# Point Sensor Networks Struggle to Detect and Quantify Short Controlled Releases at Oil and Gas Sites

Rachel E. Day,<sup>†</sup> Ethan Emerson,<sup>‡</sup> Clay Bell,<sup>‡,¶</sup> and Daniel Zimmerle<sup>\*,‡</sup>

1

†Department of Systems Engineering, Colorado State University, Fort Collins, CO 80523, U.S.A

‡Energy Institute, Colorado State University, Fort Collins, CO 80524, U.S.A ¶BPX Energy, Denver, CO 80202, U.S.A

E-mail: Daniel.Zimmerle@colostate.edu

2

#### Abstract

This study evaluated multiple commercially available continuous monitoring (CM) 3 point sensor network (PSN) solutions under single-blind controlled release testing conducted at operational upstream and midstream oil and natural gas (O&G) sites. During 5 releases, PSNs reported site-level emission rate estimates of 0 kg/h between 38-86% of the time. When non-zero site-level emission rate estimates were provided, no linear cor-7 relation between release rate and reported emission rate estimate was observed. The 8 average, aggregated across all PSN solutions during releases, shows 5% of mixing ratio ۵ readings at downwind sensors were greater than the site's baseline plus two standard 10 deviations. Four of six total PSN solutions tested during this field campaign provided 11 site-level emission rate estimates with the site average relative error ranging from -100%12 to 24% for solution D, -100% to -43% for solution E, -25% for solution F (solution F 13 was only at one site), and -99% to 430% for solution G, with an overall average of 14 -29% across all sites and solutions. Of all the individual site-level emission rate esti-15 mates, only 11% were within  $\pm$  2.5 kg/h of the study team's best estimate of site-level 16 emissions at the time of the releases. 17

# 18 Synopsis

<sup>19</sup> With current updates to methane emission regulations in the United States, specifically <sup>20</sup> in the oil and natural gas sector, actions to improve accuracy of emission measurement <sup>21</sup> techniques and establishing standardized testing methodologies for qualifying solutions are <sup>22</sup> at the forefront of research and development actions.

### 23 Keywords

- <sup>24</sup> Methane, emissions abatement, continuous monitoring, emissions quantification, oil and gas,
- <sup>25</sup> GHG, Green House Gas

# <sup>26</sup> Introduction

Anthropogenic emissions are the leading cause of increased atmospheric greenhouse gas 27 (GHG) concentrations in the last 150 years.<sup>1</sup> Atmospheric carbon dioxide  $(CO_2)$  accounts 28 for 79% of human caused GHGs, but methane  $(CH_4)$  has a global warming potential that is 29 roughly 86 times higher than  $CO_2$  over a 20-year period.<sup>2</sup> The short atmospheric lifetime of 30  $CH_4$  ( $\approx 12$  years) and high warming potential means that a reduction in  $CH_4$  emissions would 31 have a near-term effect on the radiative balance of the atmosphere and efforts to mitigate 32 climate change.<sup>1,3,4</sup> The 2022 Inflation Reduction Act (IRA)<sup>5</sup> included the Methane Emis-33 sions Reduction Program, notably a waste emissions charge for sites emitting over 25,000 34 metric tons of  $CO_2$  equivalent ( $CO_2$ e). Recent proposed changes to Subpart W for petroleum 35 and natural gas systems in the Greenhouse Gas Reporting Program (GHGRP) contain im-36 provements to the existing calculation methodologies to supplement calculated  $CH_4$  emission 37 factors with direct measurements.<sup>6</sup> Further, in December 2023 the US Environmental Protec-38 tion Agency (EPA) published the final OOOOb New Source Performance Standards (NSPS) 39 and OOOOc Emission Guidelines (EG) for oil and gas sites which includes standards to 40 allow operators to use continuous monitoring solutions as an alternative means of emission 41 detection.<sup>7</sup> In order for measurements to improve the accuracy of emission inventories, or for 42 continuous emissions monitoring systems (CEMs) to provide a robust equivalent alternative 43 to prescribed leak detection methods, it is imperative that measurements from these systems 44 are repeatable, accurate, and unbiased. 45

A typical North American onshore production site includes surface equipment to perform the first separation of production fluids into condensate (oil), natural gas, and produced water. Natural gas and condensate are transported through pipelines to larger, more complex compressor stations and/or gas processing plants where the gas is further refined to marketable natural gas and natural gas liquids.<sup>2</sup> Operational emissions on production sites occur during routine processing and maintenance, including activities such as flaring, venting, compressing, dehydrating, and heating. Unintentional emission sources include fugitives

(e.g. threaded connections, flanges, valve packing seals, and other component leaks) and pro-53 cess malfunctions (e.g. unlit flares, or stuck liquid dump values on separation vessels which 54 result in excess venting at liquid storage tanks). While fugitive component leaks have been 55 the subject of traditional leak detection and repair (LDAR) practices, they often exhibit 56 relatively low emission rates.<sup>8</sup> More recently, process malfunctions have been identified as 57 high emission rate sources potentially responsible for the discrepancies between bottom-up 58 inventories and top down measurement studies, and which may be both readily detected and 59 abated.9 60

Until recently, LDAR techniques for detecting fugitive methane emissions were performed 61 manually by operators who maintain the sites or 3rd party contractors hired to perform onsite 62 inspections. Traditional LDAR techniques involved Method 21, optical gas imaging (OGI), 63 or audio, visual, and olfactory (AVO) type inspections, all of which are manual and time in-64 tensive processes to inspect each equipment unit and component.<sup>10</sup> Next-generation leak 65 detection and quantification (LDAQ) solutions attempt to provide a less time-intensive 66 methodology and are generally divided into two types, based upon the deployment and su-67 pervision of the solution.<sup>11</sup> Survey solutions detect and quantify emissions during 'snapshots' 68 in time, and continuous emissions monitoring systems (CEM) monitor emissions 'continu-69 ously'. Survey solutions are typically deployed to sites by human operators, and collect data 70 on emissions for short periods, seconds to hours, to detect and quantify emissions. CEMs 71 consist of sensors, analytics, and a dashboard to convey results to end users autonomously.<sup>12</sup> 72 In contrast to traditional voluntary and regulatory LDAR methods, next generation LDAQ 73 solutions (including survey and CEM solutions) use gas sensors and/or wind measurements 74 coupled with algorithms to detect emissions and provide some combination of emission event 75 detection, localization, and/or per-emitter or per-site emission rate estimates using propri-76 etary algorithms.<sup>11,13</sup> Hybridized approaches leveraging alternative detection systems to find 77 high emitting sources more quickly to achieve equivalent or more emission reductions, and 78 thereby relaxing the frequency of traditional LDAR required to detect component leaks have 79

