

# **Out-of-State Greenhouse Gas Emissions from Loss, Release, and Flaring of Natural Gas Imported to California: 2018-2022**

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Prepared by:  
Industrial Strategies Division,  
California Air Resources Board

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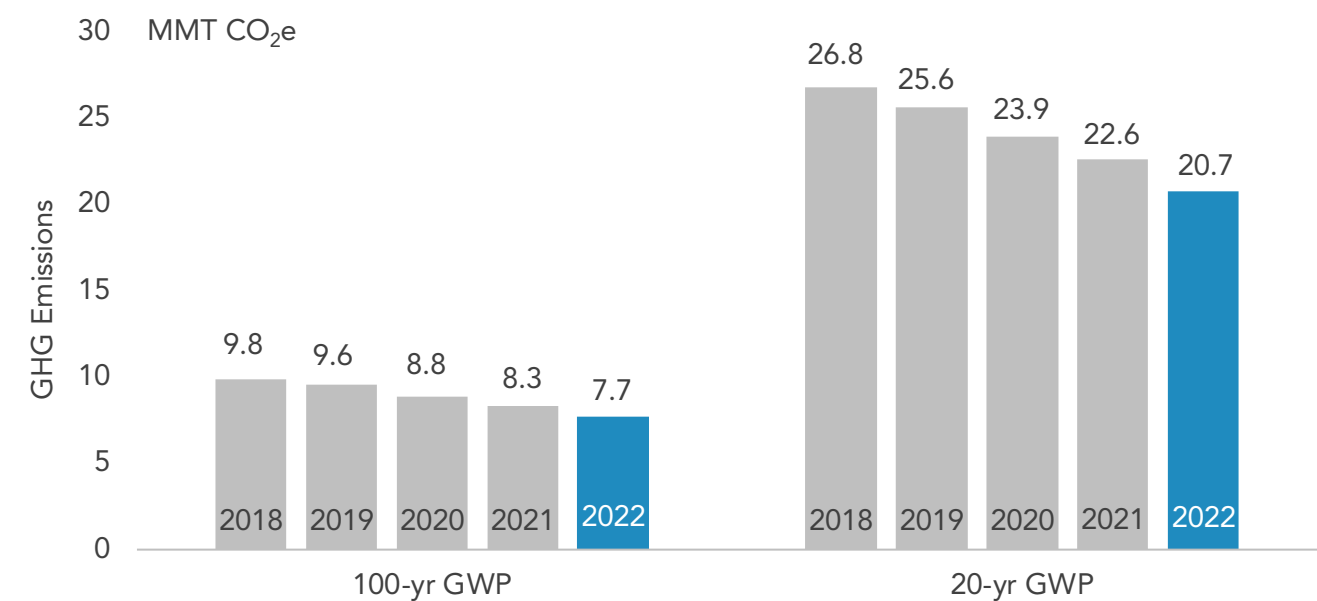
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# Summary

In 2018, Assembly Bill (AB) 2195 (Chau) was enacted to address emissions associated with natural gas from out-of-state sources. AB 2195 requires the California Air Resources Board (CARB) “to quantify and publish annually the amount of greenhouse gas emissions resulting from the loss or release of uncombusted natural gas to the atmosphere and emissions from natural gas flares during all processes associated with the production, processing, and transporting of natural gas imported into the state from out-of-state sources.”

This document presents CARB’s estimates for data years 2018-2022, with calculations demonstrated using the 2022 data. Figure 1 summarizes the greenhouse gas (GHG) emissions estimate trends for both 100-yr and 20-yr global warming potential (GWP) time horizons for all years since this reporting requirement began. These data are intended for informational purposes and do not establish any metrics with respect to the greenhouse gas emissions targets promulgated under AB 32 (Núñez and Pavley, 2006), Senate Bill (SB) 32 (Pavley, 2016), AB 1279 (Muratsuchi, 2022), or any other legislation or Executive Order.



