

U.S. DEPARTMENT OF TRANSPORTATION

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PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION

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GAS PIPELINE ADVISORY COMMITTEE

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MONDAY, NOVEMBER 27, 2023

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The Advisory Committee met in Jefferson I-III at the Westin Crystal City Reagan National Airport, 1800 Richmond Highway, Arlington, Virginia, at 8:30 a.m., David W. Danner, Chairman, presiding.

GAS PIPELINE ADVISORY COMMITTEE MEMBERS PRESENT

HON. DIANE BURMAN, New York State Public
Service Commission

HON. DAVID W. DANNER, Washington Utilities and
Transportation Commission

SAMUEL T. ARIARATNAM, Arizona State University

PETER E. CHACE, Public Utilities Commission of
Ohio

ALEX DEWAR, Boston Consulting Group

J. ANDREW DRAKE, Enbridge Gas Transmission and
Midstream

WILLIAM "CHAD" GILBERT, United Association
International

SARA ROLLET GOSMAN, University of Arkansas
School of Law

SARA W. LONGAN, U.S. Army Corps of Engineers

ERIN MURPHY, Environmental Defense Fund

ARVIND P. RAVIKUMAR, University of Texas at
Austin

STEVE SQUIBB, Director, Natural Gas Operations
City Utilities of Springfield Missouri
TERRY L. TURPIN, Federal Energy Regulatory
Commission
BRIAN R. WEISKER, Duke Energy Natural Gas
Business Unit
CHAD J. ZAMARIN, The Williams Companies, Inc.
PHMSA STAFF PRESENT or may have been present
ALAN MAYBERRY, Associate Administrator for
Pipeline Safety; Designated Federal
Official
TRISTAN BROWN, Deputy Administrator
TEWABE ASEBE
DAVID BIRCH
CLAYTON BODELL
ROBERT BURROUGH
LAUREN CLEGG
IAN CURRY
AMAL DERIA
SETH DICKSON
SEAN FORD, OST
BEN FRED
KELSEY GAGNON
JOHN GALE, Director, Office of Standards and
Rulemaking
ALEXANDRA IORIO
ROBERT JAGGER
MARK JOHNSON
JENNIFER KELLY, OST
JOE KLESIN
KATHLEEN "KATY" MAITLAND
CHRIS McLAREN
MARY McDANIEL
LANE MILLER
STEVE NANNEY
SAYLER PALABRICA
MIA PETRUCCI
GABRIELA ROHLCK
EMMA M. ROSS
CAMERON SATTERTHWAITTE, Office of Standards and
Rulemaking
RODRICK "ROD" SEELEY, National Safety
Coordinator, Pipeline Field Operations
ANNA SETZER

JOSEPH ST. PETER
MASSOUD TAHAMTANI, Deputy Associate
Administrator

ERMIAS WELDEMICAEL
CONOR WALSH

JOE WILLIAMS
DAVID YORK

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P-R-O-C-E-E-D-I-N-G-S

8:35 a.m.

MR. MAYBERRY: Well, let's get started. Good morning and thank you for attending this meeting of the Gas Pipeline Advisory Committee.

My name is Alan Mayberry, and I'm the Associate Administrator for Pipeline Safety in PHMSA. Pursuant to the Federal Advisory Committee Act, I am the Designated Federal Official for GPAC and will serve as the presiding official for this meeting.

Our Chairperson for this meeting will be the Honorable David Danner, who is the Chair of the Washington Utilities and Transportation Commission.

Before I introduce special guests, I'd like to discuss meeting protocols, you know, first, starting off with a safety moment. If we do have an emergency or fire alarm and such, the exits you can see marked on either side of my left and my right. If you go out to

1 the left out those doors, you see the stairs.
2 You came up probably from the lobby. Straight
3 down those stairs and out the front of the
4 building.

5 On the right, if you take a left
6 outside of any of these doors and go down this
7 corridor, there's an emergency exit that goes
8 to a stairwell that also goes to the outside.
9 So that covers our safety as far as evacuation
10 procedures.

11 I would like to recognize Tristan
12 Brown, who's the Deputy Administrator of PHMSA,
13 who is present today.

14 And then before we get started, I'll
15 go over a few housekeeping items to help ensure
16 the meeting runs smoothly. During this
17 meeting, not all participants will have access
18 or control to provide comments. While
19 Committee members have full participation
20 access, public participants will be provided an
21 opportunity to comment and ask questions at
22 allotted times, and those will be well noted by

1 the Chair as we go.

2 If you're not presenting or
3 speaking, please make sure that your -- well,
4 first of all, make sure your phones are on
5 mute, and then, if you're here at the
6 Committee, make sure your microphone is on
7 mute. As you can tell, these microphones are
8 quite sensitive. And if necessary, take a
9 moment now to check that you're muted. We ask
10 that you hold any comments until we open the
11 floor for discussion.

12 For members of the public, when you
13 are acknowledged, please limit your comments to
14 two minutes or less. We'll be holding tight to
15 that. As you know, we have quite an aggressive
16 week this week with two major rules that we're
17 discussing. If necessary, the Chairperson may
18 ask you to cut your comment short to keep the
19 agenda moving.

20 And, of course, you can submit
21 written comments under the Advisory Committee
22 docket under PHMSA-2023-0061, and any comments

1 should be submitted by January 5th, 2024.

2 Also, this meeting is being recorded
3 or transcribed. So, a transcript of the
4 meeting will be available to the public in the
5 meeting docket about two or three weeks after
6 the meeting.

7 Now, in an effort to maintain order
8 and decorum and schedule throughout the
9 meeting, we ask that both Committee members and
10 the public adhere to the basic rules, such as:

11 Please don't delay or disrupt the
12 meeting, whether by conversing separately
13 during proceedings or by causing other
14 distractions.

15 Do not interrupt speakers or
16 presenters.

17 Please follow the instructions of
18 the Chairperson and the presiding officer.

19 And please note that anyone who
20 disrupts the meeting will be asked to leave the
21 meeting room.

22 I think those are pretty basic

1 niceties in order to make sure that the meeting
2 runs smoothly.

3 So, this concludes the housekeeping
4 items. Before I turn it over to Chairman
5 Danner, let me just say for a second, this
6 meeting also represents a number of milestones.

7 One, it's the first in-person
8 meeting we've had in some time, and it's really
9 awesome to see the members today.

10 And also, we have a number of new
11 members. So, welcome to the new members.

12 And it's just so great to see people
13 in person, you know, both on the Committee, and
14 then, also, the people who attended that are
15 behind me today.

16 As mentioned, we're going to be
17 covering two rules this week: the leak
18 detection and repair rule, which will go first,
19 and then, I'm sure this will be repeated, but,
20 then, later, after that's finished, which after
21 about, say, day three maybe, we'll go to the
22 class location rule. No, day two, actually --

1 we hope.

2 And then, it also represents a
3 milestone in that it's key building blocks of
4 mandates that came out of the PIPES 2020 Act
5 through three sections: 113, on leak
6 detection; 114, on O&M procedures that are
7 being codified, and then, 118, on really our
8 expanded scope or our expanded mission that
9 includes cost recovery or the cost-benefit, to
10 include methane abatement measures.

