

Leaking Oil and Gas Infrastructure

Tracking Sources of Exposure

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Upstream Emissions Regulations Timeline

- **Assembly Bill 32 (AB 32):** Also known as the Global Warming Solutions Act of 2006. This foundational law gave the California Air Resources Board (CARB) the broad authority to monitor and regulate sources of greenhouse gas emissions to reduce them to 1990 levels by 2020
- **Senate Bill 32 (SB 32):** Passed in 2016, it extended the state's climate goals, requiring a reduction in greenhouse gas emissions to 40% below 1990 levels by 2030.
- **Senate Bill 605 (SB 605):** Enacted in 2014, it directed CARB to develop a comprehensive strategy specifically for short-lived climate pollutants (SLCPs), which includes methane.
- **Senate Bill 1371 (SB 1371):** (2014) Specifically addressed natural gas leaks, directing state agencies to adopt rules that minimize leakage from pipelines and facilities
- **Senate Bill 1383 (SB 1383):** Signed in 2016, it set specific targets for methane reductions, mandating a 40% reduction in methane emissions below 2013 levels by 2030.



California Air Resources Board Methane Rule

- California Oil and Gas Rule (COGR) - Implemented 2018
- LDAR Start: Mandatory quarterly surveys for components (valves, connectors)
- 29% reduction in emissions for the first year, with a total leak-to-component ratio of 0.58% across inspected facilities.
- Leak Ratios
 - 2018 - The natural gas transmission sector reported the highest leak ratio (2.09%)
 - 2022 - 3.7% (almost doubled).
 - LDAR reduced 1,600 metric tons methane.
 - Crude Oil Production Sector 0.5% leak ratio.
- Operators required to submit annual LDAR reports detailing leak inspections.



Loopholes

Text

Passes to Pollute: Regulatory Loopholes in California's Oil and Gas Rule

A White Paper by the Central California Environmental Justice Network

August 2025

Introduction

Uncontrolled methane emissions from oil and gas operations threaten both our climate and the health of communities living near extraction sites, yet critical regulatory failures continue to allow dangerous leaks to persist. With a global warming potential more than 80 times greater than carbon dioxide over a 20-year period, methane is a powerful climate forcer that accelerates near-term warming. Compounding this risk, methane leaks often carry toxic and carcinogenic air pollutants—such as benzene and other volatile organic compounds (VOCs)—that contribute to ozone formation and cause serious short- and long-term health impacts for frontline residents. As a cornerstone of California's methane reduction strategy, the California Oil and Gas Rule (COGR) is meant to advance the state's climate and health goals. However, persistent gaps in the rule undermine its effectiveness, leaving communities exposed. This white paper examines these regulatory failures and shows, through real-world examples, how closing these loopholes is essential to protect people and the climate.

Immediate action is needed from the California Air Resources Board (CARB) to close regulatory gaps in the following COGR rule sections:

- **Separator and Tank System Requirements;**
- **Well Casing Requirements; and**
- **Leak Detection and Repair (LDAR) Provisions.**



