Production[d]	6.91	1.92	0.073	0.26	0.072	0.003
Natural Gas Processing[e]	1.00	0.28	0.01	1.00	0.28	0.01

Minor discrepancies may be due to rounding.

a. The conversion factor used in this analysis is 1 thousand cubic feet of methane (Mcf) is equal to 0.0208 tons methane. Minor discrepancies may be due to rounding.
b. Natural Gas Production methane emissions are derived from Table W-1A and W-1B of Subpart W.
c. Natural gas transmission and storage methane emissions are derived from Table W-3 of Subpart W.
d. Oil production methane emissions are derived from Table W-1A and W-1B of Subpart W. It is assumed only continuous bleed devices are used in oil production.
e. Natural gas processing sector methane emissions are derived from Volume 12 of the 1996 GRI report.[9] Emissions from devices in the processing sector were determined based on data available for snap-acting and bleed devices, further distinction between high and low bleed could not be determined based on available data.

segment was analyzed separately using the best data available for each segment. The number of facilities estimated in absence of regulation was undeterminable due to the magnitude of new sources estimated and the lack of sufficient data that could indicate the number of controllers that would be installed in states that may have regulations requiring low bleed controllers, such as in Wyoming and Colorado.

For the natural gas production and oil production segments, the number of new pneumatics installed in a typical year was derived using a multiphase analysis. First, data from the US Greenhouse Gas Inventory: Emission and Sinks 1990-2009 was used to establish the ratio of pneumatic controllers installed per well site on a regional basis. These ratios were then applied to the number of well completions estimated in Chapter 4 for natural gas well completions with hydraulic fracturing, natural gas well completions without hydraulic fracturing and for oil well completions. On average, one pneumatic device was assumed to be installed per well completion for a total of 33,411 pneumatic devices. By applying the estimated 51 percent of bleed devices (versus snap acting controllers), it is estimated that an average of 17,040 bleed-devices would be installed in the production segment in a typical year.

The number of pneumatic controllers installed in the transmission segment was approximated using the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2009. The number of new devices installed in a given year was estimated by subtracting the prior year (e.g. 2007) from the given year's total (e.g. 2008). This difference was assumed to be the number of new devices installed in the latter year (e.g. Number of new devices installed during 2008 = Pneumatics in 2008 – Pneumatics in 2007). A 3-year average was calculated based on the number of new devices installed in 2006 through 2008 in order to determine the average number of new devices installed in a typical year.

Once the population counts for the number of pneumatics in each segment were established, this population count was further refined to account for the number of snap-acting devices that would be installed versus a bleed device. This estimate of the percent of snap-acting and bleed devices was based on raw data found in the GRI study, where 51 percent of the pneumatic controllers are bleed devices in the production segment, and 32 percent of the pneumatic controllers are bleed devices in the transmission segment.9 The distinction between the number of high-bleed and low-bleed devices was not estimated because this analysis assumes it is not possible to predict or ensure where low bleeds will be used in the future. Table 5-3 summarizes the estimated number of new devices installed per year.

Table 5-3. Estimated Number of Pneumatic Devices Installed in an Typical Year

Industry Segment	Number of New Devices Estimated for a Typical Year[a]		
	Snap-Acting	Bleed-Devices	Total
Natural Gas and Oil Production[b]	16,371	17,040	33,411
Natural Gas Transmission and Storage[c]	178	84	262

a. National averages of population counts from the Inventory were refined to include the difference in snap-acting and bleed devices based on raw data found in the GRI/EPA study. This is based on the assumption that 51 percent of the pneumatic controllers are bleed devices in the production segment, while 32 percent are bleed devices in the transmission segment.
b. The number of pneumatics was derived from a multiphase analysis. Data from the US Greenhouse Gas Inventory: Emission and Sinks 1990-2009 was used to establish the number of pneumatics per well on a regional basis. These ratios were applied to the number of well completions estimated in Chapter 4 for natural gas wells with hydraulic fracturing, natural gas wells without hydraulic fracturing and for oil wells.
c. The number of pneumatics estimated for the transmission segment was approximated from comparing a 3 year average of new devices installed in 2006 through 2008 in order to establish an average number of pneumatics being installed in this industry segment in a typical year. This analysis was performed using the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2009.

For the natural gas processing segment, this analysis assumes that existing natural gas plants have already replaced pneumatic controllers with other types of controls (i.e. an instrument air system) and any high-bleed devices that remain are safety related. As a result, the number of new pneumatic bleed devices installed at existing natural gas processing plants was estimated as negligible. A new greenfield natural gas processing plant would require multiple control loops. In Chapter 8 of this document, it is estimated that 29 new and existing processing facilities would be subject to the NSPS for equipment leak detection. In order to quantify the impacts of the regulatory options represented in section 5.5 of this Chapter, it is assumed that half of these facilities are new sites that will install an instrument air system in place of multiple control valves. This indicates about 15 instrument air systems will be installed in a representative year.

5.3.3 Emission Estimates

Nationwide baseline emission estimates for pneumatic devices for new sources in a typical year are summarized in Table 5-4 by industry segment and device type. This analysis assumed for the nationwide emission estimate that all bleed-devices have the high-bleed emission rates estimated in Table 5-2 per industry segment since it cannot be predicted which sources would install a low bleed versus a high bleed controller.

5.4 Control Techniques

Although pneumatic devices have relatively small emissions individually, due to the large population of these devices installed on an annual basis, the cumulative VOC emissions for the industry are significant. As a result, several options to reduce emissions have been developed over the years. Table 5-5 provides a summary of these options for reducing emissions from pneumatic devices including: instrument air, non-gas driven controls, and enhanced maintenance.

Given the various control options and applicability issues, the replacement of a high-bleed with a low-bleed device is the most likely scenario for reducing emissions from pneumatic device emissions. This is also supported by States such as Colorado and Wyoming that require the use of low-bleed controllers in place of high-bleed controllers. Therefore, low-bleed devices are further described in the following section, along with estimates of the impacts of their application for a representative device and nationwide basis. Although snap-acting devices have zero bleed emissions, this analysis assumes the

Table 5-4. Nationwide Baseline Emissions from Representative Pneumatic Device Installed in a Typical Year for the Oil and Natural Gas Industry (tons/year)[a]

Industry Segment	Baseline Emissions from Representative New Unit (tpy)			Number of New Bleed Devices Expected Per Year	Nationwide Baseline Emissions from Bleeding Pneumatic (tpy)[b]		
	VOC	Methane	HAP		VOC	Methane	HAP
Oil and Gas Production	1.9213	6.9112	0.0725	17,040	32,739	117,766	1,237
Natural Gas Transmission and Storage	0.09523	3.423	0.003	84	8	288	0.2

Minor discrepancies may be due to rounding.

a. Emissions have been based on the bleed rates for a high-bleed device by industry segment. Minor discrepancies may be due to rounding.

b. To estimate VOC and HAP, weight ratios were developed based on methane emissions per device. The specific ratios used were 0.278 pounds VOC per pound methane and 0.0105 pounds HAP per pound methane in the production and processing segments, and 0.0277 pounds VOC per pound methane and 0.0008 pounds HAP per pound methane in the transmission segment.

Table 5-5. Alternative Control Options for Pneumatic Devices

Option	Description	Applicability/Effectiveness	Estimated Cost Range
Install Low Bleed Device in Place of High Bleed Device	Low-bleed devices provide the same functional control as a high-bleed device, while emitting less continuous bleed emissions.	Applicability may depend on the function of instrumentation for an individual device on whether the device is a level, pressure, or temperature controller.	Low-bleed devices are, on average, around $165 more than high bleed versions.
Convert to Instrument Air[14]	Compressed air may be substituted for natural gas in pneumatic systems without altering any of the parts of the pneumatic control. In this type of system, atmospheric air is compressed, stored in a tank, filtered and then dried for instrument use. For utility purposes such as small pneumatic pumps, gas compressor motor starters, pneumatic tools and sand blasting, air would not need to be dried. Instrument air conversion requires additional equipment to properly compress and control the pressured air. This equipment includes a compressor, power source, air dehydrator and air storage vessel.	Replacing natural gas with instrument air in pneumatic controls eliminates VOC emissions from bleeding pneumatics. It is most effective at facilities where there are a high concentration of pneumatic control valves and an operator present. Since the systems are powered by electric compressors, they require a constant source of electrical power or a back-up natural gas pneumatic device. These systems can achieve 100 percent reduction in emissions.	A complete cost analysis is provided in Section 5.4.2. System costs are dependent on size of compressor, power supply needs, labor and other equipment.
Mechanical and Solar Powered Systems in place of Bleed device[15]	Mechanical controls operate using a simple design comprised of levers, hand wheels, springs and flow channels. The most common mechanical control device is the liquid-level float to the drain valve position with mechanical linkages. Electricity or small electrical motors (including solar powered) have been used to operate valves. Solar control systems are driven by solar power cells that actuate mechanical devices using electric power. As such, solar cells require some type of back-up power or storage to ensure reliability.	Application of mechanical controls is limited because the control must be located in close proximity to the process measurement. Mechanical systems are also incapable of handling larger flow fluctuations. Electric powered valves are only reliable with a constant supply of electricity. Overall, these options are applicable in niche areas but can achieve 100 percent reduction in emissions where applicable.	Depending on supply of power, costs can range from below $1,000 to $10,000 for entire systems.
Enhanced Maintenance[16]	Instrumentation in poor condition typically bleeds 5 to 10 scf per hour more than representative conditions due to worn seals, gaskets, diaphragms; nozzle corrosion or wear, or loose control tube fittings. This may not impact the operations but does increase emissions.	Enhanced maintenance to repair and maintain pneumatic devices periodically can reduce emissions. Proper methods of maintaining a device are highly variable and could incur significant costs.	Variable based on labor, time, and fuel required to travel to many remote locations.

devices are not always used in the same functional application as bleed devices and are, therefore, not an appropriate form of control for all bleed devices. It is assumed snap-acting, or no-bleed, devices meet the definition of a low-bleed. This concept is further detailed in Section 5.5 of this chapter. Since this analysis has assumed areas with electrical power have already converted applicable pneumatic devices to instrument air systems, instrument air systems are also described for natural gas processing plants only. Given applicability, efficiency and the expected costs of the other options identified in Table 5-5 (i.e. mechanical controls and enhanced maintenance), were not further conducted for this analysis.

5.4.1 Low-Bleed Controllers

5.4.1.1 Emission Reduction Potential

As discussed in the above sections, low-bleed devices provide the same functional control as a high-bleed device, but have lower continuous bleed emissions. As summarized in Table 5-6, it is estimated on average that 6.6 tons of methane and 1.8 tons of VOC will be reduced annually in the production segment from installing a low-bleed device in place of a high-bleed device. In the transmission segment, the average achievable reductions per device are estimated around 3.7 tons and 0.08 tons for methane and VOC, respectively. As noted in section 5.2, a low-bleed controller can emit up to 6 scfh, which is higher than the expected emissions from the typical low-bleed device available on the current market.

5.4.1.1 Effectiveness

There are certain situations in which replacing and retrofitting are not feasible, such as instances where a minimal response time is needed, cases where large valves require a high bleed rate to actuate, or a safety isolation valve is involved. Based on criteria provided by the Natural Gas STAR Program, it is assumed about 80 percent of high-bleed devices can be replaced with low-bleed devices throughout the production and transmission and storage industry segments.[1] This corresponds to 13,632 new high-bleed devices in the production segment (out of 17,040) and 67 new high-bleed devices in the transmission and storage segment (out of 84) that can be replaced with a new low-bleed alternative. For high-bleed devices in natural gas processing, this analysis assumed that the replaceable devices have already been replaced with instrument air and the remaining high-bleed devices are safety related for about half of the existing processing plants.

Table 5-6. Estimated Annual Bleed Emission Reductions from Replacing a Representative High-Bleed Pneumatic Device with a Representative Low-Bleed Pneumatic Device

Segment/Device Type	Emissions (tons/year)[a]		
	Methane	VOC	HAP
Oil and Natural Gas Production	6.65	1.85	0.07
Natural Gas Transmission and Storage	2.96	0.082	0.002

Minor discrepancies may be due to rounding.

a. Average emission reductions for each industry segment based on the typical emission flow rates from high-bleed and low-bleed devices as listed in Table 5-2 by industry segment.

Applicability may depend on the function of instrumentation for an individual device on whether the device is a level, pressure, or temperature controller. High-bleed pneumatic devices may not be applicable for replacement with low-bleed devices because a process condition may require a fast or precise control response so that it does not stray too far from the desired set point. A slower-acting controller could potentially result in damage to equipment and/or become a safety issue. An example of this is on a compressor where pneumatic devices may monitor the suction and discharge pressure and actuate a re-cycle when one or the other is out of the specified target range. Other scenarios for fast and precise control include transient (non-steady) situations where a gas flow rate may fluctuate widely or unpredictably. This situation requires a responsive high-bleed device to ensure that the gas flow can be controlled in all situations. Temperature and level controllers are typically present in control situations that are not prone to fluctuate as widely or where the fluctuation can be readily and safely accommodated by the equipment. Therefore, such processes can accommodate control from a low-bleed device, which is slower-acting and less precise.

Safety concerns may be a limitation issue, but only in specific situations because emergency valves are not bleeding controllers since safety is the pre-eminent consideration. Thus, the connection between the bleed rate of a pneumatic device and safety is not a direct one. Pneumatic devices are designed for process control during normal operations and to keep the process in a normal operating state. If an Emergency Shut Down (ESD) or Pressure Relief Valve (PRV) actuation occurs,[iv] the equipment in place for such an event is spring loaded, or otherwise not pneumatically powered. During a safety issue or emergency, it is possible that the pneumatic gas supply will be lost. For this reason, control valves are deliberately selected to either fail open or fail closed, depending on which option is the failsafe.

5.4.1.2 Cost Impacts

As described in Section 5.2.2, costs were based on the vendor research described in Section 5.2 as a result of updating and expanding upon the information given in the appendices of the Natural Gas STAR Lessons Learned document on pneumatic devices.[1] As Table 5-7 indicates, the average cost for a low bleed pneumatic is $2,553, while the average cost for a high bleed is $2,338.[v] Thus, the incremental cost of installing a low-bleed device instead of a high-bleed device is on the order of $165 per device. In order to analyze cost impacts, the incremental cost to install a low-bleed instead of a high-bleed was

[iv] ESD valves either close or open in an emergency depending on the fail safe configuration. PRVs always open in an emergency.
[v] Costs are estimated in 2008 U.S. Dollars.

Table 5-7. Cost Projections for the Representative Pneumatic Devices[a]

Device	Minimum cost ($)	Maximum cost ($)	Average cost ($)	Low-Bleed Incremental Cost ($)
High-bleed controller	366	7,000	2,388	$165
Low-bleed controller	524	8,852	2,553	

a. Major pneumatic devices vendors were surveyed for costs, emission rates, and any other pertinent information that would give an accurate picture of the present industry.

annualized for a 10 year period using a 7 percent interest rate. This equated to an annualized cost of around $23 per device for both the production and transmission segments.

Monetary savings associated with additional gas captured to the sales line was estimated based on a natural gas value of $4.00 per Mcf.[vi,17] The representative low-bleed device is estimated to emit 6.65 tons, or 319 Mcf, (using the conversion factor of 0.0208 tons methane per 1 Mcf) of methane less than the average high-bleed device per year. Assuming production quality gas is 82.8 percent methane by volume, this equals 385.5 Mcf natural gas recovered per year. Therefore, the value of recovered natural gas from one pneumatic device in the production segment equates to approximately $1,500. Savings were not estimated for the transmission segment because it is assumed the owner of the pneumatic controller generally is not the owner of the natural gas. Table 5-8 provides a summary of low-bleed pneumatic cost effectiveness.

5.4.1.3 Secondary Impacts

Low-bleed pneumatic devices are a replacement option for high-bleed devices that simply bleed less natural gas that would otherwise be emitted in the actuation of pneumatic valves. No wastes should be created, no wastewater generated, and no electricity needed. Therefore, there are no secondary impacts expected due to the use of low-bleed pneumatic devices.

5.4.2 Instrument Air Systems

5.4.2.1 Process Description

The major components of an instrument air conversion project include the compressor, power source, dehydrator, and volume tank. The following is a description of each component as described in the Natural Gas STAR document, *Lessons Learned: Convert Gas Pneumatic Controls to Instrument Air:*

- Compressors used for instrument air delivery are available in various types and sizes, from centrifugal (rotary screw) compressors to reciprocating piston (positive displacement) types. The size of the compressor depends on the size of the facility, the number of control devices operated by the system, and the typical bleed rates of these devices. The compressor is usually driven by an electric motor that turns on and off, depending on the pressure in the volume tank.

[vi] The average market price for natural gas in 2010 was approximately $4.16 per Mcf. This is much less compared to the average price in 2008 of $7.96 per Mcf. Due to the volatility in the value, a conservative savings of $4.00 per Mcf estimate was projected for the analysis in order to not overstate savings.

Table 5-8. Cost-effectiveness for Low-Bleed Pneumatic Devices versus High Bleed Pneumatics

Segment	Incremental Capital Cost Per Unit ($)[a]	Total Annual Cost Per Unit ($/yr)[b]		VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)	
		without savings	with savings	without savings	with savings	without savings	with savings
Oil and Natural Gas Production	165	23.50	-1,519	13	net savings	4	net savings
Natural Gas Transmission and Storage	165	23.50	23.50	286	286	8	8

a. Incremental cost of a low bleed device versus a high bleed device as summarized in Table 5-7.
b. Annualized cost assumes a 7 percent interest rate over a 10 year equipment lifetime.

For reliability, a full spare compressor is normally installed. A minimum amount of electrical service is required to power the compressors.

- A critical component of the instrument air control system is the power source required to operate the compressor. Since high-pressure natural gas is abundant and readily available, gas pneumatic systems can run uninterrupted on a 24-hour, 7-day per week schedule. The reliability of an instrument air system, however, depends on the reliability of the compressor and electric power supply. Most large natural gas plants have either an existing electric power supply or have their own power generation system. For smaller facilities and in remote locations, however, a reliable source of electric power can be difficult to assure. In some instances, solar-powered battery-operated air compressors can be cost effective for remote locations, which reduce both methane emissions and energy consumption. Small natural gas powered fuel cells are also being developed.

- Dehydrators, or air dryers, are also an integral part of the instrument air compressor system. Water vapor present in atmospheric air condenses when the air is pressurized and cooled, and can cause a number of problems to these systems, including corrosion of the instrument parts and blockage of instrument air piping and controller orifices.

- The volume tank holds enough air to allow the pneumatic control system to have an uninterrupted supply of high pressure air without having to run the air compressor continuously. The volume tank allows a large withdrawal of compressed air for a short time, such as for a motor starter, pneumatic pump, or pneumatic tools, without affecting the process control functions.

Compressed air may be substituted for natural gas in pneumatic systems without altering any of the parts of the pneumatic control. The use of instrument air eliminates natural gas emissions from natural gas powered pneumatic controllers. All other parts of a gas pneumatic system will operate the same way with instrument air as they do with natural gas. The conversion of natural gas pneumatic controllers to instrument air systems is applicable to all natural gas facilities with electrical service available.[14]

5.4.2.2 Effectiveness

The use of instrument air eliminates natural gas emissions from the natural gas driven pneumatic devices; however, the system is only applicable in locations with access to a sufficient and consistent

supply of electrical power. Instrument air systems are also usually installed at facilities where there is a high concentration of pneumatic control valves and the presence of an operator that can ensure the system is properly functioning.[14]

5.4.2.3 Cost Impacts

Instrument air conversion requires additional equipment to properly compress and control the pressured air. The size of the compressor will depend on the number of control loops present at a location. A control loop consists of one pneumatic controller and one control valve. The volume of compressed air supply for the pneumatic system is equivalent to the volume of gas used to run the existing instrumentation – adjusted for air losses during the drying process. The current volume of gas usage can be determined by direct metering if a meter is installed. Otherwise, an alternative rule of thumb for sizing instrument air systems is one cubic foot per minute (cfm) of instrument air for each control loop.[14] As the system is powered by electric compressors, the system requires a constant source of electrical power or a back-up pneumatic device. Table 5-9 outlines three different sized instrument air systems including the compressor power requirements, the flow rate provided from the compressor, and the associated number of control loops.

The primary costs associated with conversion to instrument air systems are the initial capital expenditures for installing compressors and related equipment and the operating costs for electrical energy to power the compressor motor. This equipment includes a compressor, a power source, a dehydrator and a storage vessel. It is assumed that in either an instrument air solution or a natural gas pneumatic solution, gas supply piping, control instruments, and valve actuators of the gas pneumatic system are required. The total cost, including installation and labor, of three representative sizes of compressors were evaluated based on assumptions found in the Natural Gas STAR document, "Lessons Learned: Convert Gas Pneumatic Controls to Instrument Air"[14] and summarized in Table 5-10.[vii]

For natural gas processing, the cost-effectiveness of the three representative instrument air system sizes was evaluated based on the emissions mitigated from the number of control loops the system can provide and not on a per device basis. This approach was chosen because we assume new processing plants will need to provide instrumentation of multiple control loops and size the instrument air system accordingly. We also assume that existing processing plants have already upgraded to instrument air

[vii] Costs have been converted to 2008 US dollars using the Chemical Engineering Cost Index.

Table 5-9. Compressor Power Requirements and Costs for Various Sized Instrument Air Systems[a]

Compressor Power Requirements[b]			Flow Rate	Control Loops
Size of Unit	hp	kW	(cfm)	Loops/Compressor
small	10	13.3	30	15
medium	30	40	125	63
large	75	100	350	175

a. Based on rules of thumb stated in the Natural Gas STAR document, *Lessons Learned: Convert Gas Pneumatic Controls to Instrument Air*[14]

b. Power is based on the operation of two compressors operating in parallel (each assumed to be operating at full capacity 50 percent of the year).

Table 5-10 Estimated Capital and Annual Costs of Various Sized Representative Instrument Air Systems

Instrument Air System Size	Compressor	Tank	Air Dryer	Total Capital[a]	Annualized Capital[b]	Labor Cost	Total Annual Costs[c]	Annualized Cost of Instrument Air System
Small	$3,772	$754	$2,262	$16,972	$2,416	$1,334	$8,674	$11,090
Medium	$18,855	$2,262	$6,787	$73,531	$10,469	$4,333	$26,408	$36,877
Large	$33,183	$4,525	$15,083	$135,750	$19,328	$5,999	$61,187	$80,515

a. Total Capital includes the cost for two compressors, tank, an air dryer and installation. Installation costs are assumed to be equal to 1.5 times the cost of capital. Equipment costs were derived from the Natural Gas Star Lessons Learned document and converted to 2008 dollars from 2006 dollars using the Chemical Engineering Cost Index.
b. The annualized cost was estimated using a 7 percent interest rate and 10 year equipment life.
c. Annual Costs include the cost of electrical power as listed in Table 5-9 and labor.

unless the function has a specific need for a bleeding device, which would most likely be safety related.[9] Table 5-11 summarizes the cost-effectiveness of the three sizes of representative instrument air systems.

5.4.2.4 Secondary Impacts

The secondary impacts from instrument air systems are indirect, variable and dependent on the electrical supply used to power the compressor. No other secondary impacts are expected.

5.5 Regulatory Options

The affected facility definition for pneumatic controllers is defined as a single natural gas pneumatic controller. Therefore, pneumatic controllers would be subject to a New Source Performance Standard (NSPS) at the time of installation. The following Regulatory alternatives were evaluated:

- Regulatory Option 1: Establish an emissions limit equal to 0 scfh.
- Regulatory Option 2: Establish an emissions limit equal to 6 scfh.

5.5.1 Evaluation of Regulatory Options

By establishing an emission limit of 0 scfh, facilities would most likely install instrument air systems to meet the threshold limit. This option is considered cost effective for natural gas processing plants as summarized in Table 5-11. A major assumption of this analysis, however, is that processing plants are constructed at a location with sufficient electrical service to power the instrument air compression system. It is assumed that facilities located outside of the processing plant would not have sufficient electrical service to install an instrument air system. This would significantly increase the cost of the system at these locations, making it not cost effective for these facilities to meet this regulatory option. Therefore, Regulatory Option 1 was accepted for natural gas processing plants and rejected for all other types of facilities.

Regulatory Option 2 would establish an emission limit equal to the maximum emissions allowed for a low-bleed device in the production and transmissions and storage industry segments. This would most likely be met by the use of low-bleed controllers in place of a high-bleed controller, but allows flexibility in the chosen method of meeting the requirement. In the key instances related to pressure control that would disallow the use of a low-bleed device, specific monitoring and recordkeeping criteria

Table 5-11 Cost-effectiveness of Representative Instrument Air Systems in the Natural Gas Processing Segment

System Size	Number of Control Loops	Annual Emissions Reduction[a] (tons/year)			Value of Product Recovered ($/year)[b]	Annualized Cost of System		VOC Cost-effectiveness ($/ton)		Methane Cost-effectiveness ($/ton)	
		VOC	CH_4	HAP		without savings	with savings	without savings	with savings	without savings	with savings
Small	15	4.18	15	0.16	3,484	11,090	7,606	2,656	1,822	738	506
Medium	63	17.5	63	0.66	14,632	36,877	22,245	2,103	1,269	585	353
Large	175	48.7	175	1.84	40,644	80,515	39,871	1,653	819	460	228

Minor discrepancies may be due to rounding.

a. Based on the emissions mitigated from the entire system, which includes multiple control loops.

b. Value of recovered product assumes natural gas processing is 82.8 percent methane by volume. A natural gas price of $4 per Mcf was assumed.

would be required to ensure the device function dictates the precision of a high bleed device. Therefore, Regulatory Option 2 was accepted for locations outside of natural gas processing plants.

5.5.2 Nationwide Impacts of Regulatory Options

Table 5-12 summarizes the costs impacts of the selected regulatory options by industry segment. Regulatory Option 1 for the natural gas processing segment is estimated to affect 15 new processing plants with nationwide annual costs discounting savings of $166,000. When savings are realized the net annual cost is reduced to around $114,000. Regulatory Option 2 has nationwide annual costs of $320,000 for the production segment and around $1,500 in the natural gas transmission and storage segment. When annual savings are realized in the production segment there is a net savings of $20.7 million in nationwide annual costs.

Table 5-12 Nationwide Cost and Emission Reduction Impacts for Selected Regulatory Options by Industry Segment

Industry Segment	Number of Sources subject to NSPS*	Capital Cost Per Device/IAS ($)**	Annual Costs ($/year)		Nationwide Emission Reductions (tpy)†			VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)		Total Nationwide Costs ($/year)		
			without savings	with savings	VOC	Methane	HAP	without savings	with savings	without savings	with savings	Capital Cost	Annual without savings	Annual with savings
Regulatory Option 1 (emission threshold equal to 0 scfh)														
Natural Gas Processing	15	16,972	11,090	7,606	63	225	2	2,656	1,822	738	506	254,576	166,351	114,094
Regulatory Option 2 (emission threshold equal to 6 scfh)														
Oil and Natural Gas Production	13,632	165	23	(1,519)	25,210	90,685	952	13	net savings	4	net savings	2,249,221	320,071	(20,699,918)
Natural Gas Transmission and Storage	67	165	23	23	6	212	0.2	262	262	7	7	11,039	1,539	1,539

Minor discrepancies may be due to rounding.

a. The number of sources subject to NSPS for the natural gas processing and the natural gas transmission and storage segments represent the number of new devices expected per year reduced by 20 percent. This is consistent with the assumption that 80 percent of high bleed devices can be replaced with a low bleed device. It is assumed all new sources would be installed as a high bleed for these segments. For the natural gas processing segment the number of new sources represents the number of Instrument Air Systems (IAS) that is expected to be installed, with each IAS expected to power 15 control loops (or replace 15 pneumatic devices).

b. The capital cost for regulatory option 2 is equal to the incremental cost of a low bleed device versus a new high bleed device. The capital cost of the IAS is based on the small IAS as summarized in Table 5-10.

c. Nationwide emission reductions vary based on average expected emission rates of bleed devices typically used in each segment industry segment as summarized in Tables 5-2.

5.6 References

1 U.S. Environmental Protection Agency. Lessons Learned: Options for Reducing Methane Emissions From Pneumatic Devices in the Natural Gas Industry. Office of Air and Radiation: Natural Gas Star. Washington, DC. February 2004

2 Memorandum to Bruce Moore from Denise Grubert. Meeting Minutes from EPA Meeting with the American Petroleum Institute. October 2011

3 U.S. Environmental Protection Agency. Greenhouse Gas Emissions Reporting From the Petroleum and Natural Gas Industry: Background Technical Support Document. Climate Change Division. Washington, DC. November 2010.

4 U.S Environmental Protection Agency. Methodology for Estimating CH4 and CO2 Emissions from Natural Gas Systems. Greenhouse Gas Inventory: Emission and Sinks 1990-2008. Washington, DC.

5 U.S Environmental Protection Agency. Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks 1990-2008. Washington, DC.

6 Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 2: Technical Report. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080b. June 1996.

7 Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 3: General Methodology. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080c. June 1996.

8 Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 5: Activity Factors. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080e. June 1996.

9 Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 12: Pneumatic Devices. Prepared for the Gas Research Institute and Environmental Protection Agency. EPA-600/R-96-080k. June 1996.

10 Radian International LLC, Methane Emissions from the U.S. Petroleum Industry, draft report for the U.S. Environmental Protection Agency, June 14, 1996.

11 ICF Consulting. Estimates of Methane Emissions from the U.S. Oil Industry. Prepared for the U.S. Environmental Protection Agency. 1999.

12 ENVIRON International Corporation. Oil and Gas Emission Inventories for the Western States. Prepared for Western Governors' Association. December 27, 2005.

13 Memorandum to Bruce Moore from Heather Brown. Gas Composition Methodology. July 2011

14 U.S. Environmental Protection Agency. Lessons Learned: Convert Gas Pneumatic Controls to Instrument Air. Office of Air and Radiation: Natural Gas Star. Washington, DC. February 2004

15 U.S. Environmental Protection Agency. Pro Fact Sheet No. 301. Convert Pneumatics to Mechanical Controls. Office of Air and Radiation: Natural Gas Star. Washington, DC. September 2004.

16 CETAC WEST. Fuel Gas Best Management Practices: Efficient Use of Fuel Gas in Pneumatic Instruments. Prepared for the Canadian Association of Petroleum Producers. May 2008.