11 And, of course, we're updating on
12 the leak detection rule what's traditionally
13 been just six simple words that were in the
14 Code that really were the requirements, the
15 federal requirements, for leak repair. You
16 will hear a lot more about that later.

17 But, at this point, I would like to
18 turn it over to Chairman Danner.

19 MR. BROWN: I'm going to cut in,
20 Alan. Is that all right?

21 MR. MAYBERRY: Oh, sure. Of course.

22 MR. BROWN: Great. Thank you so

1 much. And I'm going to pay heed to your
2 request and urging of being brief here.

3 I did just want to thank a few folks
4 and I wanted to just provide a few reminders
5 and a little bit of context for this marathon
6 meeting.

7 First of all, I wish everybody had a
8 happy Thanksgiving, but especially to Team
9 PHMSA who has been working on preparing for
10 this marathon meeting for really the last many
11 days, weeks, months, really years, but
12 especially in the last few days during a run-up
13 holiday week. So, thank you to each of you
14 that have been working so hard to be ready for
15 this week.

16 Thanks as well to the new members of
17 the Gas Pipeline Advisory Committee. We're
18 exciting, as Alan said, to see everybody in
19 person and appreciate your service to this
20 important Committee.

21 And then, thanks to the folks who
22 served on the Committee before. In particular,

1 we've got Steve Nanney, who has not served on
2 the Committee, but has served us so long.
3 Steve, thank you so much for your service and
4 congratulations on an impending -- we're going
5 to say a little bit of time off. How's that?

6 And thanks to Andy for your many
7 years of service on the Advisory Committee.

8 I wanted to just provide the
9 reminder that this Committee is directed by
10 Congress to be utilized as a tool to develop
11 our standards and regulations. And so, the
12 effort we put into it is really to, as close as
13 we can, come to consensus, as we update and
14 strengthen standards.

15 In this case, we have two rules that
16 we are working through. They're both directed
17 by Congress, as Alan mentioned. And they are
18 one of over 30 mandates from the PIPES Act of
19 2020.

20 This is the methane leak detection
21 and repair rule. It is in many ways a first-
22 of-its-kind directive from Congress to minimize

1 methane emissions.

2 And America has been leading the
3 charge in developing technologies and deploying
4 technologies to minimize methane emissions
5 across the midstream space.

6 This rule, as drafted, is designed
7 to leverage America's ingenuity, our prowess in
8 efficiency, and to lead us going forward
9 globally in the energy space.

10 And, of course, we have to write
11 rules that will be implemented years from now,
12 as technology has already continued to develop
13 and be deployed in ever-increasingly efficient
14 ways.

15 And so, as you work through the
16 rule, I hope you will consider that context,
17 that we have to write rules for implementation
18 years ahead. And it's usually many, many
19 years, sometimes a decade, before we get to
20 update rules again. And that's why we try so
21 hard and work so hard to be as encompassing and
22 as thoughtful as possible in developing a rule.

1 And that's why your work, the work
2 of the Advisory Committee, but also the many
3 people who I'm sorry I've got back behind me,
4 because I know there's so many people in the
5 room that will continue to work hard to help us
6 write the best rules that we can.

7 And I think just the final reminder
8 and thank you. This is a marathon meeting.
9 This will be a marathon meeting, and I hope
10 you'll just try to remember that we are all
11 attempting to swim in the same direction. If
12 you need a little nudging from one another to
13 be reminded of that, please do.

14 And then the last thank you to
15 Chairman Danner and Chairman Burman for
16 chairing both the efforts of creating these two
17 rules today.

18 With that, I'm going to pay heed,
19 Alan, and kick it back -- or kick it back to
20 the Honorable Dave Danner.

21 MR. DANNER: Well, thank you very
22 much. I appreciate that. And it's good to

1 meet you finally, Tristan Brown.

2 There are a lot of familiar faces
3 here and a lot of new faces as well. So, let's
4 just get right into it.

5 As Alan said, my name is Dave
6 Danner, and I'm the Chair of the Washington
7 Utilities and Transportation Commission. And
8 I'm going to serve as the Chairperson for the
9 leak detection portion of our marathon this
10 week.

11 So, I hereby call this meeting of
12 the Gas Pipeline Advisory Committee to order.

13 As Alan said, this meeting is being
14 recorded, and a transcript will be produced for
15 the record. The transcript and the
16 presentations will be available on the meeting
17 page of the PHMSA website. The docket number
18 for this meeting is PHMSA-2023-0061.

19 And before we get started, a few
20 reminders. For members, presenters, and the
21 public, please remember to introduce yourself
22 each time you speak, so your comments are

1 properly recorded in the transcripts for the
2 meeting.

3 Additionally, members should set
4 their tent cards on end to alert us that they
5 wish to make a comment.

6 And now, I'd like to take an
7 opportunity to conduct the roll call.

8 Cameron, if you would do that for
9 us?

10 MR. SATTERTHWAITE: All right.
11 Cameron Satterthwaite from PHMSA doing the roll
12 call.

13 As I say your name, just say here,
14 and we will check you down. Diane Burman?

15 MS. BURMAN: Here.

16 MR. SATTERTHWAITE: Peter Chace?

17 MR. CHACE: Here.

18 MR. SATTERTHWAITE: David Danner?

19 MR. DANNER: Here.

20 MR. SATTERTHWAITE: Sara Longan?

21 MS. LONGAN: Here.

22 MR. SATTERTHWAITE: Terry Turpin?

1 MR. TURPIN: Here.

2 MR. SATTERTHWAITE: Brian Weisker?

3 MR. WEISKER: Here.

4 MR. SATTERTHWAITE: Andy Drake?

5 MR. DRAKE: Here.

6 MR. SATTERTHWAITE: Alex Dewar?

7 MR. DEWAR: Here.

8 MR. SATTERTHWAITE: Steve Squibb?

9 MR. SQUIBB: Here.

10 MR. SATTERTHWAITE: Chad Zamarin?

11 MR. ZAMARIN: Here.

12 MR. SATTERTHWAITE: Chad Gilbert?

13 MR. GILBERT: Here.

14 MR. SATTERTHWAITE: Arvind

15 Ravikumar?

16 MR. RAVIKUMAR: Here.

17 MR. SATTERTHWAITE: Erin Murphy?

18 MS. MURPHY: Here.

19 MR. SATTERTHWAITE: Sara Gosman?

20 MS. GOSMAN: Here.

21 MR. SATTERTHWAITE: Sam Ariaratnam?

22 MR. ARIARATNAM: Here.

1 MR. SATTERTHWAITE: All right. And
2 that is it. All are accounted for. And thank
3 you for conducting this sound check.

4 (Laughter.)

5 Over to you.

6 MR. DANNER: All right. Thank you.

7 Now, I'll turn it over to Alan.

8 MR. MAYBERRY: Thank you, Chairman
9 Danner. As you know, as Tristan mentioned, it
10 takes an incredible team that we have here at
11 PHMSA to put a meeting like this on. Many are
12 present here today. Some behind the scenes are
13 not present. But I would like to call out the
14 individuals that are here -- actually, all of
15 them, and then, those who are here, if you
16 would please stand and be recognized.

