

# *RAILROAD COMMISSION OF TEXAS*

## **NOTICE TO OIL, GAS & PIPELINE OPERATORS REGARDING AIR EMISSIONS**

Concentrated natural gas activity in the Barnett Shale in several Texas counties near Fort Worth has recently led to enhanced scrutiny of air emissions of volatile organic compounds (VOCs) like benzene. Complying with certain Railroad Commission regulations related to well and pipeline control, maintenance, and conservation can minimize gas and other releases and the potential negative impact such releases may have on air quality.

Under Statewide Rule 13, the operator is responsible for compliance during all operations at the well, and must effectively control the well at all times. A leaking wellhead may create an undesirable air emission *and* be a violation of Rule 13 for failure to control the well. Statewide Rule 32 allows a certain amount of gas venting from E&P operations, but imposes limits on authorized venting for the purpose of conserving gas. Exceeding authorized venting pressures may create an undesirable air emission and is not a legal use of gas. Venting in excess of authorized limits may also indicate the need for equipment maintenance and/or equipment failure.

Recently, at two sites located in Wise County, the Texas Commission on Environmental Quality (TCEQ) measured benzene at levels above 180 parts per billion – TCEQ’S short term, health-based comparison level. These emissions were attributable to two minor mechanical valve maintenance/failure issues that were quickly and easily repaired. These are examples of the need for regular maintenance and/or repair of equipment failure that may indicate a possible violation of Rule 13 or unauthorized venting under Rule 32 if the gas venting exceeds 24 hours.

Railroad Commission rules relating to well control and conservation require ongoing monitoring and maintenance to ensure that all valves are controlled, hatches are shut and equipment is working properly and in a manner authorized by and consistent with our rules.

**Compliance with these provisions may help control air emissions and we hereby urge you to undertake regular, ongoing inspection and maintenance of your wells, valves, pipelines, tanks, hatches, and other equipment to assure full adherence to applicable rules.**

Information relating to cost-effective emission reduction practices/technologies may be found at:

<http://www.epa.gov/gasstar/tools/recommended.html>

<http://www.api.org/Newsroom/new-ghg-estimations.cfm>

[http://www.api.org/ehs/climate/new/upload/GHG\\_Reduction\\_Projects\\_Guidelines.pdf](http://www.api.org/ehs/climate/new/upload/GHG_Reduction_Projects_Guidelines.pdf)

Information regarding Barnett Shale E&P activities and air emissions may be found at:

<http://www.rrc.state.tx.us/barnettshale/index.php>

<http://www.tceq.state.tx.us/implementation/barnettshale/bshale-main>

*Commissioner*  
**Michael Williams**

*Chairman*  
**Victor G. Carrillo**

*Commissioner*  
**Elizabeth Ames Jones**

Austin, Texas

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**Please Forward to the Appropriate Section of Your Company**