# Tegre Emissions Solutions – US Emissions / EU Imports

#### Key Questions to Address

- What is going on with methane emissions in the US oil and gas industry?
- How do US LNG imports factor into EU future natural gas consumption?
- What impact will the EU Import Standard have on US LNG?

### Topics

- Evolution of LNG exports, emissions management since shale revolution (last 20 years)
- Overview of emissions regulations and reporting requirements
- Realities about the gap between reporting and real-world emissions
- What the EU can expect from US-based producers in the next 5-10 years

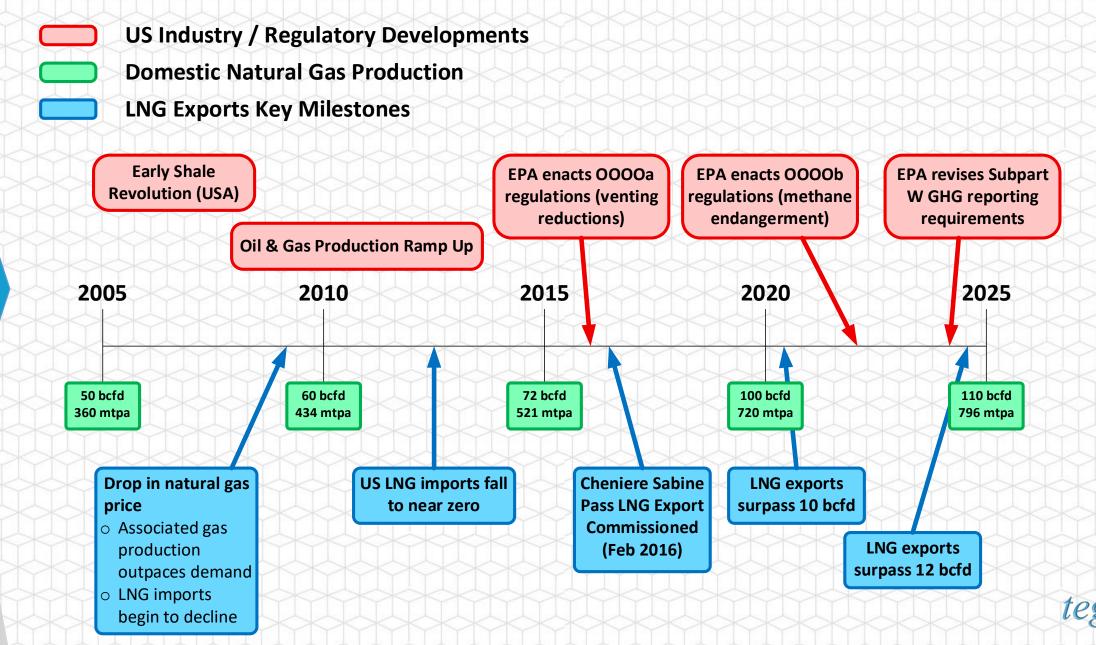
#### **Important Themes:**

- The EU may become more reliant on US
  LNG as it moves away from Russian gas
- Emissions associated with US production is likely MUCH higher than previously reported
- The EU Import Standard will likely put pressure on US producers to improve