17 Mr. Massoud Tahamtani.

18 John Gale.

19 Cameron Satterthwaite.

20 Amal Deria.

21 Janice Morgan was here at the front
22 desk, but she had to leave.

1 Michelle Tillman.

2 Jessica Appel.

3 Jenny Donohue.

4 Bobby Jagger.

5 Sayler Palabrica.

6 Anna Setzer.

7 Brianna Wilson.

8 And Mr. Tewabe Asebe.

9 Of course, I haven't covered our
10 SMEs who will be covering this today. You will
11 be meeting them here in a moment.

12 But I really appreciate the team
13 that really organized this meeting and way back
14 several months ago said say what when we talked
15 about having two rules in one meeting.

16 (Laughter.)

17 And John does point that out
18 routinely.

19 But, again, thank you. You're
20 incredible. And I'll turn it back to you,
21 Chairman.

22 MR. DANNER: All right. Thank you.

1 And I echo your remarks of thanks to your
2 incredible team.

3 So, at this point, we are just going
4 to get right into the discussion. I think we
5 will start -- we're starting with operation and
6 maintenance.

7 Oh, okay, well, I'll turn it over to
8 John. John will tell us what we're doing.

9 (Laughter.)

10 MR. GALE: Thank you, Chairman.
11 Thank you, Anna. Just a couple of additional
12 administrative matters.

13 I know it may shock you, but we do
14 have coffee for this meeting. So, hopefully,
15 you all found that.

16 There's also a lunch option. If you
17 haven't seen it, it allows you to get lunch
18 picked up and be ready, so we can be a little
19 bit more efficient during the meeting.

20 And it's not true -- Andrew asked me
21 if we're doing Thanksgiving leftovers -- that
22 is not true.

1 (Laughter.)

2 And also, there is a parking
3 discount if you're coming in for the day. I
4 would just check with the front desk or
5 registration and see if you can get that
6 discount for the meeting for parking.

7 Again, my name is John Gale. I'm
8 Director of Standards and Rulemaking in the
9 Office of Pipeline Safety.

10 And good morning to all. Good
11 morning to the public. Good morning to
12 members.

13 This is the first of two rulemakings
14 we're going to present to you. This, of
15 course, is our gas pipeline leak detection and
16 repair rulemaking. The second rulemaking we'll
17 deliver to you later in the week will be on the
18 class location change requirements.

19 Per 49 USC 60115(c)(2) of the
20 pipeline safety statute, the Committee is
21 directed to prepare and submit a report to the
22 Secretary of Transportation on the technical

1 feasibility, reasonableness, cost-
2 effectiveness, practicability, and recommended
3 actions related to the NPRM.

4 To facilitate the development of the
5 Committee report, we have scheduled this public
6 meeting of the GPAC from November 27th to
7 December 1st, 2023.

8 As the Committee has establishes,
9 the transcript of the public meeting, fully
10 duly recorded and accurately transcribed,
11 together with the presentation slides
12 documenting the Committee's votes during the
13 meeting, will serve as the report of the
14 Committee.

15 And also, in order to facilitate the
16 Committee's discussions and determination of
17 the technical feasibility, reasonableness,
18 cost-effectiveness, and practicability of the
19 proposed standard, PHMSA has made available to
20 the Committee of this public meeting our
21 technical, legal, and economic experts, as Alan
22 alluded to earlier.

1 So, we have at the meeting
2 representatives from our Counsel Department.
3 We have Mr. Rob Ross and Amal Deria. And we
4 have additional counsel support in the
5 audience.

6 From our economic team, we have Mark
7 Johnson, our lead economist who is supported,
8 also, by his Director, Ermias Weldemicael.

9 We have SMEs. This is a team that's
10 been a little bit bigger than in the past. So,
11 we have Rod Seeley. We have David York. We
12 have -- let me see -- Clayton Bodell, Steve
13 Nanney, Joe Klesin, Sayler Palabrica, Anna
14 Setzer, and even more SMEs in the audience.

15 So, if there's questions you all
16 have, we're here to support you in the
17 development of your report.

18 Okay, let's get to it. It's going
19 to be a long week.

20 (Laughter.)

21 So, on May 18th, 2023, PHMSA
22 published in the Federal Register a Notice of

1 Proposed Rulemaking to reduce methane emissions
2 from new and existing gas pipelines. This
3 rulemaking responds to congressional mandates
4 in the PIPES Act of 2020 and plays a critical
5 role in the U.S. Methane Emissions Reduction
6 Action Plan by eliminating, conservatively, 0.5
7 to 1 million metric tons of methane emissions
8 annually.

9 It also is obliging operators of all
10 Part 192-regulated gas pipelines to develop and
11 implement advanced leak detection programs for
12 detecting, grading, and repair on prescribed
13 schedules of all leaks greater than or equal to
14 5 parts per million.

15 Also, it has enhanced leak reporting
16 requirements for gas distribution, gas
17 gathering, gas transmission, and underground
18 natural gas storage facilities, and LNG
19 facilities.

20 This rulemaking would address
21 Section 113, as Alan mentioned earlier, of the
22 PIPES Act of 2020 by requiring operators to

1 adopt an advanced leak detection program able
2 to identify, locate, and categorize all leaks
3 that are hazardous to human safety or the
4 environment -- and basically, in the
5 rulemaking, that's 192.763; that's your ALDP
6 program -- including performing standards
7 reflecting commercially available technology
8 and requiring that operators use this
9 technology.

10 It also includes a schedule for
11 repairing and replacing each leaking pipe,
12 except for a pipe with a leak so small that it
13 poses no potential hazard. And basically, that
14 is your requirement in 192.760.

15 This rulemaking would also address
16 Section 114 of the PIPES Act by requiring
17 operators to update their operation and
18 maintenance procedures to minimize the release
19 of natural gas and the replacement of pipelines
20 known to leak.

21 This rulemaking also complies with
22 the direction in Section 118 of the PIPES Act

1 of 2020 to consider environmental benefits in
2 PHMSA's regulatory oversight alongside safety
3 benefits.

4 This rulemaking also builds on a lot
5 of the work that we've done, but also this
6 Committee has done on the November 2021 Gas
7 Gathering Final Rule by improving alignment of
8 PHMSA's Part 192 regulations governing gas
9 gathering pipelines with the environmental and
10 public safety risks they pose.

11 When we were developing this rule,
12 we looked at a lot of different data sources.

13 Of course, my notes just went out on
14 my computer. It's one of those days.

15 And some of the information we
16 looked at was this information right here,
17 which was the EPA's U.S. Greenhouse Gas
18 Emissions and Sinks. And we were able to look
19 at this data to identify relative risk based on
20 different sectors -- gas gathering to gas
21 transmission, to gas distribution.

22 We were also able to look at this

1 information and see where the leaks were coming
2 from. Were they vented leaks; were they
3 fugitive leaks, et cetera?

4 And then, we were able to build the
5 rule from that, based on a review of this data.
6 We looked at a lot of other data as well, but
7 utilizing this data gave us in a way a little
8 bit of a leg up to identify what the risks were
9 that were in front of us, and then, how to
10 tailor the rule to those risks.

11 Next slide, please.

12 A review of this emission data
13 informed the development of this NPRM, like I
14 was just saying.

15 On distribution lines, what we
16 identified was that virtually all emission from
17 distribution lines are from fugitive emissions
18 -- leaks and incidents, that is. And that can
19 be addressed by these leak detection and repair
20 requirements.

