

1 Air Impacts of Increased Natural Gas Acquisition, Processing, and 2 Use: A Critical Review

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11 **ABSTRACT:** During the past decade, technological advancements in the
12 United States and Canada have led to rapid and intensive development of
13 many unconventional natural gas plays (e.g., shale gas, tight sand gas, coal-bed
14 methane), raising concerns about environmental impacts. Here, we summarize
15 the current understanding of local and regional air quality impacts of natural
16 gas extraction, production, and use. Air emissions from the natural gas life cycle
17 include greenhouse gases, ozone precursors (volatile organic compounds and
18 nitrogen oxides), air toxics, and particulates. National and state regulators
19 primarily use generic emission inventories to assess the climate, air quality, and
20 health impacts of natural gas systems. These inventories rely on limited,
21 incomplete, and sometimes outdated emission factors and activity data, based
22 on few measurements. We discuss case studies for specific air impacts grouped
23 by natural gas life cycle segment, summarize the potential benefits of using
24 natural gas over other fossil fuels, and examine national and state emission regulations pertaining to natural gas systems. Finally,
25 we highlight specific gaps in scientific knowledge and suggest that substantial additional measurements of air emissions from the
26 natural gas life cycle are essential to understanding the impacts and benefits of this resource.



27 ■ INTRODUCTION

28 Natural gas currently accounts for 26% of primary energy
29 consumption in the U.S., compared to 20% for coal and 36%
30 for petroleum and other liquids.¹ Although the percentage of
31 U.S. energy obtained from natural gas is expected to rise
32 modestly to 28% during the next 30 years, the production of
33 natural gas is expected to increase to the point where the U.S.
34 will be a net exporter of natural gas by 2020.¹ A decrease in
35 conventional on-shore gas production since the 1980s has been
36 the impetus in the U.S. for developing unconventional natural
37 gas plays (areas targeted for exploration and production) that
38 have low permeability—such as sandstones (tight-sand gas),
39 shales (shale gas), and coal (coal-bed methane).¹ Between 2000
40 and 2011, the share of U.S. natural gas production from
41 unconventional formations increased from 31% to 67% and is
42 expected to reach 80% by 2040.¹ In particular, annual shale gas
43 production is expected to double from 7.9 trillion cubic feet
44 (Tcf) in 2011 to 16.7 Tcf by 2040.¹

45 Between 2000 and 2011, the number of producing gas wells
46 in the U.S. increased by 50%,² reaching 514 637. This surge in
47 exploration and production from unconventional sources has
48 been accompanied by public concerns about various environ-
49 mental issues—including air quality, water quantity and quality,

and human health impacts.^{3–9} Moreover, with this fast-moving
50 industry, scientists have been struggling to obtain adequate
51 funding and data access for research studies and regulators have
52 been grappling with the development of new rules and policies
53 along with limited resources for enforcement during the surge
54 in drilling.^{7,10,11} Decision and rule making at the state and
55 national levels in the US have been informed in part by limited,
56 out of date, and sometimes incomplete emission inventories¹¹
57 and self-reported industry data. Further confounding the ability
58 to adequately assess the industry's environmental impacts are a
59 number of other factors including (1) a lack of independent
60 field measurements to evaluate assumptions, quantify risks, and
61 assess actual impacts, (2) contradictory scientific results, and
62 (3) polarizing political and sociological dichotomies (i.e., jobs
63 vs environmental stewardship).
64

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Preproduction	Production	Transmission, Storage and Distribution	Use	End of Well Production Life
Methane	Methane	Methane	Methane	Methane
BTEX	BTEX		CO ₂	
Non-Methane Volatile Organic Compounds	Non-Methane Volatile Organic Compounds		NO _x	
NO _x				
PM2.5				
Hydrogen Sulfide				
Silica				

Figure 1. Potential atmospheric species emitted to the atmosphere during specific stages of the natural gas life cycle.

To lay the foundation for a clear, concise discussion of the issues, we begin by defining a consistent vocabulary. Unconventional oil and natural gas development in general is often referred to as “fracking”.^{12,13} Instead, we separate the process of drilling, often undertaken 1–2 km horizontally and 70 kilometers underground, from the more scientifically accurate term “hydraulic fracturing”, which describes the process of fracturing low permeability rocks using water mixed with sand and proprietary chemicals pushed into the borehole under high pressure.^{7,12,14} Hydraulic fracturing originated in the 1940s, but the pressures and volumes used today are much higher than in the past. The process of hydraulic fracturing typically lasts only a few days to a few weeks.^{15,16} Both unconventional and conventional natural gas wells typically produce commercially for a few decades.¹⁷ Therefore, a true evaluation of the air quality impacts of natural gas production and use must expand to all areas of the natural gas life cycle.