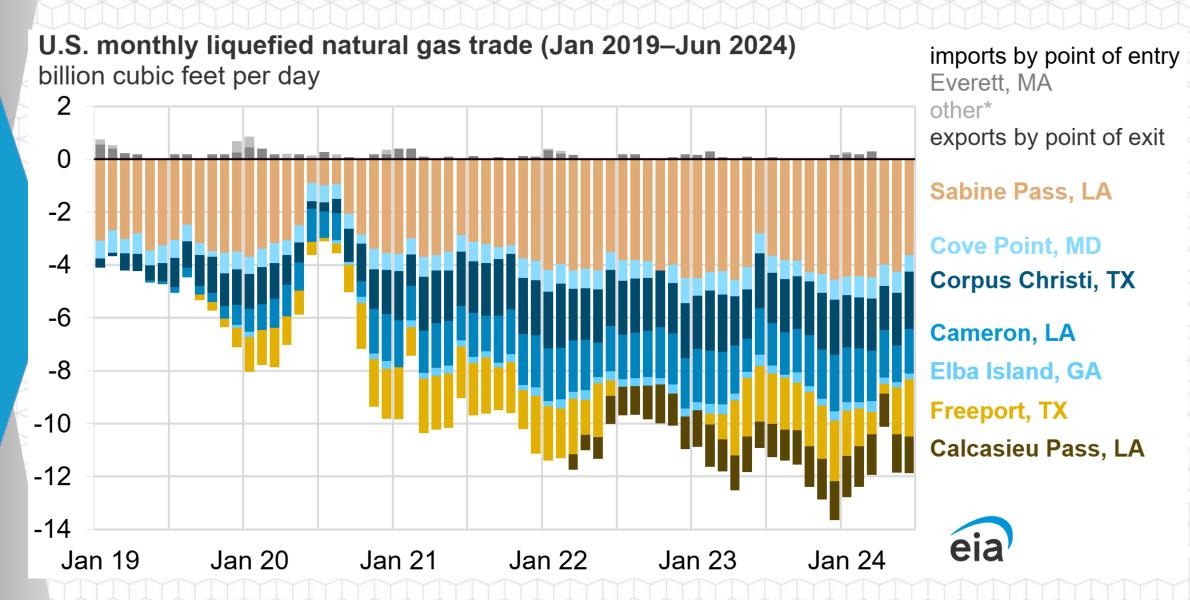
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# US Shale Revolution / LNG Exports – 20 Year Overview



# **US LNG Exports by Location**





## Realities About US Methane Emissions



- Background Greenhouse Gas
  Reporting
  - The EPA started Greenhouse Gas Reporting Program (GHGRP) in 2011
  - Largely based on equipment inventories,
    NOT measurements or leak detection
  - Some aspects led to over-reporting
    - Pneumatic controllers
  - Most aspects led to under-reporting
    - Flares (either unlit or poor performance)
    - Tanks Relief Devices
    - Vapor Recovery Units (VRUs)
    - Blowdowns
  - Reporting is often based on runtime, overall effectiveness assumptions
  - Many operators have lacked awareness of rules, rigor around application

- Background OOOO Regulations
  - Introduced in 2008
  - Greatly expanded in 2015 (OOOOa)
    - Reduction in tank emissions
    - Better flare technology
    - Applied mainly to VOCs (Volatile Organic Compounds)
    - Did NOT include methane emissions in regulation
  - Revised in 2023 (OOOOb)
    - Incorporated methane emissions into applicability criteria
    - More potential sources included in requirements for **NEW** locations
    - Introduced Super-Emitter Program

## Realities About US Methane Emissions



#### Net Effect of GHGRP & OOOO

- Behaviors misaligned with greatest needs
  - Reduction in pneumatic controllers
  - Continued poor performance of flares, VRUs
- Enforcement was originally lacking...
  - This has improved in recent years thanks to more flyovers, public scrutiny
  - Enforcement action for repeat offenders is slow (>2 years)
  - May be reduced under new administration
- The latest GHGRP (2024) is greatly improved, initial implementation underway
- Reporting does <u>NOT</u> match reality
  - Most companies that comply with OGMP
    2.0 find that their real-world emissions are
    3-5X what they have been reporting

### Pitfalls / Common Issues

- Operators often carry out False Fixes
  - Process variability can be hard to pinpoint
  - Emissions from relief devices are normally NOT caused by faulty relief devices
- Example of misreporting
  - Oil processing facility with storage tanks,
    VRU, and flare
  - Original permit calls for 95% runtime on VRU, 98% destruction efficiency for flare
  - No runtime / flowrate instrumentation on VRU or flare
  - Reporting consultant assumes performance matches permit
  - ESG Director gets report that actuals exactly match forecast (!)
- Sad Reality: Many companies have been hiding behind superficial reporting methodology

## **EU Natural Gas Import Standard**



### Key Ideas

- LNG importers must report Methane Intensity
  (MI) of sourced natural gas
- Data will be based on OGMP 2.0
  - Oil and Gas Methane Partnership
    - Created by the UN in 2014 / 2020
  - Largely based on measurement, not equipment inventories
- Quantification (such as OGMP 2.0)
  requirement goes into effect in January 2027
- MI Limit will start being enforced in 2030
  - Exact MI limit has not been established by EU
- Potential Consequences
  - Import access blocked
  - Fees
  - Alternate pricing