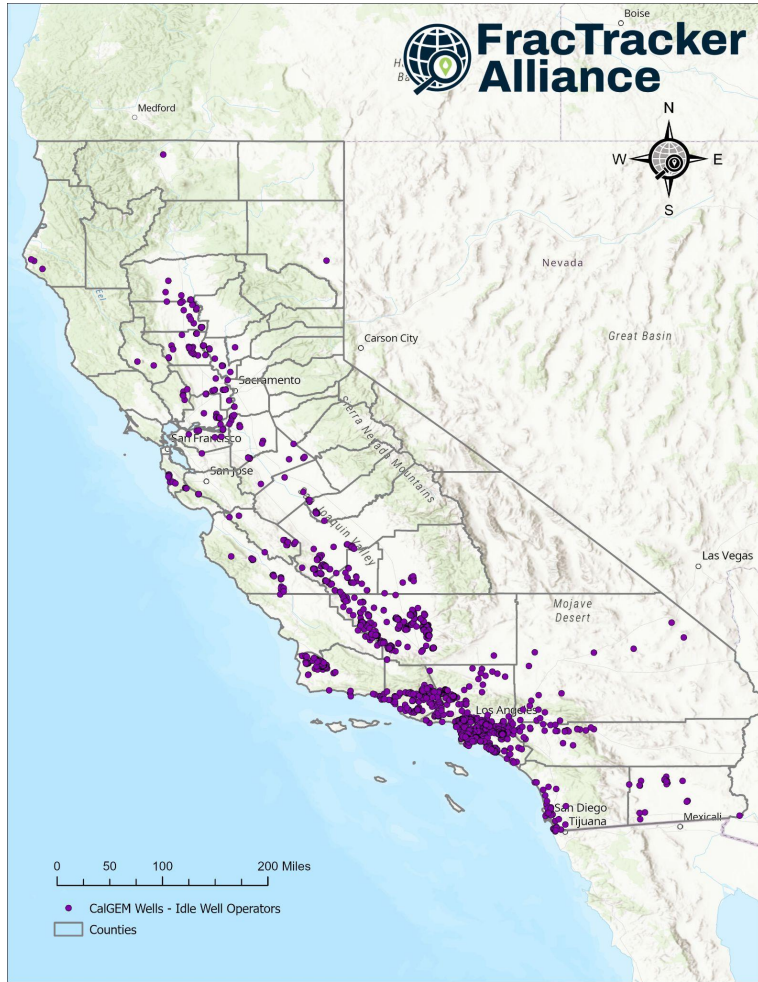
Case Study 1: Morningstar Wells

- Heavy Oil Wells (?)
 - LDAR Requirements
 - API Gravity
- Enhanced oil recovery wells

Oil and Gas Components in California



Did we find all the leaks?



Operator	Active	Idle	Total Result	Delta
Cat Canyon Resources LLC	158	345	503	187
Angel Petroleum, LLC		157	157	157
West Energy Operating, LLC	145	228	373	83
L.A. Terminal & Transport Co.		62	62	62
Sunray Petroleum, Inc.		57	57	57
Sherman Havens		55	55	55
Westlake Oil Co.		54	54	54
Union Consolidated Crude Oil Co.		47	47	47
C. C. Harris Oil Co.		45	45	45
Shadow Wolf Energy, LLC	137	179	316	42
Parker Oil Col		41	41	41
First Oil and Gas Company		40	40	40
Citadel Exploration Inc.		39	39	39
HVI Cat Canyon, Inc.		39	39	39
25 Hill Properties, Inc.	6	43	49	37
Allied Western Petroleum		36	36	36
Zynergy, LLC	3	36	39	33
Union Oil Company of California		28	28	28
Wellington Oil Co.		27	27	27
H. Rogalske		25	25	25
College Oil Co.		24	24	24
Hercules Oil Co.		24	24	24
Freedom Oil Company, LLC		22	22	22
National Oil Co.		21	21	21
C. Shirm		20	20	20
Etchegoin Oil LLC	13	33	46	20
KB Oil & Gas	5	25	30	20
Valid Energy Company		20	20	20
Dwayne's Engineering		19	19	19
Kern Front-Section 35-Partners		19	19	19
L. A. R. R. Co.		19	19	19