**Figure 1** Estimate of 2018-2022 out-of-state GHG emissions from releases of uncombusted gas and flaring associated with natural gas consumed in California (latest estimate highlighted in blue).

Although these out-of-state emissions are not intended for inventory purposes, comparisons to CARB’s Greenhouse Gas Emission Inventory could be useful to convey their general magnitude compared to emissions from other parts of the natural gas life-cycle that occur in-state. All inventory values are presented in terms of 100-yr GWP. The 2022 in-state GHG emissions from combustion of natural gas totaled 105.4 MMT CO<sub>2</sub>e. The 2022 in-state

methane emissions from fugitives and venting of natural gas during its transmission and distribution, including post-meter residential gas leaks, totaled 5.1 MMT CO<sub>2</sub>e.

## Introduction and Background

The California Air Resources Board developed the Short-Lived Climate Pollutant (SLCP) Reduction Strategy in 2017 to reduce emissions of some particularly potent GHGs (CARB 2017). Among those is methane (CH<sub>4</sub>), which is the primary component of natural gas (NG). Methane is approximately 25 times more effective than carbon dioxide (CO<sub>2</sub>) at trapping heat over a 100-year time period. Because CH<sub>4</sub> has a shorter atmospheric lifetime, it is even more potent over shorter periods with approximately 72 times the impact of CO<sub>2</sub> over a 20-year time period.<sup>1</sup>

The SLCP Strategy is a roadmap for reducing emissions of short-lived climate pollutants. Among other targets, the plan is designed to reduce CH<sub>4</sub> emissions by 40 percent by 2030 (from 2013 levels). The plan focuses on reductions of GHG emissions, but many of the strategies also reduce co-pollutants such as criteria pollutants and toxic air contaminants. SB 1383 (Lara) directed CARB to begin implementing this strategy and codified the CH<sub>4</sub> emission reduction target.

The SLCP Strategy establishes a goal of reducing methane emissions from in-state oil and gas operations by 40 percent by 2025, ramping up to 45 percent by 2030. The plan notes that additional reduction beyond those targets would most feasibly come from reducing in-state demand for oil and NG.

However, the SLCP Strategy is focused on measures to reduce emissions from in-state production only, whereas nearly 90 percent of the NG used in California is imported from other states or countries (CEC 2024). When NG is imported to California, most of the upstream emissions occur outside of the State. Therefore, imported NG is not subject to California regulations or programs for processes occurring outside of State boundaries. Understanding the out-of-state emissions associated with imported NG could help inform California policies and goals to reduce emissions associated with NG consumption.

The growing interest in emissions associated with out-of-state NG has led to policies to better characterize such emissions. AB 1496 (Thurmond) requires CARB to monitor and measure high-emission “hot spots” in the State and gather information necessary to carry out a life-cycle GHG emissions analysis of imported NG. Additionally, AB 2195 (Chau) mandates CARB publish an annual estimate of GHG emissions associated with the “loss or

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<sup>1</sup> These figures are based on the IPCC Fourth Assessment Report (AR4) from 2007. Research since then has suggested that the GWP of CH<sub>4</sub> is higher. The AR4 figures are used herein for easier comparison to other reports and inventories that use AR4 GWPs.

release of uncombusted natural gas to the atmosphere and emissions from natural gas flares” for all out-of-state gas that is imported to California.

This report describes the methods, calculations, results, and discussion of the out-of-state GHG emissions estimate for imported NG as required by AB 2195. The emissions calculated in this report are not included in CARB’s Greenhouse Gas Inventory and are not factored into targets for in-state GHG emission reductions.

It is important to note that this report does not cover all GHG emissions from upstream processes for out-of-state NG. Emissions associated with the combustion of fuels used throughout the NG supply chain are excluded as they are not considered releases of NG or emissions from flaring. For example, emissions from fuel combustion to power gas transmission compressors or to regenerate glycols during gas dehydration would not be included.

Methods

The sources of data used in this report are summarized in Table 1. Further details are provided in the following sections. Emissions, production, and import datasets all include time series data for previous years. The latest vintage of each dataset was used to adjust calculations for previous years.