Throughout this critical review, we will refer to five stages of the natural gas life cycle using the terminology of Branosky et al.:¹⁸ (1) preproduction; (2) natural gas production; (3) natural gas transmission, storage, and distribution; (4) natural gas end-use; and (5) well production end-of-life (Figure 1). In terms of the life cycle, unconventional natural gas differs from conventional natural gas in three main ways. First, extraction of unconventional natural gas often requires directional or horizontal drilling. Second, well-completion (hydraulic fracturing) procedures for unconventional natural gas are much more extensive than for conventional wells. Third, unconventional natural gas wells also typically have a sharper production decline curve and a less well constrained total volume of natural gas recovered per well (based on both economical and practical constraints).^{19,20} Once out of the ground, however, unconventional natural gas is subject to the same fate (e.g., processing, transport, end-use) as conventional natural gas, and the atmospheric impacts are indistinguishable between the two forms.

Much of the earlier scientific work on unconventional natural gas has focused on evaluating the potential climate impacts and benefits of developing unconventional natural gas reservoirs and switching from coal or oil burning to using natural gas.²¹ These studies typically focus on climate forcing impacts and

their conclusions range from small benefits (<6% greenhouse gas reduction) for the switch to unconventional from conventional natural gas, to potentially large benefits (<30% greenhouse gas reduction) for the switch to natural gas over coal²² for power generation. The air-quality benefits of switching from coal to natural gas are extensive for pollutants such as mercury and sulfur dioxide (SO₂). These benefits may be less so for nitrous oxides (NO_x), important ozone precursors for which life cycle emissions appear to be similar for natural gas and coal^{23,24} unless natural gas combined cycle (use of two heat engines) technology is used to generate electricity.²⁵

When possible, we will distinguish between conventional and unconventional natural gas in this review, which is organized into five sections. In the first section, we present a review of studies on methane (CH₄) leakage from the entire natural gas life cycle. The second section includes a synthesis of available studies on the nonmethane air quality impacts of natural gas, which include emissions of the hazardous air pollutants benzene; toluene; ethylbenzene; and xylenes (BTEX); other nonmethane volatile organic compounds (NMVOCs) and NO_x, both precursors of surface ozone; and particulate matter. We summarize the current understanding of the benefits and impacts of switching from coal or oil to gas in the third section. In the final two sections, we discuss current air emission regulations at the state and national levels and identify key areas for future research on the air quality impacts of unconventional natural gas.

ESTIMATES OF LIFE CYCLE METHANE LEAKAGE FROM NATURAL GAS

As the primary chemical constituent of natural gas (70–90% by volume for raw natural gas from the well and >90% by volume for pipeline quality natural gas),^{26,27} CH₄ alters global atmospheric chemistry and is a powerful greenhouse gas.²⁸ Combined, natural gas systems are the highest emitters of CH₄ of any anthropogenic sector in the U.S.²⁹ and may be partially responsible for a renewed increase in global CH₄ levels since 2006.^{28,30} CH₄ is an important atmospheric constituent in that it has been shown to influence background ozone concentrations at the Earth’s surface,³¹ although it reacts very slowly in the lower atmosphere (8–9 year global average lifetime). The

146 Fifth Assessment of the Intergovernmental Panel on Climate
147 Change (IPCC) estimates that CH₄ has a global warming
148 potential 28–34 times that of CO₂ over a 100-year time frame
149 and 84–86 times greater on a 20-year time frame.³² Surface
150 level CH₄ in the global atmosphere is about 1.8 ppm, making it
151 the second largest contributor (after carbon dioxide) to the
152 total direct radiative forcing due to long-lived greenhouse
153 gases.³³

154 Raw natural gas produced from wells distributed across a
155 basin is gathered via a network of pipelines and compressor
156 stations. It then is processed at centralized plants to remove
157 contaminants, such as water, and acids and to separate CH₄
158 from natural gas liquids and condensate or oil. Processed
159 natural gas that enters the pipeline distribution network for
160 consumers is comprised primarily of CH₄ and ethane (C₂H₆),
161 with the addition of an odorant, mercaptan, to help customers
162 detect leaks in their homes or neighborhoods. C₂H₆ is left in
163 the natural gas stream, at typically ~5%, to maintain the
164 minimum energy content of the gas. Its lifetime in the
165 atmosphere is much shorter than that of CH₄, typically only a
166 few months.

167 Each year since 1998,³⁴ the U.S. Environmental Protection
168 Agency (US EPA) has released an updated national inventory
169 (NI) of greenhouse gas (GHG) sources and sinks and
170 submitted it to the United Nations Framework Convention
171 on Climate Change. National estimates for CH₄ emissions from
172 natural gas systems are modeled and calculated annually from
173 1990 to 2 years prior to the release year based on 80 different
174 emission factors (emissions per unit process or component)
175 determined from direct measurements made at ~200 sites in
176 the early 1990s.^{11,29,35} Additional emissions or activity data for
177 the estimates are supplied by states and the industry.^{36,37}

178 Uncertainties in this inventory approach are illustrated by a
179 series of methodological changes that US EPA implemented
180 during the past four years to estimate CH₄ emissions from
181 natural gas systems^{29,38} (Figure 2). Based on the US EPA

al.³⁹ concluded that CH₄ leakage of 3.2% or less would provide
immediate net climate benefits for electricity production from
natural gas compared to coal.