21 When it came to the transmission
22 lines, however, while the PIPES Act requires

1 leak detection standards, most transmission
2 line emissions are from compressor stations or
3 from venting.

4 And when it came to gas gathering,
5 gas gathering pipelines and facilities have a
6 much higher emission rate from pipeline leaks
7 compared to gas transmission facilities. And
8 that's why you saw in the proposal where we
9 went and had proposals related to Class 1 gas
10 gathering lines.

11 One of the things when we got into
12 this, I had to learn the difference between
13 vented and fugitive emissions.

14 And so, when you're dealing with
15 vented emission sources, again, like we
16 mentioned earlier, most gas transmission
17 emissions outside of a compressor station are
18 vented emissions. And these include blowdowns
19 associated with repairs; maintenance;
20 replacement and construction; venting from
21 equipment such as pressure release devices;
22 regulators; compressor seals; emergency

1 shutdown devices, and venting from ruptures,
2 upset conditions, and third-party damage.

3 Next slide, please.

4 On the other hand, most gas
5 distribution emissions are fugitive emissions.

6 Pipeline fugitive emissions are also
7 significant on gas gathering lines compared
8 with gas transmission lines.

9 Fugitive emission sources include:
10 leaks, especially from pipelines known to leak,
11 such as cast iron, bare-steel systems, or
12 plastic systems with known problems; commercial
13 industrial meter sets; compressor stations;
14 residential meter sets, and excavation damage,
15 and other incidents.

16 To get into a summary of the
17 proposal -- we have a variety of proposals,
18 right? We address a variety of different
19 requirements in the regulations.

20 We looked at the survey frequency.
21 When it comes to the leak and survey frequency,
22 we looked at that for both transmission,

1 distribution, and gathering. We looked at the
2 patrolling.

3 Clarified that the leak detection
4 and investigation personnel must be qualified.
5 We wanted to definitely look at training.

6 We looked at an extension of
7 patrolling requirements and leak survey and
8 repair requirements for gas gathering lines.

9 We also were looking at -- you know,
10 we've very cognizant of the fact that EPA had
11 work going on in this very area, and there was
12 an exception to accommodate EPA's forthcoming
13 rules for new source performance standards for
14 crude oil and natural gas facilities and
15 emission guidelines.

16 But it also has adoption of the
17 technology-based Advanced Leak Detection
18 Program, or what we're referring to as an ALDP,
19 and a requirement for gas transmission,
20 distribution, and gas gathering pipelines.

21 There's a requirement for all
22 segments to use leak detection equipment with

1 very few exceptions.

2 And there's a classification and
3 prioritization repair requirement for
4 detectable leaks. And when we looked at
5 developing that, we looked directly at the GPTC
6 guide. And we get a more thorough discussion
7 of those proposals, you'll see where we came up
8 with our proposals there.

9 Also, we developed leakage survey
10 requirements for LNG facilities.

11 On the operational releases front,
12 there is a general duty to minimize releases of
13 natural gas and replace pipelines known to
14 leak. This is the Section 114 statutory
15 mandate for gas pipelines, underground gas
16 storage facilities, and LNG facilities.

17 A requirement to minimize emissions
18 from routine blowdowns, and design and
19 configuration of maintenance and relief
20 devices.

21 When we were doing this rulemaking,
22 we were looking at a variety of different

1 requirements. And one of the things we saw
2 time and time again was releases from relief
3 devices that we thought were not operating in
4 accordance with the manner they should. We
5 thought that was very important to try to
6 address.

7 Also, when you're doing any
8 rulemaking -- and you've seen it, you know, on
9 gas gathering when we did the -- I hate to say
10 mega-rule -- but the mega-rule.

11 You know, reporting is an important
12 part of the requirements that you have to try
13 to address -- making sure you're getting the
14 right data; making sure you're getting the
15 effectiveness that you're looking for.

16 So, on the reporting front, we have
17 information on emissions and leaks discovered
18 and repaired. Currently, operators only report
19 leaks repaired.

20 There's a large volume release
21 reporting proposal. PHMSA would require
22 operators to report releases of gas, both

1 intentional and unintentional, of 1 million
2 cubic feet or more.

3 And we have a proposal to extend the
4 NPMS reporting to gas gathering pipelines.
5 NPMS currently does not apply to gas gathering
6 or to distribution pipelines.

7 And just for the record, some of the
8 background of the rule, again, PHMSA hosted a
9 public meeting on gas pipeline leak repair and
10 methane emission reduction back on May 5th
11 through the 6th, 2021.

12 The NPRM was published on May 18th,
13 2023, and PHMSA extended the comment period
14 through August 16th, 2023.

15 And this was a very popular rule for
16 us.

17 (Laughter.)

18 PHMSA received approximately 40,000
19 comments for the NPRM from a diverse group of
20 stakeholders. We got it from seven different
21 public safety advocacy groups; 31 environmental
22 advocacy groups; four academic groups. Leak

1 detection and technology providers, there were
2 16 unique submissions there.

3 And on the industry trade group
4 front, we got it from gas pipeline, generally;
5 gas gathering systems; gas transmission
6 systems; liquefied petroleum, and hydrogen
7 operators.

8 On the industry operator front,
9 there was 27 gas transmission operators; 26
10 privately-owned distribution companies, and 26
11 municipally-owned or operated gas utilities.

12 And then, on the government front,
13 we heard from the NTSB. We heard from our
14 friends at NAPSRS; four other state regulatory
15 agencies; 10 elected officials with two joint
16 letters from several elected officials, and two
17 letters representing several state attorney
18 generals. I think it was approximately 35, if
19 I remember right.

20 And then, of course, there was other
21 businesses or trade associations and a form
22 letter campaign that represented about 38,000

1 of those comments.

2 Next slide, please.

3 So, at this point in time, what
4 we're going to do is give you an overview of
5 the cost-benefit summary or the Preliminary
6 Regulatory Impact Assessment.

7 So, with that being said, I'm going
8 to turn it over to Mark Johnson, who is going
9 to lead through that discussion.

10 Mark?

11 MR. JOHNSON: Test. Okay.

12 Hi. My name is Mark Johnson. I'm
13 an economist with PHMSA's Office of Planning
14 and Analytics. We're the office within PHMSA
15 that develops the Regulatory Impact Analyses
16 that support PHMSA rulemaking efforts.

17 As most of you are probably aware,
18 PHMSA can only issue a new pipeline regulation
19 after making a reasoned determination that the
20 benefits of the intended regulation justify the
21 costs. The RIA considers the costs and
22 benefits of the proposed rule and whether its

1 benefits justify its costs.

2 Just to give you our bottom line
3 upfront, for the rule as a whole, our primary
4 cost estimates range from about \$740 million to
5 about \$880 million annualized at a 3 percent
6 discount rate, and benefits were estimated at
7 about \$1.1 to \$2.3 billion annualized at a 3
8 percent discount rate.

9 I'll be getting into a little bit
10 more detail on those numbers in a few slides,
11 but, first, I wanted to discuss some of the
12 inputs that allowed us to estimate the economic
13 impacts.