Table 1 Data Sources

Type	Specification	Source	Data Years
U.S. NG production	Gross withdrawals from gas, shale gas, and coalbeds wells	EIA (2024a)	2018-2022
California NG imports	Total interstate and international receipts	EIA (2024b)	2018-2022
U.S. NG-related CH <sub>4</sub> emissions	All processes except distribution and LNG	U.S. EPA GHGI (2024)	2018-2022
U.S. NG-related CO <sub>2</sub> and N <sub>2</sub> O emissions	Flaring processes only (excludes LNG)	U.S. EPA GHGI (2024)	2018-2022
Global warming potential	100-yr and 20-yr time horizons	IPCC Fourth Assessment Report (AR4)	2007

Although NG may have other GHG constituents, in this report “uncombusted natural gas” is interpreted to mean CH<sub>4</sub> only. Therefore, the usually small amounts of other GHGs, such as CO<sub>2</sub>, that are present in some raw NG streams are not included for purposes of calculating emissions due to the release of uncombusted NG.

## Emissions Data

Emissions data were obtained from the U.S. Environmental Protection Agency (U.S. EPA) *Inventory of Greenhouse Gas Emissions and Sinks (GHGI) 1990-2022*. Specifically, 2018-2022 process-level emissions data for CH<sub>4</sub>, CO<sub>2</sub>, and nitrous oxide (N<sub>2</sub>O) were obtained from *Annex 3.6: Methodology for Estimating CH<sub>4</sub>, CO<sub>2</sub>, and N<sub>2</sub>O Emissions from Natural Gas Systems* (U.S. EPA 2024).

For the purposes of AB 2195, only the following data are considered:

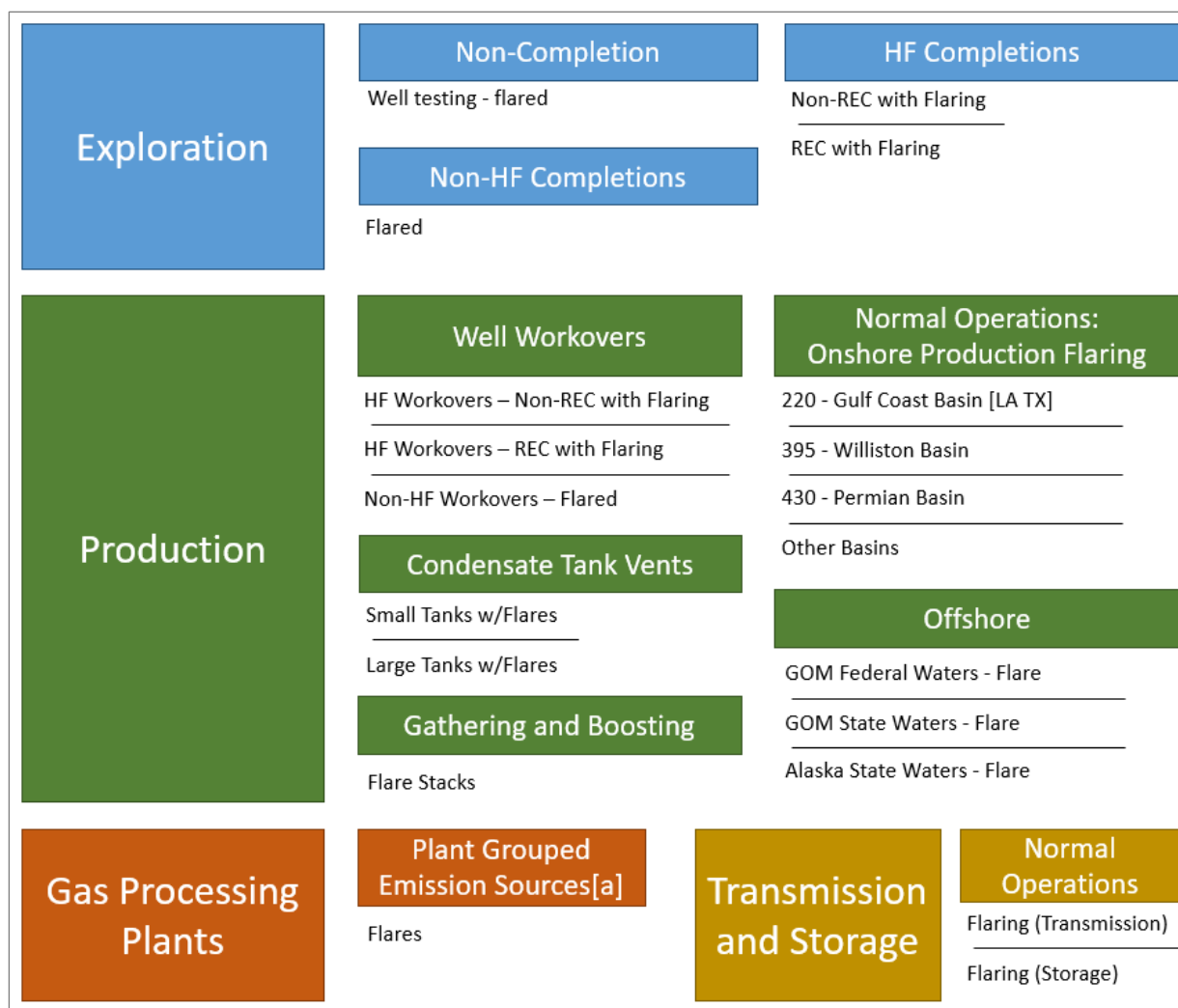
1. CH<sub>4</sub> emissions associated with exploration, production, processing, and transportation of NG. This includes transmission and storage, but not distribution.<sup>2</sup> It also includes CH<sub>4</sub> emissions from flaring.
2. CO<sub>2</sub> and N<sub>2</sub>O emissions from NG flares associated with exploration, production, processing, and transportation of NG (Figure 2).