Two recent scientific studies have found that US total CH₄
emissions are underestimated in current inventories.^{40,41} Miller
et al.⁴⁰ published a top-down estimate of CH₄ emissions in the
U.S. based on long-term aircraft and tower observations
conducted by U.S. government laboratories (National Oceanic
and Atmospheric Administration and Department of Energy)
in 2007 and 2008. The authors concluded that the US EPA
inventory underestimated CH₄ anthropogenic emissions by
~50%. Brandt et al.⁴¹ reached a similar conclusion of ~50%
underestimation by US EPA based on a meta-analysis of
published results. Based in part on the distribution of emissions
excess observed especially in the southern U.S., and on the
content of propane in the air, both studies suggest that some of
the missing emissions in the inventory could be explained by
larger emissions from oil and gas production and processing.

A few regional atmospheric studies in the U.S. have shown
elevated levels of methane and other hydrocarbons in oil and
gas producing regions.^{42–44} Karion et al.⁴⁴ estimated that 8.9 ±
2.8% of the methane produced in the Uintah Basin gas field of
Utah was lost to the atmosphere based on airborne measure-
ments on one day in 2012. This is more than twice the average
loss rate estimated by Pétron et al.⁴³ (average, 4%; range, 2.3–
7.7%) for an oil and gas field in northeastern Colorado in 2008,
based on a mix of methane and propane tower and ground-
based measurements and inventory data.

Recent emission factors derived by Allen et al.¹⁵ for three
natural gas production source categories (gas well completion
flowbacks, production sites equipment leaks, and pneumatic
pumps and controllers venting) suggest that average CH₄
emissions for well completions using reduced-emissions
flowback procedures are less than estimated in the US EPA
inventory. The study, however, found higher emissions on
average from pneumatic devices and pumps and production site
leaks than assumed in the US EPA GHG NI. The direct
emission measurements conducted by Allen et al.¹⁵ at 190
onshore production sites—in partnership with operators—in
four different U.S. regions were averaged and extrapolated to
the national level for comparison with the US EPA GHG NI. At
the national level, they estimated that 0.42% of natural gas gross
production leaked to the atmosphere, which is lower than in
the 2013 US EPA GHG NI estimate for 2011 (0.49%).

Transmission, storage, and distribution of natural gas
includes hundreds of thousands of kilometers of pipeline, >
1400 compressor stations, and approximately 3.5 Tcf
(~equivalent to two months of national consumption) of
underground storage throughout the U.S.⁴⁵ According to the
2013 US EPA inventory, transmission is the stage of the natural
gas life cycle with the highest emission of CH₄. Emissions
during transmission, storage, and distribution are mainly limited
to fugitive CH₄ (and, to a lesser extent, C₂H₆) emissions from
an aging natural gas pipeline infrastructure and venting during
pipeline and compressor stations maintenance. A few studies
have focused on methane leakage from the natural gas
distribution network across cities such as Los Angeles,
California,⁴⁶ Boston, MA,⁴⁷ and Washington, DC.⁴⁸ For
example, Phillips et al.⁴⁷ mapped ~3400 CH₄ natural gas
distribution pipeline leaks across Boston's 800 road miles in
2011. An example of these leaks is shown in Figure 3 where
concentrations of methane as high as 28.5 ppm (compared to a
global background of 1.8 ppm²⁸) were measured. The presence 250

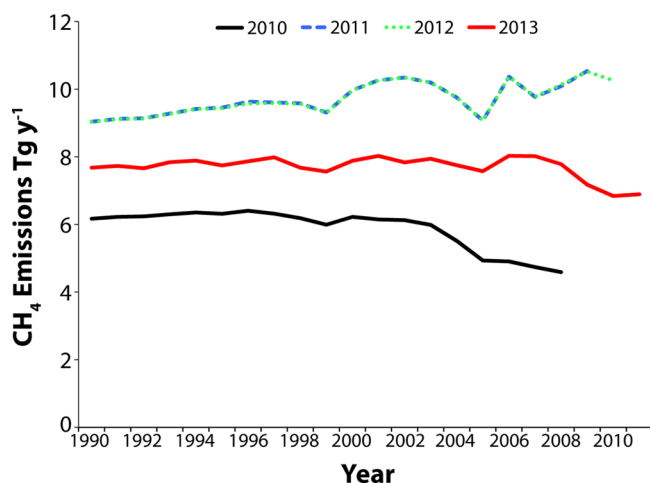


Figure 2. Methane emission estimates from 1990 to present based on the 2010, 2011, 2012, and 2013 releases of the US EPA GHG NI.

