

OCD Exhibit 50

Reducing Methane Emissions: Best Practice Guide Venting



Disclaimer

This document has been developed by the Methane Guiding Principles partnership. The Guide provides a summary of current known mitigations, costs, and available technologies as at the date of publication, but these may change or improve over time. The information included is accurate to the best of the authors' knowledge, but does not necessarily reflect the views or positions of all Signatories to or Supporting Organisations of the Methane Guiding Principles partnership, and readers will need to make their own evaluation of the information provided. No warranty is given to readers concerning the completeness or accuracy of the information included in this Guide by SLR International Corporation and its contractors, the Methane Guiding Principles partnership or its Signatories or Supporting Organisations.

This Guide describes actions that an organisation can take to help manage methane emissions. Any actions or recommendations are not mandatory; they are simply one effective way to help manage methane emissions. Other approaches might be as effective, or more effective in a particular situation. What readers choose to do will often depend on the circumstances, the specific risks under management and the applicable legal regime.

Contents

Summary	2
Introduction	3
Quantifying emissions	6
Mitigation strategies	7
Checklist	
References	

Summary



Venting is releasing gas into the atmosphere. This guide intends to help you identify the major sources of venting and reduce methane emissions from them.

The general strategies for reducing emissions are as follows;

Best practice for reducing methane emissions from venting

 Keep an inventory of emissions from venting

Avoid or reduce venting from the following

- Hydrocarbon liquid storage tanks
- Compressor seals and starter motors
- Glycol dehydrators
- Removing liquids from gas wells
- Well-completion operations
- Oil well casinghead venting

If methane needs to be released, use vapor recovery or flaring rather than venting if possible

Monitor vents and evaluate for further improvements and controls



Introduction

Venting simply means releasing gas into the atmosphere. Methane can be vented intentionally from processes or activities that are designed to vent gas, or unintentionally when equipment malfunctions or operations are not normal.

This guide focuses on a few common venting sources and strategies for reducing emissions. It does not deal with all venting sources. In this guide, venting refers to gas vented from key equipment, such as wellheads, storage tanks, compressors and dehydrators. It also deals with gas from the following activities:

- well completions; and
- removing liquids from gas wells.

Venting occurs across all parts of the gas supply chain and from a variety of activities. This guide focuses on equipment and activities that are known to be major sources of emissions. Table 1 below sets out which types of equipment are major sources of emissions. Table 2 sets out the activities that are major sources of emissions.

Equipment	Where emissions come from	When emissions occur	Condition when emissions occur	Area of operations
Storage tanks for produced liquids, such as condensate, crude oil, or water	Flash gas at tanks with no vapor- recovery units (uncontrolled tanks)	Tanks can have emissions related to the flashing of light gases that result from receiving pressurized liquids from other vessels. Most often tanks are near atmospheric pressure, but upstream vessels can be at a much higher pressure.	Normal operation	Most 'produced liquids' storage tanks exist in production, but some also exist in processing and in transmission and storage.
	Tank loading and unloading, and tank gauging	Gas is released when a tank is opened at the hatch or when there is loading into the truck or rail tanker.	Routine activity	
	Vapor blowthrough to a tank	Gas is released from the tank as a result of a gas stream unintentionally sent from an upstream vessel.	Faulty or inadequate upstream equipment, especially at separators	

Table 1: Equipment known to be major sources of emissions from venting



Equipment	Where emissions come from	When emissions occur	Condition when emissions occur	Area of operations
Compressors	Packing around rods on reciprocating compressors	Normal losses occur at the mechanical seal of the packing around the rod.	Normal operation	Compressors are used in production, gathering
	Wet seals on centrifugal compressors	Normal losses occur at the mechanical seal of the rings around the rotating compressor shaft.	Normal operation	and boosting, processing, and transmission and storage, and also the export of liquid
	Starter motors (gas powered)	Periodic emissions are released from the starter motor when an idle compressor is started.	Normal operation	natural gas.
Glycol dehydrators	Regenerator vent stack not routed to flare	Water absorbed by the circulating glycol exits through the regenerator reboiler's vent stack to the atmosphere. Absorbed methane is also released. If a gas assist lean glycol pump is used, this can add to emissions.	Normal operation	Dehydrators are used in production, gathering and boosting, and storage.
Wellheads	Casinghead vent gas	Some oil wells that do not produce gas to sales will vent the annual space in the casing to the atmosphere.	Normal operation	Production of oil