Consistent with the definition of uncombusted NG described previously, sources of CO<sub>2</sub> besides flaring (e.g., CO<sub>2</sub> venting from acid gas removal, completions, and workovers) are not included. This analysis also assumes that all gas imported to the state is in the form of compressed natural gas (CNG) through interstate pipelines. Thus, emissions from out-of-state liquefied natural gas (LNG)-related processes are excluded, though there may be some LNG imports to California.

As mentioned previously, this analysis does not consider emissions associated with the combustion of fuels in the NG supply chain. For example, water may be removed from NG in a glycol dehydrator; regenerating the glycol requires the application of heat and the resulting CO<sub>2</sub> emissions from providing that heat are not included herein.

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<sup>2</sup> Distribution was excluded because we interpret AB 2195 as seeking the GHG emissions associated with imported NG that occur outside of California, and distribution occurs within the state. Adding distribution emissions would increase the emissions estimates by approximately 8-10% depending on the year and GWP time horizon.



**Figure 2** Flaring processes included for CO<sub>2</sub> and N<sub>2</sub>O emissions (note: REC = reduced emissions completion; HF = hydraulic fracturing; GOM = Gulf of Mexico).

## Natural Gas Withdrawals and California Imports

National NG gross withdrawals for 2018-2022 were obtained from the Energy Information Administration (EIA 2024a). For the calculations in this report, the total NG production from gas wells, shale gas wells, and coalbed wells was used. NG production from oil wells was excluded because the production stage emissions estimates from the Natural Gas Systems

GHGI only include emissions from wells (and associated equipment) with a high gas-to-oil ratio (GOR).<sup>3,4</sup>

Interstate and international movements of NG into California in 2018-2022 were obtained from the EIA (2024b). All imports (domestic and international) were summed, without subtracting any exports. The calculations in this report assume the same GHG intensity for all imported gas even though regional and field-specific differences exist in production, processing, and transportation.