17 U.S. Energy Information Administration. Annual U.S. Natural Gas Wellhead Price. Energy Information Administration. Natural Gas Navigator. Retrieved online on 12 Dec 2010 at <http://www.eia.doe.gov/dnav/ng/hist/n9190us3a.htm>

6.0 COMPRESSORS

Compressors are mechanical devices that increase the pressure of natural gas and allow the natural gas to be transported from the production site, through the supply chain, and to the consumer. The types of compressors that are used by the oil and gas industry as prime movers are reciprocating and centrifugal compressors. This chapter discusses the air pollutant emissions from these compressors and provides emission estimates for reducing emission from these types of compressors. In addition, nationwide emissions estimates from new sources are estimated. Options for controlling pollutant emissions from these compressors are presented, along with costs, emission reductions, and secondary impacts. Finally, this chapter discusses considerations in developing regulatory alternatives for both reciprocating and centrifugal compressors.

6.1 Process Description

6.1.1 Reciprocating Compressors

In a reciprocating compressor, natural gas enters the suction manifold, and then flows into a compression cylinder where it is compressed by a piston driven in a reciprocating motion by the crankshaft powered by an internal combustion engine. Emissions occur when natural gas leaks around the piston rod when pressurized natural gas is in the cylinder. The compressor rod packing system consists of a series of flexible rings that create a seal around the piston rod to prevent gas from escaping between the rod and the inboard cylinder head. However, over time,during operation of the compressor, the rings become worn and the packing system will need to be replaced to prevent excessive leaking from the compression cylinder.

6.1.2 Centrifugal Compressors

Centrifugal compressors use a rotating disk or impeller to increase the velocity of the gas where it is directed to a divergent duct section that converts the velocity energy to pressure energy. These compressors are primarily used for continuous, stationary transport of natural gas in the processing and transmission systems. Many centrifugal compressors use wet (meaning oil) seals around the rotating shaft to prevent natural gas from escaping where the compressor shaft exits the compressor casing. The wet seals use oil which is circulated at high pressure to form a barrier against compressed natural gas leakage. The circulated oil entrains and absorbs some compressed natural gas which is released to the

atmosphere during the seal oil recirculation process. Alternatively, dry seals can be used to replace the wet seals in centrifugal compressors. Dry seals prevent leakage by using the opposing force created by hydrodynamic groves and springs. The opposing forcescreate a thin gap of high pressure gas between the rings through which little gas can leak. The rings do not wear or need lubrication because they are not in contact with each other. Therefore, operation and maintenance costs are lower for dry seals in comparison to wet seals.

6.2 Emissions Data and Emission Factors

6.2.1 Summary of Major Studies and Emissions Factors

There are a few studies that have been conducted that provide leak estimates from reciprocating and centrifugal compressors. These studies are provided in Table 6-1, along with the type of information contained in the study.

6.2.2 Representative Reciprocating and Centrifugal Compressor Emissions

The methodology for estimating emission from reciprocating compressor rod packing was to use the methane emission factors referenced in the EPA/GRI study[1] and use the methane to pollutant ratios developed in the gas composition memorandum.[2] The emission factors in the EPA/GRI document were expressed in thousand standard cubic feet per cylinder (Mscf/cyl), and were multiplied by the average number of cylinder per reciprocating compressor at each oil and gas industry segment. The volumetric methane emission rate was converted to a mass emission rate using a density of 41.63 pounds of methane per thousand cubic feet. This conversion factor was developed assuming that methane is an ideal gas and using the ideal gas law to calculate the density. A summary of the methane emission factors is presented in Table 6-2. Once the methane emissions were calculated, ratios were used to estimate volatile organic compounds (VOC) and hazardous air pollutants (HAP). The specific ratios that were used for this analysis were 0.278 pounds VOC per pound of methane and 0.105 pounds HAP per pound of methane for the production and processing segments, and 0.0277 pounds VOC per pound of methane and 0.0008 pounds HAP per pound of methane for the transmission and storage segments. A summary of the reciprocating compressor emissions are presented in Table 6-3.

The compressor emission factors for wet seals and dry seals are based on data used in the GHG inventory. The wet seals methane emission factor was calculated based on a sampling of 48 wet seal centrifugal compressors. The dry seal methane emission factor was based on data collected by the

Table 6-1. Major Studies Reviewed for Consideration Of Emissions and Activity Data

Report Name	Affiliation	Year of Report	Activity Information	Emissions Information	Control Information
Inventory of Greenhouse Gas Emissions and Sinks: 1990-2008[1]	EPA	2010	Nationwide	X	
Greenhouse Gas Mandatory Reporting Rule and Technical Supporting Document[2]	EPA	2010	Nationwide	X	
Methane Emissions from the Natural Gas Industry[3]	Gas Research Institute/EPA	1996	Nationwide	X	
Natural Gas STAR Program[4,5]	EPA	1993-2010	Nationwide	X	X

Table 6-2. Methane Emission Factors for Reciprocating and Centrifugal Compressors

Oil and Gas Industry Segment	Reciprocating Compressors			Centrifugal Compressors	
	Methane Emission Factor (scf/hr-cylinder)	Average Number of Cylinders	Pressurized Factor (% of hour/year Compressor Pressurized)	Wet Seal Methane Emission Factor (scf/minute)	Dry Seals Methane Emission Factor (scf/minute)
Production (Well Pads)	0.271[a]	4	100%	N/A[f]	N/A[f]
Gathering & Boosting	25.9[b]	3.3	79.1%	N/A[f]	N/A[f]
Processing	57[c]	2.5	89.7%	47.7[g]	6[g]
Transmission	57[d]	3.3	79.1%	47.7[g]	6[g]
Storage	51[e]	4.5	67.5%	47.7[g]	6[g]

a. EPA/GRI. (1996). "Methane Emissions from the Natural Gas Industry: Volume 8 – Equipment Leaks." Table 4-8.
b. Clearstone Engineering Ltd. *Cost-Effective Directed Inspection and Maintenance Control Opportunities at Five Gas Processing Plants and Upstream Gathering Compressor Stations and Well Sites.* (Draft): 2006.
c. EPA/GRI. (1996). Methane Emissions from the Natural Gas Industry: Volume 8 – Equipment Leaks. Table 4-14.
d. EPA/GRI. (1996). "Methane Emissions from the Natural Gas Industry: Volume 8 – Equipment Leaks." Table 4-17.
e. EPA/GRI. (1996). "Methane Emissions from the Natural Gas Industry: Volume 8 – Equipment Leaks." Table 4-24.
f. The 1996 EPA/GRI Study Volume 11[3], does not report any centrifugal compressors in the production or gathering/boosting sectors, therefore no emission factor data were published for those two sectors.
g. U.S Environmental Protection Agency. Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2009. Washington, DC. April 2011. Annex 3. Page A-153.

Table 6-3.Baseline Emission Estimates for Reciprocating and Centrifugal Compressors

Industry Segment/ Compressor Type	Baseline Emission Estimates (tons/year)		
	Methane	**VOC**	**HAP**
Reciprocating Compressors			
Production (Well Pads)	0.198	0.0549	0.00207
Gathering & Boosting	12.3	3.42	0.129
Processing	23.3	6.48	0.244
Transmission	27.1	0.751	0.0223
Storage	28.2	0.782	0.0232
Centrifugal Compressors (Wet seals)			
Processing	228	20.5	0.736
Transmission	126	3.50	0.104
Storage	126	3.50	0.104
Centrifugal Compressors (Dry seals)			
Processing	28.6	2.58	0.0926
Transmission	15.9	0.440	0.0131
Storage	15.9	0.440	0.0131

Natural Gas STAR Program. The methane emissions were converted to VOC and HAP emissions using the same gas composition ratios that were used for reciprocating engines.[4] A summary of the emission factors are presented in Table 6-2 and the individual compressor emission are shown in Table 6-3 for each of the oil and gas industry segments.

6.3 Nationwide Emissions from New Sources

6.3.1 Overview of Approach

The number of new affected facilities in each of the oil and gas sectors was estimated using data from the U.S. Greenhouse Gas Inventory,[5,6] with some exceptions. This basis was used whenever the total number of existing facilities was explicitly estimated as part of the Inventory, so that the difference between two years can be calculated to represent the number of new facilities. The Inventory was not used to estimate the new number of reciprocating compressor facilities in gas production, since more recent information is available in the comments received to subpart W of the mandatory reporting rule. Similarly, the Inventory was not used to estimate the new number of reciprocating compressor facilities in gas gathering, since more recent information is available in comments received as comments to subpart W of the mandatory reporting rule. For both gas production and gas gathering, information received as comments to subpart W of the mandatory reporting rule was combined with additional EPA estimates and assumptions to develop the estimates for the number of new affected facilities.

Nationwide emission estimates for new sources were then determined by multiplying the number of new sources for each oil and gas segment by the expected emissions per compressor using the emission data in Table 6-3. A summary of the number of new reciprocating and centrifugal compressors for each of the oil and gas segments is presented in Table 6-4.

6.3.2 Activity Data for Reciprocating Compressors

6.3.2.1 Wellhead Reciprocating Compressors

The number of wellhead reciprocating compressors was estimated using data from industry comments on Subpart W of the Greenhouse Gas Mandatory Reporting Rule.[7] The 2010 U.S. GHG Inventory reciprocating compressor activity data was not considered in the analysis because it does not distinguish between wellhead and gathering and boosting compressors. Therefore, using data submitted to EPA during the subpart W comment period from nine basins supplied by the El Paso Corporation,[8] the

Table 6-4.Approximate Number of New Sources in the Oil and Gas Industry in 2008

Industry Segment	Number of New Reciprocating Compressors	Number of New Centrifugal Compressors
Wellheads	6,000	0
Gathering and Boosting	210	0
Processing	209	16
Transmission	20	14
Storage	4	

average number of new wellhead compressors per new well was calculated using the 315 well head compressors provided in the El Paso comments and 3,606 wells estimated in the Final Subpart W onshore production threshold analysis. This produced an average of 0.087 compressors per wellhead. The average wellhead compressors per well was multiplied by the total well completions (oil and gas) determined from the HPDI® database[9] between 2007 and 2008, which came to 68,000 new well completions. Using this methodology, the estimated number of new reciprocating compressors at production pads was calculated to be 6,000 for 2008. A summary of the number of new reciprocating compressors located at well pads is presented in Table 6-4.

6.3.2.2 Gathering and Boosting Reciprocating Compressors

The number of gathering & boosting reciprocating compressors was also estimated using data from industry comments on Subpart W. DCP Midstream stated on page 3 of its 2010 Subpart W comments that it operates 48 natural gas processing plants and treaters and 700 gathering system compressor stations. Using this data, there were an average of 14.583 gathering and boosting compressor stations per processing plant. The number of new gathering and boosting compressors was determined by taking the average difference between the number of processing plants for each year in the 2010 U.S Inventory, which references the total processing plants in the Oil and Gas Journal. This was done for each year up to 2008. An average was taken of only the years with an increase in processing plants, up to 2008. The resulting average was multiplied by the 14.583 ratio of gathering and boosting compressor stations to processing plants and the 1.5 gathering and boosting compressors per station yielding 210 new source gathering and boosting compressor stations and is shown in Table 6-4.

6.3.2.3 Processing Reciprocating Compressors

The number of new processing reciprocating compressors at processing facilities was estimated by averaging the increase of reciprocating compressors at processing plants in the greenhouse gas inventory data for 2007, 2008, and 2009.[10,11] The estimated number of existing reciprocating compressors in the processing segment was 4,458, 4,781, and 4,876 for the years 2007, 2008, and 2009 respectively. This calculated to be 323 new reciprocating compressors between 2007 and 2008, and 95 new reciprocating compressors between 2008 and 2009. The average difference was calculated to be 209 reciprocating compressors and was used to estimate the number of new sources in Table 6-4.

6.3.2.4 Transmission and Storage Reciprocating Compressors

The number of new transmission and storage reciprocating compressors was estimated using the differences in the greenhouse gas inventory[12,13] data for 2007, 2008, and 2009 and calculating an average of those differences. The estimated number of existing reciprocating compressors at transmission stations was 7,158, 7,028, and 7,197 for the years 2007, 2008, and 2009 respectively. This calculated to be -130 new reciprocating compressors between 2007 and 2008, and 169 new reciprocating compressors between 2008and 2009. The average difference was calculated to be 20 reciprocating compressors and was used to estimate the number of new sources at transmission stations. The number of existing reciprocating compressors at storage stations was 1,144, 1,178, and 1,152 for the years 2007, 2008, and 2009 respectively. This calculated to be 34 new reciprocating compressors between 2007 and 2008, and -26 new reciprocating compressors between 2008and 2009. The average difference was calculated to be 4 reciprocating compressors and was used to estimate the number of new sources at storage stations in Table 6-4.

6.3.3 Activity Data for Centrifugal Compressors

The number of new centrifugal compressors in 2008 for the processing and transmission/storage segments was determined by taking the average difference between the centrifugal compressor activity data for each year in the 2008 U.S. Inventory . For example, the number of compressors in 1992 was subtracted from the number of compressors in 1993 to determine the number of new centrifugal compressors in 1993. This was done for each year up to 2008. An average was taken of only the years with an increase in centrifugal compressors, up to 2008, to determine the number of new centrifugal compressors in 2008. The result was 16 and 14 new centrifugal compressors in the processing and transmission segments respectively. A summary of the estimates for new centrifugal compressor is presented in Table 6-4.

6.3.4 Emission Estimates

Nationwide baseline emission estimates for new reciprocating and centrifugal compressors are summarized in Table 6-5 by industry segment.

Table 6-5.Nationwide Baseline Emissions for New Reciprocating and Centrifugal Compressors

Industry Segment/ Compressor Type	Nationwide baseline Emissions (tons/year)		
	Methane	**VOC**	**HAP**
Reciprocating Compressors			
Production (Well Pads)	1,186	330	12.4
Gathering & Boosting	2,587	719	27.1
Processing	4,871	1,354	51.0
Transmission	529	14.6	0.435
Storage	113	3.13	0.0929
Centrifugal Compressors			
Processing	3,640	329	11.8
Transmission/Storage	1,768	48.9	1.45

6.4 Control Techniques

6.4.1 Potential Control Techniques

The potential control options reviewed for reducing emissions from reciprocating compressors include control techniques that limit the leaking of natural gas past the piston rod packing. This includesreplacement of the compressor rod packing, replacement of the piston rod, and the refitting or realignment of the piston rod.

The replacement of the rod packing is a maintenance task performed on reciprocating compressors to reduce the leakage of natural gas past the piston rod. Over time the packing rings wear and allow more natural gas to escape around the piston rod. Regular replacement of these rings reduces methane and VOC emissions. Therefore, this control technique was determined to be an appropriate optionfor reciprocating compressors.

Like the packing rings, piston rods on reciprocating compressors also deteriorate. Piston rods, however, wear more slowly than packing rings, having a life of about 10 years.[14] Rods wear "out-of-round" or taper when poorly aligned, which affects the fit of packing rings against the shaft (and therefore the tightness of the seal) and the rate of ring wear. An out-of-round shaft not only seals poorly, allowing more leakage, but also causes uneven wear on the seals, thereby shortening the life of the piston rod and the packing seal. Replacing or upgrading the rod can reduce reciprocating compressor rod packing emissions. Also, upgrading piston rods by coating them with tungsten carbide or chrome reduces wear over the life of the rod. This analysis assumes operators will choose, at their discretion, when to replace the rod and hence, does not consider this control technique to be a practical control option for reciprocating compressors. A summary of these techniques are presented in the following sections.

Potential control options to reduce emissions from centrifugal compressors include control techniques that limit the leaking of natural gas across the rotating shaft, or capture and destruction of the emissions using a flare. A summary of these techniques are presented in the following sections.

A control technique for limiting or reducing the emission from the rotating shaft of a centrifugal compressor is a mechanical dry seal system. This control technique uses rings to prevent the escape of natural gas across the rotating shaft. This control technique was determined to be a viable option for reducing emission from centrifugal compressors.

For centrifugal compressors equipped with wet seals, a flare was considered to be a reasonable option for reducing emissions from centrifugal compressors. Centrifugal compressors require seals around the rotating shaft to prevent natural gas from escaping where the shaft exits the compressor casing. “Beam” type compressors have two seals, one on each end of the compressor, while “over-hung” compressors have a seal on only the “inboard” (motor end) side. These seals use oil, which is circulated under high pressure between three rings around the compressor shaft, forming a barrier against the compressed gas leakage. The center ring is attached to the rotating shaft, while the two rings on each side are stationary in the seal housing, pressed against a thin film of oil flowing between the rings to both lubricate and act as a leak barrier. The seal also includes “O-ring” rubber seals, which prevent leakage around the stationary rings. The oil barrier allows some gas to escape from the seal, but considerably more gas is entrained and absorbed in the oil under the high pressures at the “inboard” (compressor side) seal oil/gas interface, thus contaminating the seal oil. Seal oil is purged of the absorbed gas (using heaters, flash tanks, and degassing techniques) and recirculated back to the seal. As a control measure, the recovered gas would then be sent to a flare or other combustion device.

6.4.2 Reciprocating Compressor Rod Packing Replacement

6.4.2.1 Description

Reciprocating compressor rod packing consists of a series of flexible rings that fit around a shaft to create a seal against leakage. As the rings wear, they allow more compressed gas to escape, increasing rod packing emissions. Rod packing emissions typically occur around the rings from slight movement of the rings in the cups as the rod moves, but can also occur through the “nose gasket” around the packing case, between the packing cups, and between the rings and shaft. If the fit between the rod packing rings and rod is too loose, more compressed gas will escape. Periodically replacing the packing rings ensures the correct fit is maintained between packing rings and the rod.

6.4.2.2 Effectiveness

As discussed above, regular replacement of the reciprocating compressor rod packing can reduce the leaking of natural gas across the piston rod. The potential emission reductions were calculated by comparing the average rod packing emissionswith the average emissions from newly installed and worn-in rod packing. Since the estimate for newly installed rod packing was intended for larger processing and transmission compressors, this analysis uses the estimate to calculate reductions from only gathering

and boosting compressors and not wellhead compressor which are known to be smaller. The calculation for gathering and boosting reductions is shown in Equation 1.

$$R_{WP}^{G\&B} = \frac{Comp_{New}^{G\&B}\left(E_{G\&B} - E_{New}\right) \times C \times O \times 8760}{10^6} \qquad \textbf{Equation 1}$$

where,

$R_{WP}^{G\&B}$ = Potential methane emission reductions from gathering and boosting compressors switching from wet seals to dry seals, in million cubic feet per year (MMcf/year);
$Comp_{New}^{G\&B}$ = Number of new gathering and boosting compressors;
$E_{G\&B}$ = Methane emission factor for gathering and boosting compressors inTable 6-2, in cubic feet per hour per cylinder;
E_{New}=Average emissions from a newly installed rod packing, assumed to be 11.5 cubic feet per hour per cylinder[15] for this analysis;
C = Average number of cylinders for gathering and boosting compressors in Table 6-2;
O = Percent of time during the calendar year the average gathering and boosting compressor is in the operating and standby pressurized modes, 79.1%;
8760 = Number of days in a year;
10^6 = Number of cubic feet in a million cubic feet.

For wellhead reciprocating compressors, this analysis calculates a percentage reduction using the transmission emission factor from the 1996 EPA/GRI report and the minimum emissions rate from a newly installed rod packing to determine methane emission reductions. The calculation for wellhead compressor reductions is shown in Equation 2 below.

$$R_{Well} = \frac{Comp_{New}^{Well}\left(E_{Well}\right) \times C \times O \times 8760}{10^6}\left(\frac{E_{Trans} - E_{New}}{E_{Trans}}\right) \qquad \textbf{Equation 2}$$

where,

R_{Well} = Potential methane emission reductions from wellhead compressors switching from wet seals to dry seals, in million cubic feet per year (MMcf/year);
$Comp_{New}^{Well}$ = Number of new wellhead compressors;
E_{Well} = Methane emission factor for wellhead compressors from Table 6-2, cubic feet per hour per cylinder;
C = Average number of cylinders for wellhead compressors in Table 6-2;
O = Percent of time during the calendar year the average gathering and boosting compressor is in the operating and standby pressurized modes, 100%;

E_{Trans} = Methane emissions factor for transmission compressors from Table 6-2 in cubic feet per hour per cylinder;
E_{New} = Average emissions from a newly installed rod packing, assumed to be 11.5 cubic feet per hour per cylinder[16] for this analysis;
8760 = Number of days in a year;
10^6 = Number of cubic feet in a million cubic feet.

The emission reductions for the processing, transmission, and storage segments were calculated by multiplying the number of new reciprocating compressors in each segment by the difference between the average rod packing emission factors in Table 6-2 by the average emission factor from newly installed rod packing. This calculation, shown in the Equation 3 below, was performed for each of the natural gas processing, transmission, and storage/LNG sectors.

$$R_{PTS} = \frac{Comp_{New}^{PTS}\left(E_{G\&B} - E_{New}\right) \times C \times O \times 8760}{10^6} \qquad \textbf{\textit{Equation 3}}$$

where,

R_{PTS} = Potential methane emission reductions from processing, transmission, or storage compressors switching from wet seals to dry seals, in million cubic feet per year (MMcf/year);
$Comp_{New}^{PTS}$ = Number of new processing, transmission, or storage compressors;
$E_{G\&B}$ = Methane emission factor for processing, transmission, or storage compressors in Table 6-2, in cubic feet per hour per cylinder;
E_{New}=Average emissions from a newly installed rod packing, assumed to be 11.5 cubic feet per hour per cylinder[17] for this analysis;
C = Average number of cylinders for processing, transmission, or storage compressors in Table 6-2;
O = Percent of time during the calendar year the average processing, transmission, or storage compressor is in the operating and standby pressurized modes, 89.7%, 79.1%, 67.5% respectively;
8760 = Number of days in a year;
10^6 = Number of cubic feet in a million cubic feet.

A summary of the potential emission reductions for reciprocating rod packing replacement for each of the oil and gas segments is shown in Table 6-6. The emissions of VOC and HAP were calculated using the methane emission reductions calculated above the gas composition[18] for each of the segments. Reciprocating compressors in the processing sector were assumed to be used to compress production gas.

Table 6-6.Estimated Annual Reciprocating Compressor Emission Reductions from Replacing Rod Packing

Oil & Gas Segment	Number of New Sources Per Year	Individual Compressor Emission Reductions (tons/compressor-year)			Nationwide Emission Reductions (tons/year)		
		Methane	VOC	HAP	Methane	VOC	HAP
Production (Well Pads)	6,000	0.158	0.0439	0.00165	947	263	9.91
Gathering & Boosting	210	6.84	1.90	0.0717	1,437	400	15.1
Processing	375	18.6	5.18	0.195	3,892	1,082	40.8
Transmission	199	21.7	0.600	0.0178	423	11.7	0.348
Storage	9	21.8	0.604	0.0179	87.3	2.42	0.0718

6.4.2.3 Cost Impacts

Costs for the replacement of reciprocating compressor rod packing were obtained from a Natural Gas Star Lessons Learned document[19] which estimated the cost to replace the packing rings to be $1,620 per cylinder. It was assumed that rod packing replacement would occur during planned shutdowns and maintenance and therefore, no travel costs will be incurred for implementing the rod packing replacement program. In addition, no costs were included for monitoring becausethe rod packingplacement is based on number of hours that the compressor operates. The replacement of rod packing for reciprocating compressors occurs on average every four years based on industry information from the Natural Gas STAR Program. [20] The cost impacts arebased on the replacement of the rod packing 26,000 hours that the reciprocating compressor operates in the pressurized mode. The number of hours used for the cost impacts was determined using a weighted average of the annual percentage that the reciprocating compressors are pressurized for all of the new sources. This weighted hours, on average, per year the reciprocating compressor is pressurized was calculated to be 98.9 percent. This percentage was multiplied by the total number of hours in 3 years to obtain a value of 26,000 hours. This calculates to an average of 3 years for production compressors, 3.8 years for gathering and boosting compressors, 3.3 years for processing compressors, 3.8 years for transmission compressors, and 4.4 years for storage compressors using the operating factors in Table 6-2. The calculated years were assumed to be the equipment life of the compressor rod packing and were used to calculate the capital recovery factor for each of the segments. Assuming an interest rate of 7 percent, the capital recovery factors were calculated to be 0.3848, 0.3122, 0.3490, 0.3122, and 0.2720 for the production, gathering and boosting, processing, transmission, and storage sectors, respectively. The capital costs were calculated using the average rod packing cost of $1,620 and the average number of cylinders per segment in Table 6-2. The annual costs were calculated using the capital cost and the capital recovery factors. A summary of the capital and annual costs for each of the oil and gas segments is shown in Table 6-7.

Monetary savings associated with the amount of gas saved with reciprocating compressor rod packing replacement was estimated using a natural gas price of $4.00 per Mcf.[21] This cost was used to calculate theannual cost with gas savings using the methane emission reductions in Table 6-6. The annual cost with savings is shown in Table 6-7 for each of the oil and gas segments. The cost effectiveness for the reciprocating rod packing replacement option is presented in Table 6-7. There is no gas savings cost benefits for transmission and storage facilities, because they do not own the natural gas that is

Table 6-7. Cost Effectiveness for Reciprocating Compressor Rod Packing Replacement

Oil and Gas Segment	Capital Cost ($2008)	Annual Cost per Compressor ($/compressor-year)		VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)	
		Without savings	With savings	Without savings	With savings	Without savings	With savings
Production	$6,480	$2,493	$2,457	$56,847	$56,013	$15,802	$15,570
Gathering & Boosting	$5,346	$1,669	$83	$877	$43	$244	$12
Processing	$4,050	$1,413	-$2,903	$273	-$561	$76	-$156
Transmission	$5,346	$1,669	N/A	$2,782	N/A	$77	N/A
Storage	$7,290	$2,276	N/A	$3,766	N/A	$104	N/A

compressed at their compressor stations.

6.4.2.4 Secondary Impacts

The reciprocating compressor rod packing replacement is an option that prevents the escape of natural gas from the piston rod. No wastes should be created, no wastewater generated, and no electricity maintenance and therefore, no travel costs will be incurred for implementing the rod packing replacement program. In addition, no costs were included for monitoring becausethe rod packing

6.4.3 Centrifugal Compressor Dry Seals

6.4.3.1 Description

Centrifugal compressor dry seals operate mechanically under the opposing force created by hydrodynamic grooves and springs. The hydrodynamic grooves are etched into the surface of the rotating ring affixed to the compressor shaft. When the compressor is not rotating, the stationary ring in the seal housing is pressed against the rotating ring by springs. When the compressor shaft rotates at high speed, compressed gas has only one pathway to leak down the shaft, and that is between the rotating and stationary rings. This gas is pumped between the rings by grooves in the rotating ring. The opposing force of high-pressure gas pumped between the rings and springs trying to push the rings together creates a very thin gap between the rings through which little gas can leak. While the compressor is operating, the rings are not in contact with each other, and therefore, do not wear or need lubrication. O-rings seal the stationary rings in the seal case.

Dry seals substantially reduce methane emissions. At the same time, they significantly reduce operating costs and enhance compressor efficiency. Economic and environmental benefits of dry seals include:

- Gas Leak Rates. During normal operation, dry seals leak at a rate of 6scfmmethane per compressor.[22] While this is equivalent to a wet seal's leakage rate at the seal face, wet seals generate additional emissions during degassing of the circulating oil. Gas separated from the seal oil before the oil is re-circulated is usually vented to the atmosphere, bringing the total leakage rate for tandem wet seals to 47.7 scfm methane per compressor.[23,24]
- Mechanically Simpler. Dry seal systems do not require additional oil circulation components and treatment facilities.

- Reduced Power Consumption. Because dry seals have no accessory oil circulation pumps and systems, they avoid "parasitic" equipment power losses. Wet seal systems require 50 to 100 kW per hour, while dry seal systems need about 5 kW of power per hour.
- Improved Reliability. The highest percentage of downtime for a compressor using wet seals is due to seal system problems. Dry seals have fewer ancillary components, which translates into higher overall reliability and less compressor downtime.
- Lower Maintenance. Dry seal systems have lower maintenance costs than wet seals because they do not have moving parts associated with oil circulation (e.g., pumps, control valves, relief valves, and the seal oil cost itself).
- Elimination of Oil Leakage from Wet Seals. Substituting dry seals for wet seals eliminates seal oil leakage into the pipeline, thus avoiding contamination of the gas and degradation of the pipeline.

Centrifugal compressors were found in the processing and transmission sectors based on information in the greenhouse gas inventory.[25] Therefore, it was assumed that new compressors would be located in these sectors only.

6.4.3.2 Effectiveness

The control effectiveness of the dry seals was calculated by subtracting the dry seal emissions from a centrifugal compressor equipped with wet seals. The centrifugal compressor emission factors in Table 6-2 were used in combination with an operating factor of 43.6 percent for processing centrifugal compressors and 24.2 percent for transmission centrifugal compressors. The operating factors are used to account for the percent of time in a year that a compressor is in the operating mode. The operating factors for the processing and transmission sectors are based on data in the EPA/GRI study.[26] The wet seals emission factor is an average of 48 different wet seal centrifugal compressors. The dry seal emission factor is based on information from the Natural Gas STAR Program.[27] A summary of the emission reduction from the replacement of wet seals with dry seals is shown in Table 6-8.

