



**111(d) Methane Plan Updated:**  
Crude Oil & Natural Gas Source Category:  
Emissions Guidelines for Existing Sources  
May 20, 2026

# AGENDA

- Opening Remarks
- Summary of Current Final Rule and Recent EPA Changes
- Overview of ADEQ's Implementation Roadmap
- Remaining Useful Life and Other Factors (RULOF) Facilities
- Stakeholder Input: Questions & Feedback
- Closing Remarks

# Tips for a Good Meeting

- Share from your experience and perspective
- Please listen when others are speaking
- Allow space for all to participate
- Be generous
- We ask that all present be respectful and kind.



We believe that following these will lead to good outcomes and increased participation

Follow along in  
GoToWebinar

View chat  
messages

Call settings;  
If you have audio trouble,  
find phone instructions here

Enable closed  
captions



Record React



Mic



Camera



Share



Leave



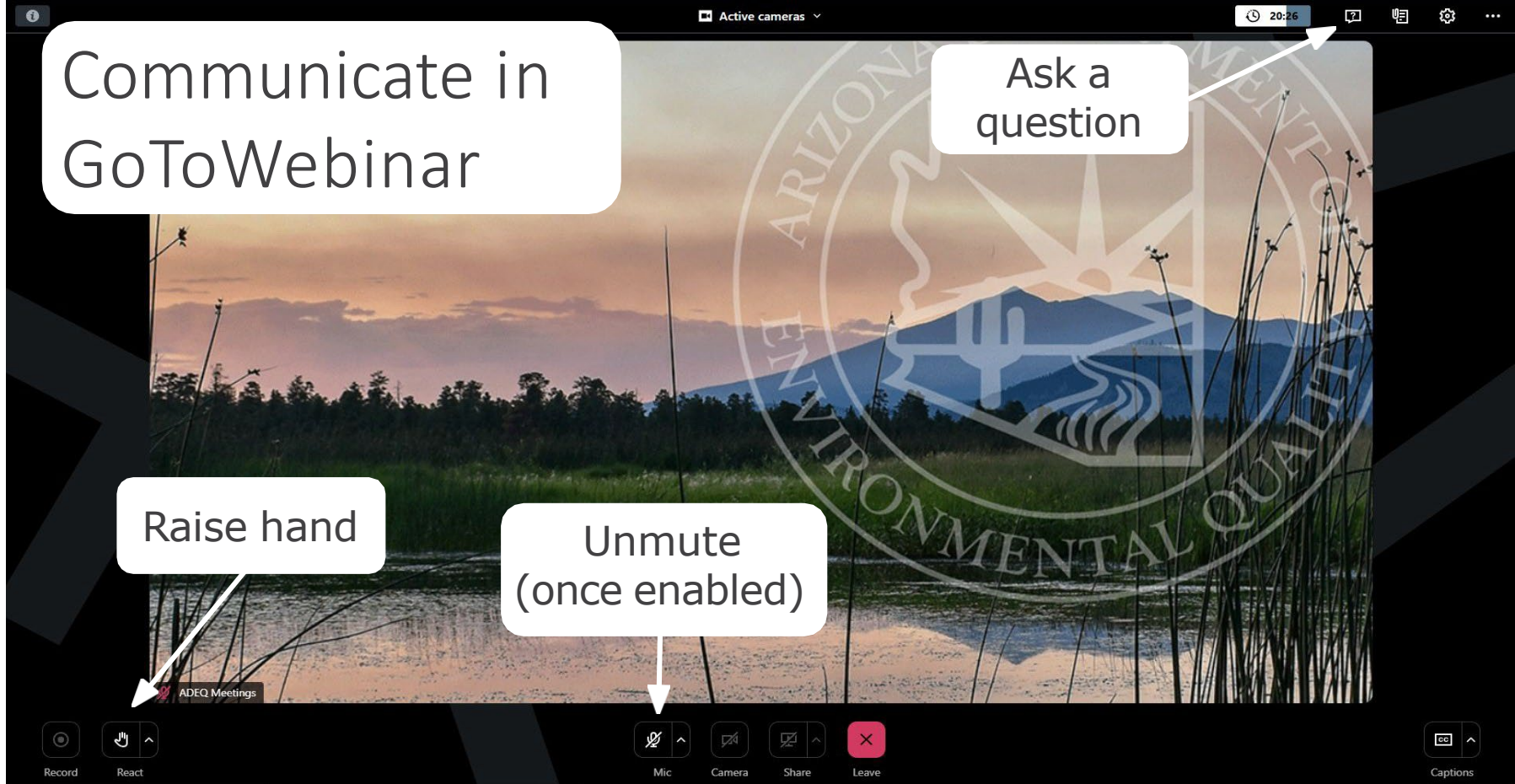
Captions

Communicate in  
GoToWebinar

Ask a  
question

Raise hand

Unmute  
(once enabled)