also been proposed.<sup>14,15</sup>

A subset of CEMs, PSNs, use stationary point sensors to provide a continuous (e.g. 1 81 hz) measurement of methane mixing ratio (ppm) at the location of each sensor.<sup>16</sup> Commer-82 cially available PSNs utilize a variety of sensor types including optical, capacitance-based, 83 calorimetric, resonant, acoustic-based, pyroelectric, semiconducting metal oxide (SOM), and 84 electrochemical sensors.<sup>16</sup> The cost, sensitivity, gas selectivity, power requirement, and other 85 specifications of each sensor type influence the selection by commercial product developers. 86 Safety restrictions at operational O&G sites typically require solutions to be installed at the 87 perimeter or along the fenceline of sites. Some solutions have sought certifications allow-88 ing them to be installed in areas classified as potentially explosive environments, enabling 89 them to be located within the fenceline and closer to equipment. Most PSNs also install 90 an anemometer at each site to measure local wind speed and direction. Figure S-1 in the 91 SI shows an example of point sensors that were implemented on one of the field campaign's 92 sites. If accurate, PSNs could provide O&G operators with an efficient and continuous way 93 of monitoring operational and unintentional emissions. 94

This study is one phase of a larger program to develop methodologies to test the perfor-95 mance of emission detection and quantification solutions, named Advancing the Development 96 of Emission Detection (ADED), funded by the U.S. Department of Energy (DOE) with con-97 tributions from partner operators and solution developers.<sup>17</sup> ADED includes elements of 98 LDAQ solution testing in both controlled conditions and field deployments. ADED devel-99 oped controlled release (CR) test protocols for both CEMs and survey methods, which have 100 been implemented at Colorado State University's Methane Emissions Technology Evalua-101 tion Center (METEC).<sup>18</sup> These protocols include instructions on single-blind testing and 102 performance metrics including probability-of-detection (POD), quantification accuracy, and 103 localization precision on a per-emitter basis.<sup>19</sup> 104

The CRs performed at METEC followed the CEM testing protocol while releasing natural gas from a confined and controlled tubing network through surface mounted retired

equipment donated from O&G operators.<sup>19</sup> The equipment at METEC is representative of 107 upstream and midstream onshore O&G sites in North America, however there are no 'oper-108 ational emissions' (pneumatic venting, incomplete combustion, packing vents, etc) occurring 109 at METEC as none of the equipment was operating or attached to non-controlled natural 110 gas lines. Performance evaluation and accuracy of 11 CEMs, 6 of which were PSNs, was con-111 ducted at METEC in 2022 and 2023 following the consensus CEM protocol established.<sup>18,20</sup> 112 The 2022 and 2023 METEC studies involved CRs of measured and recorded natural gas 113 flows from locations simulating emissions on the modeled O&G site equipment.<sup>18</sup> CRs were 114 regulated to provide release duration and flows based on site constraints and detection lim-115 its defined by CEMs solution developers. During CR testing at METEC, CEM solution 116 developers provided detection reports for CRs and results from both years show reasonable 117 performance for detection (90% POD from 0.006 - 7.1 kg/h) at a site where no operational 118 emissions occur, but high uncertainty (underestimation and overestimation by factors up to 119 > 15 and 97, respectively)<sup>20</sup> for emissions rate estimates. 120

During the field campaign for this study, single-blind controlled release experiments were 121 conducted at active oil and gas locations, including upstream production and midstream 122 gathering sites, to evaluate the field performance of commercially available continuous mon-123 itoring, emission detection, and measurement solutions. In this study, we will refer to a 124 controlled release conducted at operational oil and gas sites as a challenge release (ChR); 125 while a release done at METEC will be referenced as a CR. The term ChR is used as a 126 reminder that the flow of the release was controlled, metered, and recorded; however, coin-127 cident operational emissions at the active O&G sites are unknown. A ChR therefore reflects 128 a minimum emission rate for the site at the time of the release, or a delta from a non-zero 129 baseline expected in the site level estimates from a PSN during the release. 130

## <sup>131</sup> Materials and Methods

This study considers ChR testing done at operational O&G sites to evaluate and compare 132 PSNs' field performance at real O&G sites with performance during METEC testing to 133 identify if results of METEC testing are indicative of the solutions ability to identify un-134 intentional emission sources in field conditions.<sup>18,20</sup> While the specifics of test methodology 135 and results for CR at METEC are provided in Bell et. al., 2023, any direct comparisons 136 between METEC results must be cognizant that METEC does not simulate routine oper-137 ational emission sources such as exhaust emissions or venting from pneumatic controllers. 138 Three fundamental differences between the field campaign and METEC were (1) the solution 139 deployments, (2) the operational nature of the active O&G sites where the field campaign 140 took place, and (3) the format of data provided for evaluation of detection and quantification 141 performance. 142

The field campaign was performed by the ADED research team with the participation of O&G partner operators. These operators provided access to host sites, deployed solutions and provided access to the solution data, and supplied natural gas for the ChRs (see 'Challenge Release Equipment' below). Operator personnel were on-site with the field teams continually for all of the ChRs.

ChRs took place at seven O&G production sites and 4 gathering stations in the Up-148 per Green River (Wyoming), Marcellus (Pennsylvania), Utica (Ohio), and Permian Basins 149 (Texas) in 2022 and 2023. The field campaign included 3 total deployments, numbered 1 -150 3 and the solutions that participated in the field campaign are labeled A - G. Production 151 sites included general extraction equipment such as wellheads, separators, combustion ex-152 haust sources, dehydrators, flares, etc., and were smaller than the gathering stations, which 153 included several compressors, slug catchers (a type of liquid separator on inlet gas lines), 154 pig launchers and receivers, vapor recovery units, tanks, and miscellaneous other equipment. 155 Some of the gathering stations included additional processing equipment such as stabilizers 156 and de-ethanization towers. On average, production sites included in the study were 3.5 157

acres and the gathering stations were 10.4 acres (SI Table S-1). By comparison the area
used for METEC studies was smaller, at 1.5 acres. SI Table S-1 details site type, equipment,
size, and provided data information for all deployments of the field campaign. Operators,
solutions, and sites are coded with letters to maintain anonymity.