6.4.3.3 Cost Impacts

The price difference between a brand new dry seal and brand new wet seal centrifugal compressor is insignificant relative to the cost for the entire compressor. General Electric (GE) stated that a natural gas transmission pipeline centrifugal compressor with dry seals cost between $50,000 and $100,000 more than the same centrifugal compressor with wet seals. However, this price difference is only about 1 to 3

Table 6-8. Estimated Annual Centrifugal Compressor Emission Reductions from Replacing Wet Seals with Dry Seals

Oil & Gas Segment	Number of New Sources Per Year	Individual Compressor Emission Reductions (ton/compressor-year)			Nationwide Emission Reductions (ton/year)		
		Methane	VOC	HAP	Methane	VOC	HAP
Transmission/Storage	16	199	18.0	0.643	3,183	287	10.3
Storage	14	110	3.06	0.0908	1,546	42.8	1.27

percent of the total cost of the compressor. The price of a brand new natural gas transmission pipeline centrifugal compressor between 3,000 and 5,000 horsepower runs between $2 million to $5 million depending on the number of stages, desired pressure ratio, and gas throughput. The larger the compressor, the less significant the price difference is between dry seals and wet seals. This analysis assumes the additional capital cost for a dry seal compressor is $75,000. The annual cost was calculatedas the capital recovery of this capital cost assuming a 10-year equipment life and 7 percent interest which came to $10,678 per compressor. The Natural Gas STAR Program estimated that the operation and maintenance savings from the installation of dry seals is $88,300 in comparison to wet seals. Monetary savings associated with the amount of gas saved with the replacement of wet seals with dry seals for centrifugal compressors was estimated using a natural gas price of $4.00 per Mcf.[28] This cost was used to calculate the annual cost with gas savings using the methane emission reductions in Table 6-8. A summary of the capital and annual costs for dry seals is presented in Table 6-9. The methane and VOC cost effectiveness for the dry seal option is also shown in Table 6-9. There is no gas savings cost benefits for transmission and storage facilities, because it is assumed the owners of the compressor station may not own the natural gas that is compressed at the station.

6.4.3.4 Secondary Impacts

Dry seals for centrifugal compressors are an option that prevents the escape of natural gas across the rotating compressor shaft. No wastes should be created, no wastewater generated, and no electricity needed. Therefore, there are no secondary impacts expected due to the installation of dry seals on centrifugal compressors.

6.4.4 Centrifugal Compressor Wet Seals with a Flare

6.4.4.1 Description

Another control option used to reduce pollutant emissions from centrifugal compressors equipped withwet seals is to route the emissions to a combustion device or capture the emissions and route them to afuel system. A wet seal system uses oil that is circulated under high pressure between three rings aroundthe compressor shaft, forming a barrier against the compressed gas. The center ring is attached to the rotating shaft, while the two rings on each side are stationary in the seal housing, pressed against a thin film of oil flowing between the rings to both lubricate and act as a leak barrier. Compressed gas becomes absorbed and entrained in the fluid barrier and is removed using a heater, flash tank, or other degassing technique so that the oil can be recirculated back to the wet seal. The removed gas is either

Table 6-9. Cost Effectiveness for Centrifugal Compressor Dry Seals

Oil and Gas Segment	Capital Cost ($2008)	Annual Cost per Compressor ($/compressor-yr)		VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)	
		without savings	with O&M and gas savings	without savings	with O&M and gas savings	without savings	with O&M and gas savings
Processing	$75,000	$10,678	-$123,730	$595	-$6,892	$54	-$622
Transmission/Storage	$75,000	$10,678	-$77,622	$3,495	-$25,405	$97	-$703

combusted or released to the atmosphere. The control technique investigated in this section is the use of wet seals with the removed gas sent to an enclosed flare.

6.4.4.2 Effectiveness

Flares have been used in the oil and gas industry to combust gas streams that have VOC and HAP. A flare typically achieves 95 percent reduction of these compounds when operated according to the manufacturer instructions. For this analysis, it was assumed that the entrained gas from the seal oil that is removed in the degassing process would be directed to a flare that achieves 95 percent reduction of methane, VOC, and HAP. The wet seal emissions in Table 6-5 were used along with the control efficiency to calculate the emissions reductions from this option. A summary of the emission reductions is presented in Table 6-10.

6.4.4.3 Cost Impacts

The capital and annual cost of the enclosed flare was calculated using the methodology in the EPA Control Cost Manual.[29] The heat content of the gas stream was calculated using information from the gas composition memorandum.[30] A summary of the capital and annual costs for wet seals routed to a flare is presented in Table 6-11. The methane and VOC cost effectiveness for the wet seals routed to a flare option is also shown in Table 6-12. There is no cost saving estimated for this option because the recovered gas is combusted.

6.4.4.4 Secondary Impacts

There are secondary impacts with the option to use wet seals with a flare. The combustion of the recovered gas creates secondary emissions of hydrocarbons, nitrogen oxide (NO_X), carbon dioxide (CO_2), and carbon monoxide (CO) emissions. A summary of the estimated secondary emission are presented in Table 6-11. No other wastes should be created or wastewater generated.

6.5 Regulatory Options

The affected facility definition for a reciprocating compressor is defined as a piece of equipment that increases the pressure of a process gas by positive displacement, employing linear movement of thedriveshaft. A centrifugal compressor is defined as a piece of equipment that compresses a process gas by means of mechanical rotating vanes or impellers. Therefore these types of compressor would be

Table 6-10. Estimated Annual Centrifugal Compressor Emission Reductions from Wet Seals Routed to a Flare

Oil & Gas Segment	Number of New Sources Per Year	Individual Compressor Emission Reductions (tons/compressor-year)			Nationwide Emission Reductions (tons/year)		
		Methane	VOC	HAP	Methane	VOC	HAP
Processing	16	216	19.5	0.699	3,283	296	10.6
Transmission/Storage	14	120	3.32	0.0986	1,596	44.2	1.31

Table 6-11. Secondary Impacts from Wet Seals Equipped with a Flare

Industry Segment	Secondary Impacts from Wet Seals Equipped with a Flare (tons/year)				
	Total Hydrocarbons	Carbon Monoxide	Carbon Dioxide	Nitrogen Oxides	Particulate Matter
Processing	0.0289	0.0205	7.33	0.00377	Negligible
Transmission/Storage	0.00960	0.00889	3.18	0.00163	Negligible

Table 6-12. Cost Effectiveness for Centrifugal Compressor Wet Seals Routed to a Flare

Oil and Gas Segment	Capital Cost ($2008)	Annual Cost per Compressor ($/compressor-year)		VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)	
		without savings	with gas savings	without savings	with gas savings	without savings	with gas savings
Processing	$67,918	$103,371	N/A	$5,299	N/A	$478	N/A
Transmission/Storage	$67,918	$103,371	N/A	$31,133	N/A	$862	N/A

subject to a New Performance Standard (NSPS) at the time of installation. The following Regulatory options were evaluated:

- Regulatory Option 1: Require replacement of the reciprocating compressor rod packing based on26,000 hours of operation while the compressor is pressurized.
- Regulatory Option 2: Require all centrifugal compressors to be equipped with dry seals.
- Regulatory Option 3: Require centrifugal compressors equipped with a wet seal to route the recovered gas emissions to a combustion device.

6.5.1 Evaluation of Regulatory Options

The first regulatory option for replacement of the reciprocating compressor rod packing based on the number of hours that the compressor operates in the pressurized mode was described in Section 6.4.1. The VOC cost effectiveness from $56,847 for reciprocating compressors located at production pads to $273 for reciprocating compressors located at processing plants. The VOC cost effectiveness for the gathering and boosting, transmission, and storage segments were $877, $2,782, and 3,766 respectively. Based on these cost effectiveness values, Regulatory Option 1 was accepted for the processing, gathering and boosting, transmission, and storage segments and rejected for the production segment.

The second regulatory option would require all centrifugal compressors to be equipped with dry seals. As presented in Section 6.4.2, dry seals are effective at reducing emissions from the rotating shaft of a centrifugal compressor. Dry seals also reduce operation and maintenance costs in comparison to wet seals. In addition, a vendor reported in 2003 that 90 percent of new compressors that were sold by the company were equipped with dry seals. Another vendor confirmed in 2010 that the rate at which new compressor sales have dry seals is still 90 percent; thus, it was assumed that from 2003 onward, 90 percent of new compressors are equipped with dry seals. The VOC cost effectiveness of dry seals was calculated to be $595 for centrifugal compressors located at processing plants, and $3,495 for centrifugal compressors located at transmission or storage facilities. Therefore, Regulatory Option 2 was accepted as a regulatory option for centrifugal compressors located at processing, transmission, or storage facilities.

The third regulatory option would allow the use of wet seals if the recovered gas emissions were routed to a flare. Centrifugal compressors with wet seals are commonly used in high pressure applications over 3,000 pounds per square inch (psi). None of the applications in the oil and gas industry operate at these

pressures. Therefore, it does not appear that any facilities would be required to operate a centrifugal compressor with wet seals. The VOC control effectiveness for the processing and transmission/storage segments were $5,299 and $31,133 respectively. Therefore, Regulatory Option 3 was rejected due to the high VOC cost effectiveness.

6.5.2 Nationwide Impacts of Regulatory Options

Tables 6-13 and 6-14 summarize the impacts of the selected regulatory options by industry segment. Regulatory Option 1 is estimated to affect 210 reciprocating compressors at gathering and boosting stations, 209 reciprocating compressors at processing plants, 20 reciprocating compressors at transmission facilities, and 4 reciprocating compressors at underground storage facilities. A summary of the capital and annual costs and emission reductions for this option is presented in Table 6-13.

Regulatory Option 2 is expected to affect 16 centrifugal compressors in the processing segment and 14 centrifugal compressors in the transmission and storage segments. A summary of the capital and annual costs and emission reductions for this option is presented in Table 6-14.

Table 6-13. Nationwide Cost Impacts for Regulatory Option 1

Oil & Gas Segment	Number of New Sources Per Year	Nationwide Emission Reductions (tons/year)			Total Nationwide Costs		
		VOC	Methane	HAP	Capital Cost ($)	Annual Cost without savings ($/yr)	Annual Cost with savings ($/yr)
Gathering & Boosting	210	400	1,437	15.1	$1,122,660	$350,503	$17,337
Processing	209	1,082	3,892	40.8	$846,450	$295,397	-$606,763
Transmission	20	11.7	423	0.348	$104,247	$32,547	$32,547
Storage	4	2.42	87.3	0.0718	$29,160	$9,104	$9,104

Table 6-14. Nationwide Cost Impacts for Regulatory Option 2

Oil & Gas Segment	Number of New Sources Per Year	Nationwide Emission Reductions[1] (tons/year)			Total Nationwide Costs[a]		
		VOC	Methane	HAP	Capital Cost ($)	Annual Cost w/o Savings ($/year)	Annual Cost w/ Savings ($/year)
Production (Well Pads)	0	0	0	0	0	0	0
Gathering & Boosting	0	0	0	0	0	0	0
Processing	16	118	422	4.42	$100,196	$14,266	-$120,144
Transmission/Storage	14	3.24	117	0.0962	$50,098	$7,133	-$37,017

a. The nationwide emission reduction and nationwide costs are based on the emission reductions and costs for 2 centrifugal compressors with wet seals located a processing facility and 1 centrifugal compressor equipped with wet seal located at a transmission or storage facility.

6.6 References

1 National Risk Management Research Laboratory. GRI/EPA Research and Development, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks. Prepared for the U.S. Department of Energy, Energy Information Administration.EPA-600/R-96-080h. June 1996.

2 Memorandum to Bruce Moore, U.S. Environmental Protection Agency from Heather Brown, EC/R. Gas Composition Methodology. July 2011.

3 EPA/GRI (1996) Methane Emission from the Natural Gas Industry.Vol. 11.Pages 11 – 15. Available at: http://epa.gov/gasstar/documents/emissions_report/11_compressor.pdf

4 Memorandum to Bruce Moore, U.S. Environmental Protection Agency from Heather Brown, EC/R. Gas Composition Methodology. July 2011.

5 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2008. Washington, DC. 2010.

6 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2009. Washington, DC. April 2011.

7 EPA (2010), Mandatory Reporting of Greenhouse Gases from Petroleum and Natural Gas Systems – Subpart W, <http://edocket.access.gpo.gov/2010/pdf/2010-28655.pdf>

8 El Paso (2010), Comments from El Paso Corporation on the Proposed Rule for Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems. Federal Register, Vol. 75, No. 69, Docket ID No.EPA-HQ-OAR-2009-0923.

9 HPDI LLC (2008), U.S. Production.<http://hpdi.com>

10 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2008. Washington, DC. 2010.

11 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2009. Washington, DC. April 2011.

12 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2008. Washington, DC. 2010.

13 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2009. Washington, DC. April 2011.

14 *EPA (2006).*Lessons Learned: Reducing Methane Emissions from Compressor Rod Packing Systems. *Natural Gas STAR. Environmental Protection Agency.*

15 *EPA (2006).*Lessons Learned: Reducing Methane Emissions from Compressor Rod Packing Systems. *Natural Gas STAR. Environmental Protection Agency.*

16 *EPA (2006).*Lessons Learned: Reducing Methane Emissions from Compressor Rod Packing Systems. *Natural Gas STAR. Environmental Protection Agency.*

17 *EPA (2006).*Lessons Learned: Reducing Methane Emissions from Compressor Rod Packing Systems. *Natural Gas STAR. Environmental Protection Agency.*

18 Memorandum to Bruce Moore, U.S. Environmental Protection Agency from Heather Brown, EC/R. Gas Composition Methodology. July 2011.

19 *EPA (2006).*Lessons Learned: Reducing Methane Emissions from Compressor Rod Packing Systems. *Natural Gas STAR. Environmental Protection Agency.*

20 *EPA (2006).*Lessons Learned: Reducing Methane Emissions from Compressor Rod Packing Systems. *Natural Gas STAR. Environmental Protection Agency.*

21 U.S. Energy Information Administration.Annual U.S. Natural Gas Wellhead Price.Energy Information Administration Natural Gas Navigator. Retrieved online on December 12, 2010 at <http://www.eia.doe.gov/dnav/ng/hist/n9190us3a.htm>

22 EPA (2006), Lessons Learned Document. "Replacing Wet Seals with Dry Seals in Centrifugal Compressors." October 2006. http://epa.gov/gasstar/documents/ll_wetseals.pdf

23 "Methane's Role in Promoting Sustainable Development in the Oil and Natural Gas Industry". US EPA, ICF International, PEMEX, EnCana Oil & Gas, Hy-Bon Engineering, Pluspetrol, Gazprom, VNIIGAZ. World Gas Conference 10/2009. Available at: http://www.epa.gov/gasstar/documents/best_paper_award.pdf

24 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2009. Washington, DC. April 2011. Annex 3. Page A-153.http://epa.gov/climatechange/emissions/downloads11/US-GHG-Inventory-2011-Annex-3.pdf

25 U.S Environmental Protection Agency.Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2008. Washington, DC. 2010.

26 National Risk Management Research Laboratory. GRI/EPA Research and Development, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks. Prepared for the U.S. Department of Energy, Energy Information Administration.EPA-600/R-96-080h. June 1996.

27 *EPA (2006).*Lessons Learned: Replacing Wet Seals with Dry Seals in Centrifugal Compressors. *Natural Gas STAR. Environmental Protection Agency.*

28 U.S. Energy Information Administration.Annual U.S. Natural Gas Wellhead Price.Energy Information Administration Natural Gas Navigator. Retrieved online on December 12, 2010 at <http://www.eia.doe.gov/dnav/ng/hist/n9190us3a.htm>

29 EPA Air Pollution Control Cost Manual - Sixth Edition, (EPA 452/B-02-001)

30 Memorandum to Bruce Moore, U.S. Environmental Protection Agency from Heather Brown, EC/R. Gas Composition Methodology. July 2011.

7.0 STORAGE VESSELS

Storage vessels, or storage tanks, are sources of air emissions in the oil and natural gas sector. This chapter provides a description of the types of storage vessels present in the oil and gas sector, and provides emission estimates for a typical storage vessel as well as nationwide emission estimates. Control techniques employed to reduce emissions from storage vessels are presented, along with costs, emission reductions, and secondary impacts. Finally, this chapter provides a discussion of considerations used in developing regulatory alternatives for storage vessels.

7.1 Process Description

Storage vessels in the oil and natural gas sector are used to hold a variety of liquids, including crude oil, condensates, produced water, etc. Underground crude oil contains many lighter hydrocarbons in solution. When the oil is brought to the surface and processed, many of the dissolved lighter hydrocarbons (as well as water) are removed through as series of high-pressure and low-pressure separators. Crude oil under high pressure conditions is passed through either a two phase separator (where the associated gas is removed and any oil and water remain together) or a three phase separator (where the associated gas is removed and the oil and water are also separated). At the separator, low pressure gas is physically separated from the high pressure oil. The remaining low pressure oil is then directedto a storage vessel where it is stored for a period of time before being shipped off-site. The remaining hydrocarbons in the oil are released from the oil as vapors in the storage vessels. Storage vessels are typically installed with similar or identical vessels in a group, referred to in the industry as a tank battery.

Emissions of the remaining hydrocarbons from storage vessels are a function of working, breathing (or standing), and flash losses. Working losses occur when vapors are displaced due to the emptying and filling of storage vessels. Breathing losses are the release of gas associated with daily temperature fluctuations and other equilibrium effects. Flash losses occur when a liquid with entrained gases is transferred from a vessel with higher pressure to a vessel with lower pressure, thus allowing entrained gases or a portion of the liquid to vaporize or flash. In the oil and natural gas production segment, flashing losses occur when live crude oils or condensates flow into a storage vesselfrom a processing vessel operated at a higher pressure. Typically, the larger the pressure drop, the more flash emissions will occur in the storage stage. Temperature of the liquid may also influence the amount of flash emissions.

The volume of gas vapor emitted from a storage vessel depends on many factors. Lighter crude oils flash more hydrocarbons than heavier crude oils. In storage vessels where the oil is frequently cycled and the overall throughput is high, working losses are higher. Additionally, the operating temperature and pressure of oil in the separator dumping into the storage vesselwill affect the volume of flashed gases coming out of the oil.

The composition of the vapors from storage vessels varies, and the largest component is methane, but also includes ethane, butane, propane, and hazardous air pollutants (HAP) such as benzene, toluene, ethylbenzene, xylene (collectively referred to as BTEX), and n-hexane.

7.2 Emissions Data

7.2.1 Summary of Major Studies and Emissions

Given the potentially significant emissions from storage vessels, there have been numerous studies conducted to estimate these emissions. Many of these studies were consulted to evaluate the emissions and emission reduction options for emissions from storage vessels. Table 7-1 presents a summary of these studies, along with an indication of the type of information available in each study.

7.2.2 Representative Storage Vessel Emissions

Due to the variability in the sizes and throughputs, model tank batteries were developed to represent the ranges of sizes and population distribution of storage vessels located attank batteries throughout the sector. Model tank batteries were not intended to represent any single facility, but rather a range of facilities with similar characteristics that may be impacted by standards. Model tank batteries were developed for condensate tank batteries and crude oil tank batteries. Average VOC emissions were then developed and applied to the model tank batteries.

7.2.2.1 Model Condensate Tank Batteries

During the development of the national emissions standards for HAP (NESHAP) for oil and natural gas production facilities (40 CFR part 63, subpart HH), model plants were developed to represent condensate tank batteries across the industry.[1]For this current analysis, the most recent inventory data available was the 2008 U.S. Greenhouse Gas Emissions Inventory.[2,3] Therefore, 2008 was chosen to represent the base year for this impacts analysis.To estimate the current condensate battery population and distribution across the model plants, the number of tanks represented by the model plants was scaled

Table 7-1. Major Studies Reviewed for Consideration of Emissions and Activity Data

Report Name	Affiliation	Year of Report	Activity Factors	Emission Figures	Control Information
VOC Emissions from Oil and Condensate Storage Tanks[4]	Texas Environmental Research Consortium	2009	Regional	X	X
Lessons Learned from Natural Gas STAR Partners:Installing Vapor Recovery Units on Crude Oil Storage Tanks[5]	EPA	2003	National		X
Upstream Oil and Gas Storage Tank Project Flash Emissions Models Evaluation – Final Report[6]	Texas Commission on Environmental Quality	2009	Regional	X	
Initial Economics Impact Analysis for Proposed State Implementation Plan Revisions to the Air Quality Control Commission's Regulation Number [7]	Colorado	2008	n/a		X
E&P TANKS[8]	American Petroleum Institute		National	X	
Inventory of U.S. Greenhouse Gas Emissions and Sinks[2,3]	EPA	2008 and 2009	National	X	

from 1992 (the year for which that the model plants were developed under the NESHAP) to 2008 for this analysis. Based on this approach, it was estimated that there were a total of 59,286 existing condensate tanks in 2008. Condensate throughput data from the U.S. Greenhouse Gas Emissions Inventory was used to scale up from 1992 the condensate tank populations for each model condensate tank battery under the assumption that an increase in condensate production would be accompanied by a proportional increase in number of condensate tanks. The inventory data indicate that condensate production increased from a level of 106 million barrels per year (MMbbl/yr) in 1992to 124 MMbbl/yr in 2008.This increase in condensate production was then distributed across the model condensate tank batteriesin the same proportion as was done for the NESHAP. The model condensate tank batteries are presented in Table 7-2.

7.2.2.2 Model Crude Oil Tank Batteries

According to the Natural Gas STAR program,[5] there were 573,000 crude oil storage tanksin 2003. According to the U.S. Greenhouse Gas Emissions Inventory, crude oil production decreased from 1,464 MMbbl/yr in 2003 to 1,326 MMbbl/yr (a decrease of approximately 9.4 percent) in 2008. Therefore, it was assumed that the number of crude oil tanks in 2008 were approximately 90.6 percent of the number of tanks identified in 2003. Therefore, for this analysis it was assumed that there were 519,161 crude oil storage tanks in 2008. During the development of the NESHAP, model crude oil tank batteries were not developed and a crude oil tank population was not estimated. Therefore, it was assumed that the percentage distribution of crude oil storage tanks across the four model crude oil tank battery classifications was the same as for condensate tank batteries.Table 7-3 presents the model crude oil tank batteries.

7.2.2.3 VOC Emissions from Condensate and Crude Oil Storage Vessels

Once the modelcondensate and crude oil tank battery distributionswere developed, VOC emissions from a representative storage vessel were estimated. Emissions from storage vessels vary considerably depending on many factors, including, but not limited to, throughput, API gravity, Reid vapor pressure, separator pressure, etc. The American Petroleum Institute (API) has developed a software program called E&P TANKS which contains a dataset of more than 100 storage vessels from across the country.[8] A summary of the information contained in the dataset, as well as the output from the E&P TANKS program, is presented in Appendix A of this document. According to industry representatives, this

Table 7-2. Model Condensate Tank Batteries

	Model Condensate Tank Battery			
Parameter	**E**	**F**	**G**	**H**
Condensate throughput (bbl/day)[a]	15	100	1,000	5,000
Condensate throughput (bbl/yr) [a]	5,475	36,500	365,000	1,825,000
Number of fixed-roof product storage vessels [a]				
210 barrel capacity	4	2		
500 barrel capacity		2	2	
1,000 barrel capacity			2	4
Estimated tank battery population (1992)[a]	12,000	500	100	70
Estimated tank battery population (2008) [b]	14,038	585	117	82
Total number of storage vessels (2008) [b]	56,151	2,340	468	328
Percent of number of storage vessels in model condensate tank battery	94.7%	3.95%	0.789%	0.552%
Percent of throughput per model condensate tank battery[a]	26%	7%	15%	51%
Total tank battery condensate throughput (MMbbl/yr)[c]	32.8	9.11	18.2	63.8
Condensate throughput per model condensate battery (bbl/day)	6.41	42.7	427	2,135
Condensate throughput per storage vessel (bbl/day)	1.60	10.7	106.8	534

Minor discrepancies may be due to rounding.

a. Developed for NESHAP (Reference 1).

b. Population of tank batteries for 2008 determined based on condensate throughput increase from 106 MMbbl/yr in 1992 to 124 MMbbl/yr in 2008 (References2,3).

c. 2008 condensate production rate of 124 MMbbl/yr distributed across model tank batteries using same relative ratio as developed for NESHAP (Reference 1).

Table 7-3. Model Crude Oil Tank Batteries

	Model Crude Oil Tank Battery			
Parameter	**E**	**F**	**G**	**H**
Percent of number of condensate storage vessels in model size range[a]	94.7%	3.95%	0.789%	0.552%
Number of storage vessels[b]	491,707	20,488	4,098	2,868
Percent of throughput across condensate tank batteries	26%	7%	15%	51%
Crude oil throughput per model plant category (MMbbl/yr)	351	97.5	195	683
Crude oil throughput per storage vessel (bbl/day)	1.96	13.0	130	652

Minor discrepancies may be due to rounding.

a. Same relative percent of storage vessel population developed for model condensate tank batteries.Refer to Table 7-2.

b. Calculated by applying the percent of number of condensate storage vessels in model size range to total number of crude oil storage vessels (519,161 crude oil storage vessels estimated for 2008) (Reference 5).

c. Same relative percent of throughput developed for model condensate tank batteries.Refer to Table 7-2.

dataset in combination with the output of the E&P TANKS program is representative of the various VOC emissions from storage vessels across the country.[9]

The more than 100 storage vesselsprovided with the E&P TANKS program, which had varying characteristics, were modeled with a constant throughput (based on the assumption that emissions would increase in proportion with throughput) and the relationship of these different characteristics and emissionswas studied. While many of the characteristics impacted emissions, a correlation was found to exist between API gravity and emissions. The average API gravity for all storage vessels in the data set was approximately 40 degrees. Therefore, we selected an API gravity of 40 degrees as a parameter to distinguish between lower emitting storage vessels and higher emitting storage vessels.[i] While the liquid type was not specified for the storage vessels modeled in the study, it was assumed that condensate storage vessels would have higher emissions than crude oil storage vessels. Therefore, based on this study using the E&P TANKS program, it was assumed for this analysis that liquids with API gravity equal to or greater than 40 degrees should be classified as condensate and liquids with API gravity less than 40 degrees should be classified as crude oil.

The VOC emissions from all storage vessels in the analysis are presented in Appendix A.Table 7-4 presents a summary of the average VOC emissions from all storage vessels as well as the average VOC emissions from the storage vessels identified as being condensate storage vessels and those identified as being crude oil storage vessels. As shown in Table 7-4, the storage vessels were modeled at a constant throughput of 500 bpd.[ii]An average emission factor was developed for each type of liquid. The average of condensate storage vessel VOC emissions was modeled to be 1,046 tons/year or 11.5 lb VOC/bbl and the average of crude oil storage vessel VOC emissions was modeled to be 107 tons/year or 1.18 lb VOC/bbl. These emission factors were then applied to each of the two sets of model storage vessels in Tables 7-2 and 7-4 to develop the VOC emissions from the model tank batteries. These are presented in Table 7-5.

[i] The range of VOC emissions within the 95 percent confidence interval for storage vessels with an API gravity greater than 40 degrees was from 667 tons/year to 1425 tons/year. The range for API gravity less than 40 degrees was 76 tons/year to 138.
[ii] This throughput was originally chosen for this analysis to be equal to the 500 bbl/day throughput cutoff in subpart HH. While not part of the analysis described in this document, one of the original objectives of the E&P TANKS analysis was to assess the level of emissions associated with a storage vessel with a throughput below this cutoff. Due to the assumption that emissions increase and decrease in proportion with throughput, it was decided that using a constant throughput of 500 bbl/day would still provide the information necessary to determine VOC emissions from model condensate and crude oil storage vessels for this document.

Table 7-4. Summary of Data from E&P TANKS Modeling

Parameter[a]		Average of Dataset	Average of Storage Vessels with API Gravity > 40 degrees	Average of Storage Vessels with API Gravity ≤ 40 degrees
Throughput Rate (bbl)		500	500	500
API Gravity		40.6	52.8	30.6
VOC	Emissions (tons/year)	531	1046	107
	Emission factor (lb/bbl)	5.8	11.5	1.18

a. Information from analysis of E&P Tanks dataset, refer to Appendix A.

Table 7-5. Model Storage Vessel VOC Emissions

Parameter	Model Tank Battery			
	E	F	G	H
Model Condensate Tank Batteries				
Condensate throughput per storage vessel (bbl/day)	1.60	10.7	107	534
VOC Emissions (tons/year)[b]	3.35	22.3	223	1117
Model Crude Oil Tank Batteries				
Crude Oil throughput per storage vessel (bbl/day)[c]	2.0	13	130	652
VOC Emissions (tons/year)[d]	0.4	2.80	28	140

a. Condensate throughput per storage vessel from table 7-2.
b. Calculated using the VOC emission factor for condensate storage vessels of 11.5 lb VOC/bbl condensate.
c. Crude oil throughput per storage vessel from table 7-3.
d. Calculated using the VOC emission factor for crude oil storage vessels of 1.18 lb VOC/bbl crude oil.

7.3 Nationwide Baseline Emissions from New or Modified Sources

7.3.1 Overview of Approach

The first step in this analysis is to estimate nationwide emissions in absence of a federal rulemaking, referred to as the nationwide baseline emissions estimate. In order to develop the baseline emissions estimate, the number of new storage vessels expected in a typical year was calculated and then multiplied by the expected uncontrolled emissions per storage vessels presented in Table 7-5. In addition, to ensure no emission reduction credit was attributed to new sources that would already be required to be controlled under State regulations, it was necessary to account for the number of storage vessels already subject to State regulations as detailed below.

7.3.2 Number of New Storage Vessels Expected to be Constructed or Reconstructed

The number of new storage vessels expected to be constructed was determined for the year 2015 (the year of analysis for the regulatory impacts). To do this, it was assumed that the number of new or modified storage vessels would increase in proportion with increases in production. The Energy Information Administration (EIA), published crude oil production rates up to the year 2011.[10]Therefore, using the forecast function in Microsoft Excel® , crude oil production was predicted for the year 2015.[iii] From 2009 to 2015,[iv] the expected growth of crude oil production was projected to be 8.25 percent (from 5.36 bpd to 5.80 bpd). Applying this expected growth to the number of existing storage vessels results in an estimate of 4,890 new or modified condensate storage vessels and 42,811 new or modified crude oil storage vessels. The number of new or modified condensate and crude oil storage vessels expected to be constructed or reconstructed is presented in Table 7-6.

7.3.3 Level of Controlled Sources in Absence of Federal Regulation

As stated previously, to determine the impact of a regulation, it was first necessary to determine the current level of emissions from the sources being evaluated, or baseline emissions. To more accurately estimate baseline emissions for this analysis, and to ensure no emission reduction credit was attributed

[iii] The crude oil production values published by the EIA include leased condensate. Therefore, the increase in crude oil production was assumed to be valid for both crude oil and condensate tanks for the purpose of this analysis.
[iv] For the purposes of estimating growth, the crude oil production rate in the year 2008 was considered an outlier for production and therefore was not used in this analysis.