Table 1: Equipment known to be major sources of emissions from venting (continued)



Table 2: Activities known to be major sources of emissions from venting

Activity	What causes emissions	When emissions occur	Condition when emissions occur	Area of operations
Well completions	Clearing unwanted liquids, solids and gas from the well after drilling and fracturing	After drilling, a new well is brought into production by clearing the well of drill cuttings, sand and fracturing fluid. This process, and the process of testing the well afterwards, can result in venting or flaring of gas.	Normal process	Production only
Removing liquids from gas wells (also called "liquids unloading")	Removing accumulated liquids from low-pressure gas wells	Gas is often released to the atmosphere when a well is allowed to flow directly to a lower-pressure source, such as an atmospheric tank, to clear the well.	Well is offline and gas flows to the atmosphere. This only occurs for certain types of liquids unloading procedures.	Production only

The emission sources this guide deals with make up about 16% of the total methane emissions from the US petroleum and natural gas systems.^{1,2}

Some sources of venting are covered in other best-practice guides, such as venting during equipment maintenance blowdowns, which is covered in the guide on operational repairs, venting from pneumatic devices, which is covered in a separate guide on pneumatics, and venting from unlit flares, which is covered in the flaring guide.



Quantifying emissions

Quantification methods for methane emissions deliver a rate, such as mass per time (e.g. kilograms per hour) or volume per time (e.g. standard cubic meters per hour), and can be produced by engineering estimations, by direct measurement of the methane sources, or by use of models. Vented emissions are quantified based on the following methods, listed in order of increasing accuracy and reliability.

- **Default emission factors** emissions are quantified by multiplying the number of pieces of equipment (or venting activities) by the average emission rate per piece of equipment or per process.
- Engineering calculations equations to calculate emissions may use a variety of information gathered locally to quantify the rate from certain processes or activities. In some cases, this may involve running a computer program (for example, tank flash emissions and glycol dehydrator regenerator emissions). In those cases, a simulation program may be used to predict emissions based on first principles and equations of state.
- **Direct measurement of emissions** this may be done using information from routine monitoring or, in some cases, continuous monitoring.

There are several accepted and recommended methods of direct measurement in 'Best Practice Guidance for Methane Management in the Oil and Gas Sector' (United Nations Economic Commission for Europe).³ Those methods include using:

- a calibrated vent bag;
- a high-volume sampler;
- flow meters; or
- anemometers.

Direct measurement requires a repeatable approach with written procedures, and different measurement approaches carry their own unique uncertainties. In some cases, getting an accurate direct measurement can be difficult, and engineering approaches may be preferred.



Mitigation strategies

Strategies for reducing emissions from venting involve the following.

- Reducing or eliminating the source of the emissions through effective operations and design.
- Directing the emissions to a control device to prevent direct emission of methane to the atmosphere.
- Where venting cannot be avoided, vents should be tracked and/or monitored and evaluated for further improvements or controls.

Methane is a valuable product that can be sold, so equipment and activities have been designed to minimize venting. The need for some venting can be reduced by making changes to operations, recovering gas to be reused, or flaring (burning) the gas. Some venting will be necessary for safety, technical or cost-efficiency reasons. When venting is necessary, it should be monitored and assessed to make sure it is minimized whenever possible.

The emission sources covered in this guide have been studied for decades. There are several guides on reducing these methane emissions. The guides and programs specific to natural gas systems include the following.