162 Solution Deployment:

A total of 6 solution developers participated in the field campaign, and there were 7 total 163 PSN solutions tested. One of the developers tested two different solutions during the field 164 campaign. Each operator selected PSN solutions to deploy at their sites using their discre-165 tion for the testing period. Therefore, not all PSN solutions were deployed at each site. The 166 following solutions deployed at least once during the field campaign, in alphabetical order: 167 Baker-Hughes, Project Canary, Earthview, Qube, Sensirion, and ChampionX's Soofie. Op-168 erators installed solutions at their sites prior to the field campaign. Solutions were installed 169 following guidance on sensor placement from the solutions themselves, however in most cases 170 only general guidance (for example "install at corners of site") was provided and little guid-171 ance was given to select specific locations. In most cases solutions were installed around the 172 perimeter of the site often coinciding with the site property boundary or surrounding fence 173 line. Sensor positions during challenge releases were logged by the study team and are shown 174 overlaid on satellite imagery of each site in SI Section S-2.1. 175

At METEC, solution developers deployed their own sensors using their desired installation strategy, provided it met safety requirements of METEC. In both the field campaign and at METEC, the solutions deployed one or more anemometers to measure wind speed and direction.

180 Challenge Release Equipment:

For the field campaign a mobile release rig was used for ChRs at the host sites, allowing gas to be released at metered rates from locations where methane emissions may occur.<sup>21</sup> SI Figure S-5 provides an example of a release location at a host site. Supply for the release rig was provided by a field tap into the operator's sales or conditioned fuel gas line. SI Figure S-6 provides an example of where the release rig pulled gas at a host site. Since the supply gas was typically from a location downstream of liquids separation or other processing, gas used for ChRs may have had a higher methane fraction than other potential unintentional emission sources at the host sites.

The release rate was controlled by adjusting the flow path to different sized precision 189 orifice flow restrictors, and could be fine tuned by adjusting an upstream regulator. The 190 regulator could be bypassed to achieve higher release rates, or when operating from a low 191 pressure gas supply system such as a conditioned fuel gas system post regulation. (SI Figures 192 S-7 and S-8). ChRs were metered by a Fox FT2 mass flow meter calibrated for the range of 193 controlled release experiments. Timestamped release rate data was logged at 1 hz by an on 194 board microcomputer, and the location of each release point was manually recorded by the 195 study team. The release rig was manually controlled to provide a continuous emission at a 196 constant emission rate for the duration of a release and only a single ChR was conducted at 197 a time. Multiple ChRs were sometimes conducted in succession from the same ChR location 198 using different release rates for different durations. 199

#### 200 Challenge Releases:

The ChRs during the field campaign served to simulate an additional, unintentional emis-201 sion with a known release rate to the baseline operational emissions from the site. Most of 202 the operational emission sources at these sites were continuous: compressor exhaust and 203 packing seals, unburnt methane from catadyne heaters on meter runs and reboilers for com-204 bination units (dehydration and separation). Only a few intermittent sources were present 205 (gas operated pneumatics, and in some cases maintenance work caused short blowdowns 206 or vents). ChR rates were originally chosen based on typical fugitive component emission 207 rates (0-2 kg/h) and discussions with the operator; However, after no detections were clearly 208 identifiable in data from installed PSN systems during initial releases, the planned release 209 rates were modified to include higher emission rates in an attempt to improve the learnings 210 from the study. (Figure 1). 211



Figure 1: Duration versus release rate of 90 ChRs conducted at production sites and 75 ChRs conducted at compressor stations. The field campaign consisted of ChR rates ranging from 0.2 to 24.1 kg/h that lasted for 10 to 240 minutes from representative fugitive leak or vented locations using the transportable controlled release rig

Across all host sites 165 ChRs were performed in total. All releases were conducted during weekday operations (M-F) between 8AM and 5PM with the supervision/participation of operator personnel. Duration ranged from 10 to 240 minutes (average 68 minutes) with rates between 0.2 and 24.1 kg/h (average 5.2 kg/h). The portable release rig was setup to a field tap, a release location was decided with the operator, and the emission point was temporarily installed at the selected location.

CRs at METEC were similar to the ChRs in the field campaign, with two key differences. First, at METEC there were no un-metered emissions from on-site operations. Therefore, solutions could identify *any* release as an emission without having to establish a non-zero baseline of emissions from the site. Second, during METEC testing, the study team monitored solution reports and manipulated the emission rate so that each solution achieved near-100% detection probability at some release rate (typically large), and near-0% detection probability at another release rate (typically small). Moving release rates in this way effectively 'mapped out' the POD curve for most solutions. This approach requires 300-400 experiments for each solution. In contrast, far fewer releases were possible for each solution in the field campaign and the overall poor performance, even at release rates approaching the upper limit of the release system and far greater than typical fugitive component leaks, made it impractical to map the curve.

#### PSN Solution Data:

During the field campaign, the solutions *did not* provide detection reports using the same 231 email based reporting method as required during METEC testing.<sup>19</sup> Instead, the study team 232 was granted access to the solution's "dashboard", a graphical user interface provided to 233 operators to receive alerts, interact with data, investigate or acknowledge detections, and 234 export raw or processed emission data from the solutions. Exportable data varied between 235 solutions; SI Table S-1 provides information on each solution's data provided. Solutions 236 (D), (E), (F), and (G) provide averaged site-level emission rate estimates in increments 237 of 10, 1, 15, and 15 minutes, respectively. Most provided time series of methane or total 238 hydrocarbon gas concentration from each point sensor. Some also provided site-level emission 239 rate estimates. Site-level emission rate estimates also varied, including probability of release 240 location tables based on equipment groupings, or alert tables with coordinates of estimated 241 release locations. Data frequency also varied across solutions and across data type for a given 242 solution. For example, data products from one solution included methane mixing ratios at 243 1 Hz, site level emission rate estimates at 5 minute intervals, and a most probable source 244 location(s) at a daily resolution. 245

Independent measurement of all operational emission sources at a given site was not conducted due to challenges coordinating a time-coincident independent measurement, limitations of direct measurement techniques, and other complicating factors. Instead, the field team used data from the continuous monitors when the field team was not running ChRs

(weeks preceding and after); these data are identified as non-release (NR) data. NR data 250 was utilized to compare site-level emission rate estimates with/without active ChRs. The 251 mean of NR site-level emission rate estimates from each solution was used to represent what 252 the solution would report in the absence of a ChR at a given site, hereafter referred to as 253 'baseline (BL)'. These values can be compared to site-level emission rate estimates during 254 ChRs for the same site-solution pair to determine if the presence of a ChR impacted the site-255 level estimate. The amount of available NR data varied for site-solution pairs, and ranged 256 from one to six weeks. 257