Table 7-6. Nationwide Baseline Emissions for Storage Vessels

	Model Tank Battery				
	E	**F**	**G**	**H**	**Total**
Model Condensate Tank Batteries					
Total number of storage vessels (2008)	56,151	2,340	468	328	59,286
Total projected number of new or modified storage vessels (2015) [a]	4,630	193	39	27	4,889
Number of uncontrolled storage vessels in absence of federal regulation[b]	1,688	70	14	10	1,782
Uncontrolled VOC Emissions from storage vessel at model tank battery[c]	3.35	22.3	223	1,117	1,366
Total Nationwide Uncontrolled VOC Emissions	5,657	1,572	3,143	11,001	21,373
Model Crude Oil Tank Batteries					
Total number of storage vessels (2008)	491,707	20,488	4,098	2,868	519,161
Total projected number of new or modified storage vessels (2015) [a]	40,548	1,689	338	237	42,812
Number of uncontrolled storage vessels in absence of federal regulation[b]	14,782	616	123	86	15,607
Uncontrolled VOC Emissions from storage vessel at model tank battery[c]	0.4	2.80	28	140	171
Total Nationwide Uncontrolled VOC Emissions	6,200	1,722	3,444	12,055	23,421

Minor discrepancies may be due to rounding

a. Calculated by applying the expected 8.25 percent industry growth to the number of storage vessels in 2008.
b. Calculated by applying the estimated 36 percent of storage vessels that are uncontrolled in the absence of a Federal Regulation to the total projected number of new or modified storage vessels in 2015.
c. VOC Emissions from individual storage vessel at model tank battery, see Table 7-5.

for sources already being controlled, it was necessary to determine which storage vessels were already being controlled. To do this, the 2005 National Emissions Inventory (NEI) was used.Storage vessels in the oil and natural gas sector were identified under the review of the maximum achievable control technology (MACT) standards.[11] There were 5,412 storage vessels identified in the NEI, and of these, 1,973 (or 36 percent) were identified as being uncontrolled. Therefore, this percent of storage vessels that would not require controls under State regulations was applied to the number of new or modified storage vessels results in an estimate of 1,782 new or modified condensate storage vessels and 15,607 new or modified crude oil storage vessels.These are also presented in Table 7-6.

7.3.4 Nationwide Emission Estimates for New or Modified Storage Vessels

Nationwide emissions estimates are presented in Table 7-6 for condensate storage vessels and crude oil storage vessels. Model storage vessel emissions were multiplied by the number of expected new or modified storage vessels that would be uncontrolled in the absence of a federal regulation.As shown in Table 7-6, the baseline nationwide emissions are estimated to be 21,373 tons/year for condensate storage vessels and 23,421 tons/year for crude oil storage vessels.

7.4 Control Techniques

7.4.1 Potential Control Techniques

In analyzing controls for storage vessels, we reviewed control techniques identified in the Natural Gas STAR program and state regulations. We identified two ways of controlling storage vessel emissions, both of which can reduce VOC emissions by 95 percent. One option would be to install a vapor recovery unit (VRU) and recover all the vapors from the storage vessels. The other option would be to route the emissions from the storage vessels to a combustor. These control technologies are described below along with their effectiveness as they apply to storage vessels in the oil and gas sector, cost impacts associated with the installation and operation of these control technologies, and any secondary impacts associated with their use.

7.4.2 Vapor Recovery Units

7.4.2.1 Description

Typically, with a VRU, hydrocarbon vapors are drawn out of the storage vessel under low pressure and are piped to a separator, or suction scrubber, to collect any condensed liquids, which are typically

recycled back to the storage vessel. Vapors from the separator flow through a compressor that provides the low-pressure suction for the VRU system. Vapors are then either sent to the pipeline for sale or used as on-site fuel.[5]

7.4.2.2 Effectiveness

Vapor recovery units have been shown to reduce VOC emissions from storage vessels by approximately 95 percent.***Error! Bookmark not defined.***A VRU recovers hydrocarbon vapors that potentially can be used as supplemental burner fuel, or the vapors can be condensed and collected as condensate that can be sold.If natural gas is recovered, it can be sold as well, as long as a gathering line is available to convey the recovered salable gas product to market or to further processing. A VRU also does not have secondary air impacts, as described below. However, a VRU cannot be used in all instances. Some conditions that affect the feasibility of VRU are: availability of electrical service sufficient to power the compressor; fluctuations in vapor loading caused by surges in throughput and flash emissions from the storage vessel; potential for drawing air into condensate storage vessels causing an explosion hazard; and lack of appropriate destination or use for the vapor recovered.

7.4.2.3 Cost Impacts

Cost data for a VRU was obtained from an Initial Economic Impact Analysis (EIA) prepared for proposed state-only revisions to a Colorado regulation.Cost information contained in the EIA was assumed to be giving in 2007 dollars.[7]Therefore costs were escalated to 2008 dollars using the CE Indices for 2007 (525.4) and 2008 (575.4).[12] According to the EIA, the purchased equipment cost of a VRU was estimated to be $85,423 (escalated to 2008 dollars from $75,000 in 2007 dollars). Total capital investment, including freight and design and installation was estimated to be $98,186. These cost data are presented in Table 7-7. Total annual costs were estimated to be $18,983/year.

7.4.2.4 Secondary Impacts

A VRU is a pollution prevention technique that is used to recover natural gas that would otherwise be emitted. No secondary emissions (e.g., nitrogen oxides, particulate matter, etc.) would be generated, no wastes should be created, no wastewater generated, and no electricity needed. Therefore, there are no secondary impacts expected due to the use of a VRU.

Table 7-7. Total Capital Investment and Total Annual Cost of a Vapor Recovery Unit

Cost Item[a]	Capital Costs ($)	Non-Recurring, One-time Costs ($)	Total Capital Investment ($)[b]	O&M Costs ($)	Savings due to Fuel Sales ($/yr)	Annualized Total Cost ($/yr)[c]
VRU	$78,000					
Freight and Design		$1,500				
VRU Installation		$10,154				
Maintenance				$8,553		
Recovered natural gas					($1,063)	
Subtotal Costs (2007)	$78,000	$11,654		$8,553	($1,063)	
Subtotal Costs (2008)[d]	$85,423	$12,763	$98,186	$9,367	($1,164)	
Annualized costs (using 7% interest, 15 year equipment life)	$9,379	$1,401		n/a	n/a	$18,983

Minor discrepancies may be due to rounding

a. Assume cost data provided is for the year 2007. Reference 7.
b. Total Capital Investment is the sum of the subtotal costs for capital costs and nonrecurring one-time costs.
c. Total Annual Costs is the sum of the annualized capital and recurring costs, O&M costs, and savings due to fuel sales.
d. Costs are escalated to 2008 dollars using the CE Indices for 2007 (525.4) and 2008 (575.4). Reference 12.

7.4.3 Combustors

7.4.3.1 Description and Effectiveness

Combustors are also used to control emissions from condensate and crude oil storage vessels.The type of combustor used is a high-temperature oxidation process used to burn combustible components, mostly hydrocarbons, found in waste streams.[13] Combustors are used to control VOC in many industrial settings, since thecombustorcan normally handle fluctuations in concentration, flow rate, heating value, and inert species content.[14] For this analysis, the types of combustors installed for the oil and gas sector are assumed to achieve 95 percent efficiency.[7] Combustors do not have the same operational issues as VRUs, however secondary impacts are associated with combustors as discussed below.

7.4.3.2 Cost Impacts

Cost data for a combustor was also obtained from the Initial EIA prepared for proposed state-only revisions to the Colorado regulation.[7] As performed for the VRU, costs were escalated to 2008 dollars using the CE Indices for 2007 (525.4) and 2008 (575.4).[12] According to the EIA, the purchased equipment cost of a combustor, including an auto igniter and surveillance system was estimated to be $23,699 (escalated to 2008 dollars from $21,640 in 2007 dollars). Total capital investment, including freight and design and installation was estimated to be $32,301. These cost data are presented in Table 7-8. Total annual costs were estimated to be $8,909/year.

7.4.3.3 Secondary Impacts

Combustion and partial combustion of many pollutants also create secondary pollutants including nitrogen oxides, carbon monoxide, sulfur oxides, carbon dioxide, and smoke/particulates. Reliable data for emission factors from combustors on condensate and crude oil storage vessels are limited. Guidelines published in AP-42 for flare operations are based on tests from a mixture containing 80 percent propylene and 20 percent propane.[13] These emissions factors, however, are thebest indication for secondary pollutants from combustors currently available. The secondary emissionsper storage vessel are provided in Table 7-9.

Table 7-8. Total Capital Investment and Total Annual Cost of a Combustor

Cost Item[a]	Capital Costs ($)	Non-Recurring, One-time Costs ($)	Total Capital Investment ($)[b]	O&M Costs ($)	Annualized Total Cost ($/yr)[c]
Combustor	$16,540				
Freight and Design		$1,500			
Combustor Installation		$6,354			
Auto Igniter	$1,500				
Surveillance System[d]	$3,600				
Pilot Fuel				$1,897	
Maintenance				$2,000	
Data Management				$1,000	
Subtotal Costs (2007)	$21,640	$7,854		$4,897	
Subtotal Costs (2008)[e]	$23,699	$8,601	$32,301	$5,363	
Annualized costs (using 7% interest, 15 year equipment life)	$2,602	$944		n/a	$8,909

Minor discrepancies may be due to rounding

a. Assume cost data provided is for the year 2007. Reference 7.
b. Total Capital Investment is the sum of the subtotal costs for capital costs and nonrecurring one-time costs.
c. Total Annual Costs is the sum of the annualized capital and recurring costs, O&M costs, and savings due to fuel sales.
d. Surveillance system identifies when pilot is not lit and attempt to relight it, documents the duration of time when the pilot is not lit, and notifies and operator that repairs are necessary.
e. Costs are escalated to 2008 dollars using the CE Indices for 2007 (525.4) and 2008 (575.4). Reference 12.

Table 7-9. Secondary Impacts for Combustors used to Control Condensate and Crude Oil Storage Vessels

Pollutant	Emission Factor	Units	Emissions per Storage Vessel (tons/year)[a]
THC	0.14	lb/MMBtu	0.0061
CO	0.37	lb/MMBtu	0.0160
CO_2	60	Kg/MMBtu[b]	5.62
NO_X	0.068	lb/MMBtu	2.95E-03
PM	40	µg/l (used lightly smoking flares due to criteria that flares should not have visible emissions i.e. should not smoke)	5.51E-05

a. Converted using average saturated gross heating value of the storage vessel vapor (1,968 Btu/scf) and an average vapor flow rate of 44.07 Mcf per storage vessel. See Appendix A.

b. CO_2 emission factor obtained from 40 CFR Part 98, subpart Y, Equation Y-2.

7.5 Regulatory Options and Nationwide Impacts of Regulatory Options

7.5.1 Consideration of Regulatory Options for Condensate and Crude Oil Storage Vessels

The VOC emissions from storage vessels vary significantly, depending on the rate of liquid entering and passing through the vessel (i.e., its throughput), the pressure of the liquid as it enters the atmospheric pressure storage vessel, the liquid's volatility and temperature of the liquid.Some storage vessels have negligible emissions, such as those with very little throughput and/or handling heavy liquids entering at atmospheric pressure. Therefore, in order to determine the most cost effective means of controlling the storage vessels, a cutoff was evaluated to limit the applicability of the standards to these storage vessels. Rather than require a cutoff in terms of emissions that would require a facility to conduct an emissions test on their storage vessel, a throughput cutoff was evaluated. It was assumed that facilities would have storage vessel throughput data readily available. Therefore, we evaluated the costs of controlling storage vessels with varying throughputs to determine which throughput level would provide the most cost effective control option.

The standard would require an emission reduction of 95 percent, which, as discussed above, could be achieved with a VRU or a combustor. A combustoris an option for tank batteries because of the operational issues associated with a VRU as discussed above.However the use of a VRU is preferable to a combustorbecause a combustordestroys, rather than recycles, valuable resources and there are secondary impacts associated with the use of a combustor. Therefore, the cost impacts associated a VRU installed for the control of storage vessels were evaluated.

To conduct this evaluation, emission factor data from a study prepared for the Texas Environmental Research Consortium[15] was used to represent emissions from the different throughputs being evaluated. For condensate storage vessels, an emission factor of 33.3 lb VOC/bbl was used and for crude oil storage vessels, an emission factor of 1.6 lb VOC/bbl was used.Using the throughput for each control option, an equivalent emissions limit was determined.Table 7-10 presents the following regulatory options considered for condensate storage vessels:

- Regulatory Option 1: Control condensate storage vessels with a throughput greater than 0.5 bbl/day (equivalent emissions of 3.0 tons/year);

Table 7-10. Options for Throughput Cutoffs for Condensate Storage Vessels

Regulatory Option	Throughput Cutoff (bbl/day)	Equivalent Emissions Cutoff (tons/year) [a]	Emission Reduction (tons/year) [b]	Annual Costs for VRU ($/yr) [c]	Cost Effectiveness ($/ton)	Number of impacted units[d]
1	0.5	3.0	2.89	$18,983	$6,576	1782
2	1	6.1	5.77	$18,983	$3,288	94
3	2	12.2	11.55	$18,983	$1,644	94
4	5	30.4	28.87	$18,983	$658	24

Minor discrepancies may be due to rounding

a. Emissions calculated using emission factor of 33.3 lb VOC/bbl condensate and the throughput associated with each option.
b. Calculated using 95 percent reduction
c. Refer to Table 7-7 for VRU Annual Costs.
d. Number of impacted units determined by evaluating which of the model tank batteries and storage vessel populations associated with each model tank battery (refer to Table 7-6) would be subject to each regulatory option. A storage vessel at a model tank battery was considered to be impacted by the regulatory option if its throughput and emissions were greater than the cutoffs for the option.

- Regulatory Option 2: Control condensate storage vessels with a throughput greater than 1 bbl/day (equivalent emissions of 6 tons/year);
- Regulatory Option 3: Control condensate storage vessels with a throughput greater than 2 bbl/day (equivalent emissions of 12 tons/year);
- Regulatory Option 1: Control condensate storage vessels with a throughput greater than 5.0 bbl/day (equivalent emissions of 30 tons/year);

As shown in Table 7-10, Regulatory Option 1 is not cost effective for condensate storage vessels with a throughput of 0.5 bbl/day.Therefore Regulatory Option 1 is rejected.Since the cost effectiveness associated with Regulatory Option 2 is acceptable ($3,288/ton), this option was selected. As shown in Table 7-5, Model Condensate Storage Vessel Categories F, G, and H have throughputs greater than 1 bbl/day and emissions greater than 6 tons/year. Therefore, for the purposes of determining impacts, the populations of new and modified condensate storage vessels associated with categories F, G, and H are assumed to be required to reduce their emissions by 95 percent, a total of 94 new or modified condensate storage vessels.

A similar evaluation was performed for crude oil vessels and is presented in Table 7-11 for the following regulatory options:

- Regulatory Option 1: Control crude oil storage vessels with a throughput greater than 1 bbl/day (equivalent emissions of 0.3 tons/year);
- Regulatory Option 2: Control condensate storage vessels with a throughput greater than 5 bbl/day (equivalent emissions of 1.5 tons/year);
- Regulatory Option 3: Control condensate storage vessels with a throughput greater than 20 bbl/day (equivalent emissions of 6 tons/year);
- Regulatory Option 1: Control condensate storage vessels with a throughput greater than 50 bbl/day (equivalent emissions of 15 tons/year);

As shown in Table 7-11, Regulatory Options 1 and 2 are not cost effective crude oil storage vessels with a throughput of 1 and 5 bbl/day, respectively. Therefore Regulatory Options 1 and 2 are rejected.Since the cost effectiveness associated with Regulatory Option 3 is acceptable ($3,422/ton), this option was selected. As shown in Table 7-5, Model Crude Oil Storage Vessel CategoriesG and H have throughputs greater than 20 bbl/day and emissions greater than 6 tons/year. Therefore, for the purposes of determining impacts, the populations of new and modified crude oil storage vessels associated with categories G

Table 7-11. Options for Throughput Cutoffs for Crude Oil Storage Vessels

Regulatory Option	Throughput Cutoff (bbl/day)	Equivalent Emissions Cutoff (tons/year) [a]	Emission Reduction (tons/year) [b]	Annual Costs for VRU ($/yr) [c]	Cost Effectiveness ($/ton)	Number of impacted units[d]
1	1	0.3	0.28	$18,983	$68,432	15607
2	5	1.5	1.4	$18,983	$13,686	825
3	20	5.8	5.55	$18,983	$3,422	209
4	50	14.6	13.87	$18,983	$1,369	209

Minor discrepancies may be due to rounding

a. Emissions calculated using emission factor of 1.6 lb VOC/bbl condensate and the throughput associated with each option.
b. Calculated using 95 percent reduction
c. Refer to Table 7-7 for VRU Annual Costs.
d. Number of impacted units determined by evaluating which of the model tank batteries and storage vessel populations associated with each model tank battery (refer to Table 7-6) would be subject to each regulatory option. A storage vessel at a model tank battery was considered to be impacted by the regulatory option if its throughput and emissions were greater than the cutoffs for the option.

and H are assumed to be required to reduce their emissions by 95 percent, a total of 209 new or modified condensate storage vessels.

7.5.2 Nationwide Impacts of Regulatory Options

This section provides an analysis of the primary environmental impacts (i.e., emission reductions), cost impacts and secondary environmental impacts related to Regulatory Option 2 for condensate storage vessels and Regulatory Option 3 for crude oil storage vessels which were selected as viable options for setting standards for storage vessels.In addition, combined impacts for a typical storage vessel are presented.

7.5.3 Primary Environmental Impacts of Regulatory Options

Regulatory Option2 (condensate storage vessels) and 3 (crude oil storage vessels) were selected as options for setting standards for storage vessels as follows:

- Regulatory Option 2 (Condensate Storage Vessels): Reduce emissions from condensate storage vessels with an average throughput greater than 1 bbl/day.

- Regulatory Option 3 (Crude Oil Storage Vessels): Reduce emissions from crude oil storage vessels with an average throughput greater than 20 bbl/day.

The number of storage vessels that would be subject to the regulatory options listed above are presented in Tables7-10 and 7-11. It was estimated that there would be 94 new or modified condensate storage vessels not otherwise subject to State regulationsand impacted by Regulatory Option 2 (condensate storage vessels).As shown in Table 7-11, 209 new or modified crude oil storage vessels not otherwise subject to State regulations would be impacted by Regulatory Option 3 (crude oil storage tanks).

Table 7-12 presents the nationwide emission reduction estimates for each regulatory option. Emissions reductions were estimated by applying 95 percent control efficiency to the VOC emissions presented in Table 7-6 for each storage vessel in the model condensate and crude oil tank batteries and multiplying by the number of impacted storage vessels. For Regulatory Option 2 (condensate storage vessels), the total nationwide VOC emission reduction was estimated to be 15,061 tons/year and 14,710 tons/year for Regulatory Option 3 (crude oil storage vessels).

Table 7-12. Nationwide Impacts of Regulatory Options

Model Tank Battery	Number of Sources subject to Regulatory Option[a]	VOC Emissions for a Typical Storage Vessel (tons/year)	Capital Cost forTypical Storage Vessel[b] ($)	Annual Cost for a Typical Storage Vessel[b] ($/yr)		Nationwide Emission Reductions (tons/year)[c]		VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)		Total Nationwide Costs (million $/year)		
				without savings	with savings	VOC	Methane[d]	without savings	with savings	without savings	with savings	Capital Cost	Annual without savings	Annual with savings
Regulatory Option 2: Condensate Storage Vessels														
F	70	22.3	65,243	14,528	13,946	1,483	325	685	658	3129	3004	4.57	1.02	0.98
G	14	223	65,243	14,528	13,946	2,966	649	68	66	313	301	0.913	0.203	0.195
H	10	1117	65,243	14,528	13,946	10,612	2,322	14	13	62.6	60.1	0.652	0.145	0.139
Total for Regulatory Option 2						**15,061**	**3,296**					**6.14**	**1.37**	**1.31**
Regulatory Option 3: Crude Oil Storage Vessels														
G	123	28	65,243	14,528	13,946	3,272	716	546	524	2496	2396	8.02	1.79	1.71
H	86	140	65,243	14,528	13,946	11,438	2,503	109	104	499	479	5.61	1.25	1.20
Total for Regulatory Option 3						**14,710**	**3,219**					**13.6**	**3.04**	**2.91**
Combined Impacts[e]														
Typical Storage Vessel	**304**	**103**	**65,243**	**14,528**	**13,946**	**29,746**	**6,490**	**149**	**143**	**680**	**652**	**19.8**	**4.41**	**4.24**

Minor discrepancies may be due to rounding

a. Number of storage vessels in each model tank battery (refer to Table 7-6) determined to be subject to the regulatory option as outlined in Table 7-10.

b. It was assumed for the purposes of estimating nationwide impacts that 50 percent of facilities would install a combustor and 50 percent a VRU.This accounts for the operational difficulties of using a VRU. Capital and Annual Costs determined using the average of costs presented in Tables 7-7 and 7-8.

c. Nationwide emission reductions calculated by applying a 95 percent emissions reduction to the VOC emissions for a typical storage vessel multiplied by the number of sources subject to the regulatory option.

d. Methane Reductions calculated by applying the average Methane to VOC factor from the E&P Tanks Study (see Appendix A).Methane:VOC = 0.219

e. For purposes of evaluating NSPS impact, impacts were determined for an average storage vessel by calculating total VOC emissions from all storage vessels and dividing by the total number of impacted storage vessels to obtain the average VOC emissions per storage vessel.

7.5.4 Cost Impacts

Cost impacts of the individual control techniques (VRU and combustors) were presented in Section 7.4. For both regulatory options, it was assumed that 50 percent of facilities would install a combustor and 50 percent a VRU. This accounts for the operational difficulties of using a VRU. Therefore, the average capital cost of control for each storage vessel was estimated to be $65,243 (the average of the total capital investment for a VRU of $98,186 and $32,301 for a combustor from Tables 7-7 and 7-8, respectively). Similarly, the average annual cost for a typical storage vessel was estimated to be $14,528/yr (average of the total annual cost for a VRU of $20,147/yr and $8,909/yr for a combustor from Tables 7-7 and 7-8, respectively) without including any cost savings due to fuel sales and $13,946/yr (average of the total annual cost for a VRU of $18,983/yr and $8,909/yr for a combustorfrom Tables 7-7 and 7-8, respectively) including cost savings.

Nationwide capital and annual costs were calculated by applying the number of storage vessels subject to the regulatory option. As shown in Table 7-12, the nationwide capital cost of Regulatory Option 2 (condensate storage vessels) was estimated to be $6.14 million and for RegulatoryOption 3 (crude oil storage vessels) nationwide capital cost was estimated to be $13.6 million.Total annual costs without fuel savings were estimated to be $1.37 million/yr for Regulatory Option 2 (condensate storage vessels) and $3.04 million/yr for Regulatory Option 3 (crude oil storage vessels). Total annual costs with fuel savings were estimated to be $1.31 million/yr for Regulatory Option 2 (condensate storage vessels) and $2.91 million/yr for Regulatory Option 3 (crude oil storage vessels).

For purposes of evaluating the impact of a federal standard, impacts were determined for an average storage vessel by calculating the total VOC emissions from all storage vessels and dividing by the total number of impacted storage vessels (304) to obtain the average VOC emissions per storage vessel (103 tons/year).Therefore, the nationwide annual costs were estimated to be $4.41 million/yr. A total nationwide VOC emission reduction of 29,746 tons/year results in a cost effectiveness of $149/ton.

7.5.5 Nationwide Secondary Emission Impacts

Regulatory Options 2 (condensate storage vessels) and 3 (crude oil storage vessels) allow for the use of a combustor; therefore the estimated nationwide secondary impacts are a result of combusting 50 percent of all storage vessel emissions. The secondary impacts for controlling a single storage vessel using a combustor are presented in Table 7-9. Nationwide secondary impacts are calculated by

Table 7-13. Nationwide Secondary Combined Impacts for Storage Vessels

Pollutant	Emissions per Storage Vessel (tons/year) [a]	Nationwide Emissions (tons/year)[b]
THC	0.0061	0.927
CO	0.0160	2.43
CO_2	5.62	854
NO_X	2.95E-03	0.448
PM	5.51E-05	0.0084

a. Emissions per storage vessel presented in Table 7-9.
b. Nationwide emissions calculated by assuming that 50 percent of the 304 impacted storage vessels would install a combustor.

multiplying 50 percent of the estimated number of impacted storage vessels (152) by the secondary emissions and are presented in Table 7-13.

7.6 References

1. National Emissions Standards for Hazardous Air Pollutants for Source Categories: Oil and Natural Gas Production and Natural Gas Transmission and Storage – Background Information for Proposed Standards. U. S. Environmental Protection Agency, Research Triangle Park, NC. Publication No.EPA-453/R-94-079a. April 1997.

2. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 – 2008. U.S. Environmental Protection Agency, Research Triangle Park, NC.Publication No.EPA 430-R-10-006. April 15, 2010.

3. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 – 2007. U.S. Environmental Protection Agency, Research Triangle Park, NC.Publication No.EPA 430-R-09-004. April 15, 2009.

4. Hendler, A., (URS Corporation), Nunn, J. (COMM Engineering), and J. Lundeen (Trimeric Corporation).VOC Emissions from Oil and Condensate Storage Tanks – Final Report.Prepared for Texas Environmental Research Consortium. The Woodlands, TX. October 31, 2006 (revised April 2, 2009)

5. U.S. Environmental Protection Agency. Lessons Learned from Natural Gas STAR Partners: Installing Vapor Recovery Units on Crude Oil Storage Tanks. Publication No.EPA 430-B-03-015. October 2003.

6. Gidney, B., and S. Pena, Hy-Bon Engineering Company, Inc. Upstream Oil and Gas Storage Tank Project Flash Emissions Models Evaluation. Final Report.Prepared for Texas Commission on Environmental Quality and Eastern Research Group, Inc. July 16, 2009.

7. Initial Economic Impact Analysis for Proposed State-Only Revisions to the Air Quality Control Commission's Regulation Number 7, "Emissions of Volatile Organic Compounds." September 18, 2008.

8. Production Tank Emissions Model.E&P TANK Version 2.0, User's Manual.A Program for Estimating Emissions from Hydrocarbon Production Tanks.American Petroleum Institute.Software Number 4697. April 2000.

9. Grubert, D., EC/R Incorporated, to B. Moore, Fuels and Incineration Group, U.S. Environmental Protection Agency, Research Triangle Park, NC. Summary of the October 12, 2010 Meeting Between the EPA andAmerican Petroleum Institute. July 28, 2011.

10. U.S. Energy Information Administration.Table 4a.U.S. Crude Oil and Liquid Fuels Supply, Consumption, and Inventories. Available on the Internet at http://www.eia.gov/emeu/steo/pub/cf_tables/steotables.cfm?tableNumber=9

11. Memorandum from Wilson, D., et al, ERG, to A. Pope, U.S. Environmental Protection Agency.Documentation for NEI Updates for Oil and Natural Gas Production and Natural Gas Transmission and Storage.March 15, 2011.

12. Economic Indicators: Chemical Engineering Plant Cost Index. Chemical Engineering Magazine.

13. U.S. Environmental Protection Agency. AP 42, Fifth Edition, Volume I, Chapter 13.5 Industrial Flares.Office of Air Quality Planning & Standards. 1991

14. U.S. Environmental Protection Agency. Air Pollution Control Technology Fact Sheet: FLARES. Clean Air Technology Center.

15. Hendler, A., URS Corporation, Austin, TX, et al. VOC Emissions From Oil and Condensate Storage Tanks. Prepared for Texas Environmental Research Consortium, The Woodlands, TX. October 31, 2006 (revised April 2, 2009).

8.0 EQUIPMENT LEAKS

Leaks from components in the oil and natural gas sector are a source of pollutant emissions. This chapter explains the causes for these leaks, and provides emission estimates for "model" facilities in the various segments of the oil and gas sector. In addition, nationwide equipment leak emission estimates from new sources are estimated. Programs that are designed to reduce equipment leak emissions are explained, along with costs, emission reductions, and secondary impacts. Finally, this chapter discusses considerations in developing regulatory alternatives for equipment leaks.

8.1 Equipment Leak Description

There are several potential sources of equipment leak emissions throughout the oil and natural gas sector. Components such as pumps, valves, pressure relief valves, flanges, agitators, and compressors are potential sources that can leak due to seal failure. Other sources, such as open-ended lines, and sampling connections may leak for reasons other than faulty seals. In addition, corrosion of welded connections, flanges, and valves may also be a cause of equipment leak emissions. The following sub-sections describe potential equipment leak sources and the magnitude of the volatile emissions from typical facilities in the oil and gas industry.

Due to the large number of valves, pumps, and other components within oil and natural gas production, processing, and/or transmission facilities, total equipment leak VOC emissions from these components can be significant. Tank batteries or production pads are generally small facilities as compared with other oil and gas operations, and are generally characterized by a small number of components. Natural gas processing plants, especially those using refrigerated absorption, and transmission stations tend to have a large number of components.

8.2. Equipment leak Emission Data and Emissions Factors

8.2.1 Summary of Major Studies and Emission Factors

Emissions data from equipment leaks have been collected from chemical manufacturing and petroleum production to develop control strategies for reducing HAP and VOC emissions from these sources.[1,2,3] In the evaluation of the emissions and emission reduction options for equipment leaks, many of these studies were consulted. Table 8-1 presents a list of the studies consulted along with an indication of the type of information contained in the study.

8.2.2 Model Plants

Facilities in the oil and gas sector can consist of a variety of combinations of process equipment and components. This is particularly true in the production segment of the industry, where "surface sites" can vary from sites where only a wellhead and associated piping is located to sites where a substantial amount of separation, treatment, and compression occurs. In order to conduct analyses to be used in evaluating potential options to reduce emissions from leaking equipment, a model plant approach was used. The following sections discuss the creation of these model plants.

Information related to equipment counts was obtained from a natural gas industry report. This document provided average equipment counts for gas production, gas processing, natural gas transmission and distribution. These average counts were used to develop model plants for wellheads, well pads, and gathering line and boosting stations in the production segment of the industry, for a natural gas processing plant, and for a compression/transmission station in the natural gas transmission segment. These equipment counts are consistent with those contained in EPA's analysis to estimate methane emissions conducted in support of the Greenhouse Gas Mandatory Reporting Rule (subpart W), which was published in the *Federal Register* on November 30, 2010 (75 FR 74458), These model plants are discussed in the following sections.