Record

React

Mic

Camera

Share

Leave

Captions

# Background

- Nov. 15, 2021, EPA proposed standards of performance and emissions guidelines under §111(b) and (d) of the CAA for methane & VOC emissions from sources in the Crude Oil and Natural Gas source category.
- March 8, 2024, EPA published its Final Rule, as well as requirements for the state to follow in developing, submitting, and implementing state plans to establish standards and guidelines for designated facilities.
- On Dec. 3, 2025, EPA issued an interim final rule extending the State Plan submittal date to Jan. 22, 2027.
- On April 9, 2026, EPA issued a final rule reconsidering two technical aspects of its 2024 Final Rule.

# Why target methane emissions?

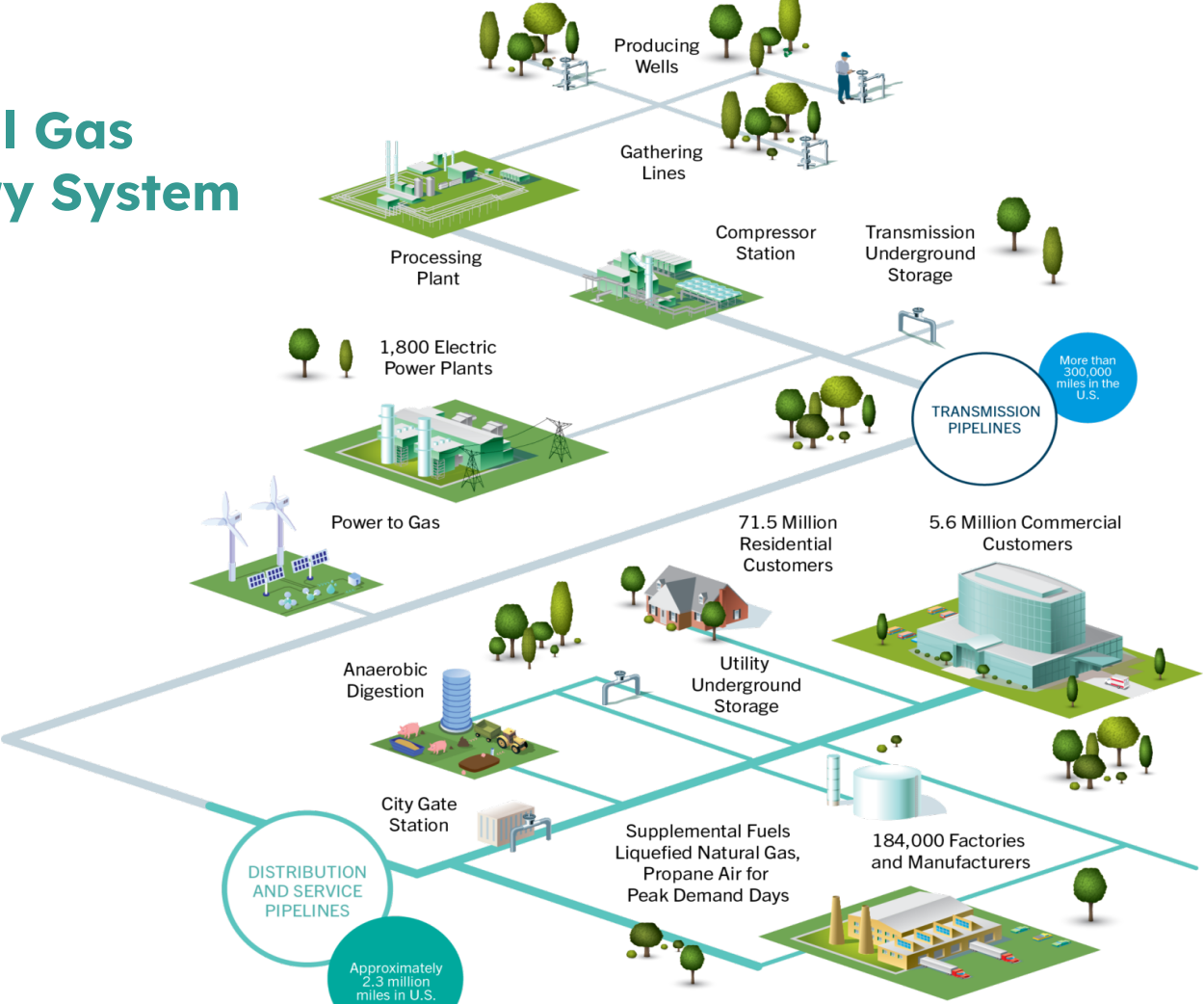
- Methane is a significant contributor of ground-level ozone. Ground-level ozone is known to aggravate numerous health issues.
- Methane emissions are a leading cause of extreme heat. In the first twenty years after being emitted into the atmosphere, methane has a warming effect more than 80x greater than carbon dioxide.
- Methane contributes to the formation of particulate matter. Particulate matter is not only detrimental to public health, but it's also responsible for reducing the visibility of our state's natural wonders.