## Global Warming Potentials

Global warming potentials for CH<sub>4</sub> and N<sub>2</sub>O were obtained from the Intergovernmental Panel on Climate Change’s (IPCC) *Fourth Assessment Report* (AR4). Both 20-year and 100-year time horizons were used, as shown in Table 2 (IPCC 2007).

**Table 2** Global Warming Potentials of CH<sub>4</sub> and N<sub>2</sub>O

Substance	100-yr GWP (g CO <sub>2</sub> e/g substance)	20-yr GWP (g CO <sub>2</sub> e/g substance)
CH <sub>4</sub>	25	72
N <sub>2</sub> O	298	289

Emissions are reported in both 100-yr and 20-yr GWPs. The figure based on a 100-yr GWP is intended to show relatively long-term impacts, while the 20-yr GWP is meant to depict shorter-term impacts.

<sup>3</sup> The U.S. EPA GHGI uses a GOR of >100 Mcf/bbl in its definition of a NG well (versus an oil well). The EIA uses >6 Mcf/bbl in their definition. This definition mismatch results in an underestimation of the carbon intensity of the gas. A previous rudimentary analysis based on states with public well-level production data suggests the impact of the mismatch could be in the range of approximately 10-20% of the carbon intensity for processes included in this estimate, assuming those states are representative.

<sup>4</sup> Beyond the production stage, the U.S. EPA GHGI Add Systems sector includes equipment receiving gas from all sources. However, analysis of the available EIA data suggests that the additional gas production volume from EIA-classified oil wells is similar to the volume that is removed from repressuring, venting, flaring, and other processes. Thus, we assume that the gas production from high-GOR wells is a reasonable proxy for the throughput volume in all stages of the gas system life cycle analyzed in this report.



## Calculations and Results

This section shows the calculations performed using the 2022 data, the latest year available. Calculations for 2018-2021 were performed using the same methods and equations based on the latest vintage of each underlying data source available at the time of the calculations (e.g., the 2024 edition U.S. EPA GHGI). Results of the calculations for every year are in Figure 1 in the Summary and the underlying data used in those calculations are in the Appendix. All data in this section come from the sources outlined in Table 1.

Total CH<sub>4</sub> emissions were calculated as the sum of net emissions<sup>5</sup> from exploration, production, gas processing, and transmission and storage. The total U.S. 2022 emissions for processes included in the scope of this analysis were 5,141 kilotonnes (kt) CH<sub>4</sub>, which equals 128,526 kt CO<sub>2</sub>e on a 100-yr basis or 370,155 kt CO<sub>2</sub>e on a 20-yr basis.

Total U.S. 2022 CO<sub>2</sub> emissions from flaring were 13,020 kt CO<sub>2</sub>. Total U.S. 2022 N<sub>2</sub>O emissions from flaring were 0.57 kt N<sub>2</sub>O, which equals 169 kt CO<sub>2</sub>e on a 100-yr basis or 164 kt CO<sub>2</sub>e on a 20-yr basis.

United States non-associated NG production (gross withdrawals from gas, shale gas, and coalbed wells) for 2022 totaled 39,226,052 million standard cubic feet (mmscf). Interstate and international imports of NG into California totaled 2,121,793 mmscf in 2022.

The equation below shows the general format for calculating total out-of-state emissions from NG imported to California from the loss or release of uncombusted NG and from flares in million metric tons (MMT) CO<sub>2</sub>e.

$$\frac{E_{CH_4} + E_{CO_2} + E_{N_2O}}{Production_{US}} \times Import_{CA} \times Conversion = CA \text{ Import Emissions}$$

where,

$E_{CH_4}$  = U.S. NG Sector CH<sub>4</sub> emissions (kt CO<sub>2</sub>e)

$E_{CO_2}$  = U.S. NG Sector CO<sub>2</sub> emissions (kt CO<sub>2</sub>e)

$E_{N_2O}$  = U.S. NG Sector N<sub>2</sub>O emissions (kt CO<sub>2</sub>e)

$Production_{US}$  = U.S. non-associated NG production (mmscf)

$Import_{CA}$  = NG volume imported to California (mmscf)

$Conversion$  = conversion factor from kt to MMT

$CA \text{ Import Emissions}$  = out-of-state GHG emissions from NG imported to California (MMT CO<sub>2</sub>e)

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<sup>5</sup> Potential emissions minus voluntary and regulatory emissions reductions, consistent with the U.S. EPA's methodology.

