



EPA's Mandatory Greenhouse Gas Reporting Rule

General Overview

EPA's Mandatory Greenhouse Gas Reporting Rule, 40 CFR Part 98, requires reporting of greenhouse gas (GHG) emissions from certain industries in the U.S. The rule does not require control of GHG emissions. Under the rule, Subpart W applies to the petroleum and natural gas industry segment.

Am I required to report, and when is my report due to EPA?

Emissions are required to be reported if they exceed 25,000 metric tons CO₂e per year for a given facility. CO₂e includes carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), with equivalencies assigned based on the global warming potential of each pollutant.

Reports must be submitted by March 31st for the preceding calendar year.

What equipment am I required to include in my reported emissions totals?

Industry Segment	What is included under the given industry segment?	Emission Sources to Report	
Onshore Petroleum and Natural Gas Production	Includes all equipment on a well pad or associated with a well pad, under common ownership or control, including leased or contracted activities by a production owner or operator located in a single hydrocarbon basin ¹ .	Pneumatic device venting	Equipment leaks
		Pneumatic pump venting	Reciprocating compressor rod packing venting
		Well venting for liquids unloading	Centrifugal compressor venting
		Gas well completion / workover venting	Dehydrator vent stack emissions
		Storage tank emissions	Acid gas removal vent stack emissions
		Combustion emissions	EOR dissolved CO ₂
		Flaring	EOR injection pump blowdowns
Onshore Natural Gas Gathering and Boosting	Includes gathering pipelines and other equipment used to collect petroleum and/or natural gas from onshore production gas or oil wells and used to compress, dehydrate, sweeten, or transport petroleum and/or natural gas to natural gas processing facilities, natural gas transmission or distribution pipelines, or gas storage facilities. Gathering pipelines operating on a vacuum or with a GOR < 300 scf/bbl are excluded from applicability.	Pneumatic device venting	Associated gas venting / flaring
		Pneumatic pump venting	Combustion equipment
		Blowdown vent stacks	Equipment leaks
		Storage tank emissions	Reciprocating compressor rod packing venting
		Combustion emissions	Centrifugal compressor venting
		Flaring	Dehydrator vent stack emissions
		Acid gas removal vent stack emissions	

Is this a "once-in-always-in" reporting program?

You may submit a notification to EPA of your intent to discontinue reporting, if reported emissions are:

- Less than 25,000 metric tons CO₂e per year for five consecutive years; OR
- Less than 15,000 metric tons CO₂e per year for three consecutive years.

Records must be retained, and reporting must resume if annual emissions subsequently increase above the reporting threshold.

¹ A basin is defined by the American Association of Petroleum Geologists Provinces Code Map: <https://ngmdb.usgs.gov/Geolex/stratres/provinces>