



# **STRONGER**

State Review of Oil & Natural Gas Environmental Regulations

# Who We Are

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- Nonprofit, Multi-Stakeholder Educational Organization
- [Board of Directors:](#)
  - (3) State Oil and Gas Regulators
  - (3) Oil and Gas Industry
  - (3) Environmental NGOs
- Membership is by independent invitation of the stakeholder groups.



# Mission

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“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.”

STRONGER was formed in 1999 to administer and carry forward the State Review process originally created in 1989 cooperatively by the [IOGCC](#) and [U.S. EPA](#) as an evaluation tool for state E&P waste management regulatory programs.



# What We Do

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The State Review Process as a cycle of continuous improvement.



# Guidelines Topics

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Originally developed in 1990, the scope of the Guidelines criteria has expanded from three topics associated with E&P waste management, to nine topics addressing a wide array of environmental issues associated with oil and gas development.

- [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](#)



# Guidelines Example:

## 11.2 Water Management Planning

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Operators should be encouraged to develop water management plans that consider reuse and recycling options. Water Management Plans should address all aspects of water management from acquisition through final disposition. Plans should be tailored to particular projects.

State programs should recognize barriers that would limit an operator's ability to reuse or recycle fluids generated during drilling, completion, and production such as technological limitations, fiscal constraints, lease or surface use constraints, stage of development, fluid quality, and agency approval timeframes.

States should encourage the use of fresh water alternatives for the drilling and completion of wells where available sources are feasible and where environmental risks can be adequately identified and controlled. See Section 9.3 for additional information concerning water and waste management related to hydraulic fracturing.

Where jurisdictional issues exist between multiple state agencies, river basin commissions, and other parties involved in the management of reused and/or recycled E&P fluids, coordination should be pursued as discussed in Section 4.4.



# State Reviews

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- Recognize Strengths
- Identify Potential Gaps
- Provide Recommendations to Close Gaps and Improve Program
- Example Finding & Recommendation from [2016 Virginia Review](#):
  - Finding: The DGO [Division of Gas and Oil] does not currently encourage the development of water management plans that consider reuse and recycling options.
  - Recommendation: The DGO should, in conjunction with relevant stakeholders, develop a water management program that encourages source water reduction and promotes reuse and recycling of fluids.
- Outcome:
  - “DMME will issue an Operators’ Memorandum that will encourage the reuse and recycling of fluids. DMME anticipates issuing this memorandum by August 2017.”
  - <https://www.dmme.virginia.gov/dgo/pdf/Recycle.pdf>



# Key Elements

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- Voluntary
  - No legal force behind State Reviews
  - Recommendations do not carry “shall do” force, but rather say “should consider”
- Multi-Stakeholder
  - Bringing diverse perspectives to the table in a framework that requires ideology be set aside to discuss issues
- Consensus-Driven
  - Findings and Recommendations must be based on criteria in the Guidelines and have the consensus support of the stakeholders involved
- Transparent
  - Guidelines undergo public comment as part of development
  - Reviews include public meeting with program staff





# Key Elements

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- Confidence
  - STRONGER's Guidelines, findings and recommendations are fully informed and represent the consensus of the stakeholders
  - Having a consensus report gives the program a defense against unwarranted criticism, and a viable path forward for continuous improvement
- Commitment
  - Participation demonstrates a commitment to both transparency and continuous improvement by voluntarily undergoing a third-party, multi-stakeholder evaluation that is itself conducted transparently





Guidelines and Reports available at  
[www.strongerinc.org](http://www.strongerinc.org).



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