



## SUBPART W CHANGES:

# A Comprehensive Guide to 2025 Subpart W Updates

The EPA has introduced significant updates to Subpart W for the 2025 reporting year (submitted in 2026), reshaping how emissions are reported and measured. These changes emphasize transparency, accuracy, and accountability in emissions data, impacting all segments of the oil and gas industry.

This guide breaks down the key updates, their implications, and what operators need to know.

## 01 Enhanced Reporting Requirements

Subpart W now mandates more granular reporting across all segments. This includes operational data and equation inputs, providing greater insight into emissions calculations.

### Key Changes:

- Additional data reporting for all segments.
- Public availability of operational data and equation inputs.

### Implications:

- EPA and the public gain deeper transparency into emissions calculations.
- Improved auditing capabilities for the EPA.

**Previously:** Limited reporting on emissions-related data.

**Now:** Extensive data inputs must be disclosed, ensuring greater accuracy and accountability.

## 02 Pad/Site-Level Emissions Reporting

Onshore production and gathering & boosting (G&B) segments must now report emissions at the pad/site level while continuing to roll data up to the basin level.

### Key Changes:

- Emissions and other data are reported at the pad/site level.
- Reporting is still summarized at the basin level for final submission.

### Implications:

- Greater transparency in site-level emissions contributions.
- Enhanced EPA auditing and data verification at a granular level.

**Previously:** Emissions were calculated and reported solely at the basin level for these segments.

**Now:** Pad/site-level reporting allows detailed insight into emissions profiles.

## 03 Reclassification of Centralized Oil Production Facilities

Centralized oil production facilities must now report under the G&B segment, impacting methane fee assessments.

### Key Changes:

- Centralized oil production facilities moved to G&B classification.

### Implications:

- G&B segment has a lower methane fee intensity threshold than onshore production. Facilities reclassified to G&B may raise the reported methane intensities of that segment for some operators.
- Operators need to reassess classification strategies to align with Subpart W.

**Previously:** Facilities reported under onshore production with less stringent methane fee implications.

**Now:** Operators must report these types of facilities under G&B, which is subject to a lower methane fee threshold.

## 04 Inclusion of New Emission Sources

To improve emissions inventory accuracy, Subpart W now requires the reporting of additional emission sources.

### Added Sources:

- Produced water tanks.
- Drilling mud degassing.
- Nitrogen removal units.
- Crankcase venting.
- Other Large Release Events (OLRE).

### Implications:

- Enhanced inventory precision by accounting for previously excluded sources.

## Updated Calculation Methodologies:

Subpart W now allows operators to utilize updated calculation methodologies, incorporating more recent studies and direct measurements.

### Implications:

- Increased reporting accuracy.
- Likely higher reported emissions, especially for flares and tanks.

### Examples:

- **Pneumatic Controllers:** Operators can now measure vent rates to create operator-specific emission factors. EPA emission factors, updated with recent data, remain an option.
  - **Previously:** Emission factors were based on outdated 1996 studies.
- **Flares:** Default destruction efficiency now varies based on flare monitoring. Emissions must account for instances when pilot lights are out.
  - **Previously:** A default destruction efficiency of 98% was used universally.
- **Tanks:** Explicit requirements for accounting for open or unseated thief hatches are now in place.
  - **Previously:** Many operators failed to report 0% control on tanks with improperly seated thief hatches.

## Overall Implications of Subpart W Changes

The updates to Subpart W represent a significant step forward in emissions reporting.

### Key Outcomes:

- ✓ Increased transparency and accountability.
- ✓ More accurate emissions inventories.
- ✓ Higher reported emissions totals due to new methodologies and source inclusions.

**Looking Ahead:** The EPA's recent Request for Information (RFI) highlights a potential future where advanced measurement technologies are incorporated into Subpart W, further improving emissions reporting and transparency.

Subpart W's revisions enhance emissions reporting in the oil and gas industry. While these changes improve data accuracy and transparency, the EPA is already exploring ways to incorporate even more advanced measurement technologies. Operators must adapt to these changes and proactively engage with upcoming innovations to stay compliant and optimize emissions management strategies.

Stay ahead of the curve by familiarizing yourself with the new requirements and building a flexible, scalable data management system. We're here to help!

**Questions?** Reach out at [info@projectcanary.com](mailto:info@projectcanary.com).