# Why methane from oil & natural gas?

- EPA estimates that methane emissions from the oil and natural gas industries account for 30% of all U.S. methane emissions.
- Methane is valuable. As a result, fixing leaks is as much about reducing emissions as it is about recovering product.
- Advanced technologies already exist and are readily available to reduce methane leaks and emissions.

# Natural Gas Delivery System



# Regulated Activities & Designated Facilities

## Regulated Activities:

- **Leaks/Fugitive Emissions:** The Emission Guidelines will require a substantial reduction in methane emissions from Designated Facilities.
- **Super Emitter Program:** Requires owners/operators of oil & nat. gas facilities to conduct a set of investigations following notification from EPA of potential super emitter event that is based on satellite and/or aircraft remote-sensing data.

## Designated Facilities:

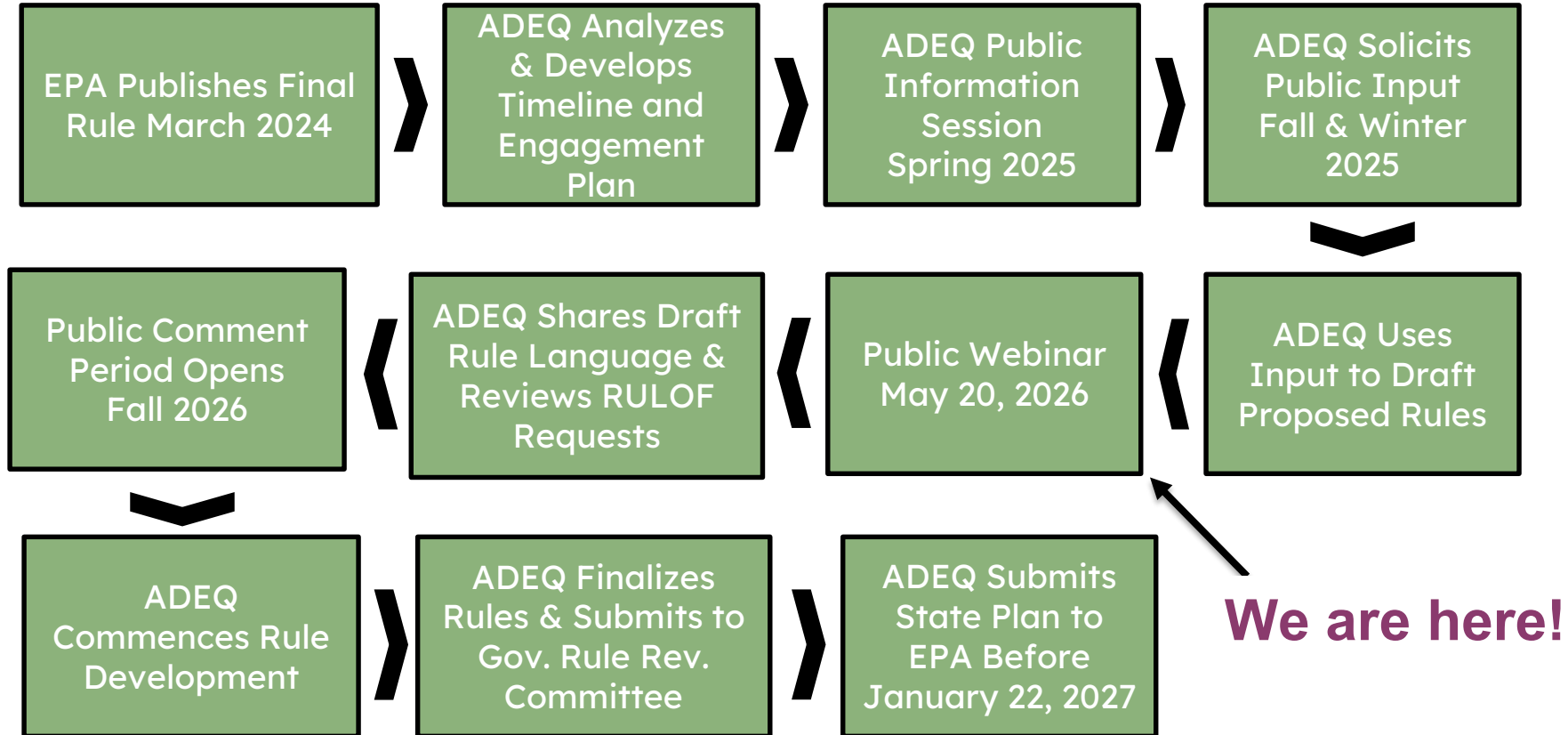
- ADEQ does NOT have jurisdiction over any oil or natural gas well sites, ONLY Designated Facilities in Transmission & Storage Segments.
- Common Designated Facilities:
  - Compressor Stations
  - Storage Vessels
  - Process Controllers

