Colorado AIMM / ITRC Methane Team

Gas Technology Institute - CH4 Connections September 25, 2018 Tim Taylor

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COLORADO

Air Pollution Control Division

Department of Public Health & Environment

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Colorado Regulation 7

- Regulates hydrocarbon emissions including methane from upstream oil & gas operations
- Primary purpose is for protection of health & environment
- Includes leak or emissions monitoring requirements for components, storage tanks and pneumatic controllers using an Approved Instrument Monitoring Method (AIMM)
 - EPA Method 21
 - Optical Gas Imaging (OGI) instrument
 - Other Division-Approved instrument based monitoring method or program (Alternative AIMM)

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- Review and Approval Criteria (Regulation 7 Section XII.L.8.)
 - Qualitative or Quantitative Detection (and how emissions quantified)
 - Commercially Available (ready for deployment; not in development or testing or a prototype)
 - Approved by other regulatory authorities and for what purpose or application?
 - Leak detection capabilities, reliability, and limitations
 - Frequency of measurements and data logging capabilities

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- Review and Approval Criteria (Regulation 7 Section XII.L.8.)
 - Data quality indicators for precision and bias
 - Quality control and quality assurance procedures necessary to ensure proper operation
 - Description of where, when and how will be used
 - Documentation (e.g., field or test data, modeling) adequate to demonstrate the proposed Alternative AIMM is capable of achieving emission reductions that are at least as effective as the emission reductions achieved using OGI or EPA Method 21 at prescribed monitoring frequencies



- The Interstate Technology & Regulatory Council (ITRC) is a state-led coalition working to advance the use of innovative environmental technologies and approaches.
- ITRC Methane Team formed in early 2015
- Context & Challenge
 - State, federal and international regulations addressing methane from oil and gas with options for alternative technologies
 - New detection technologies and applications being developed and introduced into the market
 - No standard methodology or guidelines to evaluate performance and equivalence of new or innovative methane detection technologies to existing approved technologies or methods



- ITRC Methane Detection Technologies Technical-Regulatory Guidance Document
 - Will be published September 28, 2018 (ITRCweb.org)
 - Collaborative effort from 60+ individuals representing State, Federal and International Regulators, Private Industry, Public Stakeholders, Academia and Others
 - Provides a centralized reference for oil & gas methane emission sources, leak monitoring regulations, detection technologies, evaluation guidelines and principles, and relevant case studies summaries/links



- Characterizes various methane emission sources along the entire oil and gas supply chain
- Summarizes existing and proposed methane and leak detection regulations for each segment of the oil and gas supply chain, including regulations that allow for approval of alternative detection technologies
- Identifies regulatory barriers and opportunities to the use of new or innovative methane detection technologies



- Overview of existing and emerging methane detection technologies and their applications
- Guidance regarding performance characteristics and parameters to consider in technology evaluation
- Provides a starting point and framework for evaluation of detection technologies

