

Green House Gases

Carbon Dioxide

Texas Ranks #1 in the Nation

Louisiana Ranks #9

Methane

Louisiana and Texas handle most of the nations natural gas (methane)

EPA Inventory of greenhouse gases identified

-landfills as the leading source of methane emissions

-natural gas systems, a close second

Natural Gas is 20 times more efficient in trapping atmospheric heat than carbon dioxide

30% of the natural gas utilized in the United States is distributed through the Henry Hub in Louisiana

Natural Gas Systems consist of wells, pipelines, compressor stations, LNG ports, salt dome storage, pumping stations, and transfer stations

Recent Federal Action for reporting greenhouse gases does not include natural gas processes

Need for programs to reduce greenhouse gases from natural gas processes

Discharge of Produced Waters into the Territorial Seas of Louisiana

Produced Waters are discharged into the Dead Zone

Permit Development Process Lacks consideration of
chemical constituents or concentrations
cumulative effects of toxic and radioactive
substances

Previous General Permit Issues 1997 expired 2002
118 facilities continue to discharge with expired permits

No Environmental Assessment of impacts to aquatic biota and habitats
from 118 existing facilities and
150 additional facilities

Notice of Intent - 14 days general permit is automatically valid

- *Lack of time to review and comment

- *Produced waters toxic to aquatic biota and hazardous to human health

- *Chemicals in produced water bioaccumulate in aquatic organisms

Gulf of Mexico Produced Waters contain at least 50 chemicals and radioactive compounds

General Permit requires only 7 chemicals to be monitored:

oil and grease

radium 226*

benzene**

radium 228*

lead**

thallium**

phenols

*General Permit lacks discharge limits on quantity of radioactive radium compounds

**Dilution allowed to meet permit limits

Many of the most hazardous components of produced water are not required to be monitored

Mercury Gas Meters

Mercury meters are still in use at gas wells and along gas pipelines

Independent Gas Operators estimate it will take up to 7 years to replace the mercury meters.

The extensive time period is due to lack of available replacement meters and financial resources

Meanwhile the meters currently in use continue to spill and leak mercury into the environment.

Old mercury meter locations continue to await remediation of mercury contaminated soil/sediments

Natural Gas Mercury Meters have been associated with mercury contamination of a variety of fish species and fish consumption advisories.

Need for quicker replacement of mercury meters and remediation of mercury contaminated soils

Oil and Gas Drilling and Production Sites Impacted by Hurricane Storm Surges and High River Flood Stages

Tanks have secondary containment
Pits have freeboard requirements

These requirements are to retain the contents within the levee systems

Hurricane storm surges and high waters in river systems over top levees, wash pit contents, tank and tank contents into the surrounding environments



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The hurricanes of 2005 in Louisiana resulted in 6 million orphan containers being spread over the landscape

The containers were identifiable

The contents of the containers, pits and waste streams from drilling and production sites were not so easy to address

Need for requirements to isolate oil and gas products and waste streams from outside forces

Shale Development

Full disclosure of all chemicals and constituents used in the drilling and fracturing process

Adequate wastewater treatment and handling capacity - treat and dispose of hydraulic fracturing waste

Mechanism to identify orphan and abandoned sites and wells in the area of proposed wells

Emission controls for fracturing, completion, production and storage tanks

Buffer Zone, Set Backs and Exclusionary Zones for:
well sites tank batteries
compressors associated equipment

from:

water bodies water wells
homes and businesses schools and parks

Adequate agency resources and staff to:

- review and evaluate permit applications
- issue permits
- observe field activities during drilling and fracturing
- perform compliance monitoring



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