8.2.2.1 Oil and Natural Gas Production

Oil and natural gas production varies from site-to site. Many production sites may include only a wellhead that is extracting oil or natural gas from the ground. Other production sites consist of wellheads attached to a well pad. A well pad is a site where the production, extraction, recovery, lifting, stabilization, separation and/or treating of petroleum and/or natural gas (including condensate) occurs. These sites include all equipment (including piping and associated components, compressors, generators, separators, storage vessels, and other equipment) associated with these operations. A well pad can serve one well on a pad or several wells on a pad. A wellhead site consisting of only the wellhead and affiliated piping is not considered to be a well pad. The number of wells feeding into a well pad can vary from one to as many as 7 wells. Therefore, the number of components with potential for equipment leaks can vary depending on the number of wells feeding into the production pad and the amount of processing equipment located at the site.

Table 8-1. Major Studies Reviewed for Consideration or Emissions and Activity Data

Report Name	Affiliation	Year of Report	Activity Factor (s)	Emissions Data	Control Options
Greenhouse Gas Mandatory Reporting Rule and Technical Supporting Documents	EPA	2010	Nationwide	X	X
Inventory of Greenhouse Gas Emissions and Sinks: 1990-2008[4]	EPA	2010	Nationwide	X	
Methane Emissions from the Natural Gas Industry[5,6,7]	Gas Research Institute / EPA	1996	Nationwide	X	X
Methane Emissions from the US Petroleum Industry (Draft) [8]	EPA	1996	Nationwide	X	
Methane Emissions from the US Petroleum Industry [9]	EPA	1999	Nationwide	X	
Oil and Gas Emission Inventories for Western States [10]	Western Regional Air Partnership	2005	Regional	X	X
Recommendations for Improvements to the Central States Regional Air Partnership's Oil and Gas Emission Inventories [11]	Central States Regional Air Partnership	2008	Regional	X	X
Oil and Gas Producing Industry in Your State[12]	Independent Petroleum Association of America	2009	Nationwide		
Emissions from Natural Gas Production in the Barnett Shale and Opportunities for Cost-effective Improvements [13]	Environmental Defense Fund	2009	Regional	X	X
Emissions from oil and Natural Gas Production Facilities [14]	Texas Commission for Environmental Quality	2007	Regional	X	X
Petroleum and Natural Gas Statistical Data[15]	U.S. Energy Information Administration	2007-2009	Nationwide		
Preferred and Alternative Methods for Estimating Air Emissions from Oil and Gas Field Production and Processing Operations [16]	EPA	1999		X	X
Protocol for Equipment Leak Emission Estimates[17]	EPA	1995	Nationwide	X	X

In addition to wellheads and well pads, model plants were developed for gathering lines and boosting stations. The gathering lines and boosting stations are sites that collect oil and gas from well pads and direct them to the gas processing plants. These stations have similar equipment to well pads; however they are not directly connected to the wellheads.

The EPA/GRI report provided the average number of equipment located at a well pad and the average number of components for each of these pieces of equipment.[4]The type of production equipment located at a well pad include: gas wellheads, separators, meters/piping, gathering compressors, heaters, and dehydrators. The types of components that are associated with this equipment include: valves, connectors, open-ended lines, and pressure relief valves. Four model plants were developed for well pads and are presented in Table 8-2. These model plants were developed starting with one, three, five and seven wellheads, and adding the average numberof other pieces of equipment per wellhead. Gathering compressors are not included at well pads and were included in the equipment for gathering lines and boosting stations.

Component counts for each of the equipment items were calculated using the average component counts for gas production equipment in the Eastern U.S and the Western U.S. for the EPA/GRI document. A summary of the component counts for oil and gas production well pads is presented in Table 8-3.

Gathering line and boosting station model plants were developed using the average equipment counts for oil and gas production. The average equipment count was assigned Model Plant 2 and Model Plants 1 and 3 were assumed to be equally distributed on either side of the average equipment count. Therefore, Model Plant 1 can be assumed to be a small gathering and boosting station, and Model Plant 3 can be assumed to be a large gathering and boosting station. A summary of the model plant production equipment counts for gathering lines and boosting stations is provided in Table 8-4.

Component counts for each of the equipment items were calculated using the average component counts for gas production equipment in the Eastern U.S and the Western U.S. from the EPA/GRIdocument. The components for gathering compressors were included in the model plant total counts, but the compressor seals were excluded. Compressors seals are addressed in a Chapter 6 of this document. A summary of the component counts for oil and gas gathering line and boosting stations are presented in Table 8-5.

Table 8-2.Average Equipment Count for Oil and Gas Production Well Pad Model Plants

Equipment	Model Plant 1	Model Plant 2	Model Plant 3
Gas Wellheads	1	5	48
Separators	---	4	40
Meter/Piping	---	2	24
In-Line Heaters	---	2	26
Dehydrators	---	2	19

Data Source: EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks, Table 4-4 and Table 4-7, June 1996. (EPA-600/R-96-080h)

Table 8-3.Average Component Count for Oil and Gas Production Well Pad Model Plants

Component	Model Plant 1	Model Plant 2	Model Plant 3	Model Plant 4
Valve	9	122	235	348
Connectors	37	450	863	1,276
Open-Ended Line	1	15	29	43
Pressure Relief Valve	0	5	10	15

Data Source: EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks, Table 4-4 and 4-7, June 1996. (EPA-600/R-96-080h)

Table 8-4.Average Equipment Count for Oil and Gas Production Gathering Line and Boosting Station Model Plants

Equipment	Model Plant 1	Model Plant 2	Model Plant 3
Separators	7	11	15
Meter/Piping	4	7	10
Gathering Compressors	3	5	7
In-Line Heaters	4	7	10
Dehydrators	3	5	7

Data Source: EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks, Table 4-4 and Table 4-7, June 1996. (EPA-600/R-96-080h)

Table 8-5. Average Component Count for Oil and Gas Production Gathering Line and Boosting Station Model Plants

Component	Model Plant 1	Model Plant 2	Model Plant 3
Valve	547	906	1,265
Connectors	1,723	2,864	4,005
Open-Ended Line	51	83	115
Pressure Relief Valve	29	48	67

DataSource: EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8:Equipment Leaks, Table 4-4 and 4-7, June 1996. (EPA-600/R-96-080h)

8.2.2.2 Oil and Natural Gas Processing

Natural gas processing involves the removal of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. The types of process equipment used to separate the liquids are separators, glycol dehydrators, and amine treaters. In addition, centrifugal and/or reciprocating compressors are used to pressurize and move the gas from the processing facility to the transmission stations.

New Source Performance Standards (NSPS) have already been promulgated for equipment leaks at new natural gas processing plants (40 CFR Part 60, subpart KKK), and were assumed to be the baseline emissions for this analysis. Only one model plant was developed for the processing sector. A summary of the model plant production components counts for an oil and gas processing facility is provided in Table 8-6.

8.2.2.3 Natural Gas Transmission/Storage

Natural gas transmission/storage stations are facilities that use compressors that move natural gas at elevated pressure from production fields or natural gas processing facilities, in transmission pipelines, to natural gas distribution pipelines, or into storage. In addition, transmission stations may include equipment for liquids separation, natural gas dehydration, and tanks for the storage of water and hydrocarbon liquids. Residue (sales) gas compression operated by natural gas processing facilities are included in the onshore natural gas processing segment and are excluded from this segment. This source category also does not include emissions from gathering lines and boosting stations. Component counts were obtained from the EPA/GRI report and are presented in Table 8-7.

8.3 Nationwide Emissions from New Sources

8.3.1 Overview of Approach

Nationwide emissions were calculated by using the model plant approach for estimating emissions. Baseline model plant emissions for the natural gas production, processing, and transmission sectors were calculated using the component counts and the component gas service emission factors.[5] Annual emissions were calculated assuming 8,760 hours of operation each year. The emissions factors are provided for total organic compounds (TOC) and include non-VOCs such as methane and ethane. The emission factors for the production and processing sectors that were used to estimate the new source emissions are presented in Table 8-8. Emission factors for the transmission sector are presented in

Table 8-6.Average Component Count for Oil and Gas Processing Model Plant

Component	Gas Plant (non-compressor components)
Valve	1,392
Connectors	4,392
Open-Ended Line	134
Pressure Relief Valve	29

Data Source: EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks, Table 4-13, June 1996. (EPA-600/R-96-080h)

Table 8-7.Average Component Count for a Gas TransmissionFacility

Component	Processing Plant Component Count
Valve	704
Connection	3,068
Open-Ended Line	55
Pressure Relief Valve	14

Data Source: EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks, Table 4-16, June 1996. (EPA-600/R-96-080h)

Table 8-8 Oil and Gas Production and Processing Operations Average Emissions Factors

Component Type	Component Service	Emission Factor (kg/hr/source)
Valves	Gas	4.5E-03
Connectors	Gas	2.0E-04
Open-Ended Line	Gas	2.0E-03
Pressure Relief Valve	Gas	8.8E-03

Data Source: EPA, Protocol for Equipment Leak Emission Estimates, Table 2-4, November 1995. (EPA-453/R-95-017)

Table 8-9. Emissions for VOC, hazardous air pollutants (HAP), and methane were calculated using TOC weight fractions.[6] A summary of the baseline emissions for each of the sectors are presented in Table 8-10.

8.3.2 Activity Data

Data from oil and gas technical documents and inventories were used to estimate the number of new sources for each of the oil and gas sectors. Information from the Energy Information Administration (EIA) was used to estimate the number of new wells, well pads, and gathering and boosting stations. The number of processing plants and transmission/storage facilities was estimated using data from the Oil and Gas Journal, and the EPA Greenhouse Gas Inventory. A summary of the steps used to estimate the new sources for each of the oil and gas sectors is presented in the following sections.

8.3.2.1 Well Pads

The EIA provided a forecast of the number of new conventional and unconventional gas wells for the Year 2015 for both exploratory and developmental wells. The EIA projected 19,097 conventional and unconventional gas wells in 2015. The number of wells was converted to number of well pads by dividing the total number of wells by the average number of wells serving a well pad which is estimated to be 5. Therefore, the number of new well pads was estimated to be 3,820. The facilities were divided into the model plants assuming a normal distribution of facilities around the average model plant (Model Plant 2).

8.3.2.2 Gathering and Boosting

The number of new gathering and boosting stations was estimated using the current inventory of gathering compressors listed in the EPA Greenhouse Gas Inventory. The total number of gathering compressors was listed as 32,233 in the inventory. The GRI/EPA document does not include a separate list of compressor counts for gathering and boosting stations, but it does list the average number of compressors in the gas production section. It was assumed that this average of 4.5 compressors for gas production facilities is applicable to gathering and boosting stations. Therefore, using the inventory of 32,233 compressors and the average number of 4.5 compressors per facility, we estimated the number of gathering and boosting stations to be 7,163. To estimate the number of new gathering and boosting stations, we used the same increase of 3.84 percent used to estimate well pads to estimate the number of new gathering and boosting stations. This provided an estimate of 275 new gathering and boosting

Table 8-9 Oil and Gas Transmission/Storage Average Emissions Factors

Component Type	Component Service	Emission Factor (kg/hr/source)
Valves	Gas	5.5E-03
Connectors	Gas	9.3E-04
Open-Ended Line	Gas	7.1E-02
Pressure Relief Valve	Gas	3.98E-02

Data Source:EPA/GRI, Methane Emissions from the Natural Gas Industry, Volume 8: Equipment Leaks, Table 4-17, June 1996. (EPA-600/R-96-080h)

Table 8-10. Baseline Emissions for the Oil and Gas Production, Processing, and Transmission/Storage Model Plants

Oil and Gas Sector	Model Plant	TOC Emissions (Tons/yr)	Methane Emissions (Tons/yr)	VOC Emissions (Tons/yr)	HAP Emissions (Tons/yr)
Well Pads	1	0.482	0.335	0.0930	0.00351
	2	13.3	9.24	2.56	0.0967
	3	139	96.5	26.8	1.01
Gathering & Boosting	1	30.5	21.2	5.90	0.222
	2	50.6	35.2	9.76	0.368
	3	70.6	49.1	13.6	0.514
Processing	1	74.0	51.4	14.3	0.539
Transmission/Storage	1	108.1	98.1	2.71	0.0806

stations that would be affected sources under the proposed NSPS. The new gathering and boosting stations were assumed to be normally distributed around the average model plant (Model Plant 2).

8.3.2.3 Processing Facilities

The number of new processing facilities was estimated using gas processing data from the Oil and Gas Journal. The Oil and Gas Journal Construction Survey currently shows 6,303 million cubic feet of gas per day (MMcf/day) additional gas processing capacity in various stages of development. The OGJ Gas Processing Survey shows that there is 26.9 trillion cubic feet per year (tcf/year) in existing capacity, with a current throughput of 16.6 tcf/year or 62 percent utilization rate. If the utilization rate remains constant, the new construction would add approximately 1.4 tcf/year to the processing system. This would be an increase of 8.5 percent to the processing sector. The recent energy outlook published by the EIApredicts a 1.03 tcf/year increase in natural gas processing from 21.07 to22.104 tcf/year. This would be an annual increase of 5 percent over the next five years.

The EPA Greenhouse Gas Inventory estimates the number of existing processing facilities to be 577 plants operating in the U.S. Based on the projections provided in Oil and Gas Journal and EIA, it was assumed that the processing sector would increase by 5 percent annually. Therefore the number of new sources was estimated to be 29 new processing facilities in the U.S.

8.3.2.4 Transmission/Storage Facilities

The number of new transmission and storage facilities was estimated using the annual growth rate of 5 percent used for the processing sector and the estimated number of existing transmission and storage facilities in the EPA Greenhouse Inventory. The inventory estimates 1,748 transmission stations and 400 storage facilities for a total of 2,148. Therefore, the number of new transmission/storage facilities was estimated to be 107.

8.3.3 Emission Estimates

Nationwide emission estimates for the new sources for well pads, gathering and boosting, processing, and transmission/storage are summarized in Table 8-11. For well pads and gathering and boosting stations, the numbers of new facilities were assumed to be normally distributed across the range of model plants.

Table 8-11. Nationwide Baseline Emissions for New Sources

Oil and Gas Sector	Model Plant	Number of New Facilities	TOC Emissions (tons/yr)	Methane Emissions (tons/yr)	VOC Emissions (tons/yr)	HAP Emissions (tons/yr)
Well Pads	1	605	292	203	56.3	2.12
	2	2,610	34,687	24,116	6,682	252
	3	605	84,035	58,389	16,214	612
	Total	3,820	119,014	82,708	22,952	866
Gathering & Boosting	1	44	1,312	912	254	9.55
	2	187	9,513	6,618	1,835	69.2
	3	44	3,106	2,160	598	22.6
	Total	275	13,931	9,690	2,687	101
Processing	1	29	2,146	1,490	415	15.6
Transmission/Storage	1	107	11,567	10,497	290	8.62

8.4 Control Techniques

8.4.1 Potential Control Techniques

EPA has determined that leaking equipment, such as valves, pumps, and connectors, are a significant source of VOC and HAP emissions from oil and gas facilities. The following section describes the techniques used to reduce emissions from these sources.

The most effective control technique for equipment leaks is the implementation of a leak detection and repair program (LDAR). Emissions reductions from implementing an LDAR program can potentially reduce product losses, increase safety for workers and operators, decrease exposure of hazardous chemicals to the surrounding community, reduce emissions fees, and help facilities avoid enforcement actions. The elements of an effective LDAR program include:

- Identifying Components;
- Leak Definition;
- Monitoring Components;
- Repairing Components; and
- Recordkeeping.

The primary source of equipment leak emissions from oil and gas facilities are from valves and connectors, because these are the most prevalent components and can number in the thousands. The major cause of emissions from valves and connectors is a seal or gasket failure due to normal wear or improper maintenance. A leak is detected whenever the measured concentration exceeds the threshold standard (i.e., leak definition) for the applicable regulation. Leak definitions vary by regulation, component type, service (e.g., light liquid, heavy liquid, gas/vapor), and monitoring interval. Most NSPS regulations have a leak definition of 10,000 ppm, while many NESHAP regulations use a 500-ppm or 1,000-ppm leak definition. In addition, some regulations define a leak based on visual inspections and observations (such as fluids dripping, spraying, misting or clouding from or around components), sound (such as hissing), and smell.

For many NSPS and NESHAP regulations with leak detection provisions, the primary method for monitoring to detect leaking components is EPA Reference Method 21 (40 CFR Part 60, Appendix A). Method 21 is a procedure used to detect VOC leaks from process equipment using toxic vapor analyzer (TVA) or organic vapor analyzer (OVA). In addition, other monitoring tools such as; infrared camera, soap solution, acoustic leak detection, and electronic screening device, can be used to monitor process components.

In optical gas imaging, a live video image is produced by illuminating the view area with laser light in the infrared frequency range. In this range, hydrocarbons absorb the infrared light and are revealed as a dark image or cloud on the camera. The passive infrared cameras scan an area to produce images of equipment leaks from a number of sources. Active infrared cameras point or aim an infrared beam at a potential source to indicate the presence of equipment leaks. The optical imaging camera is easy to use and very efficient in monitoring many components in a short amount of time. However, the optical imaging camera cannot quantify the amount or concentration of equipment leak. To quantify the leak, the user would need to measure the concentration of the leak using a TVA or OVA. In addition, the optical imaging camera has a high upfront capital cost of purchasing the camera.

Acoustic leak detectors measure the decibel readings of high frequency vibrations from the noise of leaking fluids from equipment leaks using a stethoscope-type device. The decibel reading, along with the type of fluid, density, system pressure, and component type can be correlated into leak rate by using algorithms developed by the instrument manufacturer. The acoustic detector does not decrease the monitoring time because components are measured separately, like the OVA or TVA monitoring. The accuracy of the measurements using the acoustic detector can also be questioned due to the number of variables used to determine the equipment leak emissions.

Monitoring intervals vary according to the applicable regulation, but are typically weekly, monthly, quarterly, and yearly. For connectors, the monitoring interval can be every 1, 2, 4, or 8 years. The monitoring interval depends on the component type and periodic leak rate for the component type. Also, many LDAR requirements specify weekly visual inspections of pumps, agitators, and compressors for indications of liquids leaking from the seals. For each component that is found to be leaking, the first attempt at repair is to be made no later than five calendar days after each leak is detected. First attempts at repair include, but are not limited to, the following best practices, where practicable and appropriate:

- Tightening of bonnet bolts;

- Replacement of bonnet bolts;
- Tightening of packing gland nuts; and
- Injection of lubricant into lubricated packing.

Once the component is repaired; it should be monitored daily over the next several days to ensure the leak has been successfully repaired. Another method that can be used to repair component is to replace the leaking component with "leakless" or other technologies.

The LDAR recordkeeping requirement for each regulated process requires that a list of all ID numbers be maintained for all equipment subject to an equipment leak regulation. A list of components that are designated as "unsafe to monitor" should also be maintained with an explanation/review of conditions for the designation. Detailed schematics, equipment design specifications (including dates and descriptions of any changes), and piping and instrumentation diagrams should also be maintained with the results of performance testing and leak detection monitoring, which may include leak monitoring results per the leak frequency, monitoring leakless equipment, and non-periodic event monitoring.

Other factors that can improve the efficiency of an LDAR program that are not addressed by the standards include training programs for equipment monitoring personnel and tracking systems that address the cost efficiency of alternative equipment (e.g., competing brands of valves in a specific application).

The first LDAR option is the implementation of a subpart VVa LDAR program. This program is similar to the VV monitoring, but finds more leaks due to the lower leak definition, thereby achieving better emission reductions. The VVa LDAR program requires the annual monitoring of connectors using an OVA or TVA (10,000 ppm leak definition), monthly monitoring of valves (500 ppm leak definition) and requires open-ended lines and pressure relief devices to operate with no detectable emissions (500 ppm leak definition). The monitoring of each of the equipment types were also analyzed as a possible option for reducing equipment leak emissions. The second option involves using the monitoring requirements in subpart VVa for each type of equipment which include: valves; connectors; pressure relief devices; and open-ended lines for each of the oil and gas sectors.

The thirdoption that was investigated was the implementation of a LDAR program using an optical gas imaging system. This option is currently available as an alternative work practice (40 CFR Part 60, subpart A) for monitoring emissions from equipment leaks in subpart VVa. The alternative work practice requires monthly monitoring of all components using the optical gas imaging system and an

annual monitoring of all components using a Method 21 monitoring device. The Method 21 monitoring allows the facility to quantify emissions from equipment leaks, since the optical gas imaging system can only provide the magnitude of the equipment leaks.

A fourth option that was investigated is a modification of the 40 CFR Part 60, subpart Aalternative work practice. The alternative work practice was modified by removing the required annual monitoring using a Method 21 instrument. This option only requires the monthly monitoring of components using the optical gas imaging system.

8.4.2 Subpart VVa LDAR Program

8.4.2.1 Description

The subpart VVa LDAR requires the monitoring of pumps, compressors, pressure relief devices, sampling connection systems, open-ended lines, valves, and connectors. These components are monitored with an OVA or TVA to determine if a component is leaking and measure the concentration of the organics if the component is leaking. Connectors, valves, and pressure relief devices have a leak definition of 500 parts per million by volume (ppmv). Valves are monitored monthly, connectors are monitored annually, and open-ended lines and pressure relief valves have no monitoring requirements, but are required to operate without any detectable emissions. Compressors are not included in this LDAR option and are regulated separately.

8.4.2.2 Effectiveness

The control effectiveness of the LDAR program is based on the frequency of monitoring, leak definition, frequency of leaks, percentage of leaks that are repaired, and the percentage of reoccurring leaks. A summary of the chemical manufacturing and petroleum refinery control effectiveness for each of the components is shown in Table 8-12. As shown in the table the control effectiveness for all of the components varies from 45 to 96 percent and is dependent on the frequency of monitoring and the leak definition. Descriptions of the frequency of monitoring and leak definition are described further below.

> Monitoring Frequency: The monitoring frequency is the number of times each component is checked for leaks. For an example, quarterly monitoring requires that each component be checked for leaks 4 times per year, and annual monitoring requires that each component be checked for leaks once per year. As shown in Table 8-12, monthly monitoring provides higher control effectiveness than quarterly

Table 8-12. Control Effectiveness for an LDAR program at a Chemical Process Unit and a Petroleum Refinery

Equipment Type and Service	Control Effectiveness (% Reduction)		
	Monthly Monitoring 10,000 ppmv Leak Definition	Quarterly Monitoring 10,000 ppmv Leak Definition	500 ppm Leak Definition[a]
Chemical Process Unit			
Valves – Gas Service[b]	87	67	92
Valves – Light Liquid Service[c]	84	61	88
Pumps – Light Liquid Service[c]	69	45	75
Connectors – All Services	---	---	93
Petroleum Refinery			
Valves – Gas Service[b]	88	70	96
Valves – Light Liquid Service[c]	76	61	95
Pumps – Light Liquid Service[c]	68	45	88
Connectors – All Services	---	---	81

Source: Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017, Nov 1995.

a. Control effectiveness attributable to the HON-negotiated equipment leak regulation (40 CFR 63, Subpart H) is estimated based on equipment-specific leak definitions and performance levels. However, pumps subject to the HON at existing process units have a 1,000 to 5,000 ppm leak definition, depending on the type of process.

b. Gas (vapor) service means the material in contact with the equipment component is in a gaseous state at the process operating conditions.

c. Light liquid service means the material in contact with the equipment component is in a liquid state in which the sum of the concentration of individual constituents with a vapor pressure above 0.3 kilopascals (kPa) at 20°C is greater than or equal to 20% by weight.

monitoring. This is because leaking components are found and repaired more quickly, which lowers the amount of emissions that are leaked to the atmosphere.

> Leak Definition: The leak definition describes the local VOC concentration at the surface of a leak source that indicates that a VOC emission (leak) is present. The leak definition is an instrument meter reading based on a reference compound. Decreasing the leak definition concentration generally increases the number of leaks found during a monitoring period, which generally increases the number of leaks that are repaired.

The control effectiveness for the well pad, gathering and boosting stations, processing facilities, and transmissions and storage facilities were calculated using the LDAR control effectiveness and leak fraction equations for oil and gas production operation units in the EPA equipment leaks protocol document. The leak fraction equation uses the average leak rate (e.g., the component emission factor) and leak definition to calculate the leak fraction.[7] This leak fraction is used in a steady state set of equations to determine the final leak rate after implementing a LDAR program.[8] The initial leak rate and the final leak rate after implementing a LDAR program were then used to calculate the control effectiveness of the program. The control effectiveness for implementing a subpart VVa LDAR program was calculated to be 93.6 perccent for valves, 95.9 percent for connectors, 100 percent for open-ended lines, and 100 percent for pressure relief devices.

8.4.2.3 Cost Impacts

Costs were calculated using a LDAR cost spreadsheet developedfor estimating capital and annual costs for applying LDAR to the Petroleum Refinery and Chemical Manufacturing industry. The costs are based on the following assumptions:

- Subpart VVa monitoring frequency and leak definition were used for processing plants since they are already required to do subpart VV requirements. Connectors were assumed to be monitored over a 4-year period after initial annual compliance monitoring.
- Initial monitoring and setup costs are $17.70 for valves, $1.13 per connector, $78.00 for pressure relief valve disks, $3,852 for pressure relief valve disk holder and valves, and $102 for open-ended lines.
- Subsequent monitoring costs are $1.50 for valves and connectors, $2.00 for pressure relief valve disks, and $5.00 for pressure relief valve devices and open-ended lines.
- A wage rate of $30.46 per hour was used to determine labor costs for repair.

- Administrative costs and initial planning and training costs are based on the Miscellaneous Organic NESHAP (MON) analysis. The costs were based on 340 hours for planning and training and 300 hours per year for reporting and administrative tasks at $48.04 per hour.
- The capital cost also includes $14,500 for a data collection system for maintaining the inventory and monitoring records for the components at a facility.
- Recovery credits were calculated assuming the methane reduction has a value of $4.00 per 1000 standard cubic feet.

It was assumed that a single Method 21 monitoring device could be used at multiple locations for production pads, gathering and boosting stations, and transmission and storage facilities. To calculate the shared cost of the Method 21 device, the time required to monitor a single facility was estimated. For production pads and gathering and boosting stations, it was assumed that it takes approximately 1 minute to monitor a single component, and approximately 451 components would have to be monitored at an average facility in a month. This calculates to be 451 minutes or 7.5 hours per day. Assuming 20 working days in a typical month, a single Method 21 device could monitor 20 facilities. Therefore, the capital cost of the Method 21 device ($6,500) was divided by 20 to get a shared capital cost of $325 per facility. It was assumed for processing facilities that the full cost of the Method 21 monitoring device would apply to each individual plant. The transmission and storage segment Method 21 device cost was estimated using assuming the same 1 minute per component monitoring time. The average number of components that would need to be monitored in a month was estimated to be 1,440, which calculates to be 24 hours of monitoring time or 3 days. Assuming the same 20 day work month, the total number of facilities that could be monitored by a single Method 21 device is 7. Therefore, the shared cost of the Method 21 monitoring device was calculated to be $929 per site.

A summary of the capital and annual costs and the cost effectiveness for each of the model plants in the oil and gas sectors are provided in Table 8-13. In addition to the full subpart VVa LDAR monitoring, a component by component LDAR analysis was performed for each of the oil and gas sectors using the component count for an average size facility. This Model Plant 2 for well pads, Model Plant 2 for gathering and boosting stations, and Model Plant 1 for processing plants and transmission and storage facilities.

Table 8-13. Summary of the Model Plant Cost Effectiveness for the Subpart VVa Option

Model Plant	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/year)		Cost Effectiveness ($/ton)		
	VOC	HAP	Methane		without savings	with savings	VOC	HAP	Methane
Well Pads									
1	0.0876	0.00330	0.315	$15,418	$23,423	$23,350	$267,386	$7,088,667	$74,253
2	2.43	0.0915	8.73	$69,179	$37,711	$35,687	$15,549	$412,226	$4,318
3	25.3	0.956	91.3	$584,763	$175,753	$154,595	$6,934	$183,835	$1,926
Gathering and Boosting Stations									
1	5.58	0.210	20.1	$148,885	$57,575	$52,921	$10,327	$273,769	$2,868
2	9.23	0.348	33.2	$255,344	$84,966	$77,259	$9,203	$243,987	$2,556
3	12.9	0.486	46.4	$321,203	$105,350	$94,591	$8,174	$216,692	$2,270
Processing Plants									
1	13.5	0.508	48.5	$7,522	$45,160	$33,915	$3,352	$88,870	$931
Transmission/Storage Facilities									
1	2.62	0.0780	94.9	$94,482	$51,875	N/A	$19,769	$665,155	$546

Note: Transmission and storage facilities do not own the natural gas; therefore they do not receive any cost benefits from reducing the amount of natural gas as the result of equipment leaks.

The component costs were calculated using a LDAR cost spreadsheet developedfor estimating capital and annual costs for applying LDAR to the Petroleum Refinery and Chemical Manufacturing industry. The costs are based on the following assumptions:

- Initial monitoring and setup costs are $17.70 for valves, $1.13 per connector, $78.00 for pressure relief valve disks, $3,852 for pressure relief valve disk holder and valves, and $102 for open-ended lines.
- Subsequent monitoring costs are $1.50 for valves and connectors, $2.00 for pressure relief valve disks, and $5.00 for pressure relief valve devices and open-ended lines.
- A wage rate of $30.46 per hour was used to determine labor costs for repair.
- Administrative costs and initial planning and training costs are were included for the component option and are based on the Miscellaneous Organic NESHAP (MON) analysis. The costs were based on 340 hours for planning and training and 300 hours per year for reporting and administrative tasks at $48.04 per hour.
- The capital cost for purchasing a TVA or OVA monitoring system was estimated to be $6,500.