### Out-of-State Natural Gas GHG Emissions: 100-yr timescale

Based on this analysis, the 2022 annual GHG emissions on a 100-yr GWP timescale are 7.7 MMT CO<sub>2</sub>e, calculated as shown below. Of this total, 10% is from flaring processes.

$$\frac{(128,526 + 13,020 + 169) \text{ kt CO}_2\text{e}}{39,226,052 \text{ mmscf}} \times 2,121,793 \text{ mmscf} \times \frac{1 \text{ MMT}}{1000 \text{ kt}} = 7.7 \text{ MMT CO}_2\text{e}$$

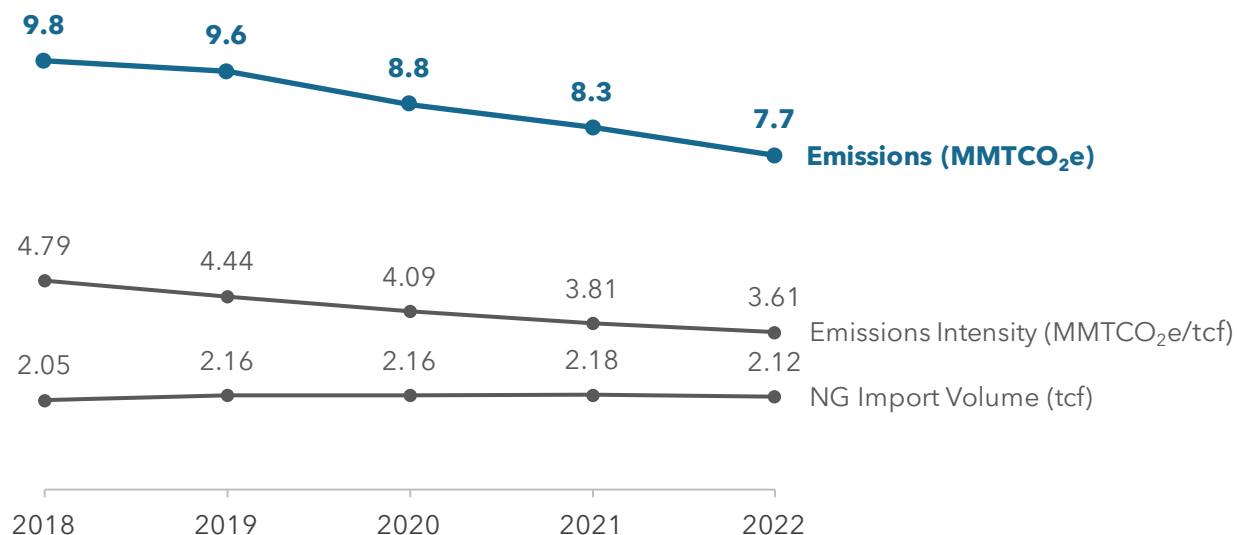
### Out-of-State Natural Gas GHG Emissions: 20-yr timescale

The 2022 annual GHG emissions on a 20-yr GWP timescale are 20.7 MMT CO<sub>2</sub>e, calculated as shown below. Of this total, 4% is from flaring processes.

$$\frac{(370,155 + 13,020 + 164) \text{ kt CO}_2\text{e}}{39,226,052 \text{ mmscf}} \times 2,121,793 \text{ mmscf} \times \frac{1 \text{ MMT}}{1000 \text{ kt}} = 20.7 \text{ MMT CO}_2\text{e}$$

## Discussion

The total estimated out-of-state GHG emissions associated with imported NG have decreased over data years 2018-2022 (blue line in Figure 3), based on the data sources in Table 1 and the calculation methodology in the Calculations and Results section. The primary reason for this trend was a reduction in emission intensity estimated by U.S. EPA over the time series (top gray line). Additionally, a small reduction in NG import volume was noted from 2021-2022 which also contributed to a reduction in emissions. This is true for both 100-yr and 20-yr GWP, though Figure 3 only shows the results for 100-yr GWP.