- Climate and Clean Air Coalition's (CCAC) Oil and Gas Methane Partnership technical guidance documents:^{4,5,6,7,8,9,10}
 - Number 3: 'Centrifugal Compressors with Wet (Oil) Seals', 2017
 - Number 4: 'Reciprocating Compressors Rod Seal/Packing Vents', 2017
 - Number 5: 'Glycol Dehydrators', 2017
 - Number 6: 'Unstabilized Hydrocarbon Liquid Storage Tanks', 2017
 - Number 7: 'Well Venting For Liquids Unloading', 2017

- Number 8: 'Well Venting/Flaring During
 Well Completion for Hydraulically Fractured
 Gas', 2017
- Number 9: 'Casinghead Gas Venting', 2017
- Natural Gas Star Program's 'Recommended Technologies to Reduce Methane Emissions', a program by the United States Environmental Protection Agency¹¹ (www.epa.gov/naturalgas-star-program/recommended-technologiesreduce-methane-emissions)
- United Nations Economic Commission for Europe's 'Best Practice Guidance for Methane Management in the Oil and Gas Sector', August 2019³
- Norwegian Environment Agency's 'Cold venting and fugitive emissions from Norwegian offshore oil and gas activities', a summary report prepared by Add Energy, April 2016¹²

This best-practice guide does not provide information on all reduction methods available as not all methods apply to the vented emissions this guide covers.

Recommended mitigation strategies for specific vented sources are summarized in table 3.

Table 3: Mitigation strategies for emissions from venting

Source of emissions	Mitigation strategy	Description	Effectiveness	Source of information
Storage tanks – flash gas	Add vapor- recovery units (VRUs)	The main option is installing a VRU for directing the emission to be reused, sold or flared.	95% reduction in emissions if the VRU has a high reliability.	CCAC ⁷ technical guidance document 6 EPA Gas Star ¹¹ NEA ¹²
	Eliminate tanks at production sites	Add lease automatic custody transfer (LACT) systems to transfer the oil or gas to a pipeline.	100% reduction	EPA Gas Star ¹¹
Storage tanks – opening and loading liquids from tanks to	Add automatic gauging systems	Automatic gauging may eliminate the need to open tank hatches, and so can reduce tank emissions.	100% reduction	Emerson guide ¹³
trucks	Introduce a system to balance or exchange gases between the tanks and tanker vehicles	Vapor return lines can be installed to collect or control gases displaced in the truck when transferring liquids from tanks to trucks. The gases may either be returned to the tanks (vapor balance) or sent direct to a control device.	Variable	EPA Gas Star ¹¹
Storage tanks – vapor blowthrough from upstream vessels	Add pressure monitors to tanks	Tank pressure monitors in a SCADA (supervisory control and data acquisition) system can alert operators of overpressure conditions that may result in direct emissions to the atmosphere.	Variable	US EPA Settlements ^{14, 15, 16}



Table 3: Mitigation strategies for emissions from venting (continued)

Source of emissions	Mitigation strategy	Description	Effectiveness	Source of information
Storage tanks – vapor blowthrough from upstream vessels (continued)	Routine monitoring	Routine monitoring of dump valves to make sure they are working properly, and routine monitoring of storage-tank hatches and safety valves, such as with an OGI camera, will allow earlier detection of vapor blowthrough.	Variable	CCAC ⁷ technical guidance document 6 NEA ¹²
Compressors – packing around rods on reciprocating compressors	Conduct regular monitoring	Add regular monitoring to a periodic leak detection and repair (LDAR) program.VariableThe information from the program can be used to either assess opportunities for reducing venting or monitor improvement after mitigation efforts.Variable	CCAC⁵ technical guidance document 4	
	Regularly replace packing around rods	The timing of replacements can be scheduled or based on inspections. Scheduled replacements should be carried out at least every three years, or as soon as excessive venting is identified. This strategy is most relevant to compressors that are spared (can be stopped without affecting production).	A 50 to 65% reduction in emissions is expected	CCAC⁵ technical guidance document 4
	Direct emissions to a control device	Emissions could be directed to a flare or another device such as catalytic destruction control.	95% reduction	CCAC⁵ technical guidance document 4



Table 3: Mitigation	strategies	for	emissions	from	venting	(continued)
----------------------------	------------	-----	-----------	------	---------	-------------