182 approach, leakage estimates for natural gas across the entire life
183 cycle ranged from as high as 2.8% of domestic natural gas
184 production (2011 and 2012 GHG NI releases) to as low as
185 1.65% in the 2013 US EPA GHG NI release (6.9 million metric
186 tons lost out of 418 million metric tons CH₄ produced²⁹). This
187 range in values is important because an analysis by Alvarez et

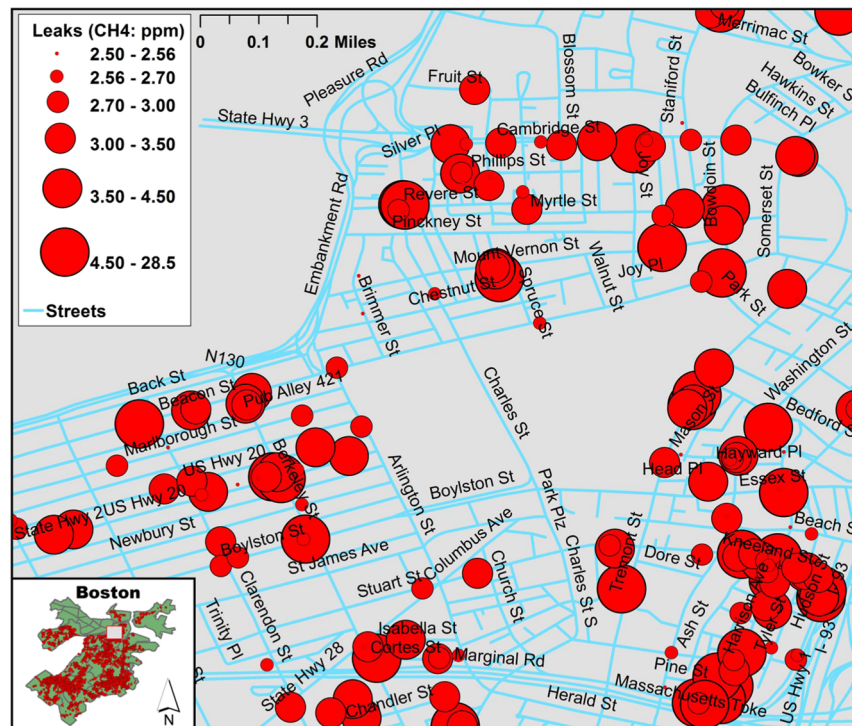


Figure 3. Locations of elevated methane concentrations in the Beacon Hill area of Boston, MA, associated with natural gas distribution pipeline leaks.

251 of older cast-iron distribution mains was the strongest predictor
252 for the leaks that they observed ($r^2 = 0.79$, $P < 0.001$ ⁴⁷).

253 The US EPA CH₄ leakage rates for distribution alone are in
254 the range 0.35–0.70%.^{49,50} Lelieveld et al.⁵¹ combined loss
255 estimates for storage and distribution together to suggest an
256 overall average loss rate of 1.4% (with a range from 1.0% to
257 2.5%). Based on additional data from Texas and elsewhere,
258 Howarth et al.⁵² assumed a higher range of values, from 1.4% to
259 3.6% leakage of CH₄ during transmission, storage, and
260 distribution; but these estimates have been debated.⁵³ Cathles
261 et al.⁵³ suggested that Howarth et al.⁵² “significantly over-
262 estimated” fugitive emissions and undervalued the emission
263 reduction from the use of “green technologies”. Other
264 authors^{53,54} have criticized Howarth et al.⁵² for use of “heat
265 rather than electricity generation” for their life cycle assessment,
266 and a 20 year time frame that overemphasized the shorter-term
267 impact of CH₄ on radiative forcing. However, with the current
268 lack of representative and recently measured emissions, we are
269 left to wonder just what the actual leakage rates are at the
270 regional and national scales, emphasizing the difficulty with
271 elucidating existing interpretations.

272 A review of 20 years of literature on CH₄ leaks⁴¹ has found
273 that the extent of leakages from North American natural gas
274 systems may be larger than anticipated yet best management
275 practices and regulation for technologically achievable
276 emissions reduction and effective leak detection and repair
277 programs can significantly reduce the climate footprint of
278 natural gas.⁵⁵ The large recent changes in US EPA method-
279 ology and annual emission estimates and disparities in site level
280 and regional level emission measurements highlight the need
281 for additional research to better understand emissions across
282 the natural gas life cycle (see above) and to reconcile emissions
283 measured at different spatiotemporal scales.^{15,22,39,51,52,56,57}

■ AIR QUALITY IMPACTS OF THE FIRST TWO LIFE CYCLE STAGES 284 285

Preproduction. In addition to CH₄, activities in the first 286
two of the five natural gas life cycle stages emit other 287
compounds than can impact local and regional air quality. The 288
preproduction stage includes everything from exploration, site 289
clearing, and road construction to drilling, hydraulic fracturing, 290
and well completion. For a single well, preproduction is usually 291
completed within a few weeks; but, these operations may be 292
carried out for a dozen or more wells on a pad and at multiple 293
sites in the field, typically lasting for months.¹⁶ Several 294
pollutants with environmental and human health impacts⁵⁸ 295
have been linked to this stage^{59–63} and a few monitoring efforts 296
are underway to document actual atmospheric exposures.^{64–66} 297