**Figure 3** Trends in GHG emissions, emissions intensity, and NG import volume from 2018 to 2022 using 100-yr GWP (note, the product of the two gray lines equals the blue line, with rounding) (tcf = trillion cubic feet).

The reduction in emissions intensity over time in Figure 3 is due to an overall trend of reduced emissions estimated by the U.S. EPA GHGI paired with increased NG production. Those reduced emissions estimates are based mostly on data reported to U.S. EPA through the Greenhouse Gas Reporting Program subpart W and reflect either reductions in activity factors (e.g., reduced equipment counts) or reductions in emissions factors (i.e., the amount of emissions per unit of activity). These changes may be due to various factors such as federal and state policies or voluntary actions by industry.

This analysis was intended to estimate emissions occurring outside of California. However, based on the emission estimation method used, some of the transmission emissions may occur within the State. This indicates there may be some overlap with CARB's AB 32 GHG inventory. This emissions amount is expected to be small because of the relatively long distances that most imported gas travels before reaching California and because transmission and storage emissions account for less than 30 percent of the total calculated out-of-state emissions.

These estimates are based on the emissions in the U.S. EPA GHGI. Numerous studies (e.g., Alvarez et al. 2018 and Rutherford et al. 2021) have suggested that the GHGI has underestimated CH<sub>4</sub> emissions from the oil and gas sector, mostly based on comparisons to top-down and facility-scale measurements and modeling. However, the U.S. EPA GHGI is the best currently available data source that is nationally consistent, regularly updated, and

has sufficiently detailed attribution of emissions to specific processes to use in this assessment. Staff are evaluating other methods to estimate these emissions such as remote sensing studies or modeling for possible use in future editions of this report. To the extent possible, emissions estimates from previous years would be recalculated based on the new methodologies if changes are implemented.

Regional differences exist in production and processing practices, and NG from different regions is transported different distances to reach California. Ideally, those differences would be captured by basin-specific or region-specific carbon intensities and paired with California import volumes by basin or region. U.S. EPA began including basin-specific emission rates for select types of equipment and processes starting in the 2023 edition GHGI. Staff are evaluating how to potentially integrate that data into future versions of this report. Using this improved spatial resolution would require an analysis of the fraction of NG consumed in California that originates in each production basin and bifurcation of the emissions data into equipment/processes with and without basin-level data.

Due to data limitations, this analysis was based primarily on the emissions intensity of non-associated gas, that is NG which is not co-produced with significant quantities of oil. However, some of the NG consumed in California originates from basins which produce both NG and oil, which presumably includes some associated gas. Therefore, to the extent that there may be differences in the emissions intensity of associated gas and non-associated gas, this estimate would not account for those differences.

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## Appendix: Data Tables

Table 3 shows the underlying data used to make the calculations in this report for each data year. Data sources and calculation approaches are as outlined in the report.

**Table 3** Underlying Data used in Calculations for each Data Year

<b>Data Year</b>	<b>CH<sub>4</sub> Emissions (kt CH<sub>4</sub>)</b>	<b>CO<sub>2</sub> Emissions (kt CO<sub>2</sub>)</b>	<b>N<sub>2</sub>O Emissions (kt N<sub>2</sub>O)</b>	<b>National NG Production (excluding from oil wells) (mmscf)</b>	<b>CA Import Volume (mmscf)</b>
2022	5,141	13,020	0.568	39,226,052	2,121,793
2021	5,206	11,912	0.042	37,268,080	2,176,587
2020	5,405	13,639	0.026	36,366,987	2,161,467
2019	5,715	17,752	0.038	36,176,662	2,160,190
2018	5,770	13,028	0.029	32,822,041	2,052,635