The original intent of the field campaign was to utilize the same metrics as METEC 258 CR testing, specifically POD, quantification accuracy, and localization accuracy.<sup>19</sup> Since 250 solutions did not provide defined detection reports that could be used for this purpose, 260 the field team needed to interpret the dashboards' raw data to determine if there was a 261 sufficient change in emissions that the presence of excess emissions at the site could be 262 reasonably identified. To avoid subjective bias, this was completed by defining thresholds 263 for what change in emissions constituted a detection. Further, these thresholds needed to be 264 applicable to all solutions. The analysis used thresholds that could be applied to exportable 265 data from the solutions' dashboards, specifically: 266

<sup>267</sup> 1. Mixing ratio data taken from the solutions' sensors

268

<sup>8</sup> 2. Site-level methane emission rate estimates, hereafter 'emission estimates'.

Several analyses were performed, and the thresholds specific to each analysis are provided
 along with the results, below.

271 Challenge Release Detection Classification:

Solutions can be configured to alert at operator defined emission thresholds and/or durations. Since operators did not have much time to configure solutions prior to the testing, these automated alerts were not leveraged in the detection classification. The majority of emissions estimates from solutions D, E and G, were 0 kg/h. For these solutions 'any non-zero

emission estimate' overlapping in time with a challenge release as a true positive  $(TP)_{POD}$ 276 detection. This  $TP_{POD}$  definition is conservative and accepts any non-zero estimate during 277 the ChR as a  $TP_{POD}$ , regardless of attribution indicating the detection was of our release, 278 not some other activity or operational emission at the site. Solution F did not report any 0 279 kg/h emission estimates, and a  $TP_{POD}$  detection was defined as any emission estimate above 280 the site BL, that is, if any site-level emission estimate greater than the BL was reported dur-281 ing the ChR, the ChR was designated as a  $TP_{POD}$ . For any solution, if a ChR was not 282 classified as a  $TP_{POD}$  detection following the logic above, then it was classified as a false 283 negative  $(FN)_{POD}$  detection. A  $FN_{POD}$  is defined as a non-detect, meaning the challenge 284 release was not identified by the solution. POD curves were then derived from  $TP_{POD}$  and 285  $FN_{POD}$  data using the regression methodology, as described in Ilonze et al. (2023). False 286 positives and true negatives could not be attributed during these studies, because the field 287 team was unable to rule out the presence of all fugitive or vented emissions from operational 288 activities at the site. 289

Therefore, a classification matrix and the non-parametric  $\chi^2$  statistical test of indepen-290 dence was used to assess whether a statistical difference may exist in a solution's data between 291 the reported site-level emission rate estimates when ChRs were occurring versus when they 292 were not. Different from the POD definition for detection, the classification matrix used 293 reported NR emission estimates to identify a  $TP_E$  detection or a  $FN_E$  non-detection. Note 294 that the  $\chi^2$  statistic does not identify a relationship; a significant result ( $p \leq 0.05$ ) indicates 295 only that a relationship cannot be ruled out. Classification was applied to any site-level 296 emission estimate,  $E_{i,j}$ , for solution, *i*, at site, *j* such that: 297

$$TP_E \leftarrow E_{i,j} \ge \bar{E}_{NR,i,j} + \sigma_{E_{NR,i,j}}$$
 (1)

$$FN_E \leftarrow E_{i,j} < \bar{E}_{NR,i,j} + \sigma_{E_{NR,i,j}} \tag{2}$$

where  $\bar{E}_{NR,i,j}$  is the mean of all NR reports by solution *i* at site *j*, and  $\sigma_{E_{NR,i,j}}$  is the standard deviation of all NR reports by solution *i* at site *j*.

For the mixing ratio analysis, we first identify downwind sensors as any sensor which is within  $\pm$  45° of directly downwind from the ChR location (SI Figure S-9). All other sensors are classified as 'not downwind.' A TP<sub>X</sub> and FN<sub>X</sub> sensor response,  $X_{i,j}$  is defined as any reported mixing ratio by a downwind sensor where:

$$TP_X \leftarrow X_{i,j} \ge \bar{X}_{\mathrm{NR},i,j} + 2\sigma_{X_{\mathrm{NR},i,j}}$$
(3)

$$FN_X \leftarrow X_{i,j} < \bar{X}_{\mathrm{NR},i,j} + 2\sigma_{X_{\mathrm{NR},i,j}} \tag{4}$$

Higher percentages of  $TP_X$  responses at the downwind sensors compared with the upwind sensors could indicate that the sensors are picking up a response when directly downwind of a ChR.

#### 307 Quantification Analysis:

To assess quantification performance, we compare the solutions' emission estimates in NR conditions to estimates when ChRs were occurring. This analysis assumes the site-level emission estimate (zero or non-zero) during NR periods represents the baseline operational emissions at the site and any ChR represents an incremental emission source which the solution should detect. For a conservative analysis, the BL was reset for each ChR using the most recent available NR data from the solution. Relative error,  $\epsilon$ , for solution *i* during a ChR at site *j* was defined as:

$$\epsilon_{i,j} = \frac{\sum E_{i,j} - \sum(SOE)}{\sum(SOE)}$$
(5)

where study onsite estimate (SOE) is the sum of the ChR rate,  $c_j$ , and the BL,  $b_{i,j}$ , and  $E_{i,j}$  is the site-level emission estimate provided by solution *i* at site *j*. If  $E_{i,j}$  accurately reflected the additional emissions from the ChR,  $E_{i,j} = SOE$  and relative error is zero.

