## State Review of Oil & Natural Gas Environmental Regulations, Inc.



## Who We Are

- STRONGER is a nonprofit, multi-stakeholder educational organization. The Board of Directors is comprised of equal representation from the oil and gas industry, state oil and gas environmental regulatory agencies, and the environmental public advocacy community.
- STRONGER's mission is to enhance protection of human health and the environment by educating and providing services for the continuous improvement of state oil and gas environmental regulatory programs.



## What We Do

- <u>Develop</u> Guidelines for state oil and gas environmental regulatory programs with multi-stakeholder workgroups comprised of subject matter experts.
- <u>**Review</u>** volunteer state programs against the criteria in the Guidelines with multi-stakeholder review teams.</u>
- <u>Publish</u> State Review Reports containing findings of program strengths and recommendations for improvement.



# History

- The State Review process was created in 1989 by the IOGCC Council on Regulatory Needs to develop Guidelines as an evaluation tool for state exploration and production waste management regulatory programs under the RCRA exemption.
- STRONGER was formed in 1999 administer and carry forward the State Review process.
- STRONGER has received grants from EPA, DOE, and API. The majority of funding for the State Review process averaged over time has come from federal grants.
- The scope of the Guidelines has expanded from three topics in 1990 to eight topics in 2015.



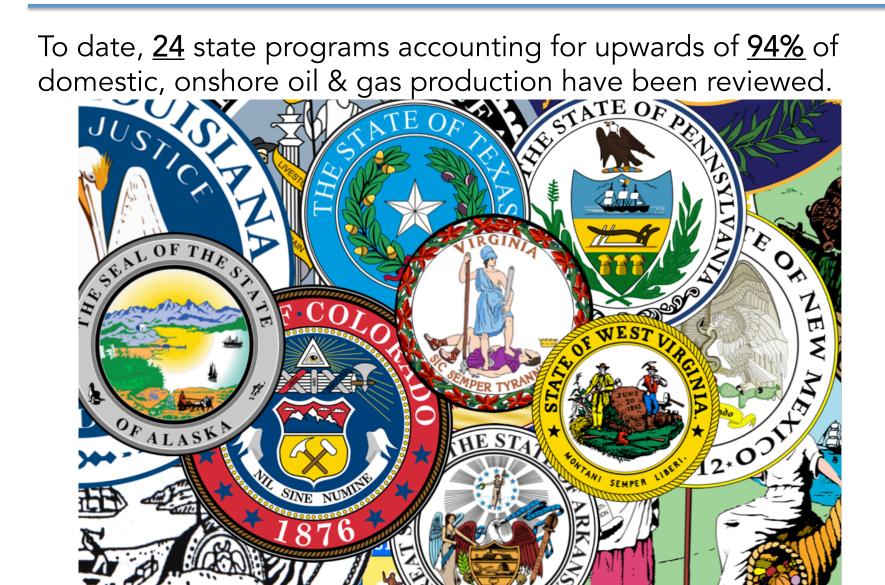
# **Guidelines** Topics

- Administrative Criteria (Permitting, Compliance Evaluation, Enforcement)
- Technical Criteria (Waste Management)
- Abandoned Sites
- Naturally Occurring Radioactive Material (NORM)

- Stormwater Management
- Hydraulic Fracturing
- Air Quality
- Reused and Recycled Fluids

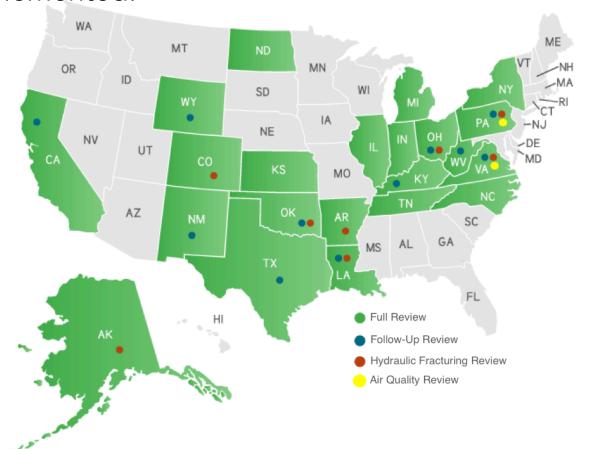


#### **State Reviews**



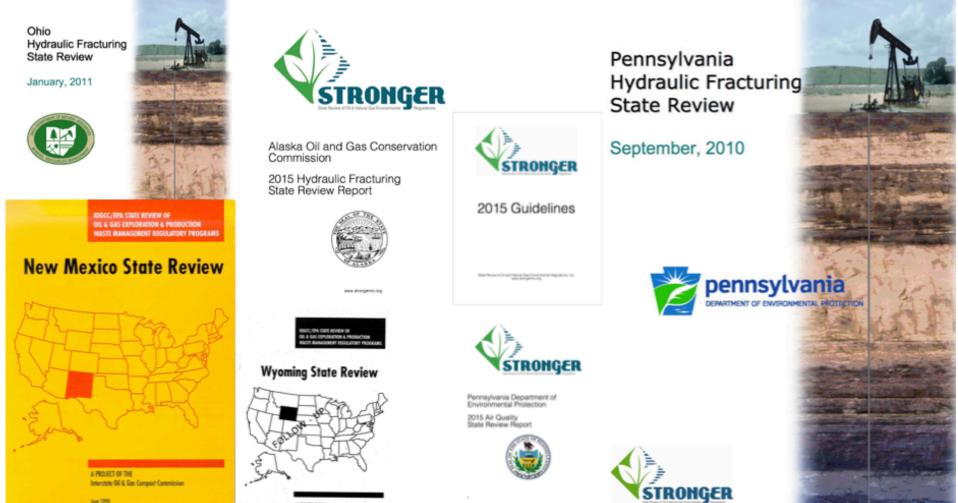
#### **State Reviews**

Many states have volunteered for multiple reviews. Results indicate that <u>76%</u> of recommendations from prior reviews have been implemented.



#### Work Products

#### Reports and Guidelines are published online at strongerinc.org



#### The State Review Process

- A state program volunteers for review against selected Guidelines topics.
- STRONGER provides a questionnaire based on the Guidelines.
- STRONGER assembles a multi-stakeholder Review Team with Official Observers including representatives of federal and local government.
- State agency staff complete and return the questionnaire.
- Review Team prepares for in-state interview by reviewing the completed questionnaire, agency policies, regulations, MOU/MOA, etc.



#### The State Review Process

- STRONGER conducts an in-state interview with agency staff. The interview may require up to five days, and is open to the public.
- The Review Team develops a draft report with findings and recommendations based on the questionnaire and interview.
- A draft report is distributed to the volunteer state agency, and Official Observers for a 30-day comment period.
- The Review Team discusses comments received, and revises the draft report as necessary.
- The STRONGER Board approves final draft report for publication and distribution.



## The State Review Opportunity

- Volunteer agency can receive fair and balanced appraisal of its management of "hot topics" in the public eye.
- Inter-agency coordination and cooperation.
- Demonstrate commitment to continuous improvement.
- Receive consensus recommendations for program improvement from independent subject-matter experts.
- Identify program funding and staffing needs, and support requests for additional resources.



#### The State Review Value

- Reviews are conducted at no cost to the volunteer state agency, apart from their time.
- State Reviews are led by multi-stakeholder teams committed to achieving consensus.
- State Reviews are flexible to meet an agency's needs.
- State Review Reports provide an educational benefit to the public, local government officials, and state legislatures.
- The State Review Process is an avenue for sharing knowledge among states.