- What does this mean for US LNG in the next 5 years?
  - US LNG export capacity expected to double by 2030
  - Pressure to comply will cascade from LNG exporters to upstream producers
  - Very few US operators are following OGMP 2.0 standard
  - Main focus: Molecules that flow to US Gulf Coast
    - Haynesville
    - Permian
    - Mid-Continent
    - Appalachia
  - Many companies will struggle to get actual emissions down to acceptable level
  - Hardest hit: Private and PE-backed operators who do not have diversified portfolios

# Discussion / Notes / Conjecture

- What will the EU MI limit be?
  - Proposed Methane Intensity Limit: 0.2%
  - Previous US administration was working towards national level equivalency w/ taxation above this level
- What if critical suppliers do not meet this limit?
- What if critical suppliers meet this limit but lack transparency?
- Current LNG import sources:
  - USA
  - Qatar
  - Russia
  - Algeria
  - Nigeria
  - Other (15%)



Get Ready for the Berlin Gas Lift



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# **Tegre Emissions Solutions**

### Moving Beyond Super-Emitters

- Super-Emitters have been the primary focus for many
  Types of Sources countries and organizations. However...
- Global methane emissions are not decreasing at the rate expected
- The contributions from the large number of medium sources are not being addressed quickly enough
- Medium-Emitters require a **different** approach
  - Most super-emitters are "find-it-fix-it" solutions.
  - Most medium-emitters are systemic and require engineering solutions

- - Relief devices
  - Vapor recovery systems
  - Flares
  - Important: The **source** may not be the **cause**!
- Medium-Emitters May Be Intermittent
  - Process variability may lead to inconsistent equipment performance
  - Good News: Solutions are often scalable
  - More Good News: Finding solutions may take time, but they are often low cost

#### **Key Idea: Start Addressing Medium-Emitters Now**

- Medium-Emitters often add up to larger emissions than Super-Emitters
- More time is needed to analyze individual situations, engineer solutions
- These sources are often **intermittent** and require effective **remote** monitoring

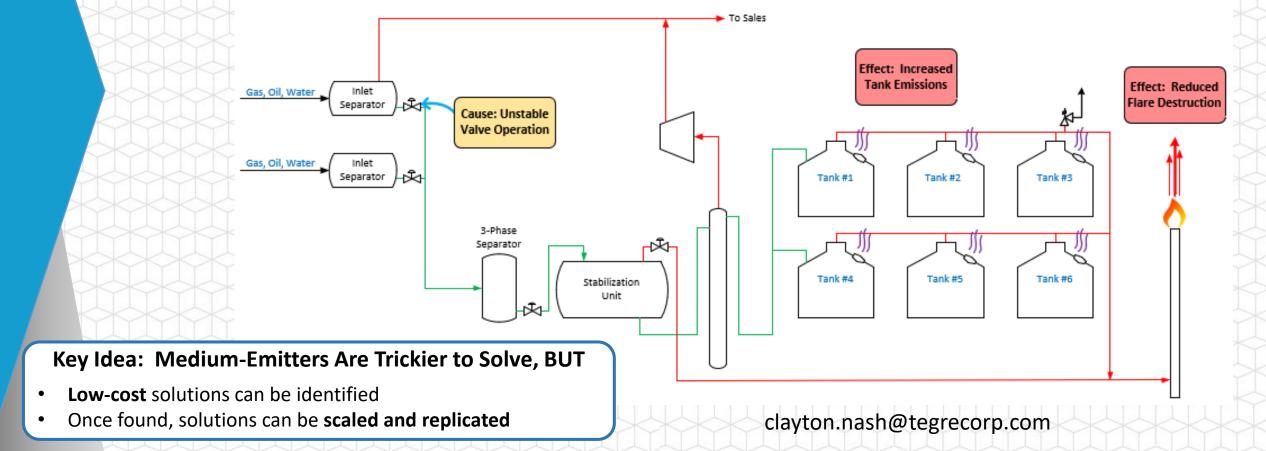


# **Tegre Emissions Solutions**

### Process Variability Example

- Cause: Unstable Valve Operation
- Effects:
  - Uncontrolled tank emissions
  - Poor flare destruction efficiency

- Solution: Improved process controller tuning
- Scalability: This solution can likely be implemented on similar locations



### The Tegre Emissions Solutions Way

- Don't do everything, but do a little bit of everything
- Work on solutions to Super-Emitters and Medium-Emitters in parallel
- Identify low-cost solutions that can be scaled and replicated quickly
- Utilize effective remote monitoring and measurement technologies



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