The component control effectiveness for the subpart VVa component option were 93.6 percent for valves, 95.9 percent for connectors, 100 percent for open-ended lines, and 100 percent for pressure relief devices. These were the same control effectiveness's that were used for the subpart VVa facility option. The control effectiveness for the modified subpart VVa option with less frequent monitoring was estimated assuming the control effectiveness follows a hyperbolic curve or a 1/x relationship with the monitoring frequency. Using this assumption the component cost effectiveness's were determined to be 87.2 percent for valves, 81.0 percent for connectors, 100 percent for open-ended lines, and 100 percent for pressure relief devices. The assumption is believed to provide a conservative estimate of the control efficiency based on less frequent monitoring. A summary of the capital and annual costs and the cost effectiveness for each of the components for each of the oil and gas sectors are provided in Tables 8-14, 8-15, 8-16, and 8-17.

8.4.2.4 Secondary Impacts

The implementation of a LDAR program reduces pollutant emissions from equipment leaks. No secondary gaseous pollutant emissions or wastewater are generated during the monitoring and repair of equipment leaks. Therefore, there are no secondary impacts expected from the implementation of a LDAR program.

Table 8-14. Summary of Component Cost Effectiveness for Well Pads for the Subpart VVa Options

Component	Average Number of Components	Monitoring Frequency (Times/yr)	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/yr)	Cost-effectiveness ($/ton)		
			VOC	HAP	Methane			VOC	HAP	Methane
Subpart VVa Option										
Valves	235	12	1.84	0.0696	6.64	$11,175	$27,786	$15,063	$399,331	$4,183
Connectors	863	1/0.25[a]	0.308	0.0116	1.11	$7,830	$22,915	$74,283	$1,969,328	$20,628
PRD	10	0	0.164	0.00619	0.591	$48,800	$29,609	$180,537	$4,786,215	$50,135
OEL	29	0	0.108	0.00408	0.389	$9,458	$22,915	$211,992	$5,620,108	$58,870
Modified Subpart VVa– Less Frequent Monitoring										
Valves	235	1	1.31	0.0496	4.73	$11,175	$23,436	$17,828	$472,640	$4,951
Connectors	863	1/0.125[b]	0.261	0.00983	0.938	$7,830	$22,740	$87,277	$2,313,795	$24,237
PRD	5	0	0.164	0.00619	0.591	$48,800	$29,609	$180,537	$4,786,215	$50,135
OEL	29	0	0.108	0.00408	0.389	$9,458	$22,915	$211,992	$5,620,108	$58,870

Minor discrepancies may be due to rounding.

a. It was assumed that all the connectors are monitored in the first year for initial compliance and every 4 years thereafter.

b. It was assumed that all the connectors are monitored in the first year for initial compliance and every 8 years thereafter.

Table 8-15. Summary of Component Cost Effectiveness for Gathering and Boosting Stations for the Subpart VVa Options

Component	Average Number of Components	Monitoring Frequency (Times/yr)	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/yr)	Cost-effectiveness ($/ton)		
			VOC	HAP	Methane			VOC	HAP	Methane
Subpart VVa Option										
Valves	906	12	7.11	0.268	25.6	$24,524	$43,234	$6,079	$161,162	$1,688
Connectors	2,864	1/0.25[a]	1.02	0.0386	3.69	$10,914	$24,164	$23,603	$625,752	$6,555
PRD	48	0	0.787	0.0297	2.83	$195,140	$57,091	$72,523	$1,922,648	$20,139
OEL	83	0	0.309	0.0117	1.11	$14,966	$23,917	$77,310	$2,049,557	$21,469
Modified Subpart VVa – Less Frequent Monitoring										
Valves	906	1	5.07	0.191	18.2	$24,524	$24,461	$5,221	$138,417	$1,450
Connectors	2,864	1/0.125[b]	0.865	0.0326	3.11	$10,914	$23,584	$27,274	$723,067	$7,574
PRD	48	0	0.787	0.0297	2.83	$195,140	$57,091	$72,523	$1,922,648	$20,139
OEL	83	0	0.309	0.0117	1.11	$14,966	$23,917	$77,310	$2,049,557	$21,469

Minor discrepancies may be due to rounding.

a. It was assumed that all the connectors are monitored in the first year for initial compliance and every 4 years thereafter.
b. It was assumed that all the connectors are monitored in the first year for initial compliance and every 8 years thereafter.

Table 8-16. Summary of Incremental Component Cost Effectiveness for Processing Plants for the Subpart VVa Option

Component	Average Number of Components	Monitoring Frequency (Times/yr)	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/yr)	Cost-effectiveness ($/ton)		
			VOC	HAP	Methane			VOC	HAP	Methane
Incremental Component Cost for Subpart VV to Subpart VVa Option										
Valves	1,392	12	10.9	0.412	39.3	$6,680	$1,576	$144	$3,824	$40
Connectors	4,392	1/0.25[a]	1.57	0.0592	5.65	$2,559	$6,845	$4,360	$115,585	$1,211
PRD	29	0	0.499	0.0188	1.80	$0	$0	$0	$0	$0
OEL	134	0	0.476	0.0179	1.71	$0	$0	$0	$0	$0

Minor discrepancies may be due to rounding.

a. It was assumed that all the connectors are monitored in the first year for initial compliance and every 4 years thereafter.

Table 8-17. Summary of Component Cost Effectiveness for Transmission and Storage Facilities for the Subpart VVa Options

Component	Average Number of Components	Monitoring Frequency (Times/yr)	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/yr)	Cost-effectiveness ($/ton)		
			VOC	HAP	Methane			VOC	HAP	Methane
Subpart VVa Option										
Valves	673	12	0.878	0.0261	31.8	$19,888	$37,870	$43,111	$1,450,510	$1,192
Connectors	3,068	1/0.25[a]	0.665	0.0198	24.1	$11,229	$24,291	$36,527	$1,229,005	$1,010
PRD	14	0	0.133	0.00397	4.83	$61,520	$32,501	$243,525	$8,193,684	$6,732
OEL	58	0	0.947	0.0282	34.3	$12,416	$23,453	$24,762	$833,137	$684
Modified Subpart VVa – Less Frequent Monitoring										
Valves	673	1	0.626	0.0186	22.6	$19,888	$25,410	$40,593	$1,365,801	$1,122
Connectors	3,068	1/0.125[b]	0.562	0.0167	20.3	$11,229	$23,669	$42,140	$1,417,844	$1,165
PRD	14	0	0.133	0.00397	4.83	$61,520	$32,501	$243,525	$8,193,684	$6,732
OEL	58	0	0.947	0.0282	34.3	$12,416	$23,453	$24,762	$833,137	$684

Minor discrepancies may be due to rounding.

a. It was assumed that all the connectors are monitored in the first year for initial compliance and every 4 years thereafter.
b. It was assumed that all the connectors are monitored in the first year for initial compliance and every 8 years thereafter.

8.4.3 LDAR with Optical Gas Imaging

8.4.3.1 Description

The alternative work practice for equipment leaks in §60.18 of 40 CFR Part 60, subpart A allows the use of an optical gas imaging system to monitor leaks from components. This LDAR requires monthly monitoring and repair of components using an optical gas imaging system, and annual monitoring of components using a Method 21 instrument. This requirement does not have a leak definition because the optical gas imaging system can only measure the magnitude of a leak and not the concentration. However, this alternative work practice does not require the repair of leaks below 500 ppm. Compressors are not included in this LDAR option and arediscussed in Chapter 6 of this document.

8.4.3.2 Effectiveness

No data was found on the control effectiveness of the alternative work practice. It is believed that this option would provide the same control effectiveness as the subpart VVa monitoring program. Therefore, the control effectiveness's for implementing an alternative work practice was assumed to be 93.6 percent for valves, 95.9 percent for connectors, 100 percent for open-ended lines, and 100 percent for pressure relief devices.

8.4.3.3 Cost Impacts

Costs were calculated using a LDAR cost spreadsheet developedfor estimating capital and annual costs for applying LDAR to the Petroleum Refinery and Chemical Manufacturing industry. The costs are based on the following assumptions:

- Initial monitoring and setup costs are $17.70 for valves, $1.13 per connector, $78.00 for pressure relief valve disks, $3,852 for pressure relief valve disk holder and valves, and $102 for open-ended lines.
- Monthly optical gas imaging monitoring costs are estimated to be $0.50 for valves, connectors, pressure relief valve devices, and open-ended lines.
- Annual monitoring costs using a Method 21 device are estimated to be $1.50 for valves and connectors, $2.00 for pressure relief valve disks, and $5.00 for pressure relief devices and open-ended lines.
- A wage rate of $30.46 per hour was used to determine labor costs for repair.

- Administrative costs and initial planning and training costs are based on the Miscellaneous Organic NESHAP (MON) analysis. The costs were based on 340 hours for planning and training and 300 hours per year for reporting and administrative tasks at $48.04 per hour.
- The capital cost also includes $14,500 for a data collection system for maintaining the inventory and monitoring records for the components at a facility.
- Recovery credits were calculated assuming the methane reduction has a value of $4.00 per 1000 standard cubic feet.

It was assumed that a single optical gas imaging and a Method 21 monitoring device could be used at multiple locations for production pads, gathering and boosting stations, and transmission and storage facilities. To calculate the shared cost of the optical gas imaging system and the Method 21 device, the time required to monitor a single facility was estimated. For production pads and gathering and boosting stations, it was assumed that 8 production pads could be monitored per day. This means that 160 production facilities could be monitored in a month. In addition, it was assumed 13 gathering and boosting station would service these wells and could be monitored during the same month for a total of 173 facilities. Therefore, the capital cost of the optical gas imaging system (Flir Model GF320, $85,000) and the Method 21 device ($6,500) was divided by 173 to get a shared capital cost of $529 per facility. It was assumed for processing facilities that the full cost of the optical gas imaging system and the Method 21 monitoring device would apply to each individual plant. The transmission and storage segment Method 21 device cost was estimated assuming that one facility could be monitored in one hour, and the travel time between facilities was one hour. Therefore, in a typical day 4 transmission stations could be monitored in one day. Assuming the same 20 day work month, the total number of facilities that could be monitored by a single optical gas imaging system and Method 21 device is 80. Therefore, the shared cost of the Method 21 monitoring device was calculated to be $1,144 per site.

A summary of the capital and annual costs and the cost effectiveness for each of the model plants in the oil and gas sectorusing the alternative work practice monitoring is provided in Table 8-18. A component cost effectiveness analysis for the alternative work practice was not performed, because the optical gas imaging system is not conducive to component monitoring, but is intended for facility-wide monitoring.

8.4.3.4 Secondary Impacts

The implementation of a LDAR program reduces pollutant emissions from equipment leaks. No secondary gaseous pollutant emissions or wastewater are generated during the monitoring and repair of

Table 8-18. Summary of the Model Plant Cost Effectiveness for the Optical Gas Imaging and Method 21 Monitoring Option

Model Plant	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/year)		Cost Effectiveness ($/ton)		
	VOC	HAP	Methane		without savings	with savings	VOC	HAP	Methane
Well Pads									
1	0.0876	0.00330	0.315	$15,428	$21,464	$21,391	$245,024	$6,495,835	$68,043
2	2.43	0.0915	8.73	$64,858	$39,112	$37,088	$16,127	$427,540	$4,478
3	25.3	0.956	91.3	$132,891	$135,964	$114,807	$5,364	$142,216	$1,490
Gathering and Boosting Stations									
1	5.58	0.210	20.1	$149,089	$63,949	$59,295	$11,470	$304,078	$3,185
2	9.23	0.348	33.2	$240,529	$93,210	$85,503	$10,096	$267,659	$2,804
3	12.9	0.486	46.4	$329,725	$121,820	$111,060	$9,451	$250,567	$2,625
Processing Plants									
1	13.5	0.508	48.5	$92,522	$87,059	$75,813	$6,462	$171,321	$1,795
Transmission/Storage Facilities									
1	2.62	0.0780	94.9	$20,898	$51,753	N/A	$19,723	$663,591	$545

Minor discrepancies may be due to rounding.

Note: Transmission and storage facilities do not own the natural gas; therefore cost benefits from reducing the amount of natural gas as the result of equipment leaks was not estimated for the transmission segment..

equipment leaks. Therefore, there are no secondary impacts expected from the implementation of a LDAR program.

8.4.4 Modified Alternative Work Practice with Optical Gas Imaging

8.4.4.1 Description

The modified alternative work practice for equipment leaks in §60.18 of 40 CFR Part 60, subpart A allows the use of an optical gas imaging system to monitor leaks from components, but removes the requirement of the annual Method 21 device monitoring. Therefore, the modified work practice would require only monthly monitoring and repair of components using an optical gas imaging system. This requirement does not have a leak definition because the optical gas imaging system can only measure the magnitude of a leak and not the concentration. However, this alternative work practice does not require the repair of leaks below 500 ppm. Compressors are not included in this LDAR option and are regulated separately.

8.4.4.2 Effectiveness

No data was found on the control effectiveness of this modified alternative work practice. However, it is believed that this option would provide the similar control effectiveness and emission reductions as the subpart VVa monitoring program. Therefore, the control effectiveness's for implementing an alternative work practice was assumed to be 93.6 percent for valves, 95.9 percent for connectors, 100 percent for open-ended lines, and 100 percent for pressure relief devices.

8.4.4.3 Cost Impacts

Costs were calculated using a LDAR cost spreadsheet developedfor estimating capital and annual costs for applying LDAR to the Petroleum Refinery and Chemical Manufacturing industry. The costs are based on the following assumptions:

- Initial monitoring and setup costs are $17.70 for valves, $1.13 per connector, $78.00 for pressure relief valve disks, $3,852 for pressure relief valve disk holder and valves, and $102 for open-ended lines.
- Monthly optical gas imaging monitoring costs are estimated to be $0.50 for valves, connectors, pressure relief valve devices, and open-ended lines.
- A wage rate of $30.46 per hour was used to determine labor costs for repair.

- Administrative costs and initial planning and training costs are based on the Miscellaneous Organic NESHAP (MON) analysis. The costs were based on 340 hours for planning and training and 300 hours per year for reporting and administrative tasks at $48.04 per hour.
- The shared capital cost for optical gas imaging system is $491 for production and gathering and boosting, $85,000 for processing, and $1,063 for transmission for a FLIR Model GF320 optical gas imaging system.
- The capital cost also includes $14,500 for a data collection system for maintaining the inventory and monitoring records for the components at a facility.
- Recovery credits were calculated assuming the methane reduction has a value of $4.00 per 1000 standard cubic feet.

A summary of the capital and annual costs and the cost effectiveness for each of the model plants in the oil and gas sectors using the alternative work practice monitoring is provided in Table 8-19. A component cost effectiveness analysis for the alternative work practice was not performed, because the optical gas imaging system is not conducive to component monitoring, but is intended for facility-wide monitoring.

8.4.4.4 Secondary Impacts

The implementation of a LDAR program reduces pollutant emissions from equipment leaks. No secondary gaseous pollutant emissions or wastewater are generated during the monitoring and repair of equipment leaks. Therefore, there are no secondary impacts expected from the implementation of a LDAR program.

8.5 Regulatory Options

The LDAR pollution prevention approach is believed to be the best method for reducing pollutant emissions from equipment leaks. Therefore, the following regulatory options were considered for reducing equipment leaks from well pads, gathering and boosting stations, processing facilities, and transmission and storage facilities:

- Regulatory Option 1: Require the implementation of a subpart VVa LDAR program;
- Regulatory Option 2: Require the implementation of a component subpart VVa LDAR program;
- Regulatory Option 3: Require the implementation of the alternative work practice in §60.18 of 40 CFR Part 60;

Table 8-19. Summary of the Model Plant Cost Effectiveness for Monthly Gas Imaging Monitoring

Model Plant	Annual Emission Reductions (tons/year)			Capital Cost ($)	Annual Cost ($/year)		Cost Effectiveness ($/ton)		
	VOC	HAP	Methane		without savings	with savings	VOC	HAP	Methane
Well Pads									
1	N/A	N/A	N/A	$15,390	$21,373	N/A	N/A	N/A	N/A
2	N/A	N/A	N/A	$64,820	$37,049	N/A	N/A	N/A	N/A
3	N/A	N/A	N/A	$537,313	$189,174	N/A	N/A	N/A	N/A
Gathering and Boosting Stations									
1	N/A	N/A	N/A	$149,051	$59,790	N/A	N/A	N/A	N/A
2	N/A	N/A	N/A	$240,491	$86,135	N/A	N/A	N/A	N/A
3	N/A	N/A	N/A	$329,687	$11,940	N/A	N/A	N/A	N/A
Processing Plants									
1	N/A	N/A	N/A	$92,522	$76,581	N/A	N/A	N/A	N/A
Transmission/Storage Facilities									
1	N/A	N/A	N/A	$20,817	$45,080	N/A	N/A	N/A	N/A

Note: This option only provides the number and magnitude of the leaks. Therefore, the emission reduction from this program cannot be quantified and the cost effectiveness values calculated.

- Regulatory Option 4: Require the implementation of a modified alternative work practice in §60.18 of 40 CFR Part 60 that removes the requirement for annual monitoring using a Method 21 device.

The following sections discuss these regulatory options.

8.5.1 Evaluation of Regulatory Options for Equipment Leaks

8.5.1.1 Well pads

The first regulatory option of a subpart VVa LDAR program was evaluated for well pads, which include the wells, processing equipment (separators, dehydrators, acid gas removal), as well as any heaters and piping. The equipment does not include any of the compressors which will be regulated separately. For well pads the VOC cost effectiveness for the model plants ranged from $267,386 per ton of VOC for a single well head facility to $6,934 ton of VOC for a well pad servicing 48 wells. Because of the high VOC cost effectiveness, Regulatory Option 1 was rejected for well pads.

The second regulatory option that was evaluated for well pads was Regulatory Option 2, which would require the implementation of a component subpart VVa LDAR program. The VOC cost effectiveness of this option ranged from $15,063 for valves to $211,992 for open-ended lines. These costs were determined to be unreasonable and therefore this regulatory option was rejected.

The third regulatory option requires the implementation of a monthly LDAR program using an Optical gas imaging system with annual monitoring using a Method 21 device. The VOC cost effectiveness of this option ranged from $5,364 per ton of VOC for Model Plant 3to $245,024 per ton of VOC for Model Plant 1. This regulatory option was determined to be not cost effective and was rejected.

The fourth regulatory option would require the implementation of a monthly LDAR program using an optical imaging instrument. The emission reductions from this option could not be quantified; therefore this regulatory option was rejected.

8.5.1.2 Gathering and Boosting Stations

The first regulatory option was evaluated for gathering and boosting stations which include the processing equipment (separators, dehydrators, acid gas removal), as well as any heaters and piping. The equipment does not include any of the compressors which will be regulated separately. The VOC cost effectiveness for the gathering and boosting model plants ranged from $10,327 per ton of VOC for

Model Plant 1 to $8,174per ton of VOC for Model Plant 3. Regulatory Option 1 was rejected due to the high VOC cost effectiveness.

The second regulatory option that was evaluated for gathering and boosting stations was Regulatory Option 2. The VOC cost effectiveness of this option ranged from $6,079 for valves to $77,310 per ton of VOC for open-ended lines. These costs were determined to be unreasonable and therefore this regulatory option was also rejected.

The third regulatory option requires the implementation of a monthly LDAR program using an Optical gas imaging system with annual monitoring using a Method 21 device. The VOC cost effectiveness of this option was calculated to be $10,724 per ton of VOC for Model Plant 1 and $8,685 per ton of VOC for Model Plant 3. This regulatory option was determined to be not cost effective and was rejected.

The fourth regulatory option would require the implementation of a monthly LDAR program using an optical imaging instrument. The emission reductions from this option could not be quantified; therefore this regulatory option was rejected.

8.5.1.3 Processing Plants

The VOC cost effectiveness of the first regulatory option was calculated to be $3,352 per ton of VOC. This cost effectiveness was determined to be reasonable and therefore this regulatory option was accepted.

The second option was evaluated for processing plants and the VOC cost effectiveness ranged from $0 for open-ended lined and pressure relief devices to $4,360 for connectors. Because the emission benefits and the cost effectiveness of Regulatory Option 1 were accepted, this option was not accepted.

The third regulatory option requires the implementation of a monthly LDAR program using an Optical gas imaging system with annual monitoring using a Method 21 device. The VOC cost effectiveness of this option was calculated to be $6,462 per ton of VOC and was determined to be not cost effective. Therefore, this regulatory option was rejected.

The fourth regulatory option would require the implementation of a monthly LDAR program using an optical imaging instrument. The emission reductions from this option could not be quantified; therefore this regulatory option was rejected.

8.5.1.4 Transmission and Storage Facilities

The first regulatory option was evaluated for transmission and storage facilities which include separators and dehydrators, as well as any heaters and piping. The equipment does not include any of the compressors which will be regulated separately. This sector moves processed gas from the processing facilities to the city gates. The VOC cost effectiveness for Regulatory Option 1 was $19,769per ton of VOC. The high VOC cost effectiveness is due to the inherent low VOC concentration in the processed natural gas, therefore the VOC reductions from this sector are low in comparison to the other sectors. Regulatory Option 1 was rejected due to the high VOC cost effectiveness.

The second option was evaluated for transmission facilities and the VOC cost effectiveness ranged from $24,762 for open-ended lined to $243,525 for connectors. This option was not accepted because of the high cost effectiveness.

The third regulatory option that was evaluated for transmission and storage facilities was Regulatory Option 3. The VOC cost effectiveness of this option was calculated to be $19,723 per ton of VOC. Again, because of the low VOC content of the processed gas, the regulatory option has a low VOC reduction. This cost was determined to be unreasonable and therefore this regulatory option was also rejected.

The fourth regulatory option would require the implementation of a monthly LDAR program using an optical imaging instrument. The emission reductions from this option could not be quantified; therefore this regulatory option was rejected.

8.5.2 Nationwide Impacts of Regulatory Options

Regulatory Option 1 was selected as an option for setting standards for equipment leaks at processing plants. This option would require the implementation of an LDAR program using the subpart VVa requirements. For production facilities, 29 facilities per year are expected to be affected sources by the NSPS regulation annually. Table 8-20 provides a summary of the expected emission reductions from the implementation of this option.

Table 8-20. Nationwide Emission and Cost Analysis of Regulatory Options

Category	Estimated Number of Sources subject to NSPS	Facility Capital Cost ($)	Nationwide Emission Reductions (tpy)			VOC Cost Effectiveness ($/ton)		Methane Cost Effectiveness ($/ton)		Total Nationwide Costs (million $/year)		
			VOC	Methane	HAP	without savings	with savings	without savings	with savings	Capital Cost	Annual without savings	Annual with savings
Regulatory Option 2 (Subpart VVa LDAR Program)												
Processing Plants	29	$7,522	392	1,407	14.7	$3,352	$2,517	$931	$699	0.218	1.31	0.984

8.6 References

1 Memorandum from David Randall, RTI and Karen Schaffner, RTI to Randy McDonald, U.S. Environmental Protection Agency. Control Options and Impacts for Equipment Leaks: Chemical Manufacturing Area Source Standards. September 2, 2008.

2 Memorandum from Kristen Parrish, RTI and David Randall, RTI to Karen Rackley, U.S. Environmental Protection Agency.Final Impacts for Regulatory Options for Equipment Leaks of VOC on SOCMI. October 30, 2007.

3 Memorandum from Kristen Parrish, RTI, David Randall, RTI, and Jeff Coburn, RTI to Karen Rackley, U.S. Environmental Protection Agency.Final Impacts for Regulatory Options for Equipment Leaks of VOC in Petroleum Refineries. October 30, 2007.

4 U.S. Environmental Protection Agency. Methodology for Estimating CH4 and CO2 Emissions from Petroleum Systems. Greenhouse Gas Inventory: Emission and Sinks1990-2008. Washington, DC.

5 Radian International LLC.Methane Emissions from the Natural Gas Industry, Vol. 2: Technical Report. Prepared for the Gas Research Institute and Environmental Protection Agency.EPA-600/R-96-080b.June 1996.

6 Radian International LLC.Methane Emissions from the Natural Gas Industry, Vol. 3: General Methodology. Prepared for the Gas Research Institute and Environmental Protection Agency.EPA-600/R-96-080c.June 1996.

7 Radian International LLC.Methane Emissions from the Natural Gas Industry, Vol. 5: Activity Factors. Prepared for the Gas Research Institute and Environmental Protection Agency.EPA-600/R-96-080e.June 1996

8 Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 5: Activity Factors. Prepared for the Gas Research Institute and Environmental Protection Agency.EPA-600/R-96-080e.June 1996

9 Radian International LLC. Methane Emissions from the Natural Gas Industry, Vol. 6: Vented and Combustion Source Summary Emissions. Prepared for the Gas Research Institute and Environmental Protection Agency.EPA-600/R-96-080f.June 1996.

10 Radian International LLC, Methane Emissions from the U.S. Petroleum Industry, draft report for the U.S. Environmental Protection Agency, June 14, 1996.

11 ICF Consulting. Estimates of Methane Emissions from the U.S. Oil Industry.Prepared for the U.S. Environmental Protection Agency. 1999.

12 ENVIRON International Corporation. Oil and Gas Emission Inventories for the Western States.Prepared for Western Governors' Association. December 27, 2005.

13 ENVIRON International Corporation. Recommendations for Improvements to the Central States Regional Air Partnership's Oil and Gas Emission Inventories Prepared for Central States Regional Air Partnership. November 2008

14 Independent Petroleum Association of America. Oil and Gas Producing Industry in Your State.

15 Armendariz, Al. Emissions from Natural Gas Production in the Barnett Shale Area and Opportunities for Cost-Effective Improvements. Prepared for Environmental Defense Fund. January 2009.

16 Eastern Research Group, Inc. Emissions from Oil and Gas Production Facilities. Prepared for the Texas Commission on Environmental Quality. August 31, 2007.

17 U.S. Energy Information Administration. Annual U.S. Natural Gas Wellhead Price.Energy Information Administration.Natural Gas Navigator. Retrieved online on 12 Dec 2010 at <http://www.eia.doe.gov/dnav/ng/hist/n9190us3a.htm>

18 Eastern Research Group, Inc. Preferred and Alternative Methods for Estimating Air Emissions from Oil and Gas Field Production and Processing Operation. Prepared for the U.S. Environmental Protection Agency. September 1999.