Source of emissions	Mitigation strategy	Description	Effectiveness	Source of information
Compressors – wet seals on centrifugal compressors	Regularly monitor sources of vented emissions	Add to periodic LDAR program. The information from the LDAR program can be used to either assess opportunities for reducing venting or monitor improvement after mitigation efforts. For information on developing an LDAR program, please see the best-practice guidance relating to equipment leaks.	Variable	CCAC ⁴ technical guidance document 3 NEA ¹²
	Direct emissions to a control device	Emissions could be directed to a flare or another device such as catalytic destruction control.	95% reduction	CCAC ⁴ technical guidance document 3 NEA ¹²
	Convert wet seals to dry seals	Dry seals generally use less power and are more reliable. However, replacing seals requires a lengthy and often expensive compressor shutdown. Operators should buy new compressors that have dry seals (about 90% of products on the market have dry seals).	Variable	CCAC4 technical guidance document 3 EPA Gas Star ¹¹



Source of emissions	Mitigation strategy	Description	Effectiveness	Source of information
Compressors – gas starter motors	Convert gas starter motors to electric starter motors	Gas starter motors use the energy in the pressurized gas to spin a turbine to start the compressor. Converting to electric power eliminates the need for gas power. (Note: An electricity supply is sometimes unavailable, or less reliable than gas pressure at the site.)	100% reduction	EPA Gas Star ¹¹ NEA ¹²
	Switch starters to compressed air (EPA Gas Star)	A compressed-air system at a facility often cannot power gas starter motors and is less reliable than gas pressure at the site.	100% reduction	EPA Gas Star ¹¹ NEA ¹²
	Recover or flare the gas from the starter motor	There must be large short- term capacity in the VRU or flare.	95% reduction	EPA Gas Star ¹¹
Glycol dehydrators – regenerator vent stack	Replace a gas-assist lean glycol pump with an electric lean glycol pump	Replacing the pump eliminates the need for gas that is discharged into the glycol stream and then vented.	100% reduction in pump-added emissions	CCAC ⁶ technical guidance document 5
	Install a flash tank separator, recover gas, and optimize glycol- circulation rates	(Note: Some newer control systems automatically shut down the dehydrator if the VRU system recovering the flash tank gas goes down.)	90% reduction	CCAC6 technical guidance document 5 NEA ¹²
	Replace with a 'near-zero emissions' dehydrator system	Change technology for dehydration (for example, desiccant) dehydrators.	100% reduction	CCAC6 technical guidance document 5



Table 3: Mitigation strategies for emissions from venting (continued)

Source of emissions	Mitigation strategy	Description	Effectiveness	Source of information
Well casinghead vent	Recover or flare the gas from the oil well casinghead vent	Gas can be recovered by a new vapor recovery unit (VRU) or by routing the gas to an existing vapor recovery unit on tanks if one already exists at the site. If recovery is not possible, flare the gas.	95% reduction in emissions if the VRU has a high reliability. For flare, 95%.	CCAC ¹⁰ technical guidance document 9
Well completions	Introduce a reduced- emission (green) completion system	The objective of the technology is to capture the flowback gas so it can be sold, or flare it as soon as possible, rather than venting. This step requires special flowback equipment. Install portable equipment during the final stage of a well completion that is designed for a high flow rate of water, sand and gas, and capture gas so it can be sold.	Roughly 90% reduction	CCAC ⁹ technical guidance document 8
Removing liquids from gas wells (also called "liquids unloading")	Manual liquids unloading: minimize time	Remove liquids by manually venting the well through an atmospheric tank, but only under direct supervision (eliminate unattended unloadings).	Unknown, variable	CCAC ⁸ technical guidance document 7
	Alter the well and downhole operation so that periodic venting is not needed	Operators have a number of options for removing liquids from the well that would eliminate the need for venting. Examples include adding foaming agents, soap strings or surfactants; installing velocity tubing; installing gas-lift compressors; or adding well pumps.	100% reduction	CCAC [®] technical guidance document 7



Table 3: Mitigation strategies for emissions from venting (continued)

Source of emissions	Mitigation strategy	Description	Effectiveness	Source of information
	Use automated liquids unloading	In some cases, an operator can install an automated plunger lift system that periodically drops a plunger to remove liquids. This method can be designed to eliminate venting.	Unknown, variable	CCAC ⁸ technical guidance document 7



Checklist

The following checklist allows you to assess your progress in reducing methane emissions from venting. You can introduce the strategies across all sites and equipment or start with only a selection.

