



United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

September 15, 2023

Ref: OWPO-2023-Admin-001a

Memorandum

To: Orphaned Wells Program Grant and Award Recipients

From: Kimbra Davis, Director **KIMBRA DAVIS** Digitally signed by KIMBRA DAVIS
Date: 2023.09.15 15:08:51 -06'00'
Office of the Secretary - Orphaned Wells Program Office

Subject: Updated *Methane Measurement Guidelines to Meet Reporting Requirements of the 2021 Infrastructure Investment and Jobs Act*

The U.S. Department of the Interior's Orphaned Wells Program Office released updated guidelines for the measurement of methane emissions from orphaned wells plugged using funds from the 2021 Infrastructure Investment and Jobs Act (IIJA), also referred to as the Bipartisan Infrastructure Law (BIL; Public Law 117-58). The updated guidelines serve as the minimum standard for measuring methane emissions for pre- and post-plugging methane emissions from orphaned wells. Contracts already awarded for well-plugging or methane emissions measurement that reference the April 2022 guidelines¹ and contracts under the Bureau of Land Management's Indefinite Delivery Indefinite Quantity (IDIQ) contract for orphaned well plugging and remediation services may continue to use that previous version. However, the updated, July 2023 version should be used by all grant recipients going forward.

BIL Section 40601, *Orphaned well site plugging, remediation, and restoration*, established reporting requirements for methane emissions reductions for orphaned wells. In April 2022, the Department posted Federal Program Guidelines for measuring methane emissions from orphaned wells and in the Initial State Grants guidance recommended that States follow those published guidelines. When issuing the Tribal Grant Guidance and Phase 1 State Formula Grant Guidance, the Department subsequently required that funding recipients follow the established methane measurement guidelines.

The updated, July 2023 version provides further clarification regarding implementation of the methane measurement guidelines. The July 2023 version:

- Updates national statistics and references regarding the number of abandoned wells, location, and emissions estimates.
- Provides clarification regarding modeling emissions from orphaned wells and recommends that model estimates not be used as a substitute for actual methane emission rate measurement, except in limited circumstances where direct measurement is impractical.

¹ *Assessing Methane Emissions from Orphaned Wells to meet Reporting Requirements of the 2021 Infrastructure Investment and Jobs Act (BIL): Federal Program Guidelines, April 11, 2022*; available at: <https://www.doi.gov/sites/doi.gov/files/federal-orphaned-wells-methane-measurement-guidelines-final-for-posting-v2.pdf>.

- Adds detail to the description of how screening of wells through a binary detect/non-detect method can be incorporated into a methane emission rate measurement program.
- Expands the discussion of the methane detection equipment/instrumentation suitable for use in a methane screening program.
- Includes additional discussion of the intent of the protocol for quantifying methane emissions.
- References the approved June 2023 American Carbon Registry protocol as an alternative protocol.
- Adds a new section discussing wells with exceptional circumstances or situations where flow rate measurements may be too difficult to obtain and outlines potential options for these situations.

The technology and approaches for methane detection, quantification, and monitoring are rapidly improving and evolving. As such, the DOI methane emission guidelines and requirements, including the use of models and estimation tools, will evolve over time in a manner intended to achieve the BIL goals and reduce the costs and burdens on fund recipients to detect and quantify methane emissions from orphaned wells.

The updated methane measurement guidelines, *Assessing Methane Emissions from Orphaned Wells to Meet Reporting Requirements of the 2021 Infrastructure Investment and Jobs Act: Methane Measurement Guidelines, July 2023 Version*, are available on the Department's website at: <https://www.doi.gov/sites/doi.gov/files/orphaned-wells-methane-measurement-guidelines-July-2023-version.pdf>.