APPENDIX A

E&P TANKS ANALYSIS FOR STORAGE VESSELS

Tank ID	**Sample Tank No. 1**	**Sample Tank No. 2**	**Sample Tank No. 3**	**Sample Tank No. 4**	**Sample Tank No. 5**	**Sample Tank No. 6**	**Sample Tank No. 7**	**Sample Tank No. 8**
E&P Tank Number	**Tank No. 58**	**Tank No. 59**	**Tank No. 60**	**Tank No. 61**	**Tank No. 62**	**Tank No. 63**	**Tank No. 64**	**Tank No. 65**
Total Emissions (tpy)	289.778	230.196	129.419	129.853	201.547	738.511	294.500	142.371
VOC Emissions (tpy)	43.734	111.414	101.853	63.343	154.313	578.379	205.794	89.728
Methane Emissions (tpy)	0.197	56.006	10.064	50.910	8.343	47.831	26.305	24.276
HAP Emissions (tpy)	**4.236**	**13.100**	**5.050**	**2.730**	**3.500**	**37.840**	**4.480**	**2.680**
Benzene	*0.828*	*6.343*	*0.501*	*0.285*	*0.051*	*7.568*	*0.116*	*0.219*
Toluene	*1.194*	*3.539*	*0.648*	*0.243*	*0.067*	*5.950*	*0.085*	*0.301*
E-Benzene	*0.041*	*0.083*	*0.040*	*0.008*	*0.002*	*0.086*	*0.006*	*0.020*
Xylenes	*0.165*	*0.327*	*0.233*	*0.066*	*0.046*	*0.679*	*0.018*	*0.152*
n-C6	*2.008*	*2.809*	*3.623*	*2.132*	*3.333*	*23.553*	*4.252*	*1.989*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	66	66	13	64	28	95	29	44
Separator Temperature (F)	83	90	110	74	78	118	60	71
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	83	90	110	74	78	118	60	71
C10+ SG	0.848	0.865	0.879	0.866	0.864	0.862	0.841	0.849
C10+ MW	234	237	294	301	281	312	224	349
API Gravity	**40.0**	**40.0**	**40.0**	**40.0**	**42.0**	**42.0**	**44.0**	**44.0**
Production Rate (bbl/day)	500	500	500	500	500	500	500	500
Reid Vapor Pressure (psia)	3.00	4.10	4.80	3.90	4.20	8.10	5.70	7.00
GOR (scf/bbl)	25.96	30.32	12.30	19.58	19.68	68.74	32.46	16.92
Heating Value of Vapor (Btu/s	398.80	1689.70	2486.42	1567.19	2261.27	2529.29	2162.56	2003.83
LP Oil Component	mol %							
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	5.0200	0.2700	0.0000	0.0800	0.0400	0.0000	0.0100	0.0200
N2	0.0000	0.0100	0.0000	0.0200	0.3100	0.0200	0.0200	0.0100
C1	0.0100	2.2600	0.4700	2.6500	0.4000	2.2500	1.1300	1.2900
C2	0.0400	1.2000	0.4800	0.3900	0.6500	3.1100	1.4100	1.0300
C3	0.2000	1.3200	1.5800	0.9200	1.7500	4.1100	3.2900	2.3000
i-C4	0.2800	0.7100	0.6200	0.9800	0.9200	1.3300	0.4500	1.1200
n-C4	0.4800	1.0800	2.6100	1.4700	2.4500	3.8100	4.0200	3.2200
i-C5	0.7600	1.2000	1.8100	2.0500	2.3900	2.5400	0.7000	2.3600
n-C5	0.7400	1.1300	2.9300	2.1600	2.9500	3.5100	4.0700	2.9600
C6	1.5100	2.0000	3.8800	3.4500	2.7600	3.0900	0.9600	3.0600
C7	4.6600	6.7600	10.7300	7.9400	10.8800	8.0100	5.5900	9.5000
C8	6.6100	9.4200	12.5300	9.6900	11.6400	7.6800	5.5200	11.5900
C9	4.8700	6.5600	6.9400	6.5600	6.1800	4.4400	4.2700	6.3200
C10+	70.1100	49.2600	47.3100	56.3900	52.0200	47.6400	63.0500	47.7200
Benzene	0.5700	4.9100	0.5800	0.4300	0.0700	1.3400	0.1600	0.3600
Toluene	2.1400	7.7900	1.9900	1.1000	0.2700	2.6800	0.3700	1.4900
E-Benzene	0.1700	0.4600	0.2900	0.1000	0.0200	0.0900	0.0700	0.2600
Xylenes	0.7600	2.0500	1.9000	0.9000	0.5500	0.8000	0.2500	2.2900
n-C6	1.0700	1.6100	3.3500	2.7200	3.7500	3.5500	4.6600	3.1000
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 9**	**Sample Tank No. 10**	**Sample Tank No. 11**	**Sample Tank No. 12**	**Sample Tank No. 13**	**Sample Tank No. 14**	**Sample Tank No. 15**
E&P Tank Number	**Tank No. 66**	**Tank No. 67**	**Tank No. 68**	**Tank No. 69**	**Tank No. 70**	**Tank No. 71**	**Tank No. 72**
Total Emissions (tpy)	357.688	134.789	314.446	505.131	306.443	256.029	1061.274
VOC Emissions (tpy)	243.348	79.118	224.158	437.555	252.987	204.571	987.647
Methane Emissions (tpy)	56.846	37.876	18.892	21.472	15.159	21.237	32.940
HAP Emissions (tpy)	**5.590**	**5.680**	**7.030**	**13.450**	**15.330**	**6.500**	**56.780**
Benzene	*0.244*	*1.308*	*0.242*	*0.119*	*1.048*	*0.464*	*5.791*
Toluene	*0.440*	*1.184*	*0.385*	*0.146*	*1.488*	*0.927*	*6.793*
E-Benzene	*0.039*	*0.029*	*0.043*	*0.019*	*0.062*	*0.051*	*0.303*
Xylenes	*0.208*	*0.488*	*0.167*	*0.162*	*0.734*	*0.590*	*4.255*
n-C6	*4.661*	*2.671*	*6.191*	*13.008*	*12.001*	*4.468*	*39.634*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	60	41	20	23	24	52	45
Separator Temperature (F)	60	72	68	85	114	108	140
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	60	72	68	85	114	108	140
C10+ SG	0.878	0.854	0.926	0.848	0.87	0.886	0.893
C10+ MW	270	270	290	275	274	269	277
API Gravity	**44.0**	**45.0**	**45.0**	**46.0**	**46.0**	**47.0**	**47.0**
Production Rate (bbl/day)	500	500	500	500	500	500	500
Reid Vapor Pressure (psia)	10.10	5.20	8.10	4.70	5.00	5.30	6.00
GOR (scf/bbl)	41.30	17.66	30.80	43.26	26.30	24.28	78.80
Heating Value of Vapor (Btu/s	2060.54	1812.87	2234.66	2651.81	2611.90	2491.55	3120.85
LP Oil Component							
H2S	0.0000	0.0000	0.0000	0.0500	0.0700	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0500	0.0400	0.3100	0.2400	0.1700	0.0000	0.0400
N2	0.0000	0.0100	0.0200	0.0100	0.0000	0.0000	0.0000
C1	2.3400	1.8400	0.6900	0.9400	0.6200	0.9700	1.2100
C2	1.5600	0.6100	0.9400	0.6600	0.5200	0.7700	0.7600
C3	3.8500	1.2700	2.7300	2.1500	1.6800	2.0200	2.9200
i-C4	1.3600	0.8900	1.7300	1.1100	0.9900	1.5500	4.1500
n-C4	3.9600	1.5600	3.9300	4.5400	3.1200	2.1400	3.0600
i-C5	3.1300	1.8000	3.8800	3.0600	2.4500	3.3400	3.9300
n-C5	4.0300	1.8800	4.1000	4.9800	3.4200	2.8800	3.0900
C6	3.6100	3.4300	5.1500	4.1100	4.4300	3.2600	4.9100
C7	7.7900	10.7400	12.0700	10.2100	8.8900	9.0800	13.0800
C8	13.7700	12.6900	18.2000	10.6800	18.5800	11.7900	14.6200
C9	4.8300	7.8700	8.8800	5.4300	8.7200	5.8500	7.6300
C10+	42.2300	43.0100	27.3600	45.2800	36.2600	49.3100	31.1400
Benzene	0.2400	1.5600	0.3000	0.0600	0.5300	0.3000	0.6900
Toluene	1.3400	3.8100	1.4700	0.2100	1.9700	1.6000	1.9400
E-Benzene	0.3200	0.2200	0.4400	0.0700	0.1900	0.2100	0.1900
Xylenes	1.9700	4.1900	1.9600	0.6700	2.5500	2.7300	2.9800
n-C6	3.6200	2.5800	5.8400	5.5400	4.8400	2.2000	3.6600
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 16**	**Sample Tank No. 17**	**Sample Tank No. 18**	**Sample Tank No. 19**	**Sample Tank No. 20**	**Sample Tank No. 21**
E&P Tank Number	**Tank No. 73**	**Tank No. 74**	**Tank No. 75**	**Tank No. 76**	**Tank No. 77**	**Tank No. 78**
Total Emissions (tpy)	464.597	214.658	1331.488	3972.618	540.533	1228.897
VOC Emissions (tpy)	383.349	135.482	1146.617	2331.105	399.555	940.078
Methane Emissions (tpy)	18.132	32.283	31.967	755.826	38.624	105.184
HAP Emissions (tpy)	**10.980**	**7.530**	**77.780**	**82.380**	**7.580**	**13.230**
Benzene	*0.222*	*1.269*	*7.661*	*12.470*	*2.447*	*0.543*
Toluene	*0.208*	*0.708*	*3.775*	*23.584*	*1.643*	*0.466*
E-Benzene	*0.058*	*0.019*	*0.113*	*0.056*	*0.051*	*0.006*
Xylenes	*0.193*	*0.411*	*0.929*	*0.635*	*0.256*	*0.052*
n-C6	*10.296*	*5.124*	*65.304*	*45.632*	*3.186*	*12.160*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	40	31	50	700	20	98
Separator Temperature (F)	76	76	125	100	48	40
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	76	76	125	100	48	40
C10+ SG	0.885	0.839	0.842	0.878	0.877	0.929
C10+ MW	318	296	287	178	179	324
API Gravity	**47.0**	**49.0**	**49.0**	**50.0**	**50.0**	**51.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	10.60	5.00	8.90	7.40	9.40	11.20
GOR (scf/bbl)	41.32	24.48	106.60	491.90	56.44	128.16
Heating Value of Vapor (Btu/s	2421.27	2045.68	2822.40	1916.15	2275.04	2279.83
LP Oil Component						
H2S	0.0000	0.0000	1.2800	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0400	0.0800	0.0300	0.4200	0.0100	0.0100
N2	0.8400	0.0100	0.0000	0.0700	0.0100	0.0400
C1	0.7800	1.4000	1.2700	15.3300	1.1400	3.2200
C2	0.7500	0.9700	2.0800	8.9600	1.6000	2.9500
C3	3.5300	1.3500	4.5700	8.2100	4.0100	6.4800
i-C4	2.0700	1.0500	1.8900	2.3100	2.3400	2.2000
n-C4	6.8800	2.4200	6.4800	4.1900	4.7300	8.5300
i-C5	5.0000	2.7100	3.8800	2.4300	4.1700	4.6800
n-C5	7.4800	3.2900	7.0400	2.3500	2.9700	7.4700
C6	4.1000	4.6900	3.0500	3.1100	4.3800	5.7300
C7	11.3200	11.3500	6.8200	8.4700	8.8100	15.8300
C8	11.7900	12.4100	7.7800	8.8400	12.3800	12.6400
C9	6.1100	9.3100	7.2300	3.7100	5.4900	4.0800
C10+	32.0700	36.0900	37.9300	23.5600	32.1400	18.1600
Benzene	0.1400	1.4000	0.8300	0.8200	2.8900	0.3400
Toluene	0.3800	2.3200	1.0200	4.6700	6.4200	1.0200
E-Benzene	0.2700	0.1600	0.0700	0.0300	0.5700	0.0400
Xylenes	1.0300	4.0200	0.6500	0.3900	3.3000	0.4000
n-C6	5.4200	4.9700	6.1000	2.1300	2.6400	6.1800
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 22**	**Sample Tank No. 23**	**Sample Tank No. 24**	**Sample Tank No. 25**	**Sample Tank No. 26**	**Sample Tank No. 27**
E&P Tank Number	**Tank No. 79**	**Tank No. 80**	**Tank No. 81**	**Tank No. 82**	**Tank No. 83**	**Tank No. 84**
Total Emissions (tpy)	362.298	790.092	557.188	5007.636	175.911	714.052
VOC Emissions (tpy)	175.304	665.349	483.599	3386.300	77.584	639.895
Methane Emissions (tpy)	109.676	24.115	10.288	842.206	54.660	18.553
HAP Emissions (tpy)	**7.150**	**28.770**	**14.580**	**101.610**	**4.770**	**30.190**
Benzene	*0.353*	*3.892*	*1.930*	*9.782*	*0.929*	*4.165*
Toluene	*0.102*	*6.465*	*1.651*	*12.547*	*0.909*	*2.542*
E-Benzene	*0.120*	*0.119*	*0.055*	*0.040*	*0.050*	*0.192*
Xylenes	*0.437*	*2.017*	*0.631*	*0.716*	*0.221*	*1.424*
n-C6	*6.133*	*16.273*	*10.317*	*78.528*	*2.665*	*21.871*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	115	30	15	770	39	38
Separator Temperature (F)	73	100	86	100	66	95
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	73	100	86	100	66	95
C10+ SG	0.873	0.901	0.878	0.858	0.854	0.823
C10+ MW	200	220	254	195	175	375
API Gravity	**54.0**	**54.0**	**54.0**	**55.0**	**57.0**	**57.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	5.30	9.40	10.30	7.80	5.70	9.60
GOR (scf/bbl)	51.34	68.32	47.12	578.20	25.46	57.38
Heating Value of Vapor (Btu/s	1678.80	2676.21	2764.90	2043.18	1632.00	2897.16
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0900	0.1100	0.0200	0.5500	0.0700	0.0400
N2	0.0300	0.0200	0.0100	0.0300	0.0000	0.0000
C1	3.5600	0.7100	0.3300	16.1500	1.7200	0.7000
C2	1.4300	1.5400	1.0900	7.1400	0.9000	1.0900
C3	1.8700	4.5900	3.8300	9.6600	1.3800	3.5600
i-C4	0.6800	2.3400	3.7000	3.8100	1.0000	2.9000
n-C4	2.0000	4.4400	4.8700	5.9600	1.4900	6.2100
i-C5	1.6600	3.9000	4.4800	3.5300	1.4600	6.0400
n-C5	2.0600	3.8000	3.9800	3.7200	1.5300	5.8400
C6	2.4100	5.0900	6.0500	3.8400	4.0600	7.3200
C7	15.0800	12.9700	15.6400	8.7600	14.5700	13.0000
C8	25.1900	19.0700	17.5800	8.9200	23.7200	12.2200
C9	12.4900	6.9500	6.1000	3.1000	13.7700	7.9600
C10+	24.3900	18.9200	21.1300	17.9300	20.9800	20.0200
Benzene	0.2400	1.2000	1.0500	0.5800	1.4900	1.2200
Toluene	0.2100	5.5400	2.6000	2.3000	4.5300	2.0500
E-Benzene	0.6600	0.2500	0.2200	0.0200	0.6700	0.3800
Xylenes	2.7600	4.8300	2.8900	0.4200	3.4200	3.2200
n-C6	3.1900	3.7300	4.4300	3.5800	3.2400	6.2300
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 28**	**Sample Tank No. 29**	**Sample Tank No. 30**	**Sample Tank No. 31**	**Sample Tank No. 32**	**Sample Tank No. 33**
E&P Tank Number	**Tank No. 85**	**Tank No. 86**	**Tank No. 87**	**Tank No. 88**	**Tank No. 89**	**Tank No. 90**
Total Emissions (tpy)	801.228	983.881	4326.573	3074.670	2951.879	616.490
VOC Emissions (tpy)	757.176	750.313	2406.579	1892.668	1439.584	332.126
Methane Emissions (tpy)	5.307	49.123	1088.727	746.499	999.175	120.918
HAP Emissions (tpy)	**29.510**	**14.080**	**58.180**	**47.230**	**44.040**	**9.140**
Benzene	*3.415*	*1.119*	*4.653*	*5.891*	*1.409*	*0.576*
Toluene	*5.329*	*1.453*	*5.785*	*6.575*	*2.934*	*1.658*
E-Benzene	*0.192*	*0.049*	*0.186*	*0.022*	*0.159*	*0.079*
Xylenes	*1.786*	*0.263*	*0.989*	*0.316*	*1.136*	*0.806*
n-C6	*18.788*	*11.194*	*46.561*	*34.427*	*38.406*	*6.016*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	65	54	870	600	780	60
Separator Temperature (F)	80	60	78	70	70	56
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	80	60	78	70	70	60
C10+ SG	0.899	0.868	0.868	0.847	0.905	0.905
C10+ MW	166	268	268	176	174	174
API Gravity	**57.0**	**57.0**	**57.0**	**57.0**	**58.0**	**58.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	4.80	13.10	13.10	7.50	8.00	8.00
GOR (scf/bbl)	61.26	97.00	578.20	396.24	436.98	79.54
Heating Value of Vapor (Btu/s	3046.83	2390.47	1789.23	1831.51	1633.60	1851.14
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0100	0.0800	0.4200	0.5800	0.2700	0.0800
N2	0.0000	0.0000	0.0800	0.0200	0.0200	0.0100
C1	0.1500	1.4800	21.2000	16.0200	20.3000	3.3900
C2	0.5700	2.9100	8.2900	4.1200	5.1800	2.4300
C3	2.4100	6.9600	8.5400	6.9000	5.6800	3.8400
i-C4	1.7300	2.6300	2.3000	2.7500	1.4200	1.3000
n-C4	3.5500	7.2100	5.8400	4.9100	4.1400	3.2000
i-C5	4.1400	4.6400	3.3500	3.6000	2.5400	2.4100
n-C5	3.8600	5.7100	4.0400	3.9000	3.1000	2.5600
C6	6.5100	5.0100	3.4200	3.9500	3.7700	3.7700
C7	18.7100	13.5500	9.1200	10.3800	11.2200	13.2600
C8	19.4300	15.0600	10.0900	11.3000	14.7500	22.4400
C9	6.8400	6.2300	4.1700	4.2100	7.0600	11.1300
C10+	15.5200	18.8400	12.5900	19.2800	13.5400	16.0600
Benzene	1.1800	0.5900	0.4000	0.8200	0.1800	0.4100
Toluene	5.2100	2.5000	1.6800	3.0600	1.2600	3.8600
E-Benzene	0.4600	0.2400	0.1600	0.0300	0.2000	0.5200
Xylenes	4.8600	1.4900	1.0000	0.5000	1.6700	6.1500
n-C6	4.8600	4.8700	3.3100	3.6700	3.7000	3.1800
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 34**	**Sample Tank No. 35**	**Sample Tank No. 36**	**Sample Tank No. 37**	**Sample Tank No. 38**	**Sample Tank No. 39**
E&P Tank Number	**Tank No. 91**	**Tank No. 92**	**Tank No. 93**	**Tank No. 94**	**Tank No. 95**	**Tank No. 96**
Total Emissions (tpy)	2575.122	2774.089	653.459	3495.242	363.650	4744.399
VOC Emissions (tpy)	1494.749	2092.925	394.781	2876.860	223.772	3658.384
Methane Emissions (tpy)	581.208	346.071	121.446	169.818	84.912	381.967
HAP Emissions (tpy)	**65.980**	**48.710**	**14.210**	**93.030**	**10.760**	**89.970**
Benzene	*9.303*	*2.750*	*0.871*	*10.232*	*0.500*	*11.564*
Toluene	*14.114*	*2.311*	*2.688*	*11.558*	*0.279*	*11.735*
E-Benzene	*0.019*	*0.128*	*0.136*	*0.034*	*0.060*	*0.033*
Xylenes	*0.409*	*0.872*	*1.400*	*0.580*	*0.256*	*0.472*
n-C6	*42.130*	*42.650*	*9.111*	*70.629*	*9.661*	*66.162*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	500	300	110	750	85	730
Separator Temperature (F)	84	80	72	90	85	84
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	84	80	72	90	85	84
C10+ SG	0.909	0.882	0.901	0.898	0.9	0.898
C10+ MW	204	296	162	215	202	225
API Gravity	**58.0**	**58.0**	**59.0**	**60.0**	**61.0**	**61.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	9.10	10.60	10.00	9.40	7.00	9.80
GOR (scf/bbl)	323.88	287.10	79.90	320.48	45.04	475.20
Heating Value of Vapor (Btu/s	1892.64	2289.04	1946.32	2541.49	1921.87	2340.56
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.2300	0.0300	0.0800	0.3400	0.0400	0.4100
N2	0.0600	0.0900	0.0100	0.0200	0.0200	0.0300
C1	12.9800	8.4300	3.3900	3.7500	2.6100	7.3900
C2	5.7800	4.2300	2.4300	4.7700	1.1600	6.6400
C3	4.6400	5.9100	3.8400	9.2600	2.2100	10.9400
i-C4	2.0900	5.1700	1.3000	4.8100	0.9300	4.5800
n-C4	4.1800	6.2200	3.2000	7.0200	2.4900	8.3400
i-C5	4.9600	8.9100	2.4100	5.5900	2.1300	5.5000
n-C5	4.0700	4.9700	2.5600	6.1200	2.9200	5.8200
C6	6.0700	9.1100	3.7700	6.1300	3.5400	5.3200
C7	13.1100	11.3400	13.2600	12.8200	19.5300	11.2900
C8	11.9500	10.3900	22.4400	12.5200	27.1600	11.1800
C9	4.8600	5.9600	11.1300	4.0100	14.7000	3.1900
C10+	14.1100	11.7500	16.0600	11.4200	13.8800	8.8000
Benzene	1.1400	0.3700	0.4100	1.1000	0.2900	1.1400
Toluene	5.4100	0.9800	3.8600	3.7900	0.4700	3.7600
E-Benzene	0.0200	0.1500	0.5200	0.0300	0.2600	0.0300
Xylenes	0.5000	1.1900	6.1500	0.5900	1.2600	0.5000
n-C6	3.8400	4.8000	3.1800	5.9100	4.4000	5.1400
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 40**	**Sample Tank No. 41**	**Sample Tank No. 42**	**Sample Tank No. 43**	**Sample Tank No. 44**	**Sample Tank No. 45**
E&P Tank Number	**Tank No. 97**	**Tank No. 98**	**Tank No. 99**	**Tank No. 100**	**Tank No. 101**	**Tank No. 102**
Total Emissions (tpy)	907.495	277.197	3410.034	2122.607	8152.118	6780.555
VOC Emissions (tpy)	734.651	158.333	2732.261	1066.705	5678.554	4276.160
Methane Emissions (tpy)	49.578	75.426	159.904	736.341	1206.981	1045.765
HAP Emissions (tpy)	**24.160**	**8.820**	**67.500**	**64.680**	**81.710**	**48.890**
Benzene	*1.573*	*0.204*	*9.290*	*9.500*	*10.844*	*5.934*
Toluene	*3.102*	*0.854*	*9.192*	*15.007*	*8.516*	*1.416*
E-Benzene	*0.094*	*0.042*	*0.016*	*0.161*	*0.012*	*0.222*
Xylenes	*1.079*	*0.375*	*0.371*	*1.585*	*0.288*	*1.359*
n-C6	*18.314*	*7.344*	*48.628*	*38.425*	*62.050*	*39.961*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	57	72	730	580	730	807
Separator Temperature (F)	82	80	80	77	80	96
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	82	80	80	77	80	96
C10+ SG	0.884	0.869	0.883	0.85	0.895	0.811
C10+ MW	240	190	226	190	197	173
API Gravity	**62.0**	**63.0**	**63.0**	**64.0**	**64.0**	**66.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	10.40	7.00	11.90	6.40	11.00	11.80
GOR (scf/bbl)	84.20	36.56	321.62	309.64	924.96	804.54
Heating Value of Vapor (Btu/s	2521.70	1805.12	2477.18	1622.20	2083.02	2013.21
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0800	0.0400	0.3200	0.0700	0.5600	0.2200
N2	0.0100	0.0300	0.0200	0.0700	0.0300	0.0800
C1	1.4000	2.3500	3.4800	16.3500	16.9100	16.2600
C2	1.7700	1.0000	5.5300	3.6400	8.6200	11.7100
C3	4.8200	2.0700	10.1700	3.5600	12.0400	11.6100
i-C4	2.8200	0.7100	4.9900	1.6900	5.2700	4.3900
n-C4	5.9700	2.2600	8.1400	2.9800	9.0700	7.5600
i-C5	4.3100	1.7000	5.8700	2.6800	5.6500	4.5200
n-C5	4.1900	2.7400	6.1600	2.7900	5.8200	3.9400
C6	6.5100	3.4900	5.7200	3.8200	5.1000	3.3600
C7	17.7500	17.7300	12.3800	18.1400	8.0600	5.9200
C8	18.6400	27.9100	12.3100	19.4700	7.5500	11.6900
C9	7.4400	16.1500	3.7900	4.5900	2.2200	5.9200
C10+	11.6100	12.2800	9.9100	6.7300	5.6700	8.9300
Benzene	0.5600	0.1600	1.2800	1.2200	0.8500	0.3700
Toluene	3.2800	1.9800	4.0500	6.0700	2.3800	0.3000
E-Benzene	0.2600	0.2500	0.0200	0.1800	0.0100	0.1400
Xylenes	3.4100	2.5800	0.5300	2.0600	0.2900	1.0100
n-C6	5.1700	4.5700	5.3300	3.8900	3.9000	2.0700
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 46**	**Sample Tank No. 47**	**Sample Tank No. 48**	**Sample Tank No. 49**	**Sample Tank No. 50**	**Sample Tank No. 51**
E&P Tank Number	**Tank No. 103**	**Tank No. 1**	**Tank No. 2**	**Tank No. 3**	**Tank No. 4**	**Tank No. 5**
Total Emissions (tpy)	927.902	95.816	112.738	74.503	155.244	93.073
VOC Emissions (tpy)	623.038	6.175	61.936	28.446	61.470	51.471
Methane Emissions (tpy)	167.129	0.115	1.927	0.309	46.064	0.440
HAP Emissions (tpy)	**20.320**	**0.460**	**2.960**	**0.990**	**1.760**	**3.190**
Benzene	*1.625*	*0.006*	*0.076*	*0.012*	*0.010*	*0.218*
Toluene	*1.876*	*0.013*	*0.060*	*0.031*	*0.037*	*0.074*
E-Benzene	*0.062*	*0.007*	*0.019*	*0.002*	*0.025*	*0.006*
Xylenes	*0.696*	*0.018*	*0.105*	*0.041*	*0.069*	*0.048*
n-C6	*16.059*	*0.421*	*2.704*	*0.904*	*1.616*	*2.845*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	170	45	22	20	53	15
Separator Temperature (F)	75	106	155	160	101	120
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	75	106	155	160	101	120
C10+ SG	0.801	0.972	0.972	0.952	0.961	0.984
C10+ MW	196	425	436	458	394	551
API Gravity	**68.0**	**15.0**	**17.0**	**18.0**	**19.0**	**19.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	12.50	0.80	2.00	0.60	2.30	4.80
GOR (scf/bbl)	106.60	8.88	9.60	6.44	17.78	7.52
Heating Value of Vapor (Btu/s	2081.33	181.43	1738.61	1076.97	1365.68	1718.17
LP Oil Component						
H2S	0.0000	0.1100	0.0000	0.0400	0.5100	0.1400
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0100	2.8500	1.3000	1.5400	1.1900	1.5000
N2	0.0100	0.0000	0.0000	0.0300	0.0100	0.0000
C1	4.9300	0.0100	0.1500	0.0300	1.5300	0.0400
C2	2.5800	0.0100	0.4000	0.0400	0.5300	0.2400
C3	3.4200	0.0200	0.7800	0.2200	0.8100	0.8500
i-C4	3.4300	0.0500	0.5600	0.1600	0.5000	0.6500
n-C4	3.7300	0.1800	1.2600	0.4700	1.2000	1.6500
i-C5	5.5500	0.3200	0.8700	0.4300	1.1500	2.1900
n-C5	3.6500	0.4500	1.2400	0.6500	1.3400	3.1500
C6	8.0700	0.6000	1.9800	0.6100	1.7500	4.7300
C7	14.6500	1.7200	3.4500	1.5800	3.6200	6.2500
C8	13.2600	2.1800	4.2600	2.0700	3.5300	10.2800
C9	7.8000	1.8400	3.6600	2.2800	3.5300	5.9300
C10+	19.6300	88.7100	78.1500	88.9700	76.8100	57.9100
Benzene	0.5400	0.0100	0.0500	0.0100	0.0100	0.3000
Toluene	1.9200	0.0600	0.0900	0.0600	0.1000	0.2600
E-Benzene	0.1700	0.0800	0.0600	0.0100	0.1600	0.0500
Xylenes	2.2200	0.2300	0.3700	0.1800	0.5100	0.4300
n-C6	4.4300	0.5700	1.3700	0.6200	1.2100	3.4500
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 52**	**Sample Tank No. 53**	**Sample Tank No. 54**	**Sample Tank No. 55**	**Sample Tank No. 56**	**Sample Tank No. 57**
E&P Tank Number	**Tank No. 6**	**Tank No. 7**	**Tank No. 8**	**Tank No. 9**	**Tank No. 10**	**Tank No. 11**
Total Emissions (tpy)	24.484	26.091	29.739	114.630	42.075	
VOC Emissions (tpy)	3.087	17.629	11.288	74.707	8.263	
Methane Emissions (tpy)	15.587	2.836	5.908	25.400	27.176	
HAP Emissions (tpy)	**0.190**	**0.510**	**0.330**	**2.120**	**0.090**	
Benzene	*0.003*	*0.007*	*0.013*	*0.039*	*0.028*	
Toluene	*0.006*	*0.014*	*0.008*	*0.071*	*0.010*	
E-Benzene	*0.000*	*0.001*	*0.003*	*0.007*	*0.000*	
Xylenes	*0.005*	*0.012*	*0.007*	*0.090*	*0.001*	
n-C6	*0.175*	*0.474*	*0.298*	*1.919*	*0.052*	
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	
Separator Pressure (psig)	23	17	18	54	35	
Separator Temperature (F)	79	106	75	125	76	
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	
Ambient Temperature (F)	79	106	75	125	76	
C10+ SG	0.947	0.967	0.963	0.943	0.923	
C10+ MW	368	383	401	363	278	
API Gravity	**20.0**	**20.0**	**20.0**	**21.0**	**23.0**	
Production Rate (bbl/day)	500	500	500	500	500	
Reid Vapor Pressure (psia)	1.20	3.30	3.80	1.10	1.80	
GOR (scf/bbl)	4.98	2.82	3.94	13.90	8.52	
Heating Value of Vapor (Btu/s	1067.32	2208.23	1236.41	1980.20	1192.63	
LP Oil Component						
H2S	0.0100	0.0000	0.0000	0.0000	0.0000	
O2	0.0000	0.0000	0.0000	0.0000	0.0000	
CO2	0.0700	0.0000	0.2500	0.0000	0.0600	
N2	0.0900	0.0000	0.2100	0.0100	0.0100	
C1	1.2500	0.1900	0.5300	1.8000	1.7700	
C2	0.2000	0.2300	0.3300	0.5400	0.2900	
C3	0.0800	0.7500	0.7500	0.5200	0.3700	
i-C4	0.0900	0.4900	0.4900	0.2800	0.2300	
n-C4	0.1800	1.5700	1.5000	0.9200	0.3100	
i-C5	0.4000	1.5300	1.3500	0.9800	0.4900	
n-C5	0.4500	1.9100	1.7700	0.9700	0.2400	
C6	1.0500	2.7500	2.3700	1.6800	0.2500	
C7	2.3300	3.9000	4.3000	3.0100	0.5900	
C8	2.9800	6.8100	5.5200	3.7300	0.5000	
C9	2.6000	4.0100	3.5700	3.5400	0.2500	
C10+	87.0300	73.0300	74.2800	80.2500	94.2100	
Benzene	0.0200	0.0400	0.1000	0.0300	0.1100	
Toluene	0.1100	0.2200	0.1900	0.1400	0.1200	
E-Benzene	0.0200	0.0500	0.1900	0.0300	0.0100	
Xylenes	0.2700	0.5100	0.4700	0.4500	0.0500	
n-C6	0.7700	2.0100	1.8300	1.1200	0.1400	
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	
	100.0000	100.0000	100.0000	100.0000	100.0000	0.0000

