



DGCC Teleconference with OIRA
Thursday, June 29, 2023 | 2:30-3:00 pm EDT
Questions for OIRA and EPA Staff

The Differentiated Gas Coordinating Council (DGCC) thanks the Office of Information and Regulatory Affairs (OIRA) and Environmental Protection Agency (EPA) for meeting with our group to discuss the EPA's revisions to the requirements of 40 Code of Federal Regulations (CFR) part 98, subpart W to ensure that reporting and calculation of charges are based on empirical data and accurately reflect total emissions from applicable facilities, as required by the Inflation Reduction Act (IRA). The DGCC recommends that EPA solicit comment on the following questions in its Proposed Rule.

Full Question List

Category 1: State of the Sector: Is it capable?

- What is the state of advanced measurement technologies in the United States today?

Category 2: Technology Neutrality and Outcome Oriented

- How might direct measurement and reporting be designed so that it is performance-based rather than prescriptive?

Category 3: Degree of Accuracy

- What should be the statistical framework for evaluating the accuracy of estimates of methane emissions?
- How might EPA expedite the deployment of new, innovative direct measurement methods for methane emissions?
- Is the method for determination of uncertainty as described in the Nature publication titled "Creating measurement-based oil and gas sector methane inventories using source-resolved aerial surveys" appropriate for calculating uncertainty of methane intensity for determining a fee to be paid?¹
- Should EPA create different standards of measurement and accuracy for broad categories of technology based on differences in spatial and temporal resolution (e.g., handheld OGI, continuous monitoring, etc.)?
- Should third parties be authorized to certify the accuracy of calculations? If yes, what should be the accrediting process?

Category 4: Transition-Related Issues

- Should EPA require regulated entities to report a specified level of accuracy in emissions intensity data and, if so, what should be the level of accuracy?

¹ See Nature's "[Creating measurement-based oil and gas sector methane inventories using source-resolved aerial surveys](#)"



- What accuracy of emissions calculations is a realistic target for the calendar year 2024 and the next few years?
- What are the most important parameters impacting the accuracy of calculation?
- How are they best addressed?
- Will EPA allow a tiered approach?
- Will BAM be allowed?
- What kind of sample size should be used on existing sites?
- Is an accuracy of the methane intensity of $\pm 20\%$ for fees due for 2024, $\pm 15\%$ for fees due for 2025, and $\pm 10\%$ for fees due for 2026 and beyond an appropriate level?
- What are the best ways to improve the accuracy of calculations for fees due for calendar years 2025 and beyond?
- Should EPA have increasingly stringent requirements for the accuracy of emissions data submissions over subsequent years for which the fee is due?

Category 5: Regulatory Harmonization

- Should there be any alignment with Oil and Gas Methane Partnership (OGMP) 2.0 Level 4 (i.e., source-level measurements) and Level 5 (i.e., source/site level measurements) so that measurement standards are aligned with other regulatory programs (i.e., the European Union's regulations to reduce methane emissions)?²

² See OGMP's "[Documentation for Level 4 and Level 5 methods](#)" document.