14 This is the leak detection and
15 repair rule. So, obviously, one of the main
16 inputs to the analysis are the amount of
17 pipeline mileage that needs to be surveyed.
18 So, we obtained that from PHMSA Annual Reports
19 that operators submit to us for distribution,
20 transmission, and Type A and B gathering lines.

21 And then, for Type C gathering
22 lines, they are now submitting this data to us

1 as well, but that's a recent development and it
2 was not available to us in time for us to use
3 it in the Preliminary RIA that accompanied the
4 NPRM. So, we used an estimate from the 2021
5 gas gathering rule and projected that forward
6 using Type A and B growth rates. And the other
7 estimates were projected for using segment-
8 specific growth rates.

9 And another important input is leak
10 survey and leak repair unit costs, and those we
11 took from operator rate cases and other
12 filings.

13 And finally, we needed leak
14 incidents and emissions rates. Leak incident
15 rates are the number of leaks that are present
16 on a pipeline per mile, and emission rates are
17 the amount of natural gas that is escaping from
18 those leaks.

19 And for gathering and transmission
20 operators, they report to us, along with the
21 mileage data, all leaks they find on their
22 systems. So, we could use that data to develop

1 a leak incidence rate, and then, we derived the
2 emissions rates from EPA's Greenhouse Gas
3 Inventory.

4 Distribution operators do not report
5 all leaks found to us. So, we needed other
6 sources. Thankfully, that segment of the
7 industry has received some attention from
8 researchers.

9 So, we used to peer-reviewed,
10 published studies to estimate those leak
11 incidents and emissions rates for distribution
12 operators. And those studies were Lamb, et
13 al., from 2015, and Weller, et al., from 2020.

14 The Weller study used advanced
15 mobile leak detection technologies and
16 practices and found significantly higher leak
17 incidents and emissions rates than Lamb. So,
18 the emissions estimates from Weller were
19 significantly higher than those for Lamb.

20 Moving forward, when I start getting
21 into some of the numbers, you will see maybe a
22 low scenario and a high scenario. The low

1 scenario is based on the lower emissions
2 associated with the Lamb estimates, and those
3 are also consistent with the EPA Greenhouse Gas
4 Inventory estimates. And the high scenario is
5 based on the higher emissions associated with
6 the Weller study.

7 So, next slide, please.

8 Once we had an idea of the amount of
9 emissions, the number of leaks on various parts
10 of the pipeline system, we could estimate how
11 much our proposed standard would reduce
12 emissions and monetized benefits. And we had
13 two streams of monetized benefits. One was
14 climate benefits and the other is value of net
15 lost natural gas.

16 To monetize climate benefits, we
17 applied per-ton emissions reduction values,
18 based on the social cost of methane, taken from
19 the 2021 Interim Guidance from the Interagency
20 Working Group on the Social Cost of Greenhouse
21 Gases.

22 And then, of course, natural gas is

1 a valuable commodity. And if we find and fix
2 leaks more effectively, less of that value will
3 be lost due to those leaks. So, we monetized
4 the prevention of that loss of natural gas
5 using projected Henry Hub prices, as projected
6 by the Energy Information Administration.

7 As I've already touched on, recent
8 studies have produced a wide range of natural
9 gas emissions estimates for gathering and
10 distribution operators, respectively. The RIA
11 evaluated the rule over a range of emissions
12 estimates, but cost effects would vary as
13 emissions change.

14 We've already touched on the RIA
15 capturing distribution emissions uncertainty by
16 using Lamb and Weller as our range of
17 estimates. And the RIA also considered in the
18 sensitivity analysis section a higher emissions
19 scenario for gathering line operators, based on
20 a study by Chen, et al., that showed much
21 higher Permian Basin emissions than the EPA
22 estimates would indicate.

1 Next slide. Okay.

2 And in addition to the monetized
3 benefits, we describe a couple of different
4 benefit streams that we were not able to fully
5 quantify and monetize.

6 The first I'm going to discuss is
7 safety benefits. We believe that better LDAR
8 practices should detect and eliminate leaks
9 that would otherwise turn into safety-critical
10 incidents. And we see some evidence for that
11 in our incident descriptions in the PHMSA
12 incident database, where incidents are
13 described as being found via leak surveys or
14 patrols.

15 And then, we also see a non-trivial
16 portion of incidents that list leaks as a
17 cause. Unfortunately, we had difficulty
18 quantifying the relationship between leak
19 detection practices and detection of leaks that
20 would eventually become safety-critical.

21 And one of the contributing factors
22 there is it was hard to disentangle the

1 percentage of leaks that would be identified by
2 leak surveys, which are relatively infrequent,
3 versus being found in between leak surveys by
4 other means, such as odor complaints or other
5 third-party reports, or found during patrols or
6 other operator maintenance and repair
7 activities, et cetera. So, in addition, we had
8 difficulty predicting the magnitude and
9 consequences of the safety-critical leaks.

10 And the other stream that we weren't
11 fully able to monetize is health benefits.
12 Methane, especially unprocessed methane, has
13 hazardous air pollutants and volatile organic
14 compounds present in it. And also, release of
15 methane, whether processed or not, contributes
16 to ground-level formation of ozone. Human
17 exposure to these substances leads to negative
18 respiratory health and other health impacts.

19 Unfortunately, we have limited data
20 on the location of pipeline leaks relative to
21 human populations, and therefore, relatively
22 little information on the exposure magnitude

1 and duration of human populations to these
2 substances due to these leaks.

3 And in addition, there's a complex
4 relationship between exposure levels and
5 durations and adverse health impacts. So, we
6 were not able to fully quantify those benefits,
7 although we have been reviewing some work done
8 by EPA on this issue of health benefits
9 associated with reductions in methane
10 emissions. And we're considering what we could
11 do maybe to develop those further for the final
12 rule phase.

13 Okay. This slide is a lot of
14 numbers. This presents annualized cost by
15 industry segment and rule provision area at a 3
16 percent discount rate.

17 And I'll start with gathering. You
18 can see that the gathering line segment, we
19 anticipate patrols as the major cost driver
20 there, followed by leak surveys and leak
21 repairs. And the total economic cost for that
22 segment is estimated at about \$211 million.

1 For transmission operators, leakage
2 surveys were the largest cost driver, and we
3 estimated about \$15 million in total cost for
4 them.

5 And for distribution operators, we,
6 again, are using Lamb and Weller to bracket the
7 economic impacts. And leakage surveys and leak
8 repairs are the two main cost drivers there.
9 And we estimated about \$534 to \$654 million in
10 total cost impacts there, for a total for the
11 rule of about \$540 to \$880 million.

12 Next slide.

13 These two tables, the top table
14 presents the estimated benefits of the rule,
15 the monetized estimated benefits -- they do not
16 include the non-monetized benefits --
17 annualized at a 3 percent discount rate again.

18 As you can see, the climate benefits
19 are by far the larger benefit stream. They're
20 about an order of magnitude higher than the
21 natural gas loss benefits.

22 And for gathering lines, we

1 estimated benefits of about \$553 million.
2 Transmission, we estimated benefits of about
3 \$12.1 million, and for distribution, our
4 estimate of benefits was about \$515 million to
5 \$1.8 billion, for total benefits of \$1.1 to
6 \$2.3 billion.