Air quality impacts begin with the use of large diesel-powered 298
equipment during site preparation,⁶¹ including the construction 299
of roads and holding ponds and clearing of the well pad.^{67,68} 300
Emissions from on and off-road diesel continue throughout 301
drilling and hydraulic fracturing as millions of gallons of water, 302
sand, and hydraulic fracturing chemicals are transported to and 303
from the well pads.⁶⁹ Diesel emissions are known to include 304
airborne fine particulate matter (2.5 μm and smaller in 305
diameter; PM_{2.5})^{70–73} as well as ozone precursors such as 306
NO_x and nonmethane VOCs.^{74,75} Long-term exposure to PM_{2.5} 307
can lead to decreased lung function, asthma, and increased 308
respiratory symptoms such as coughing and difficulty breathing.⁷⁶ 309
Truck traffic also generates coarse particulate matter ≤ 10 310
 μm in diameter (PM₁₀),⁶¹ emitted from tire wear, brake wear, 311
and resuspended road dust. However, Litovitz et al.⁶¹ found 312
that emissions from oil and gas operation related transportation 313
in Pennsylvania were small compared to other emissions from 314
natural gas activities statewide, contributing only 0.5–1.2% of 315
VOCs, 3.2–3.5% of NO_x, and 2.1–3.5% of PM_{2.5} emitted from 316
natural gas activities. 317

318 Emissions can continue into the drilling and hydraulic
319 fracturing procedures. During the process of drilling, pockets of
320 CH₄, and potentially C₂H₆, and propane through which the
321 drill passes can be released into the atmosphere.⁵⁶ However,
322 little information exists on the frequency and volumes of
323 emissions from these releases, which is currently a major
324 uncertainty in emissions inventories. Emissions measurements
325 are strongly needed during this section of preproduction.

326 After drilling is completed, water, hydraulic fracturing fluid,
327 and proppant (e.g., silica sand or man-made ceramic beads) are
328 pumped underground at pressures of ~10 000 to 20 000 psi to
329 fracture the low permeability reservoir rock to allow the natural
330 gas to flow.^{7,77} Emissions during drilling and hydraulic
331 fracturing include exhaust from diesel⁶² and natural-gas
332 powered engines for drilling rigs and pumps.⁷⁸ Bar-Ilan et
333 al.⁶² estimated that 12 to 27% of NO_x emissions from natural
334 gas activities in three areas of Wyoming originate from drilling
335 rigs alone. Litovitz et al.⁶¹ estimated that well drilling and
336 hydraulic fracturing in Pennsylvania accounted for 2.6–10% of
337 VOC, 29–39% of NO_x, 16–33% of PM_{2.5}, and 35–55% of SO_x
338 emissions from natural gas activities. The fluid used during
339 hydraulic fracturing can contain hundreds of chemicals,
340 including acids, ethylene glycol, and isopropanol.^{7,79–81}
341 However, the detailed constituents of the hydraulic fracturing
342 fluid mix are often proprietary, meaning that reporting of the
343 constituents is voluntary by the industry⁸¹ and often
344 incomplete. Also, no information exists on the interactions of
345 the chemicals in the fracturing fluid with naturally occurring
346 chemicals down the well and what potential problems this
347 might cause. Many of the constituents are volatile under
348 atmospheric conditions. A portion of the fracturing fluid mix
349 returns to the surface during the flowback stage and is stored in
350 holding ponds or flowback tanks and later disposed of at
351 industrial waste or deep injection facilities. A full classification
352 of all emissions during drilling and hydraulic fracturing does not
353 exist.

354 Another area where little information exists is on the
355 emission of (and exposure to) respirable silica (crystalline silica
356 “small enough to enter the gas-exchange regions of the
357 lungs⁸²”; 10 μm and smaller⁸²) from the proppant injected
358 during hydraulic fracturing. The U.S. National Institute for
359 Occupational Safety and Health conducted field studies at 11
360 sites in 5 states between 2010 and 2011 and found that workers
361 were exposed to high levels of respirable silica in 31% of
362 sampled cases (*N* = 111).⁸³ The high values observed were ten
363 or more times the recommended exposure limit and above the
364 filtration capabilities of half-face respirators worn by the
365 workers.⁸³ This exposure can occur during transportation of
366 the sand by truck or conveyor belt and also can occur upstream,
367 at the site where the silica is extracted.⁸² Exposure to respirable
368 silica can decrease lung function, increase respiratory symptoms
369 such as coughing, result in difficulty breathing, and cause
370 asthma and silicosis.⁸² The impacts of respirable silica are
371 greatest for workers on site, but broader studies are needed for
372 people living near well pads and production staging areas.

373 Once drilling and hydraulic fracturing operations have been
374 finished, the well is completed and prepared to produce natural
375 gas. Emissions during the well completion process, particularly
376 during venting and flaring of initial natural gas before the well is
377 connected to a transmission pipeline, can include CH₄ and
378 BTEX (benzene, toluene, ethylbenzene, and xylenes).^{59,84}
379 These emissions also contain other nonmethane hydrocarbons,
380 along with hydrogen sulfide H₂S,⁶² NO_x, and formaldehyde,⁸⁵

at concentrations in the air that have the potential to effect
381 residents living within <800 m of wells.⁵⁹ Nearly all of these
382 emissions, however, are scheduled to be mostly eliminated by
383 2015⁸⁶ when the US EPA will require use of “green
384 completions” or “reduced emission completions” when
385 technically feasible. During these processes, flowback fluid, oil
386 and gas are separated as soon as possible in well completion
387 and the gas and oil are routed to sales. Green completions
388 reduce overall emission of CH₄ and air pollutants that
389 traditionally would have been vented.^{15,87,88} 390