This method is analogous to the use case, where operators wish to be notified of unexpected 318 fugitive emissions; That is, the solution must establish a baseline emission rate from the 319 site, and then accurately assess the presence of incremental emissions. This analysis is also 320 analogous to the "action-levels" defined in OOOOb NSPS where a deviation of 1.2 kg/h (for 321 wellhead only sites) or 1.6 kg/h (for other affected facilities) in the rolling 90-day average 322 over a site-specific baseline requires a followup action.<sup>7</sup> Additionally, the percent of emission 323 estimates  $E_{i,j}$  that were within  $\pm 2.5$  kg/h of the SOE were found for each site and each 324 solution. 325

Given the observed POD performance, a classification matrix approach was also con-326 ducted, to determine if a relationship exists between quantification estimates with/without 327 ChRs. The analysis used a  $3 \times 3$  classification matrix with experiments classified along one 328 axis, and the emission estimates classified along the other. Experiments were classified into 329 three groups: "Not releasing" when no ChR is active, "ChR  $\leq$  BL" when a ChR is lower 330 than the solution's BL estimate of the site, and "ChR > BL " when a ChR is larger than 331 the solution's BL estimate of the site. Site-level emission estimates were classified as "Zero 332 Estimate" when  $E_{i,j} = 0$ , as "Within 3x" when  $\frac{SOE_{i,j}}{3} \leq E_{i,j} \leq 3 \cdot (SOE_{i,j})$ , or as "Outside 333 3x'' when  $E_{i,j} > 3 \cdot (SOE_{i,j})$  or  $E_{i,j} < \frac{SOE_{i,j}}{3}$ . 334

$$Zero \ Estimate \leftarrow E_{i,j} = 0 \tag{6}$$

Within 
$$3x \leftarrow \frac{SOE_{i,j}}{3} \le E_{i,j} \le 3 \cdot SOE_{i,j}$$
 (7)

$$Outside \ 3x \leftarrow \begin{bmatrix} E_{i,j} > 3 \cdot SOE_{i,j} \\ \text{or} \\ E_{i,j} < \frac{SOE_{i,j}}{3} \end{bmatrix}$$
(8)

## **Results and Discussion**

Four of the seven solutions provided site-level emission rate estimates, with solutions fre-336 quently reporting 0 kg/h (38% - G, 62% - E, and 86% - D). Excluding 0 kg/h estimates, 337 no clear relationship between challenge release rates and solutions' site-level emission rate 338 estimates were observed during the field campaign across all sites (Figure 2). Solutions D 339 and E show high bias for all ChR rates, while solution F and G show high bias at low ChRs 340 rates and low bias during the higher ChR rates. A solution that is sensitive to the ChRs 341 amongst the site's background emissions would have shown a linear relationship above the 342 1:1 line and indicates an insensitivity to the tested conditions. 343



Figure 2: Solutions' site level estimates from all sites temporally aligned with ChRs. Individual estimates are shown as blue circles. Data were separated into bins with equal points and plotted as orange dots to indicate the average estimated emission rate. Horizontal whiskers indicate the bin width, vertical whiskers indicate the 25th and 75th percentiles for estimated emission rates and the intersection is the median. Estimates of 0 kg/h are not included in this log-log plot.

There was a substantial spread observed between controlled releases and solutions' estimates during controlled testing at METEC, indicating a wide uncertainty in these solutions' estimates for any given release.<sup>20</sup> These uncertainties are exacerbated in the field campaign by the operational nature of a site where during any given challenge release, the site-level emission rate estimates often span many orders of magnitude. SI Figures S-10 - S-20 show solution site-level estimates versus SOEs for each site and solution pair.

#### <sup>350</sup> Probability of Detection

None of the solutions achieved a 90% POD across the range of ChRs conducted, as shown 351 in Figure 3. Implementing the METEC POD framework to the field campaign results in 352 substantially reduced performance at operational sites when comparing the same solutions' 353 METEC POD curves. None of the solutions demonstrated POD results similar to that 354 in METEC testing, as shown in the logistic regression POD curve in SI Figure S-21. This 355 suggests the test and analysis methods utilized for METEC CR testing provided little insight 356 into actual field performance. One variance in test method between METEC and the field 357 campaign that may have affected results was the number of sensors per area. Each solution 358 that participated in METEC testing deployed more sensors per acre at METEC than at any 359 location in the field campaign. (SI Figure S-22) This leads to increased "blind-spots" in the 360 field deployments where a ChR may disperse between sensors and not transect any sensor 361 location downwind for the duration of the experiment. While this implies a lower POD, and 362 our field results confirm, it is important to recognize the ChR in this study were relatively 363 short in duration (0-4 hours) and a CM solution performance may improve given longer 364 opportunities to detect where the wind may have increased directional variability. However, 365 controlled releases at METEC were generally of similar duration, with the large majority 366 lasting between 0-4 hrs. 367



Figure 3: Probability of detection as a power curve function of site rate estimates during ChRs for the four solutions with emission rate estimates during all deployments. The definition of detection, or a  $\text{TP}_{POD}$  reading, for the field campaign includes any estimate above 0 kg/h for solutions D, E, and G. As solution F does not have any 0 kg/h estimates, the definition of detection is any estimate above 2.23 kg/h, the BL site rate estimate, see *Methods*.

The non-parametric classification shows 85% of the emission estimates made during ChRs 368 and 94% of estimates during NR periods were below the detection threshold. To determine 369 if the change in emission estimates between periods with ChRs and without ChRs have a 370 chance of significance, the results of the  $\chi^2$  test from each site-solution combination are 371 summarized in Table 1. Note that the  $\chi^2$  test does not confirm a relationship between 372 the solution response and the presence absence of a ChR; significance only indicates that 373 such a relationship cannot be ruled out. Results indicate that no difference is observed 374 between periods with/without ChRs in 11 of the 19 site-solution combinations. Of the 19 375 combinations, all solutions indicated the possibility of a detection relationship at least once, 376

<sup>377</sup> including solution F which tested in only one combination.

Table 1: Results from the detection classification matrix. Note that 'No' indicates that the data is random and 'Yes' indicates that a statistical significant relationship cannot be ruled out.

	Site Type	$\mid D$	$\mid E$	F	G
Site 1	Production	No	No	Yes	No
Site 2	Production				Yes
Site 3	Production				No
Site 4	Production				No
Site $5$	Production				Yes
Site 6	Compressor		Yes		Yes
Site 7	Gas plant		Yes		
Site 8	Compressor		Yes		No
Site 9	Compressor	No			No
Site 10	Production	Yes			No
Site 11	Production	No			No

**Possibly Observed Detection** 

#### 378 Mixing Ratio Results

The poor relationship between ChRs and detections may be driven by multiple factors which may also vary between solutions. However, a successful detection for any solution would require two sequential events to be true: (a) the solution's sensor must respond to the ChR with increased readings, and (b) the solution's algorithms must identify a detection by successfully analyzing the sensor data. We analyze (a) by reviewing time series of mixing ratio data as per Equations 3 and 4.