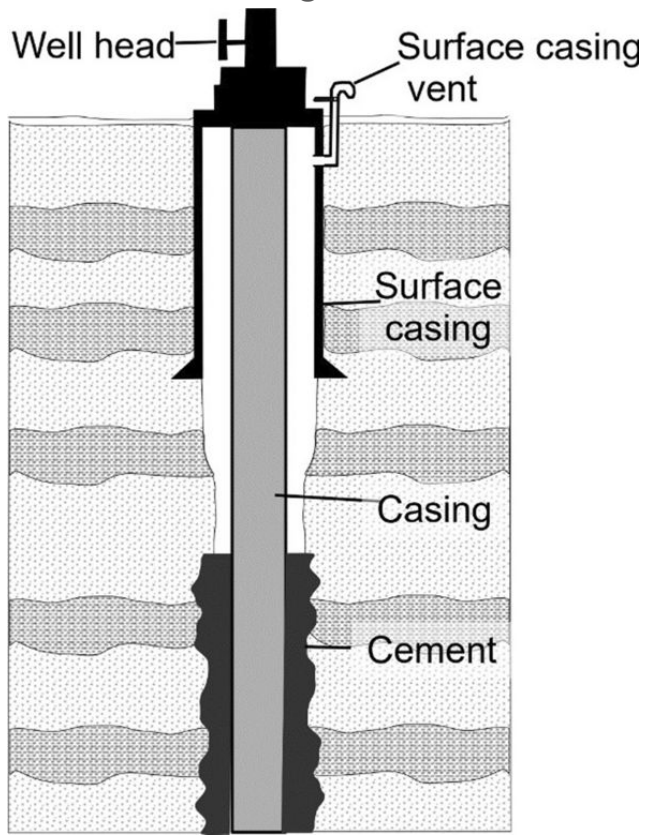
Case Study 2: Grow (Grimmway) Academy

- Emergency equipment
 - Tank Vents
 - Flares



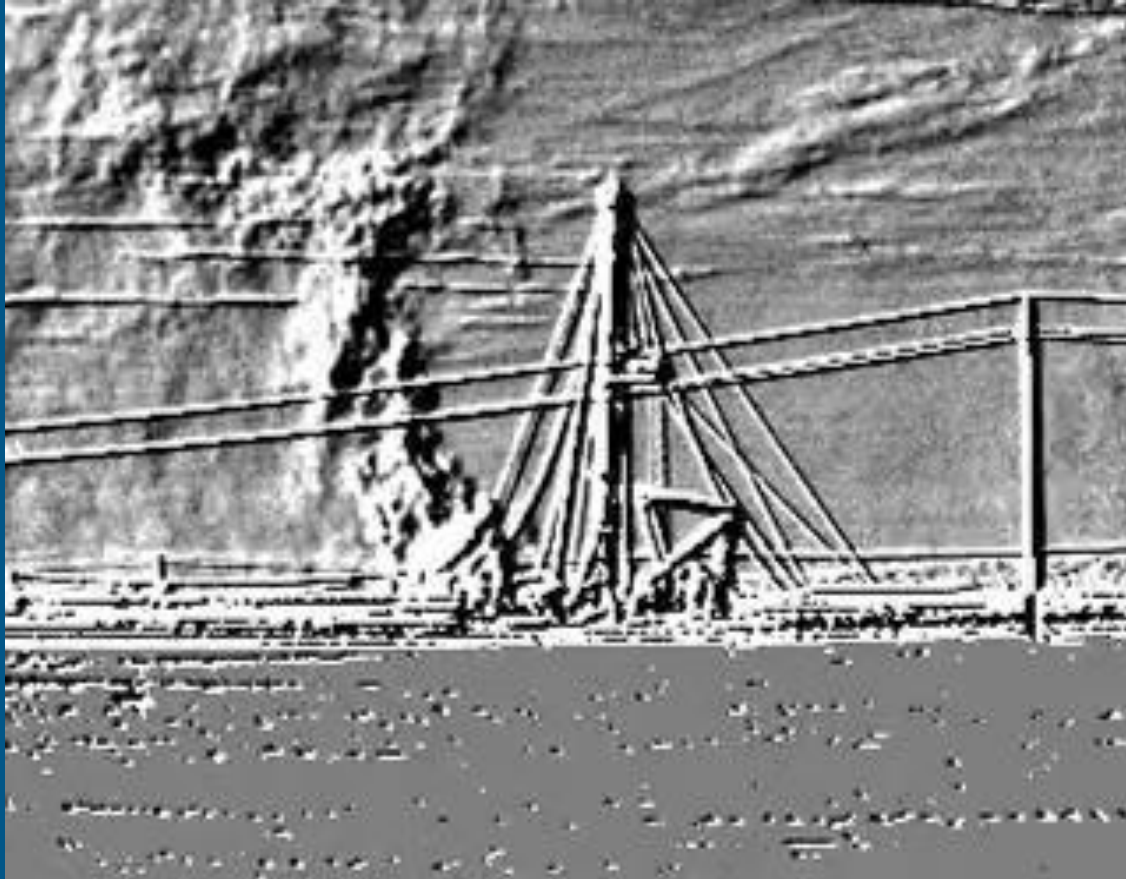
Case Study 3: Downtown Bakersfield

- Heavy Oil Wells
 - Well Casing Vents



Case Study 4: Downhole Work

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THANK YOU

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