Allen et al.¹⁵ describe four different completion flowback
391 configurations at hydraulically fractured gas wells and present
392 direct measurements of CH₄ emissions at 27 sites in four
393 different regions of the U.S. On average, the sites sampled by
394 Allen et al.¹⁵ had lower emissions than what is assumed by the
395 2013 US EPA GHG NI for 2011. Methane emissions measured
396 during 27 well completion flowbacks, for instance, averaged
397 only 1.7 Mg CH₄¹⁵ compared to an average of 81 Mg per event
398 used in the 2013 US EPA GHG NI.¹⁵ Measured emissions
399 during a flowback event, however, varied by 2 orders of
400 magnitude within a basin.¹⁵ The distribution of emissions from
401 completion flowback measured by Allen et al.¹⁵ is not Gaussian,
402 and therefore, a simple set of uniform average emission factors
403 at the regional and national levels for an average green
404 completion configuration will most likely not capture the actual
405 aggregated emission magnitude. 406

Production. Several atmospheric pollutants have been
407 linked to the production stage of the natural gas life cycle
408 and have been studied in a few areas.^{64–66,89–96} As mentioned
409 earlier, the natural gas that flows directly from the well often
410 contains other associated NMVOCs, water vapor, carbon
411 dioxide, hydrogen sulfide, or natural gas liquids¹⁴ and needs
412 processing in order to meet purity standards for addition to the
413 pipeline infrastructure, known as “pipeline quality natural
414 gas”.^{14,97} Processing occurs near the well and/or at a centralized
415 processing plant and includes compression of the processed
416 natural gas to be transported through pipelines to consumers.
417 Once production at a well has begun, emission sources can
418 include well-head compressors or pumps that bring the
419 produced gas up to the surface or up to pipeline pressure
420 (engines are often fired with raw or processed natural gas), well
421 pad equipment bleeding and leaks, flare emissions, maintenance
422 emissions, and compressor station emissions. Litovitz et al.⁶¹
423 estimated that production sites and compressor stations in
424 Pennsylvania accounted for 91–97% of VOCs, 59–68% of
425 NO_x, 64–84% of PM_{2.5}, and 40–64% of SO_x emissions from
426 natural gas activities. 427

Other sources of CH₄ and NMVOCs (including BTEX)
428 emissions during the production stage can include dehydrator
429 regeneration vents, venting from pneumatic pumps and devices
430 that are actuated by natural gas, leaks through faulty casing,
431 incomplete emissions capture or burning in flaring systems.
432 Some of these emissions can be continuous or intermittent but
433 will be ongoing during the entire lifetime of the well unless
434 direct emissions capture and destruction or recovery are put
435 into place. Emissions from crude oil and liquid condensate
436 (light crude oil) storage tanks were estimated to be responsible
437 for 66% of total NMVOCs emitted by oil and gas operations in
438 Denver-Juleburg Basin in the northeast Colorado Front
439 Range.⁹⁸ Other emissions related to maintenance or production
440 stimulation, for example, will be episodic such as during liquids
441 unloadings and during workovers. Due to the diffuse nature of
442 emissions from hundreds of thousands of well pads, variations 443

444 in composition of the raw gas itself, and varying degrees of
445 emissions controls and reduction requirements, conclusions on
446 the overall air quality impact of this stage span from highly
447 detrimental^{8,42,43,99,100} to little or no impact at
448 all.^{64,89,91,94,101–104} This level of discrepancy indicates that
449 more work needs to be done at the basin scale on the emissions
450 from the production stage of the life cycle and their impacts.
451 Oil and gas emissions of ozone (O₃) precursors
452 (NMVOCs)^{43,61,62,98,100,105–111} have been linked to regional
453 exceedances of the 8-h national ambient air quality standard for
454 O₃ (75 ppb for fourth highest daily maximum concentration
455 averaged for three consecutive years). O₃ precur-
456 sors^{43,61,62,98,100,105–111} emitted from the natural gas and oil
457 production stage can make attainment of US EPA O₃ exposure
458 limits difficult even in winter for some areas.^{98,105–107,112,113}
459 High surface level O₃ concentrations, produced by increased
460 NO_x and VOC abundance,^{85,114} can lead to respiratory
461 problems, particularly in children and older adults.¹¹⁵ The US
462 EPA nonattainment designation for the O₃ standard has been a
463 driving force behind state-level regulation of O₃ precursor
464 emissions from oil and gas operations and increased ambient air
465 monitoring programs in Wyoming and Colorado,⁸⁸ two states
466 with the most stringent air regulations in the US for their
467 affected areas. Air monitoring before and during oil and gas
468 development can help regulators and air quality managers keep
469 track of the air impacts of different air pollution sources and
470 how they may change over time. To date, most US EPA and
471 state air monitoring (especially for O₃) is done in urban areas,
472 leaving entire industrialized rural and suburban communities
473 without baseline and routine air quality measurements.
474 **Other Stages.** Much less information exists on the non-
475 CH₄ emissions from two of the three other natural gas life cycle
476 stages. Since pipeline quality natural gas is predominantly CH₄,
477 few other pollutants have been reported to be emitted from the
478 transmission, storage and distribution stage (Figure 1). On the
479 other hand, some emissions (e.g., NO_x, SO₂, CO₂, and CH₄)
480 from the use of natural gas are estimated each year by the US
481 EPA,¹¹⁶ particularly what is emitted during use for power
482 generation (discussed in more detail below), and researchers
483 have attributed some formaldehyde emissions to natural gas
484 combustion. In particular, Zhang et al.¹¹⁷ attributed 10–30% of
485 the primary formaldehyde concentrations to natural gas
486 combustion in the Houston, Texas area during the 2006
487 Texas Air Quality Study (TexAQS). Other studies have
488 indicated that O₃ concentration criteria exceedances in Texas
489 cities are attributed to natural gas combustion.^{117,118}
490 At the end of the well production life (well production end-
491 of-life), the well is “plugged” (if not just abandoned). What
492 information is available on the potential for gas leakage is
493 derived primarily from historical studies of conventional wells.
494 In Alberta, for instance, 4% of abandoned wellbores leaked,
495 including many which were plugged before abandonment.¹¹⁹ In
496 Pennsylvania, an estimated 325 000 oil and gas wells were
497 drilled between 1860 and 2000, but the PA Department of
498 Environmental Protection only has records for 88 300 regulated
499 operating wells, 44 700 plugged wells, and 8000 abandoned
500 wells, leaving the status of 184 000 wells unknown.¹²⁰ Other
501 states have similar issues, for instance, New York plugged 323
502 (mostly old/abandoned) wells in 2012 with many more still
503 needing to be plugged.¹²¹ Until the number of orphaned/
504 abandoned wells is known, we cannot even begin to estimate
505 the air quality impacts from this portion of the natural gas life
506 cycle.