From site-solution combinations that provided reviewable mixing ratio data, sensors downwind averaged 5% of readings indicating enhancements greater than  $2\sigma_{X_{\text{NR},i,j}}$ , while sensors upwind averaged 1% of readings indicating enhancements. Since sensors were  $\approx 100$ meters from the ChR emission sources, the low 5% enhancement rate observed during ChRs is unsurprising, given the instability of transport in near-field dispersion. These data indicate the presence of a signal at the sensors, and therefore the presence of information which could potentially identify controlled releases. However, the signal is both weak and noisy, likely indicating that post-processing algorithms require improvement to extract detectionsfrom the signal.

Figure 4 provides an example of the enhancement analysis, showing sensor activity with respect to the ChR rates. Under ideal sensor positioning and wind directions, a ChR from a location occurring directly upwind of a sensor node of the PSN shows a mixing ratio enhancement where peak mixing ratios trend with different ChR release rates (Figure 4, left panel); changes in mean mixing ratios are less clear. During varied wind directions the enhancements do not trend with the ChR release rate, and a period with no ChR shows reading similar to periods with releases (Figure 4, right panel).



Figure 4: Solution C's mixing ratio estimates in comparison with the ChR rates at Site 1. The black dashed line shows the ChR rate and the colored lines are mixing ratio measurements from the point sensors at the site. The left panel illustrates a period with wind from the NW and the closest downwind WSW sensor measuring peak mixing ratios that increase and decrease with the ChR rate. Other sensors which are not downwind of the ChR show little response. Right plot shows the same solution at Site 1, with the wind direction moving through a section with no sensors. Mixing ratio enhancements are therefore not present in any sensor, and variability in sensor mixing ratio is random or associated with routine operational emission sources at the site.

Figure 4 shows one example; other site-solution combinations displayed similar behavior with varying degrees of clarity. These qualitative results suggest that algorithms may need to consider multiple wind transport parameters to know when mixing ratio enhancements are likely to occur, over what upwind angle, at what intensity, and may need to modify both detection and quantification algorithms to match meteorological conditions. For conditions outside of operable parameters, observations are unlikely to be indicative of emissions, and <sup>407</sup> may need to be discarded. This would result in fewer emission reports of higher accuracy
<sup>408</sup> than data provided by algorithms at the time of testing.

#### <sup>409</sup> Site Rate Quantification Results

While the study design was primarily intended to evaluate detection and alerting of un-410 intentional emission sources using ChRs, many solutions are now attempting to provide 411 site-level, time resolved emission rate estimates. In this mode, detection of any given emit-412 ter is of lower priority, and accurate estimates of site-level emissions over extended periods 413 are higher priority. Recent regulatory changes including the Inflation Reduction Act (IRA), 414 proposed amendments to the US GHGRP, and the EPA's Final Methane Rule raise priority 415 for this mode.<sup>7</sup> With the new waste emission charge starting in 2024 at \$900/tonnes above 416 defined emission intensities, the solutions' emission estimate accuracy is of importance to 417 O&G companies and regulatory authorities. Additionally, the Final Methane Rule allows 418 CEM solutions to be implemented by operators as an alternative means for fugitive emission 419 detection using site-level emission rate based action limits. The rule specifies action levels for 420 sites with major production and processing equipment, centralized facilities, and compressor 421 stations as a deviation of 1.6 kg/h in a 90 day rolling average and a deviation of 21 kg/h in 422 a 7 day rolling average above a site-specific baseline. 423

Table 2 shows the solutions' estimates averaged at each site during the field campaign 424 and extrapolated to an annual estimate by assuming the ChR continued at the average 425 emission rate for a full year (8760 hours). All solutions underestimate the magnitude of 426 additional emissions from the ChRs relative to the solution's BL. This analysis highlights 427 the implications of inaccurate site-level emission estimates resulting from the application 428 of proprietary inversion models used by PSNs at the time of testing, where assessed waste 429 emission charges may be substantially biased (in this case low) relative to true site annualized 430 emissions. Note that this analysis only considers the difference between a site-level emission 431 rate estimate and the BL during a ChR compared to the magnitude of the ChR and does 432

not consider the accuracy of the solution's BL itself. Therefore, the study does not conclude 433 that CM emission estimates would result in reduced charges for operators relative to actual 434 emissions, but instead may only conclude that the accuracy of emission estimates from 435 PSNs is not sufficient to base a waste emission charge on. BL emissions assessed by different 436 solutions at each site varied significantly (See SI Table S-2). Though this study can not assess 437 the accuracy of any one solution, the high variability in baseline emission estimates across 438 solutions indicates that annualized estimates developed by integrating site-level emission 439 estimates from PSNs versus time are unlikely to provide an accurate estimate of true annual 440 emissions. 441

Table 2: Annualized emission estimates compared to annualized ChRs. The difference in waste emission charge assumes \$900/tonne that will be implemented in the U.S. Inflation Reduction Act. Note that the difference reflects the solution's inability to measure the difference in site-level emissions resulting from (ChRs), and does not imply their baseline (BL) is accurate, which may result in waste charges biased low or high overall.

	and New	Waste	Emissi	on Cha	arge
	Total				Waste Charge
	Average	Total	Total	Total	Difference
	Estimates	ChRs	BLs	SOEs	Annually
Solution	(kg)	(kg)	(kg)	(kg)	(\$)
D	640	650	355	$1,\!005$	\$-151,000
${ m E}$	1,500	545	2,770	$3,\!315$	-712,000
$\mathbf{F}$	375	360	135	495	-16,000
G	580	835	670	1,505	-285,000

Total Field Campaign Estimate Averages and New Waste Emission Charge

Also as a part of the EPA's Final Methane Rule, if a certified third party (remote measurement systems that doesn't rely on access to facilities, e.g. satellite or aerial measurements) detects an emission of 100 kg/h or greater of methane it will be considered a super-emitter event and the O&G operator will need to take action to address the event.<sup>7</sup> During the times of ChRs in the field campaign, solutions D, E, and G reported emissions greater than or equal to 100 kg/h 3, 46, and 1 times, respectively, even though all ChRs were below 25 kg/h (25% of the EPA's Super-Emitter Program (SEP) threshold).

Histograms presented in SI Figure S-23 depict the individual site-level emission rate

estimates of the solutions, revealing a prevalence of estimates clustered around or near 0 kg/h at all sites. Substantially higher site-level emission rate estimates are observed at a much lower frequency, particularly in the cases of D, E, and G. This indicates that solutions are missing site emissions. Even estimates of 0 kg/h during NR times are likely inaccurate, due to the presence of operational emissions, particularly at compressor stations where nonzero exhaust emissions from compressors and packing seals are present as well as from heaters and combusters for dehydration systems.