7 And in the lower table, we present
8 benefits, costs, and net benefits at 3 and 7
9 percent discount rates. I'm going to focus on
10 the 3 percent rates, just to be consistent with
11 everything else I've presented.

12 Net benefits for gathering line
13 operators were estimated to be about \$343
14 million. For transmission, we had a net cost
15 of about \$3 million. For distribution, we were
16 just over the breakeven point at about a
17 million in net benefits, using the Lamb
18 emissions estimates, to significant positive
19 net benefits, using the Weller estimates of
20 \$1.1 billion. So, the rule as a whole had net
21 benefits of about \$341 million to \$1.4 billion.

22 So, next slide, please.

1 And I don't know if most of you are
2 aware of this, but OMB just issued new guidance
3 to agencies on how to conduct regulatory impact
4 analysis. As part of that new guidance, they
5 recommended that agencies assess rules at a 2
6 percent discount rate. So, this slide presents
7 benefits and net benefits at a 2 percent
8 discount rate.

9 And I'm not going to go through
10 these in a lot of detail, but the general
11 takeaway from this is that the lower discount
12 rate causes net benefits, and net benefits to
13 increase some.

14 So, with that, that concludes my
15 summary of the RIA.

16 And I'll hand it back over to John
17 Gale.

18 MR. GALE: Thank you, Mark.

19 Thank you, Anna.

20 Members, so what we recommend we do
21 from here is we've broken up the Committee
22 discussion in this rulemaking into about nine

1 different parts. The 10th one there is the
2 discussion of the Committee report.

3 So, we have an agenda where we
4 discuss, first, operations, maintenance, and
5 venting.

6 We would, then, move from there and
7 move to leak surveys and patrols.

8 From there, we would discuss the
9 ALDP program, leak grading and repair, gas
10 gathering, reporting, then followed up with LNG
11 and hydrogen, and have a discussion on
12 compliance deadlines.

13 And then, at the very end, nine is
14 kind of like a miscellaneous category, where we
15 would discuss things like operator
16 qualification, a variety of our definitional
17 proposals, like hazardous leak, business
18 district, et cetera.

19 But, even still, within these
20 discussion points -- and, of course, it's going
21 to be your prerogative and the Chairman's
22 prerogative -- you know, there might be the

1 need, because some of these areas are a little
2 beefy, there might be a need for multiple
3 votes. Like grading and repair is pretty long.
4 But, you know, we'll see how we go when we get
5 into those discussions.

6 So, we're going to have different
7 SMEs lead the discussion in these different
8 parts. And the very first one we're going to
9 discuss is going to be operations, maintenance,
10 and venting.

11 MR. DANNER: So, John, just before
12 we get into each of these items, I just wanted
13 to make sure if the Committee members had any
14 questions for John or Mark Johnson at this
15 point. This is an opportunity to ask them.

16 Okay. Yes, Peter?

17 MR. CHACE: Yes. Thank you.

18 Pete Chace, representing NAPSRS.

19 Mark, a quick question for you. In
20 the NPRM, you have estimates of methane
21 sources, methane emissions from various
22 sources. And I just wanted to know -- you have

1 also discussed a lot of different studies that
2 have come in with Lamb, and I can't recall the
3 other one.

4 Do you have a reason to believe that
5 those estimates of emission sources from
6 various categories are incorrect or should be
7 called into question?

8 MR. JOHNSON: Well, what we relied
9 on primarily was the EPA Greenhouse Gas
10 Inventory. Those are the official government
11 estimates.

12 In addition, we relied on the Weller
13 study, which is peer-reviewed and published. I
14 know there's been some criticism of that study
15 in the comments we received, but we were
16 evaluating those to consider those comments.
17 We do think it is a fairly high-quality study
18 and does have a large number of leak
19 observances. It's got a much larger sample
20 size than the Lamb study.

21 So, yes, but we haven't made a final
22 decision on how we would address those

1 comments, but we're aware of them.

2 MR. CHACE: Thank you.

3 MR. DANNER: All right. No other
4 questions.

5 So, John, take it away.

6 MR. GALE: Thank you, Chairman.

7 John Gale again, PHMSA.

8 So, again, just following up, we're
9 going to start off here with operations,
10 maintenance, and venting. Hopefully, we can
11 get through that this morning, and then, this
12 afternoon start maybe discussing leak surveys
13 and patrols.

14 So, Steve Nanney will lead us in our
15 discussion of operations, maintenance, and
16 venting.

17 Take it away, Steve.

18 MR. NANNEY: Good morning.

19 My name is Steve Nanney with PHMSA,
20 and I'll be going through, as John said
21 earlier, the operations, maintenance, and
22 venting section of the rulemaking.

1 First, the first slide we've got up
2 is on procedure manuals in Part 192.12 and Part
3 192.605.

4 The current requirements for
5 procedure manuals which are in Section 605
6 requires operators of gas transmission
7 pipelines, distribution pipelines, and offshore
8 gas gathering pipelines, and Type A gas, to
9 have them follow procedure manuals.

10 Also, Section 192(12)(c) addresses
11 similar requirements for underground natural
12 gas storage facilities.

13 And also, in Section 192.605, it
14 does not directly address the mandate in
15 Section 114 of the PIPES Act of 2020 that John
16 talked about earlier to eliminate leaks and
17 minimize the release of natural gas.

18 Next slide.

19 The Notice of Proposed Rulemaking
20 proposal for the procedure manuals in Section
21 192.12 and Section 192.605, again, it's to
22 update these sections to require operators of

1 gas pipelines and underground natural gas
2 storage facilities to address eliminating
3 leaks, minimizing releases of gas, and
4 replacing or remediating pipelines known to
5 leak.

6 Also, PHMSA has proposed to require
7 procedure manuals for Type B and C regulated
8 gathering lines, and also, for LNG facilities.

9 Next slide.

10 As far as what the intent of this
11 portion of the section is, it is transmission
12 blowdown mitigation. It's in Section 192.770.

13 The current requirements for
14 blowdown mitigation, again, it really doesn't
15 generally require operators to mitigate planned
16 and intentional emissions.

17 The proposal that we're proposing in
18 the rule is that gas transmission and LNG
19 operators mitigate operational non-emergency
20 blowdowns. An example to look at would be
21 EPA's Methane Challenge Program and industry
22 commitments.

1 A non-emergency blowdown is defined
2 as one that does not involve the activation of
3 the operator's emergency plans under Section
4 192.615.

5 Next slide.

6 A major part of this is relief
7 device design, configuration, and maintenance
8 that are in Section 192.199 and Section
9 192.773.

10 And again, the proposal in the rule
11 is maintenance and configuration. It is that
12 the operator must have written procedures for
13 assessing pressure relief valves that activate
14 unintentionally or fail to operate as designed.

15 And again, just for everybody, I
16 think everybody knows a relief valve is
17 normally used in compressor stations. It may
18 not be exactly in the compressor station. It
19 may be on the main line that the compressor
20 station feeds into and to laterals that feed
21 into the pipeline. When they have different
22 MAOPs is normally where you will see relief

1 valves.

2 Going back to the slide, when the
3 relief valve fails to operate at or above its
4 set activation pressure, or otherwise fails to
5 provide overpressure protection, the
6 malfunctioning device or sensing equipment must
7 be replaced immediate.