■ POTENTIAL AIR QUALITY BENEFITS OF INCREASED NATURAL GAS USE

507
508

The interest in increasing production and use of natural gas in 509
the U.S. during the past decade is due, in part, to the fact that 510
natural gas emits less CO₂, sulfur dioxide (SO₂), NO_x, and 511
mercury (Hg) compared to coal and oil when burned to 512
produce heat or electricity.^{23,35,94,122,123} Natural gas use for 513
electricity generation emits roughly half the CO₂ of coal per 514
kWh produced, potentially improving air quality and reducing 515
GHG emissions compared to coal. An immediate benefit from 516
an increased share of natural gas for electricity generation in the 517
U.S. (from 14% in 2000 to 29% in 2012¹²⁴) is a reduction in 518
the carbon intensity of U.S. electricity generation in 2011 and 519
2012.^{25,125,126} The controversy, however, arises in attempting 520
to estimate the total methane leakage associated with natural 521
gas production, distribution, and use, and, to a lesser extent, the 522
methane leakage associated with coal mining.^{54,56} Most life 523
cycle comparison studies have relied on leakage estimates 524
derived from the US EPA GHG NI for natural gas systems. 525
Venkatesh et al.¹²⁷ estimated that approximately 1–3 kg of 526
NO_x per MWh and 2–10 kg of SO₂ per MWh are the typical 527
emissions from coal-fired power plants likely to be retired or 528
replaced by combined cycle natural gas plants. Alternatively, 529
emissions of SO₂ and Hg from natural-gas-fired power plants 530
are negligible; and emissions of NO_x are substantially lower 531
than for coal-fired power plants. 532

Another potential use for natural gas (conventional or 533
unconventional) includes replacing petroleum in products such 534
as liquid fuels and olefins.¹²⁸ Olefins are used to produce 535
plastics (polyethylene, polyester, polyvinyl chloride (PVC), and 536
polystyrene) that are in turn are used to produce millions of 537
consumer goods. Access to CH₄, C₂H₆, propane, and butane 538
through unconventional natural gas development, may increase 539
their use in the production of high-value chemicals. The 540
benefits of a potentially “new” source of materials for making 541
these products is clear, but new process chemistry will be 542
needed to replace petroleum with natural gas,¹²⁸ and these uses 543
will need to be included in new life cycle assessments for 544
unconventional natural gas. 545

Until the efficiency of compressed natural gas (CNG) 546
vehicles increases, and CH₄ leakage rates from natural gas 547
production decrease further, the GHG benefits of substituting 548
natural gas for gasoline in vehicles are small²² or negli- 549
gible.^{39,129,130} Alvarez et al.³⁹ estimated that converting a fleet 550
of gasoline cars to CNG would increase radiative forcing for at 551
least 80 years before modest net climate benefits would be 552
achieved; the comparable crossover point for heavy-duty diesel 553
vehicles would be nearly 300 years. In fact, Alvarez et al.³⁹ 554
estimated that CNG conversion would result in more rapid 555
climate change for decades, attributable to the greater radiative 556
forcing in the early years after conversion. In contrast, 557
converting vehicles to natural gas would have immediate 558
(nonclimate) air quality benefits compared to gasoline because 559
of the cleaner burning properties of natural gas and reduced 560
non-methane air pollution. 561