# April 2026 Final Technical Reconsideration

- **Changes to Temporary Flaring Provisions:**
  - Extends allowance for temporary flaring of associated gas in certain situations from 24 hours to 72 hours
  - Extends flaring time beyond 72 hours when extreme inclement weather is present, personnel shortages, or supply chain issues are present
- **Changes to Net Heating Value (NHV) Monitoring and Testing Requirements:**
  - Owners/operators will not be required to perform NHV sampling from flares or enclosed combustion devices, except when particular scenarios are present
  - Finalized alternative performance tests for new and existing sources
  - Allowed grab sampling upstream to the inlet to the control device, set performance testing at 14 operating days with weekend and holiday breaks, and required block hourly averaging for continuous samples
  - Set one-hour minimum sampling time twice daily



# ADEQ State Plan Process Roadmap



# Standards of Performance Stringency

- ARS § 49-104(A)(16):
  - “Unless specifically authorized by the legislature, ensure that state laws, rules, standards, permits, variances and orders are adopted and construed to be **consistent with and not more stringent than the corresponding federal law** that addresses the same subject matter. This paragraph does not adversely affect standards adopted by an Indian tribe under federal law.”
- 40 CFR § 60.24a(c)
  - “(c) **Except as provided in paragraph (e) of this section, standards of performance shall be no less stringent than the corresponding emission guideline(s)** specified in this part, and final compliance shall be required as expeditiously as practicable, but no later than the compliance times specified in an applicable subpart of this part.”



## RULOF 40 § 60.24a(e)

- The State may apply a less stringent standard of performance and/or a compliance schedule longer than required by an applicable Emissions Guideline based on:
  - Unreasonable cost of control resulting from plant age, location, or basic process design.
  - Physical impossibility or technical infeasibility of installing necessary control equipment.
  - Other circumstances specific to the facility.
- If you will be seeking variances for standards of performance or compliance deadlines for any of your designated facilities, please supply ADEQ with an inventory of those designated facilities.
- ADEQ would like to schedule additional advanced planning sessions as soon as possible.