8 And a relief device that allows gas
9 to release at an operating pressure below the
10 set activation pressure range, the operator
11 must take immediate action to prevent further
12 releases or repair or replace the device within
13 30 days.

14 Next slide.

15 Again, the current requirement for
16 design, configuration, and maintenance of
17 pressure-limiting, relief, and regulating
18 devices. In Section 192.199, it defines the
19 design requirements for pressure-limiting,
20 relief, and regulating devices.

21 Section 192.739 addresses the
22 requirements for the inspection and testing of

1 these devices.

2 The Notice of Proposed Rulemaking
3 proposal and the design of Section 192.199 is
4 that the set and reset pressures, device size,
5 and sensing line location must be designed and
6 configured to minimize unnecessary releases and
7 be suitable for the operating environment that
8 it's placed in. Also, relief devices must
9 include isolation device valves, I mean, to
10 facilitate testing and maintenance.

11 Next slide, please.

12 As far as Section 192.199(i) for
13 pressure relief valves (audio interference).

14 Is it, I guess, working?

15 As far as comments that we received:

16 NAPSAR expressed general support for
17 this provision.

18 Industry trade representatives
19 encouraged PHMSA to clarify the requirements.

20 It keeps going in and out, Cameron.

21 Okay, closer seems to help.

22 Multiple operators requested

1 clarification on under what circumstances PHMSA
2 would consider a change for location of a
3 limiting device.

4 (Audio interference.)

5 Hello. I don't know; it seems to be
6 working.

7 The next bullet here is an operator
8 asked PHMSA to remove Section 192.199(i)(2), as
9 it pertains to existing requirements.

10 Next slide, please.

11 PHMSA notes on this Section .199
12 that it is a non-retroactive subpart which
13 would only apply to facilities installed and
14 modified after the effective date of the rule.

15 The revised design requirements are
16 intended to apply only to the components that
17 are relocated or changed, and PHMSA will
18 clarify that the (audio interference)
19 requirements and will address any duplication
20 in the final rule.

21 Next slide.

22 Other comments received:

1 An operator requested an upfront
2 clarification on (audio interference) isolation
3 valves needing to be installed.

4 A couple of industry trades wrote
5 that installing unnecessary valves will
6 increase installation and maintenance cost
7 without commensurate benefit. They urged PHMSA
8 to reconsider the requirement for isolation
9 valves.

10 An operator stated that the proposed
11 Section 192.199(i)(3) would be too restrictive
12 and urged PHMSA to consider alternatives for
13 isolation pressure relief devices for testing
14 and maintenance.

15 Next slide.

16 Multiple trade associations wrote
17 that the proposal does not indicate (audio
18 interference) valve must be installed (audio
19 interference).

20 MR. DANNER: Sorry about these
21 technical issues, Members and the public.
22 We're trying to come up with a solution right

1 now. Just bear with us one second, please.

2 (Pause.)

3 MR. NANNEY: Hello. It's working
4 now. It's going off and on, is what it's been
5 doing.

6 Go ahead? Okay.

7 The last bullet up there is, again,
8 PHMSA will clarify and ensure that the
9 unnecessary valves are not required in the
10 final rule.

11 Next slide, please. Some other
12 comments that were received on procedure
13 manuals:

14 NAPSR expressed support for the
15 requirement.

16 We had an operator comment that the
17 requirement to have procedures for eliminating
18 leaks was beyond the mandate in the PIPES Act.

19 Also, GPTC, an operator commented
20 that the amendments in Section 192.605 would
21 duplicate existing requirements addressing
22 risk-based pipe replacement in Section

1 192.613(b), 192.703(b), and in DIMP leak
2 management requirements.

3 Also, we got a comment from the
4 Attorney General of New York that said that
5 Section 192.605 would support PHMSA cooperation
6 with states undertaking inspection and
7 enforcement activity in connection with the
8 PIPES Act.

9 Also, industry trade suggested that
10 the revised Section 192.605 should require
11 operators to reduce, rather than minimize,
12 emissions.

13 And then, PHMSA notes that the
14 amendment to Section 192.605 codifies the
15 requirement from Section 114 of the PIPES Act
16 of 2020 that the term minimize is used in the
17 statute.

18 Next slide, please. As far as
19 blowdown mitigation, some of the comments we
20 got to the notice are state and U.S.
21 representatives, NAPSR, and an environmental
22 representative expressed support for

1 requirements aimed at reducing intentional
2 releases.

3 Also, the Attorney General of New
4 York suggested that operators, first,
5 prioritize methods to prevent releases, and
6 then, minimize emissions that are unavoidable.

7 And then, lastly, multiple industry
8 trades stated that the proposed requirements
9 were overly prescriptive and would hurt
10 operator flexibility.

11 Next slide.

12 Just one second here. Normally,
13 when I give these slides, my biggest issue is
14 reading the slides when they're up there.
15 Today, I think my voice coming in and out has
16 been my biggest challenge in going through
17 this.

18 So, anyway, blowdown emissions is
19 the next comment that we got comments from.

20 The industry trade suggested that the blowdown
21 mitigation requirement should direct operators
22 to reduce, rather than minimize, emissions.

1 An operator stated that the
2 intentional release of gas standard was too
3 broad and that it should only include
4 intentional releases that relate to planned
5 repairs.

6 And then, last on this slide is from
7 multiple operators and industry trades. They
8 expressed support for limiting the
9 applicability to planned releases that exceeded
10 a defined volume of gas and suggested the
11 requirement should be for blowdowns that are
12 expected to exceed 1 million cubic feet of gas.

13 Next slide.

14 Multiple operators and industry
15 trades suggested expanding the section for
16 emergencies to include safety risks and
17 commercial impacts.

18 Multiple operators suggested that
19 PHMSA focus on a total emission reduction
20 across the operator's footprint, instead of a
21 specific volume or pressure reduction. In
22 other words, how much gas they save in a year's

1 timeframe. Look at it on some annual basis
2 versus individual impact.

3 An operator also said the prevent or
4 minimize standard is ambiguous and suggested
5 PHMSA define a threshold of 50 percent, which
6 is consistent with EPA's Methane Challenge.

7 Next slide.

8 PHMSA requests that the Committee
9 give us feedback on the scope of the blowdown
10 reduction requirements, including consideration
11 of a minimum release volume criteria and/or a
12 systemwide emissions reduction target, and the
13 applicability to planned or unplanned releases.

14 And we note that the proposed Large
15 Volume Gas Release Report would be required for
16 any gas released over 1 million cubic feet.

17 Next slide, please.

18 Some additional comments that we got
19 to the rulemaking:

20 An operator said that it was neither
21 realistic nor practical to expect operators to
22 have mobile compression on standby.

1 Additionally, mobile compressor supplies may
2 not be ready for increased demand.

3 Multiple operators and industry
4 trades said that PHMSA should not restrict the
5 use of flaring.

6 Also, we have an individual
7 commenter that suggested venting and flaring be
8 prohibited.

9 Also, the Pipeline Safety Trust
10 suggested that PHMSA clearly articulate flaring
11 be reserved for instances when other mitigation
12 options are impractical or unsafe.

