



## METHANE RULE SURVEY FAQ SHEET

### Should I fill out this survey?

- You should fill out this survey if your facility/facilities
  - fall under the designated facility criteria in the New Source Performance Standards Subpart OOOOc regulations.
  - are subject to methane emissions reporting under the OOOOc standards.
  - reports to the Board of Oil & Gas.

If you're unsure, it's best to consult the survey instructions or contact DEQ for clarification.

### What qualifies as a "designated facility" under NSPS 40 CFR 60 Subpart OOOOc?

- [eCFR :: 40 CFR 60.5365b -- Am I subject to this subpart?](#)

### What is meant by sites? Does a site represent each individual well?

- EPA has designated any emitting unit as a facility. So, a Site (what we would normally call a facility) will have a Site Name, and that Site may contain several Facilities, i.e 3 wellheads, a tank battery, a pneumatic pump, and 10-20 fugitive emission facilities (i.e. points that can have fugitive emission leaks such as valves, thief hatches, etc).
- In addition to this, all wells, whether they are producing or not, need to be reported because each has the **potential** to emit, according to the EPA.

### What is the deadline for submitting the survey?

- October 30, 2024

### Will the Information we provide be made public?

- Yes, this information will be public through FOIA requests according to transparency requirements under Montana's public record laws. These laws ensure that environmental data and compliance reports are accessible to the public.

### How will the reported information be used by DEQ

- This survey information will help us identify facilities subject to New Source Performance Standards 40 CFR Part 60 Subpart OOOOc. This data is essential for creating a State Implementation Plan that helps Montana ensure compliance with federal methane reduction rules.

### What kind of technical support is available if we encounter issues during the process?

- Contact DEQ at: [deq-armb-admin@mt.gov](mailto:deq-armb-admin@mt.gov) or 406-444-3490

### What documentation or records should we keep after completing the survey?

- After completing the survey, keep a copy of the submission, supporting data, correspondence with us, and proof of submission for future reference.
- DEQ will retain a copy for 15 years per the records retention schedule.

### Will there be future surveys or updates to this reporting requirement?

- We intend this to be our only raw data collection survey.
- When implemented, owner/operators will be required to use controls compliant to the new rule for facility emissions under OOOOc.
- DEQ will be implementing new processes to track and monitor the updated control requirements when the new rule is finalized.