■ REGULATIONS

562

Until recently, air regulation of oil and gas production 563
operations was done at the state level. The US EPA attempts 564
to quantify and minimize the air quality impacts of industrial 565
activities, including oil and natural gas operations and in 2012 566
the agency released a set of new source performance standards 567

(NSPS).⁸⁶ The NSPS take effect in 2015 and rely heavily on self-reporting from the industry of emissions to the US EPA.¹³¹ The standards attempt to limit VOC emissions during well completion by requiring the use of green completion technologies, which the US EPA estimates will result in a 95% reduction of VOC emissions and a 99.9% reduction in SO₂ emissions.^{86,88} Further requirements of the rule include limiting emissions of VOCs from a single oil or condensate tank to four tons per year¹³² and limiting BTEX from a single dehydrator to one ton per year.⁸⁶ The rule focuses on two types of compressors: centrifugal compressors with wet seals must reduce VOC emissions by 95% and reciprocating compressors must have regular maintenance to keep them from leaking VOCs.⁸⁶ Also, pneumatic controllers are required to vent less than six standard cubic feet per hour. Other air toxics are not specifically regulated under this new rule, and are limited to major sources that emit 10 or more tons of a single air toxic or 25 or more tons of a combination of toxics.⁸⁶

The US EPA also has adopted multiple tiers of emission standards for on-road¹³³ and off-road¹³⁴ diesel engines that may influence overall air impacts from the natural gas life cycle. These standards apply to criteria pollutants including NO_x, non-methane hydrocarbons, CO, and PM. Manufacturers must currently ensure that each new engine, vehicle, or equipment meets the latest emission standards. If diesel engines were built before US EPA emission standards came into effect, however, they are generally not affected by the standards or other regulatory requirements. Although the latest tiers of diesel engine emission standards are very stringent, heavy-duty diesel engines are long lasting. Thus, many older trucks and off-road equipment are still being used.

Many states have also taken separate, individual actions to regulate the overall environmental impacts of the oil and natural gas industries, and some states are developing public disclosure laws for hydraulic fracturing fluids.⁸¹ Colorado passed regulations from 2007 to 2009 requiring operators to (1) use no-bleed or low bleed pneumatic devices at oil and gas production sites in the northeastern Front Range O₃ non-attainment area (2) use green completion technologies at oil and gas wells when technically feasible, and (3) control flashing emissions from condensate and oil storage tanks. The Colorado system-wide emissions reduction requirements for NMVOCs from tanks are 90% in the summer time and 70% otherwise, the state, however, estimates that the actual annual average reduction in emissions has been 53% (compared to having no controls in place).^{135,136} Wyoming has required green completions since 2004 and requires 98% reduction of emissions (instead of 95% for the NSPS) for newly installed tanks.⁸⁸ Montana requires the control of emissions from the well immediately upon completion and has specific regulations regarding compression devices, pneumatic controllers, condensate/crude oil storage tanks, and glycol dehydrators.⁸⁸ New York has issued a moratorium on high-volume hydraulic fracturing all together.

Other states have taken fewer additional regulatory steps and will rely largely on the NSPS that will be begin January 1, 2015.⁸⁸ These include Alaska, North Dakota, New Mexico, and West Virginia. Texas has been tracking emissions data from the oil and gas industry for years, but often limits regulations of emissions to the Houston and Dallas–Fort Worth areas.¹³⁷ Utah has regulations that limit emissions from hydrocarbon storage tanks; however, these regulations only apply to Salt Lake City and Davis county.⁸⁸ These areas are not near the

Uintah Basin where oil and gas operations exist, and therefore do nothing to improve the high wintertime O₃ concentrations observed during strong temperature inversions.^{88,138} Pennsylvania has recently reevaluated and limited the oil and natural gas facilities that were previously exempt from regulations.¹³⁹ The wide variety of regulations and practices by state indicates that much more attention should be focused on systematically assessing the air emissions from oil and gas operations and their air impacts in those states with substantial levels of unconventional natural gas activities and production.

RECOMMENDATIONS

Based on our examination of the literature on the air quality impacts of unconventional gas extraction and distribution, we have determined that actual measurement data on various individual segments of the natural gas life cycle are sparse or critically lacking. To maximize the true benefits and minimize the negative impacts of this resource, we recommend that the following steps be taken to fill critical knowledge gaps:

- Air quality measurements need to be made prior to oil and gas development, including during drilling and hydraulic fracturing, to more clearly understand the direct impacts of these activities. Air monitoring during these operations can help ensure emissions management strategies are effective and exposure to air pollutants, including silica, are kept to a minimum.
- A full chemical classification of emissions, including air toxics, during all life cycle stages needs to be obtained to properly perform source apportionment modeling and to understand all potential air quality and health impacts.
- Independent scientific data on the true nationwide extent of methane leaks from the production, processing, transmission, storage, and distribution infrastructure, including measurements of flows and fluxes, should be acquired.
- An inventory of abandoned/orphaned wells should be collected so that emissions can be properly estimated.
- Measurements on the variation of air emission composition and magnitude by natural gas and oil play need to be made.
- Collaborations between independent scientists, regulators, and operators need to be increased to gain access to areas where measurements should be made and to inform effective emissions detection, reduction, and monitoring strategies.

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Notes

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