Act	ivity	Completed	Percentage of equipment or sites
	Keep an inventory of emissions from venting		
	Avoid or reduce venting from the following		
	• Oil well casinghead venting		
	 Hydrocarbon liquid storage tanks 		
	 Compressor seals and starter motors 		
	Glycol dehydrators		
	Removing liquids from gas wells		
	• Well-completion operations		
	If methane needs to be released, use vapor recovery or flaring rather than venting		
0	Monitor vents and evaluate for further improvements and controls		



References

- United States Environmental Protection Agency (US EPA) '2017 Greenhouse Gas Reporting Program Industrial Profile: Petroleum and Natural Gas Systems' (October 2018)
- 2 US EPA 'Inventory of Greenhouse Gas Emission and Sinks, 1990-2017' (April 2019)
- 3 United Nations Economic Commission for Europe (UNECE) 'Best Practice Guidance for Methane Management in the Oil and Gas Sector: Monitoring, Reporting and Verification (MRV) and Mitigation' (August 2019)
- 4 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 3: 'Centrifugal Compressors with Wet Oil Seals' (2017)
- 5 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 4: 'Reciprocating Compressors Rod Seal/Packing Vents' (2017)
- 6 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 5: 'Glycol Dehydrators' (2017)
- 7 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 6: 'Unstabilized Hydrocarbon Liquid Storage Tanks' (2017)
- 8 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 7: 'Well Venting for Liquids Unloading' (2017)

- 9 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 8: 'Well Venting/Flaring During Well Completion for Hydraulically Fractured Gas Wells' (2017)
- 10 Climate and Clean Air Coalition's Oil and Gas Methane Partnership Technical guidance document 9: 'Casinghead Gas Venting' (2017)
- 11 Natural Gas Star Program 'Recommended Technologies to Reduce Methane Emissions', a program by the United States Environmental Protection Agency Available from www.epa. gov/natural-gas-star-program/recommendedtechnologies-reduce-methane-emissions
- 12 'Cold venting and fugitive emissions from Norwegian offshore oil and gas activities', a summary report prepared for the Norwegian Environment Agency (NEA) by Add Energy (April 2016)
- 13 Emerson 'The Engineer's Guide to Tank Gauging' (2017)
- 14 US Environmental Protection Agency
 'HighPoint Operating Corporation Clean Air
 Act Settlement' (April 2019) Available at www.
 epa.gov/enforcement/highpoint-operatingcorporation-clean-air-act-settlement
- 15 US Environmental Protection Agency 'Noble Energy, Inc. Settlement' (April 2015) Available at www.epa.gov/enforcement/noble-energyinc-settlement
- 16 16. US Environmental Protection Agency
 'MarkWest Clean Air Act Settlement
 Information Sheet' (May 2018) Available at
 www.epa.gov/enforcement/markwest-cleanair-act-settlement-information-sheet

References

- American Petroleum Institute 'Consistent Methodology for Estimating Greenhouse Gas Emissions from Liquefied Natural Gas (LNG) Operations', version 1 (May 2015)
- 18. Gas Research Institute and the US
 Environmental Protection Agency 'Methane
 Emissions from the Natural Gas Industry',
 Volume 14: Glycol Dehydrators (1996)
- 19. American Petroleum Institute 'Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry' (2009)
- 20. Michael McMahon 'Capturing the Tank Vapor Opportunity: Removing Oxygen from the Production Stream Reduces Emissions and Generates Incremental Economics', presentation at the Laurance Reid Gas Conditioning Conference, February 25-28, 2019 Available at www.ecovaporrs.com/ wp-content/uploads/EcoVapor-Laurance-Reid-Paper-Capturing-the-Tank-Vapor-Opportunity.pdf
- Kent A Pennybaker and River City Engineering Inc Society of Petroleum Engineers
 'Optimizing Field Compressor Station Designs' (March 1998)