SI Figure S-24 shows that average site-level emission rate estimates during ChRs are 457 higher than during NR periods (except solution E). This is in line with expectations and 458 may indicate solutions are working to some degree, however (a) the variability in emission 459 estimates during any given ChR is large ranging from below the ChR release rate to much 460 higher than the ChR release rate plus the SOE, and (b) the TP/FN classification and de-461 tection analysis was conservative/forgiving and still indicates poor detection. Table 3 shows 462 the mean relative error for nearly all solutions at nearly all facilities is negative, indicating 463 emission estimates during ChRs were consistently biased low, i.e. a smaller incremental 464 increase above BL was observed during a ChR than the release rate of the ChR. 465

Table 3: Relative error between the individual emission estimates and the SOE. Only periods during ChRs are included in the figure. No NR periods (ChR = 0) are included. The percentage is the average relative error for individual site-level emission estimates for each solution.

	Site Type	D	$E$	F	G
Site 1	Production	-32%	-43%	-25%	-47%
Site 2	Production				-41%
Site 3	Production				-54%
Site 4	Production				-52%
Site 5	Production				430%
Site 6	Compressor		-100%		-64%
Site 7	Gas plant		-88%		
Site 8	Compressor		-46%		-72%
Site 9	Compressor	-56%			-10%
Site 10	Production	24%			-99%
Site 11	Production	-100%			-84%
Mean Error		-35%	-70%	-25%	-51%

**Emission Estimate Relative Error** 

In Table 4, we present the percentages of non-zero emission estimates falling within a 466 range of  $\pm 2.5$  kg/h of the SOE. Notably, any 0 kg/h site-level emission rate estimate 467 was considered *not* within this range, reflecting the expectation that site-level emission rate 468 estimates should not be 0 kg/h during ChR activities. For instance, if a ChR of 0.5 kg/h 469 occurred alongside a baseline of 0.5 kg/h, totaling 1 kg/h of SOE, an emission estimate of 0 470 kg/h would technically be in range but is excluded from consideration in our analysis. The 471 infrequent alignment of solution estimates within the bounding range and frequent reports 472 of no emissions suggests underlying issues with their estimation accuracy. Note, the band 473 of  $\pm 2.5$  kg/h is greater than the action level defined in the EPA OOOOb NSPS, indicating 474 that solutions may not currently be capable of providing data with high enough precision to 475 make the rule effective. 476

G
7%
170
41%
0.2%
39%
36%
27%
25%
5%
0%
8%

Table 4: Percent of emission estimates within  $\pm$  2.5 kg/h of ChRs and BLs.

Lacking a clear proportional relationship between ChR emission rates and reported emis-477 sions, we utilized a classification matrix approach to determine if any relationship could 478 exist. From the  $\chi^2$  tests performed on the quantification matrices, 18 of the 19 site-solution 479 pairs showed that a statistical significance could not be ruled out. This indicates that the 480 difference between emission estimates when ChRs were occurring and when ChRs were not 481 occurring may not be random, even though little correlation was seen between the deviation 482 from the BL in reported site-level emission rate estimates and the emission rate of the ChR. 483 With a factor of 3, the limits for the classification matrix provided a wide range for the 484 estimates to fall within, but Table 5 shows only a small amount of site-solution pairs within 485 those limits. 486

Emission Estimates within  $\pm$  2.5 kg/h

Table 5: Percentages of site quantification estimates with limits of 3 times the expected site emissions. Only showing percentages of estimates made when the ChR was higher than the BL. A dash specifies sites that the study team was not able to release a ChR above the BL.

	$Site \ Type$	D	$\mid E$	$F$	G
Site 1	Production	12%	-	75%	17%
Site 2	Production				40%
Site 3	Production				44%
Site 4	Production				38%
Site $5$	Production				35%
Site 6	Compressor		1%		1%
Site 7	Gas plant		-		
Site 8	Compressor		-		1%
Site 9	Compressor	17%			24%
Site 10	Production	0%			0%
Site 11	Production	0%			2%

Quantification Estimates Within Limits

#### 487 Implications

Recent regulatory and voluntary emissions reporting changes will place additional reliance on detection and measurement of emissions at sites for reporting purposes. To trust any measurement method for this purpose, the performance of the method needs to be understood in two areas:

First, numerous studies have indicated that a small number of large emitters contributes 492 disproportionately to total emissions from O&G sites. A key selling point of CEM is rapid 493 detection of large emitters, shortening the time to detect and mitigate, thus reducing total 494 emissions. Therefore, detection performance is a key input to CEM mitigation performance. 495 This study shows that the field campaign POD is significantly lower than the POD in con-496 trolled test conditions at METEC and indicates that controlled testing did not reflect field 497 conditions accurately. Therefore, new methods are needed to translate controlled testing 498 performance into field conditions. 490

However, field campaigns are unlikely to provide the type of rigorous testing available in controlled testing at a test center. Controlled testing still remains essential for characterizing solution performance. A 12-week test period at METEC covers more than 400 CR experiments, per solution, operating 24 hours per day, 7 days per week. In contrast, 8 weeks of field deployment in this study was able to conduct only 165 ChR experiments, and it was infeasible for all solutions to be installed at all sites for these experiments. This resulted in a small number of experiments, relative to METEC testing, for any single solution. Given this constraint, this study indicates that controlled testing must be improved to better reflect field conditions.

When analysis controls for wind conditions and times when emissions are directly upwind of a sensor, mixing ratio readings when ChRs are active differ from times when ChRs are not active, indicating that a signal exists using current sensor technology. This suggests that point sensors may be sufficient to detect emissions at field sites, but current algorithms seem unable to reliably extract accurate emission rate estimates from the sensor readings. Additional investments in analytics are likely required, although improvements in sensing technologies may also be necessary.

Second, ignoring whether individual incremental emitters (i.e. the ChRs) were detected, 516 there is an interest in using CEM to regularly report emission rates from sites. To be 517 used in this mode, total emissions observed by the CEM over an extended period must 518 reasonably represent total emissions at the site. While results from the ChRs performed 519 in this study represent a short experimental duration, results strongly suggest that using 520 CEMs to estimate long-term intermittent emissions are inaccurate. In this study, results 521 from the ChRs indicate that most solutions, at most sites, do not accurately report the 522 incremental emissions represented by ChRs ranging from 0.2 - 24.1 kg/h. Given that many 523 emitters in field conditions are intermittent, and the sizes utilized here are representative 524 of those emitters, results suggest long-term reporting will not correctly report the emissions 525 from sites. However, statistical analysis does not conclude a relationship does not exist 526 between reported emission rates and ChRs. These results suggest that a signal exists, but 527 current algorithms may not be sufficiently advanced to accurately estimate emissions in field 528

<sup>529</sup> conditions, and that further development of CEM analytics are required for this application.

