

Greenhouse Gas Industrial Reporting and Control Act Bulletin 018

Updated emission factors for pneumatic device venting at oil and gas operations

Greenhouse Gas Emission Reporting Regulation (GGERR)

Overview

This bulletin provides information to industrial operators that have a reporting obligation under the Greenhouse Gas Emission Reporting Regulation ('the Regulation' or 'GGERR') regarding a recent amendment (OIC#702) that provides updated emission factors for pneumatic device venting at oil and gas operations. The amendments were made in response to recent research on pneumatic device vent rates.

Industrial operators should ensure they understand the requirements and provide notice of concerns or issues to the attention of the Compliance Unit for Industrial Reporting and Control at GHGRegulator@gov.bc.ca.

Amendments to the GGERR

A new table of vent rates for pneumatic devices and retrofitted pneumatic devices has been added to Schedule A of the GGERR. Section 15(2) of the GGERR requires that oil and gas operations quantify their greenhouse gas emissions using WCI 350 and 360, which set out emission factors in WCI 350-6 and 360-6 that must be used to quantify vented methane emissions from pneumatic devices.

WCI 350-6 and 360-6 list rates for different makes and models of pneumatic devices that are based on field studies completed in 2013. However, studies completed in 2018 showed that rates for many of these devices are likely higher than previously understood.

Since BC has withdrawn from WCI but still references and relies on those methodologies in the GGERR, BC cannot directly amend WCI 350-6 and 360-6. Instead, the GGERR has been amended to require operators to substitute the vent rates that are now listed in Table 4 of Schedule A of the Regulation. If a pneumatic device is not listed in Table 4 of Schedule A, then operators are required to continue using WCI 350-6 and 360-6 in accordance with WCI 350 and WCI 360.

Columns 3, 4 and 5 of Table 4 in Schedule A list the applicable vent rates for a device listed in Column 2 or 6 that must be substituted for a rate listed in WCI 350-6 or 360-6 for that device. Columns 3 and 4 list vent rates for devices that have not been retrofitted. Column 5 lists vent rates for devices that have been retrofitted.

Operators must ensure that they retain the information or records required for a third-party verification body and/or the Oil and Gas Commission to confirm a device has been correctly installed with the

relevant retrofit kit. If a device cannot be verified to be retrofitted, it must not be reported with the rate listed in Column 5.

Note that in accordance with WCI 353 and 363, operators may have the option to report their emissions using a device-specific rate volume that is not provided in Table 4 of Schedule A or in WCI 350-6 or 360-6. Operators may use the device-specific supply pressure coefficient provided in Table 350-6 or 360-6 multiplied by an operator-measured supply pressure (kPa) of that device to determine the applicable rate volume for that device.

Applicability

The amendments apply to the 2022 reporting period and going forward.

Regulation is Determinative

The above is not legal advice and is provided as an aid in understanding the Regulation. Operators are responsible for reviewing the Regulation to ensure compliance with it.

To view Order in Council No. 702, visit the [BC Laws website](#).