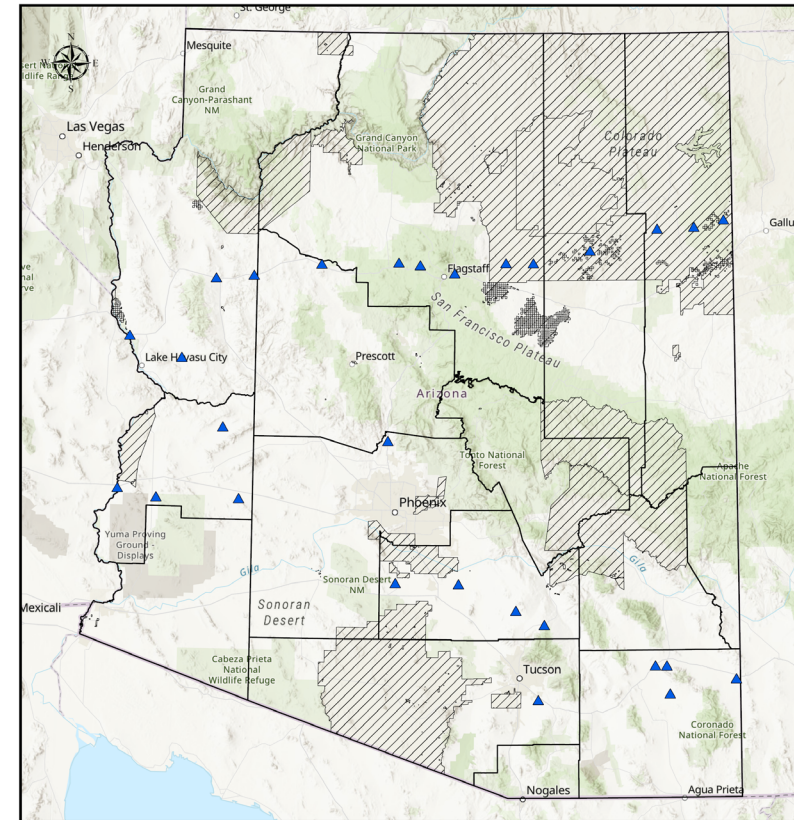
**RULOF Request Review Deadline**

**June 3, 2026**



# Map of Existing Natural Gas Compressor Stations within Arizona

- This map shows the approximate locations of existing natural gas compressor stations within the geographic scope of Arizona but does not represent designated facilities covered by ADEQ's draft rule and state plan.
- Six (6) facilities are located on tribal land, and are outside of ADEQ's jurisdiction.
- Six (6) facilities are located in local air agency permitting jurisdiction.



## Legend

- ▨ Tribal Land
- ▭ Counties
- ▲ Compressor Stations

0 12.5 25 50 75 100 Miles

**ADEQ**  
Arizona Department  
of Environmental Quality

This map is for general reference only and may not be all inclusive. ADEQ program's data collection efforts are ongoing. More detailed information and specific locations can be obtained by contacting the Arizona Department of Environmental Quality.

# ADEQ's Approach to EPA's Model Rule

- Part A under Arizona Administrative Code Title 18, Chapter 2, Article 7 – Existing Stationary Source Performance Standards
- The draft rule would create 26 new rules based on the model rules created by EPA.
  - Definitions
  - Applicability Criteria
  - Methane Emissions and Work Practice Standards for:
    - Centrifugal Compressors
    - Reciprocating Compressors
    - Process Controllers
    - Pumps
    - Storage Vessels
    - Fugitive Emissions Components
      - Alternative Methane Emissions and Work Practice Standards for Fugitive Emissions Component Designated Facilities and Inspection and Monitoring Requirements for Covers and Closed Vent Systems Using an Alternative Technology
    - Process Unit Equipment
      - Alternative Methane Emissions Standards for Process Unit Equipment
      - Exceptions to the Methane Emissions Standards for Process Unit Equipment Designated Facilities



# Draft Rule Continued

- Test Methods and Procedures for Centrifugal and Reciprocating Compressor Designated Facilities
- Test Methods and Procedures for Process Unit Equipment
- Initial Compliance Requirements for Each Designated Facility
- Initial Compliance Requirements for Covers and Closed Vent Systems
- Compliance and Performance Testing Requirements for Control Devices
- Continuous Compliance Requirements for Each of the Designated Facilities
- Initial and Continuous Inspection and Monitoring Requirements for Covers and Closed Vent Systems



# Draft Rule Continued

- Continuous Monitoring Requirements for Control Devices
- Notification, Reporting, and Recordkeeping Requirements
- Additional Recordkeeping and Reporting Requirements for Process Unit Designated Facilities
- Additional Recordkeeping and Reporting Requirements for Fugitive Emissions Components, Covers, and Closed Vent Systems Designated Facilities that Comply with the Alternative Methane Emissions Standard
- Super-Emitter Event Standards and Requirements
- Requirements for Meeting Increments of Progress and Achieving Final Compliance





**Questions?  
Thank You!**