# <sup>530</sup> Supporting Information

Additional experimental details, materials, and methods, including photographs of sites (PDF).

#### **Acknowledgment**

Acknowledgments to Arvind Ravikumar, Oladamola Amieyeofori, and Eldar Sharafutdinov from University of Texas at Austin for their field assistance. Subsequent to manuscript submission, Clay Bell began working for bpx energy, headquartered in Denver, Colorado. bpx energy did not participate in the drafting of this paper and the views set forth in the paper do not necessarily reflect those of bpx energy.

# 539 Author Information

All authors were employees of Colorado State University (CSU) during the period when all testing, and most analysis was performed. One author (CB) left CSU to join BPX in November 2022.

## 543 References

(1) Intergovernmental Panel On Climate Change (Ipcc) <u>Climate Change 2022 – Impacts</u>,
 Adaptation and Vulnerability: Working Group II Contribution to the Sixth Assessment
 <u>Report of the Intergovernmental Panel on Climate Change</u>, 1st ed.; Cambridge University Press, 2023.

- (2) EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021. U.S. Environ mental Protection Agency, EPA 430-R-23-002. https://www.epa.gov/ghgemissions/
   inventory-us-greenhouse-gas-emissions-and-sinks.
- (3) IEA Global Methane Tracker 2023. https://www.iea.org/reports/
   global-methane-tracker-2023.
- (4) Ocko, I. B.; Sun, T.; Shindell, D.; Oppenheimer, M.; Hristov, A. N.; Pacala, S. W.;
  Mauzerall, D. L.; Xu, Y.; Hamburg, S. P. Acting rapidly to deploy readily available methane mitigation measures by sector can immediately slow global warming.
  Environmental Research Letters **2021**, 16, 054042.
- (5) US EPA, O. Methane Emissions Reduction Program. 2023; https://www.epa.gov/
   inflation-reduction-act/methane-emissions-reduction-program.
- (6) U.S. Environmental Protection Agency Office of Atmospheric Protection; Greenhouse
   Gas Reporting Program (GHGRP); EPA Subpart W Fact Sheet Proposed Rule. www.
   epa.gov/ghgreporting.
- (7) EPA ENVIRONMENTAL PROTECTION AGENCY 40 CFR Part 60 [EPA-HQ-OAR-2021-0317; FRL-8510-01-OAR] RIN 2060-AV16: Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review.
  2023; https://www.epa.gov/system/files/documents/2023-12/eo12866\_ oil-and-gas-nsps-eg-climate-review-2060-av16-final-rule-20231130.pdf.
- (8) Pacsi, A.; Ferrara, T.; Schwan, K.; Tupper, P.; Lev-On, M.; Smith, R.; Ritter, K.
  Equipment leak detection and quantification at 67 oil and gas sites in the Western
  United States. <u>Elem Sci Anth</u> 2019, 7, 29.
- (9) Plant, G.; Kort, E. A.; Brandt, A. R.; Chen, Y.; Fordice, G.; Gorchov Negron, A. M.;

29

572		Schwietzke, S.; Smith, M.; Zavala-Araiza, D. Inefficient and unlit natural gas flares
573		both emit large quantities of methane. <u>Science</u> <b>2022</b> , <u>377</u> , 1566–1571.
574	(10)	EPA Leak Detection and Repair: A Best Practices Guide, EPA-305-D-07-001. 2007;
575		www.epa.gov/compliance.
576	(11)	Bell, C. S.; Vaughn, T.; Zimmerle, D. Evaluation of next generation emission mea-
577		surement technologies under repeatable test protocols. <u>Elementa: Science of the</u>
578		<u>Anthropocene</u> <b>2020</b> , $\underline{8}$ , 32.
579	(12)	US EPA, O. EMC: Continuous Emission Monitoring Systems. 2016; https://www.epa.
580		gov/emc/emc-continuous-emission-monitoring-systems.
581	(13)	EPA Next Generation Emission Measurement. 2023; https://www.epa.gov/
582		air-research/next-generation-emission-measurement-ngem-research-fugitive-air-pollut
583		leak-detection.
584	(14)	Cardoso-Saldaña, F. J. Tiered Leak Detection and Repair Programs at Simulated Oil
585		and Gas Production Facilities: Increasing Emission Reduction by Targeting High-
586		Emitting Sources. Environmental Science & Technology 2023, 57, 7382–7390, PMID:
587		37130155.
588	(15)	Ravikumar, A. P.; Wang, J.; McGuire, M.; Bell, C. S.; Zimmerle, D.; Brandt, A. R.
589		"Good versus Good Enough?" Empirical Tests of Methane Leak Detection Sensitivity
590		of a Commercial Infrared Camera. <u>Environmental Science &amp; Technology</u> 2018, <u>52</u> ,
591		2368-2374.
592	(16)	Aldhafeeri, T.; Tran, MK.; Vrolyk, R.; Pope, M.; Fowler, M. A Review of Methane Gas

<sup>593</sup> Detection Sensors: Recent Developments and Future Perspectives. <u>Inventions</u> 2020, <u>5</u>,
<sup>594</sup> 28.

30

- <sup>595</sup> (17) Advancing Development of Emissions Detection. https://energy.colostate.edu/
   <sup>596</sup> metec/aded/.
- (18) Bell, C.; Ilonze, C.; Duggan, A.; Zimmerle, D. Performance of Continuous Emission
   Monitoring Solutions under a Single-Blind Controlled Testing Protocol. <u>Environmental</u>
   Science & Technology 2023, 57, 5794–5805.
- (19) Bell, C.; Zimmerle, D. METEC controlled test protocol: Continuous monitoring emission detection and quantification. 2022, Publisher: Mountain Scholar
  tex.copyright: Copyright and other restrictions may apply. User is responsible for
  compliance with all applicable laws. For information about copyright law, please see
  https://libguides.colostate.edu/copyright.
- (20) Ilonze, C.; Emerson, E.; Duggan, A.; Zimmerle, D. <u>Assessing the progress of the</u>
   performance of continuous emission monitoring solutions under single-blind controlled
   testing protocol; preprint, 2023.
- (21) Vaughn, T. L. CSU Release Rig Users Guide. 2022.