Tank ID	**Sample Tank No. 58**	**Sample Tank No. 59**	**Sample Tank No. 60**	**Sample Tank No. 61**	**Sample Tank No. 62**	**Sample Tank No. 63**
E&P Tank Number	**Tank No. 12**	**Tank No. 13**	**Tank No. 14**	**Tank No. 15**	**Tank No. 16**	**Tank No. 17**
Total Emissions (tpy)	134.719	26.214	195.573	142.068	191.224	35.095
VOC Emissions (tpy)	63.729	5.207	109.615	69.135	105.838	25.578
Methane Emissions (tpy)	16.689	12.924	7.759	5.438	4.313	3.029
HAP Emissions (tpy)	**1.170**	**0.430**	**2.810**	**1.760**	**2.110**	**0.750**
Benzene	*0.020*	*0.008*	*0.033*	*0.024*	*0.041*	*0.011*
Toluene	*0.014*	*0.032*	*0.032*	*0.053*	*0.079*	*0.022*
E-Benzene	*0.007*	*0.002*	*0.023*	*0.003*	*0.003*	*0.003*
Xylenes	*0.027*	*0.019*	*0.064*	*0.041*	*0.016*	*0.011*
n-C6	*1.104*	*0.371*	*2.659*	*1.640*	*1.969*	*0.701*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	30	20	20	22	20	19
Separator Temperature (F)	66	122	88	86	68	133
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	66	122	88	86	68	133
C10+ SG	0.946	0.926	0.945	0.944	0.964	0.928
C10+ MW	382	336	381	404	444	327
API Gravity	**23.0**	**24.0**	**24.0**	**24.0**	**24.0**	**25.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	4.00	0.60	3.90	4.60	4.80	4.10
GOR (scf/bbl)	15.42	4.60	19.12	13.74	17.84	3.48
Heating Value of Vapor (Btu/s	1553.86	1059.39	1747.39	1543.44	1703.42	2314.31
LP Oil Component						
H2S	0.4400	0.0000	0.5200	0.4500	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.6400	0.1200	0.9600	1.1500	1.4200	0.0500
N2	0.0100	0.1000	0.1200	0.0200	0.0200	0.0000
C1	1.0700	0.9400	0.4900	0.3600	0.2700	0.2500
C2	0.5400	0.0500	0.6500	0.5000	0.6200	0.4900
C3	1.4100	0.0700	1.7300	1.5900	1.9400	1.1600
i-C4	0.7000	0.0600	0.7400	0.7600	1.1000	0.6000
n-C4	1.9400	0.1000	2.4600	2.4000	3.0100	1.5900
i-C5	1.8900	0.2400	1.7900	1.7300	2.1900	1.4300
n-C5	2.3600	0.2300	2.3100	2.1400	3.2100	1.4400
C6	2.7100	0.9100	2.6100	2.6400	3.9300	1.9900
C7	5.1800	2.8000	5.3300	5.5200	5.6800	3.5100
C8	5.3700	4.2200	5.5400	6.0700	11.3000	4.4100
C9	3.9800	4.3400	4.2100	4.6000	6.7600	4.4400
C10+	68.6500	84.5400	67.0700	66.9000	54.5000	76.8100
Benzene	0.0500	0.0200	0.0400	0.0400	0.0800	0.0300
Toluene	0.1100	0.2100	0.1100	0.2600	0.4700	0.1500
E-Benzene	0.1500	0.0300	0.2000	0.0400	0.0400	0.0400
Xylenes	0.6500	0.3100	0.6300	0.5800	0.2900	0.1800
n-C6	2.1500	0.7100	2.4900	2.2500	3.1700	1.4300
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 64**	**Sample Tank No. 65**	**Sample Tank No. 66**	**Sample Tank No. 67**	**Sample Tank No. 68**	**Sample Tank No. 69**
E&P Tank Number	**Tank No. 18**	**Tank No. 19**	**Tank No. 20**	**Tank No. 21**	**Tank No. 22**	**Tank No. 23**
Total Emissions (tpy)	139.887	70.761	171.538	38.394	215.631	148.757
VOC Emissions (tpy)	89.426	46.290	110.120	12.834	164.956	138.780
Methane Emissions (tpy)	21.590	4.142	15.382	16.424	8.875	1.515
HAP Emissions (tpy)	**1.190**	**2.570**	**1.670**	**0.720**	**4.240**	**5.310**
Benzene	*0.011*	*0.371*	*0.013*	*0.224*	*0.985*	*1.086*
Toluene	*0.035*	*0.697*	*0.017*	*0.209*	*0.787*	*0.854*
E-Benzene	*0.010*	*0.039*	*0.004*	*0.007*	*0.020*	*0.025*
Xylenes	*0.025*	*0.176*	*0.025*	*0.066*	*0.118*	*0.122*
n-C6	*1.109*	*1.292*	*1.613*	*0.216*	*2.331*	*3.227*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	30	25	31	23	17	20
Separator Temperature (F)	60	136	64	79	86	120
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	60	136	64	79	86	120
C10+ SG	0.94	0.916	0.938	0.908	0.946	0.932
C10+ MW	380	431	340	324	323	326
API Gravity	**25.0**	**27.0**	**27.0**	**29.0**	**29.0**	**29.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	4.90	3.30	5.20	3.10	4.80	4.90
GOR (scf/bbl)	16.66	6.76	18.46	6.36	20.11	11.50
Heating Value of Vapor (Btu/s	1966.88	2041.97	1887.18	1405.21	2354.30	2985.81
LP Oil Component						
H2S	0.0000	0.3800	0.2400	0.0000	0.2700	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0600	0.2200	0.2100	0.0900	0.0800	0.0300
N2	0.0400	0.1000	0.3000	0.0000	0.0000	0.0000
C1	1.3500	0.3200	0.8600	1.1200	0.4400	0.0800
C2	0.8500	0.4100	0.5400	0.5300	0.7000	0.2000
C3	2.0900	1.0700	1.7500	0.7000	2.0600	1.3000
i-C4	1.1400	0.5700	1.1600	0.4500	0.9700	1.0400
n-C4	2.7100	1.4500	3.1500	0.6300	2.7500	3.8800
i-C5	2.1900	1.5700	2.9100	0.6400	2.7000	2.2100
n-C5	2.4600	1.5100	2.5900	0.4600	2.3200	3.2000
C6	2.2400	2.5400	3.7200	0.8400	3.5000	2.5500
C7	5.7900	3.5300	5.8600	4.7900	8.3100	7.2000
C8	4.7900	4.9600	5.6200	8.9000	7.2900	7.2300
C9	4.4800	4.1700	3.7300	5.8000	7.0500	4.7500
C10+	66.3000	72.0600	63.8500	67.7100	53.9500	59.2600
Benzene	0.0300	0.4300	0.0300	1.0000	1.2400	1.1600
Toluene	0.2900	1.9600	0.1200	2.7600	2.8500	2.3500
E-Benzene	0.2200	0.2400	0.0800	0.2400	0.1800	0.1600
Xylenes	0.6500	1.2100	0.5400	2.5900	1.2300	0.8600
n-C6	2.3200	1.3000	2.7400	0.7500	2.1100	2.5400
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 70**	**Sample Tank No. 71**	**Sample Tank No. 72**	**Sample Tank No. 73**	**Sample Tank No. 74**	**Sample Tank No. 75**
E&P Tank Number	**Tank No. 24**	**Tank No. 25**	**Tank No. 26**	**Tank No. 27**	**Tank No. 28**	**Tank No. 29**
Total Emissions (tpy)	243.873	502.831	13.397	154.387	119.805	263.134
VOC Emissions (tpy)	151.292	330.274	4.231	125.001	48.333	168.558
Methane Emissions (tpy)	7.881	124.465	6.395	4.603	45.716	54.016
HAP Emissions (tpy)	**2.480**	**13.120**	**0.070**	**10.900**	**1.090**	**3.440**
Benzene	*0.188*	*0.954*	*0.008*	*0.053*	*0.189*	*0.435*
Toluene	*0.276*	*1.256*	*0.003*	*0.110*	*0.076*	*0.413*
E-Benzene	*0.007*	*0.086*	*0.000*	*0.031*	*0.004*	*0.046*
Xylenes	*0.114*	*0.732*	*0.008*	*0.305*	*0.033*	*0.285*
n-C6	*1.896*	*10.096*	*0.055*	*10.401*	*0.785*	*2.257*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	22	280	4	25	64	80
Separator Temperature (F)	98	106	80	180	70	77
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	98	106	80	180	70	77
C10+ SG	0.917	0.921	0.893	0.916	0.898	0.896
C10+ MW	311	450	313	304	368	309
API Gravity	**29.0**	**30.0**	**30.0**	**30.0**	**30.0**	**33.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	6.20	4.80	2.60	2.70	2.80	2.20
GOR (scf/bbl)	24.26	61.80	2.34	11.76	18.78	32.78
Heating Value of Vapor (Btu/s	2141.84	1933.26	1394.74	2814.20	1478.45	1920.70
LP Oil Component						
H2S	1.0100	0.0000	0.0000	0.0300	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.1100	0.1200	0.0200	0.2700	0.1700	0.0300
N2	0.0000	0.0500	0.0000	0.0000	0.0200	0.0200
C1	0.4000	7.9800	0.5900	0.2600	3.1300	2.9000
C2	1.6600	1.5600	0.4000	0.4800	0.7000	1.1000
C3	2.2300	2.8200	0.5500	0.8100	1.0700	1.7100
i-C4	1.1500	1.4300	0.4500	0.3600	0.8800	1.0700
n-C4	1.9500	2.4400	0.6300	1.1800	1.1100	1.1500
i-C5	2.8400	2.1200	0.4800	1.2900	1.0500	1.5000
n-C5	1.3600	2.0900	0.4500	2.0600	1.0000	1.2300
C6	3.0700	2.5400	1.0000	2.6800	1.5300	2.3300
C7	6.9000	6.3500	4.3100	6.5200	4.4300	6.0000
C8	7.6500	8.0300	4.9000	7.3900	5.8900	8.7700
C9	5.8200	3.5600	4.1700	4.8600	4.2200	6.3100
C10+	61.2100	54.9600	80.5100	68.2000	72.4400	60.3600
Benzene	0.1500	0.2000	0.0900	0.0200	0.3100	0.3800
Toluene	0.6100	0.6800	0.1100	0.0900	0.3800	1.0700
E-Benzene	0.0400	0.1100	0.0200	0.0500	0.0500	0.3100
Xylenes	0.7000	1.0600	0.8100	0.5400	0.5000	2.2000
n-C6	1.1400	1.9000	0.5100	2.9100	1.1200	1.5600
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 76**	**Sample Tank No. 77**	**Sample Tank No. 78**	**Sample Tank No. 79**	**Sample Tank No. 80**	**Sample Tank No. 81**
E&P Tank Number	**Tank No. 30**	**Tank No. 31**	**Tank No. 32**	**Tank No. 33**	**Tank No. 34**	**Tank No. 35**
Total Emissions (tpy)	75.697	67.111	33.481	98.139	246.837	206.565
VOC Emissions (tpy)	48.997	21.176	9.640	41.538	186.576	136.694
Methane Emissions (tpy)	15.026	39.198	18.906	45.393	13.777	5.258
HAP Emissions (tpy)	**1.330**	**0.460**	**0.290**	**1.230**	**7.150**	**4.120**
Benzene	*0.115*	*0.055*	*0.025*	*0.118*	*1.477*	*0.060*
Toluene	*0.088*	*0.025*	*0.040*	*0.085*	*1.336*	*0.122*
E-Benzene	*0.010*	*0.002*	*0.004*	*0.008*	*0.030*	*0.010*
Xylenes	*0.038*	*0.011*	*0.023*	*0.165*	*0.263*	*0.100*
n-C6	*1.075*	*0.362*	*0.196*	*0.852*	*4.047*	*3.833*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	20	60	18	40	18	15
Separator Temperature (F)	115	78	70	110	80	108
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	115	78	70	110	80	108
C10+ SG	0.885	0.866	0.875	0.87	0.923	0.887
C10+ MW	280	324	277	297	346	272
API Gravity	**33.0**	**34.0**	**34.0**	**34.0**	**35.0**	**35.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	3.10	2.00	2.20	3.20	4.70	4.50
GOR (scf/bbl)	8.96	12.60	6.20	16.18	24.36	18.78
Heating Value of Vapor (Btu/s	1989.27	1308.40	1280.62	1473.81	2361.43	2135.62
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0100	0.0500
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0300	0.0500	0.0700	0.0400	0.0600	0.6100
N2	0.0000	0.0000	0.0000	0.0100	0.0100	0.0500
C1	0.8400	2.8100	1.1600	2.9100	0.6400	0.2600
C2	0.3700	0.3100	0.2400	0.4400	1.0500	0.7800
C3	0.9200	0.6200	0.4900	0.6800	2.2200	1.7400
i-C4	1.0000	0.4700	0.4300	0.5800	0.8300	0.8400
n-C4	1.3200	0.7300	0.6500	0.6300	2.7600	2.3700
i-C5	1.3500	0.7100	0.8000	0.5300	2.1100	2.2400
n-C5	1.2200	0.6600	0.7000	0.4900	3.1100	2.2500
C6	1.8500	1.0800	1.2900	0.8900	3.5800	3.1500
C7	4.6800	2.3500	3.6200	4.6300	11.4200	6.1800
C8	5.5400	2.9600	5.5500	5.3100	11.2400	6.7100
C9	3.8000	1.9300	3.8000	4.5800	8.3200	5.0700
C10+	74.8700	84.1900	78.1200	76.3800	40.2000	64.3300
Benzene	0.1700	0.1100	0.1400	0.1000	1.6600	0.0500
Toluene	0.3400	0.1500	0.6900	0.1900	4.4100	0.2700
E-Benzene	0.0900	0.0300	0.1800	0.0400	0.2500	0.0500
Xylenes	0.3900	0.2000	1.2000	0.9800	2.5500	0.5900
n-C6	1.2200	0.6400	0.8700	0.5900	3.5700	2.4100
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 82**	**Sample Tank No. 83**	**Sample Tank No. 84**	**Sample Tank No. 85**	**Sample Tank No. 86**	**Sample Tank No. 87**
E&P Tank Number	**Tank No. 36**	**Tank No. 37**	**Tank No. 38**	**Tank No. 39**	**Tank No. 40**	**Tank No. 41**
Total Emissions (tpy)	176.370	34.019	82.578	113.253	204.693	178.190
VOC Emissions (tpy)	121.493	16.601	32.683	56.649	107.904	100.629
Methane Emissions (tpy)	10.526	12.380	40.189	30.738	57.039	28.323
HAP Emissions (tpy)	**3.520**	**1.050**	**1.820**	**2.310**	**3.540**	**2.460**
Benzene	*0.068*	*0.262*	*0.364*	*0.285*	*0.530*	*0.307*
Toluene	*0.092*	*0.297*	*0.293*	*0.292*	*0.386*	*0.280*
E-Benzene	*0.019*	*0.011*	*0.016*	*0.018*	*0.030*	*0.012*
Xylenes	*0.072*	*0.048*	*0.125*	*0.138*	*0.208*	*0.068*
n-C6	*3.266*	*0.435*	*1.023*	*1.573*	*2.383*	*1.789*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	17	30	50	57	75	28
Separator Temperature (F)	100	125	68	80	81	60
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	100	125	68	80	81	60
C10+ SG	0.887	0.863	0.879	0.883	0.883	0.891
C10+ MW	283	276	356	294	288	277
API Gravity	**35.0**	**36.0**	**36.0**	**36.0**	**36.0**	**36.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	4.90	2.50	3.80	3.90	4.10	3.80
GOR (scf/bbl)	17.62	5.02	14.02	15.52	27.84	22.04
Heating Value of Vapor (Btu/s	2307.25	1616.36	1437.32	1721.01	1718.90	1846.39
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.2000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0900	0.0300	0.0300	0.0600	0.1400	0.0600
N2	0.0100	0.0000	0.0100	0.0100	0.0100	0.0100
C1	0.5300	0.9100	2.4200	1.5900	2.9000	1.3300
C2	1.1100	0.3200	0.4500	0.7200	0.9500	0.9300
C3	1.7600	0.5700	0.8100	1.1100	1.4500	1.7200
i-C4	0.8000	0.3900	0.5400	0.7700	1.0000	0.4400
n-C4	2.3800	0.5800	1.1700	1.6000	1.8400	1.9800
i-C5	2.1600	0.6500	1.3400	1.5200	1.6700	1.2300
n-C5	2.6700	0.5700	1.6000	1.6700	1.7900	2.2100
C6	3.3700	1.0700	2.4800	2.5900	2.1500	2.4300
C7	6.0700	3.3600	7.6400	7.1400	6.1000	9.4100
C8	6.8700	5.7300	10.3500	9.7000	7.9700	10.5500
C9	6.0400	4.2600	5.9100	5.1000	5.2600	6.0500
C10+	62.5300	77.9200	57.3100	59.8700	61.4100	54.5600
Benzene	0.0700	0.5500	0.8300	0.5000	0.5100	0.6300
Toluene	0.2600	1.5800	2.0500	1.5100	1.0900	1.8200
E-Benzene	0.1300	0.1300	0.2900	0.2400	0.2200	0.2100
Xylenes	0.5600	0.6500	2.6900	2.1000	1.7300	1.4100
n-C6	2.5900	0.7300	2.0800	2.2000	1.8100	2.8200
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 88**	**Sample Tank No. 89**	**Sample Tank No. 90**	**Sample Tank No. 91**	**Sample Tank No. 92**	**Sample Tank No. 93**
E&P Tank Number	**Tank No. 42**	**Tank No. 43**	**Tank No. 44**	**Tank No. 45**	**Tank No. 46**	**Tank No. 47**
Total Emissions (tpy)	264.744	77.810	341.571	746.422	120.452	114.826
VOC Emissions (tpy)	197.667	45.796	126.289	598.797	71.033	53.659
Methane Emissions (tpy)	4.156	20.047	121.935	12.450	24.855	41.873
HAP Emissions (tpy)	**5.070**	**1.720**	**2.060**	**7.990**	**1.310**	**1.960**
Benzene	*0.536*	*0.269*	*0.294*	*3.587*	*0.126*	*0.496*
Toluene	*6.120*	*0.232*	*0.161*	*0.449*	*0.199*	*0.291*
E-Benzene	*0.040*	*0.014*	*0.036*	*0.061*	*0.009*	*0.009*
Xylenes	*0.205*	*0.121*	*0.106*	*0.072*	*0.077*	*0.052*
n-C6	*3.677*	*1.081*	*1.462*	*3.820*	*0.900*	*1.109*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	18	18	190	22	24	60
Separator Temperature (F)	95	98	70	50	68	72
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	95	98	70	50	68	72
C10+ SG	0.9	0.871	0.861	0.918	0.872	0.863
C10+ MW	288	270	270	372	239	318
API Gravity	**36.0**	**37.0**	**37.0**	**37.0**	**38.0**	**38.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	7.20	3.90	3.00	4.90	3.60	4.50
GOR (scf/bbl)	23.68	10.02	53.74	67.22	15.46	17.44
Heating Value of Vapor (Btu/s	2352.89	1820.80	1489.35	2491.03	1867.10	1590.85
LP Oil Component						
H2S	0.8700	0.0000	0.0000	0.1400	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.1200	0.0500	0.3100	0.5300	0.0200	0.0500
N2	0.0200	0.0000	0.0300	0.0000	0.0000	0.0000
C1	0.1900	1.0400	6.2500	0.5600	1.1400	2.5500
C2	0.6800	0.4200	2.2000	2.3100	0.5800	0.8600
C3	2.5400	0.9700	2.0200	4.1000	1.2600	1.3500
i-C4	1.1400	1.1500	0.5500	1.9100	0.9300	0.9700
n-C4	3.8100	1.3100	1.1800	5.0000	1.4400	1.3600
i-C5	2.9900	1.6600	0.8300	3.4000	1.6100	1.4200
n-C5	2.9100	1.2800	0.7100	3.5100	1.3900	1.3400
C6	3.7100	2.1200	1.3200	3.0200	2.3200	2.1100
C7	9.0500	5.2700	3.8300	13.2800	6.5000	5.5300
C8	7.1100	7.7200	6.7800	13.1300	8.7200	7.6500
C9	5.9500	4.7200	2.8000	5.9600	5.9100	5.6600
C10+	52.8400	67.1300	69.1900	36.1900	62.7500	64.2400
Benzene	0.4700	0.5000	0.1800	2.6100	0.3100	0.8400
Toluene	1.5000	1.1900	0.3000	1.0600	1.5000	1.4900
E-Benzene	0.2400	0.1800	0.1800	0.4000	0.1800	0.1200
Xylenes	1.4100	1.7200	0.6100	0.5500	1.7900	0.8100
n-C6	2.4500	1.5700	0.7300	2.3400	1.6500	1.6500
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 94**	**Sample Tank No. 95**	**Sample Tank No. 96**	**Sample Tank No. 97**	**Sample Tank No. 98**	**Sample Tank No. 99**
E&P Tank Number	**Tank No. 48**	**Tank No. 49**	**Tank No. 50**	**Tank No. 51**	**Tank No. 52**	**Tank No. 53**
Total Emissions (tpy)	54.705	437.309	165.905	279.758	608.810	254.487
VOC Emissions (tpy)	37.588	181.269	149.208	103.605	571.582	161.927
Methane Emissions (tpy)	8.963	1.079	0.600	12.141	8.030	48.433
HAP Emissions (tpy)	**2.550**	**4.660**	**4.640**	**1.630**	**17.380**	**7.830**
Benzene	*0.263*	*0.041*	*0.202*	*0.453*	*0.424*	*2.228*
Toluene	*0.317*	*0.110*	*0.380*	*0.085*	*0.458*	*1.268*
E-Benzene	*0.024*	*0.053*	*0.035*	*0.015*	*0.025*	*0.039*
Xylenes	*0.218*	*0.149*	*0.168*	*0.017*	*0.441*	*0.399*
n-C6	*1.726*	*4.311*	*3.855*	*1.063*	*16.032*	*3.892*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	32	62	13	28	22	66
Separator Temperature (F)	149	80	113	45	114	89
Ambient Pressure (psia)	14.7	14.7	14.7	14.7	14.7	14.7
Ambient Temperature (F)	149	80	113	45	114	89
C10+ SG	0.862	0.894	0.882	0.904	0.877	0.877
C10+ MW	251	310	294	294	337	282
API Gravity	**38.0**	**38.0**	**38.0**	**38.0**	**38.0**	**39.0**
Production Rate (bbl/day)	500	500	500	500	500	500
Reid Vapor Pressure (psia)	3.00	5.20	5.70	7.40	3.10	3.70
GOR (scf/bbl)	5.82	37.60	13.60	28.24	45.82	30.08
Heating Value of Vapor (Btu/s	2216.65	1206.29	2853.46	1313.43	3053.30	1945.58
LP Oil Component						
H2S	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
O2	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
CO2	0.0100	4.1200	0.0100	2.0000	0.0400	0.1800
N2	0.0000	0.0200	0.0000	0.0000	0.2000	0.0000
C1	0.5100	0.0500	0.0300	0.5300	0.4200	2.2600
C2	0.4400	0.3200	0.4500	1.0400	0.5700	0.8400
C3	0.5900	1.4800	2.4200	1.9800	2.1600	1.4800
i-C4	0.5400	0.8700	1.1900	1.4200	1.1400	1.0300
n-C4	0.6500	3.3500	3.2300	3.7800	4.2600	1.6000
i-C5	1.3500	3.0800	2.0600	2.9700	2.9000	2.0600
n-C5	1.1500	2.8200	3.0500	2.9500	4.2900	1.8600
C6	2.5000	4.7100	2.3400	2.6800	3.5200	3.4100
C7	6.4600	10.0400	7.7900	11.8900	10.3400	8.6400
C8	8.5600	11.8100	8.3700	11.7900	9.9300	11.0300
C9	3.4500	6.4100	6.4400	6.6500	4.4300	5.1000
C10+	69.3200	46.8100	57.0400	45.6300	51.0200	51.2400
Benzene	0.3200	0.0300	0.2000	1.1100	0.1100	1.6600
Toluene	0.9100	0.2400	0.9900	0.7100	0.3100	2.6900
E-Benzene	0.1500	0.3000	0.2100	0.3600	0.0400	0.2100
Xylenes	1.4800	0.9700	1.1500	0.4800	0.7800	2.4200
n-C6	1.6100	2.5700	3.0300	2.0300	3.5400	2.2900
224Trimethylp	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000	100.0000	100.0000

Tank ID	**Sample Tank No. 100**	**Sample Tank No. 101**	**Sample Tank No. 102**	**Sample Tank No. 103**
E&P Tank Number	**Tank No. 54**	**Tank No. 55**	**Tank No. 56**	**Tank No. 57**
Total Emissions (tpy)	173.095	363.718	391.465	274.631
VOC Emissions (tpy)	97.629	237.995	191.567	204.825
Methane Emissions (tpy)	52.151	56.163	3.830	22.453
HAP Emissions (tpy)	**4.410**	**2.820**	**5.090**	**19.640**
Benzene	*0.242*	*0.369*	*0.970*	*5.674*
Toluene	*0.281*	*0.045*	*0.836*	*4.267*
E-Benzene	*0.031*	*0.026*	*0.019*	*0.070*
Xylenes	*0.164*	*0.129*	*0.135*	*0.436*
n-C6	*3.689*	*2.253*	*3.127*	*9.194*
224Trimethylp	*0.000*	*0.000*	*0.000*	*0.000*
Separator Pressure (psig)	60	60	33	42
Separator Temperature (F)	80	58	60	110
Ambient Pressure (psia)	14.7	14.7	14.7	14.7
Ambient Temperature (F)	60	58	60	110
C10+ SG	0.891	0.877	0.907	0.879
C10+ MW	265	309	295	283
API Gravity	**39.0**	**39.0**	**39.0**	**39.0**
Production Rate (bbl/day)	500	500	500	500
Reid Vapor Pressure (psia)	5.60	6.80	6.40	5.40
GOR (scf/bbl)	23.36	43.14	36.04	26.60
Heating Value of Vapor (Btu/s	1766.66	2016.56	1509.76	2428.31
LP Oil Component				
H2S	0.0000	0.0000	0.1100	0.0000
O2	0.0000	0.0000	0.0000	0.0000
CO2	0.0500	0.0300	2.4000	0.0100
N2	0.0100	0.0100	0.0000	0.0000
C1	2.3200	2.6700	0.1600	1.0900
C2	0.7200	1.7300	0.7600	1.5000
C3	1.1900	3.6000	2.6400	2.1200
i-C4	0.8900	1.8800	0.9100	0.8400
n-C4	1.8300	3.2300	3.5800	2.2800
i-C5	2.3500	2.4900	2.6500	1.6400
n-C5	3.2400	2.1100	3.4400	2.5200
C6	3.9900	2.7200	3.7800	2.6100
C7	9.9400	8.1600	10.7700	9.7300
C8	11.5600	11.9800	11.8300	8.9300
C9	6.0600	4.9500	6.1900	5.8900
C10+	48.9900	50.3400	40.8600	47.7300
Benzene	0.3000	0.3800	1.2700	2.7500
Toluene	1.0300	0.1500	3.4900	5.3000
E-Benzene	0.2900	0.2400	0.2200	0.2000
Xylenes	1.7800	1.3700	1.8000	1.3900
n-C6	3.4600	1.9600	3.1400	3.4700
224Trimethylp	0.0000	0.0000	0.0000	0.0000
	100.0000	100.0000	100.0000	100.0000

Tank ID					API > 40		
E&P Tank Number		**Average**	**ratios to HAP**	**Ratio to VOC**	**Maximum**	**Minimum**	**Average**
Total Emissions (tpy)	Total	785.812			8152.118	129.419	1530.229
VOC Emissions (tpy)	VOC	530.750	**33.837**		5678.554	43.734	1046.343
Methane Emissions (tpy)	Methane	116.167	**7.406**	**0.219**	1206.981	0.197	230.569
HAP Emissions (tpy)	**HAP**	**15.685**		**0.030**	**101.610**	**2.680**	**30.684**
Benzene							
Toluene							
E-Benzene							
Xylenes							
n-C6							
224Trimethylp							
Separator Pressure (psig)	Separator Pressure	126.451			870.000	13.000	231.870
Separator Temperature (F)	Separator Temperature	88.657			140.000	40.000	82.500
Ambient Pressure (psia)							
Ambient Temperature (F)							
C10+ SG		0.893			0.929	0.801	0.873
C10+ MW		292.72			375.000	162.000	241.304
API Gravity	**API Gravity**	**40.6**			**68.0**	**40.0**	**52.8**
Production Rate (bbl/day)							
Reid Vapor Pressure (psia)	RVP	5.691			13.100	3.000	7.983
GOR (scf/bbl)	GOR	88.149			924.960	12.300	172.479
Heating Value of Vapor (Btu/s	Heating value	1968.085					
LP Oil Component		**Composition**					
H2S		0.0679					
O2		0.0000					
CO2		0.3661					
N2		0.0360					
C1		2.9248					
C2		1.6262					
C3		2.7564					
i-C4		1.3958					
n-C4		2.9738					
i-C5		2.4711					
n-C5		2.7194					
C6		3.2723					
C7		8.5230					
C8		10.3202					
C9		5.6686					
C10+		48.1339					
Benzene		0.6044					
Toluene		1.6882					
E-Benzene		0.1797					
Xylenes		1.4353					
n-C6		2.8369					
224Trimethylp		0.0000					
		100.0000					

Tank ID	**API <40**		
E&P Tank Number	**Maximum**	**Minimum**	**Average**
Total Emissions (tpy)	746.422	13.397	174.327
VOC Emissions (tpy)	598.797	3.087	107.227
Methane Emissions (tpy)	124.465	0.115	22.193
HAP Emissions (tpy)	**19.640**	**0.070**	**3.366**
Benzene	5.674	0.003	0.445
Toluene	6.120	0.003	0.431
E-Benzene	0.086	0.000	0.019
Xylenes	0.732	0.001	0.120
n-C6	16.032	0.052	2.449
224Trimethylp	0.000	0.000	0.000
Separator Pressure (psig)	280.000	4.000	39.857
Separator Temperature (F)			
Ambient Pressure (psia)			
Ambient Temperature (F)			
C10+ SG	0.984	0.861	0.910
C10+ MW	551.000	239.000	334.946
API Gravity	**39.0**	**15.0**	**30.6**
Production Rate (bbl/day)			
Reid Vapor Pressure (psia)	7.400	0.600	3.809
GOR (scf/bbl)	67.220	2.340	18.878
Heating Value of Vapor (Btu/s			
LP Oil Component			
H2S			
O2			
CO2			
N2			
C1			
C2			
C3			
i-C4			
n-C4			
i-C5			
n-C5			
C6			
C7			
C8			
C9			
C10+			
Benzene			
Toluene			
E-Benzene			
Xylenes			
n-C6			
224Trimethylp			

API Gravity >40	
VOC Emissions (tpy)	
Mean	1046.343
Standard Error	188.1410357
Median	530.989
Mode	#N/A
Standard Deviation	1276.034588
Sample Variance	1628264.269
Kurtosis	3.35522263
Skewness	1.864492873
Range	5634.82
Minimum	43.734
Maximum	5678.554
Sum	48131.778
Count	46
Largest(1)	5678.554
Confidence Level(95.0%)	378.9354921
	667.4075079
VOC	1046.343
	1425.278492

API Gravity <40	
VOC Emissions (tpy)	
Mean	107.2265
Standard Error	15.51304
Median	72.87
Mode	#N/A
Standard Deviation	116.0889
Sample Variance	13476.64
Kurtosis	9.02191
Skewness	2.680349
Range	595.71
Minimum	3.087
Maximum	598.797
Sum	6004.685
Count	56
Largest(1)	598.797
Confidence Level(95.0%)	31.08882
	76.1377
VOC	107.2265
	138.3153

United States
Environmental Protection
Agency

Office of Air Quality Planning and Standards
Sector Policies and Programs Division
Research Triangle Park, NC

EPA-453/R-11-002
July 2011