13 Next slide.

14 Some of the environmental advocacy
15 groups noted that flaring is preferable to
16 venting gas and it should be used as a last
17 resort after all other options have been
18 exhausted. The commenter suggested that PHMSA
19 permit an operator to flare only if all non-
20 flaring methods have been exhausted.

21 Industry trade shared that a minimum
22 pressure requirement or pressure reduction

1 should not be included.

2 And then, PHMSA notes that flaring
3 is one of the methods allowed for blowdown
4 emissions reduction in EPA's voluntary
5 programs.

6 Next slide.

7 Also, comments that we got on
8 Section 192.770(c):

9 Again, it's Pipeline Safety Trust
10 expressed support for the requirements, but
11 suggested that PHMSA set standards for
12 operators to follow for each instance of vented
13 emissions and ensure that operators mitigate 50
14 percent of their emissions using a given
15 technology.

16 Also, industry trades said that
17 there was no need for operators to document the
18 methodologies associated with intentional
19 releases and that it should clarify
20 requirements that can be satisfied through the
21 development and implementation of written
22 procedures that apply to their pipelines.

1 Next slide.

2 Again, this is still on Section
3 192.773. This is on relief valve maintenance.

4 Industry trades and some operators
5 recommended that PHMSA incorporate the proposed
6 maintenance requirements into existing Section
7 192.739, since they broaden the scope of
8 inspection and testing to include requirements
9 for maintenance and recordkeeping.

10 And the industry trades also
11 commented that continuous action is
12 unnecessary, and that instead of a defined
13 timeframe, PHMSA should allow operators to
14 complete pressure relief device remediation as
15 soon as practical.

16 Next slide, please. Some other
17 comments that we got on this section is an
18 operator and an individual commenter
19 recommended that PHMSA add our operating
20 knowledge and historical documentation as an
21 alternative to a documented engineering
22 analysis.

1 Also, NAPSRS recommended that PHMSA
2 require records associated with relief device
3 malfunction to be maintained for a pipeline's
4 lifetime.

5 And a note from PHMSA is that we
6 will clarify that continuous action is no
7 longer necessary following the cessation of a
8 release and the implementation of alternative
9 overpressure protection measures.

10 Next slide, please.

11 Some additional comments. And this
12 is on the operations and maintenance and
13 venting, the PRIA.

14 Again, one comment we got is an
15 operator said that PHMSA's cost assessment of
16 the blowdown mitigation measures in Section
17 192.770 was not accurate. And I think Mark
18 spoke on that earlier. PHMSA notes that PHMSA
19 appreciates the comment and will update the RIA
20 appropriate.

21 Next slide, please.

22 And this concludes PHMSA's response

1 to comments on operations and maintenance.

2 Next slide.

3 As far as operations, maintenance,
4 and venting, specific topics raised by
5 commenters that PHMSA is requesting the
6 Committee recommendations on include:

7 Carryover and blowdown mitigation is
8 required.

9 No. 2 is minimum release volume
10 criteria or a systemwide emissions reduction
11 target.

12 And three, applicability to
13 intentional releases associated with planned or
14 unplanned work.

15 Next slide, please. And then I'll
16 turn it over to John for public comments -- or
17 to Dave.

18 MR. DANNER: Actually this is Dave
19 Danner. And thank you, Steve -- and sorry
20 about the IT problems, but I think we got the
21 gist of it. Thank you very much.

22 So this is an opportunity for

1 Committee members to ask questions of -- oh,
2 you don't want to have questions. Just
3 clarifying questions? All right.

4 All right. Comments?

5 MR. MAYBERRY: Thank you, Sayler.
6 This reminds me of why I don't like wireless
7 speakers in my house.

8 So, yes, we're going to take public
9 comments now. We're going to do it -- if
10 people want to make comments on the operations,
11 maintenance, and venting section. The
12 commenters are going to be down in the front,
13 if we could. If the public could line up on
14 the right side and then make their comments
15 here at the speaker that -- at the very front
16 of the room by the screen where Cameron's at.

17 Thank you, Ben, for leading the
18 charge.

19 MR. KOCHMAN: Good morning,
20 everyone. My name's Ben Kochman. I'm the
21 Director of Pipeline Safety Policy for the
22 Interstate Natural Gas Association, or INGAA.

1 Thank you all for the meeting this morning.

2 I just wanted to state overall that
3 INGAA really appreciates the opportunity to
4 comment on this very important proposed rule.
5 On its whole INGAA is very supportive of the
6 concept of the rule, but would appreciate there
7 being several tweaks as reflected in our
8 comments. That said, I wanted to highlight a
9 couple quick things then have a question at the
10 end.

11 So regarding the cost benefit
12 analysis and the regulatory impact analysis
13 INGAA did a detailed dive on the written
14 analysis and found there to be substantial
15 issues with it. For instance, for one thing
16 using the PHMSA data we had anticipated the
17 cost effectiveness of being about \$23,763 using
18 PHMSA data. Using our own analysis we have --
19 excuse me, \$23 million. And then our analysis
20 with our own data for what things are actually
21 practically used we estimated a low of 363
22 million and a high of 822 million per year,

1 total cost to the industry.

2 So I wanted to highlight a few
3 things. There were some faulty assumptions
4 that PHMSA used, especially that leak rates
5 will increase due to the over-2,500 miles of
6 additional mileage added per year. As many of
7 you are aware, building new pipelines is not
8 something that's every easily come by -- or
9 that's easy to come by these days. So that's a
10 pretty faulty analysis when you're doing the
11 overall cost and benefit analysis.

12 Also I recognize that OMD sets your
13 analysis now. And the new guidance that just
14 came down about two weeks ago changed it from 3
15 percent that you had done to 2 percent.
16 Recognize that you're going to do an updated
17 regulatory impact analysis. We appreciate
18 that. But I would encourage you all to please
19 review the INGAA cost benefit analysis comments
20 as they will be more accurate numbers reflected
21 in your data.

22 Last but not least, just had a

1 question about the status of the Section 114
2 report that you all -- that PHMSA was supposed
3 to be producing, if you all had an updated
4 timetable for when that would be released. And
5 also if there will still be an opportunity for
6 public comment. Thank you very much.

7 MR. TAYLOR: All right. I'm Eric
8 Taylor. I work for BHE GT&S here to speak on
9 behalf of INGAA. Just 199, the proposed
10 requirement for engineering analysis, currently
11 there's requirements as we saw here today with
12 199 and 201 that talk about accurately sizing
13 and have adequate capacity to ensure that the
14 relief valve operates adequately and can vent
15 appropriately. And so that -- the main purpose
16 of the relief valve is to vent natural gas to
17 prevent exceedance of the MEOP. So we don't
18 currently as operators set the pipe -- or set
19 the relief valve up to vent unnecessarily. So
20 it's already currently -- requirements are
21 already there to ensure it's properly sized and
22 vents appropriately to protect the integrity of

1 the pipeline. So thank you.

2 MS. SAMES: They're all taller than
3 me. Christina Sames, American Gas Association,
4 and thank you for allowing the public to speak.

5 Two comments really pertaining to
6 the preamble. And I apologize it's now because
7 there wasn't an opportunity for the public to
8 speak on the preamble when it was discussed.

9 First, the -- PHMSA has in our
10 opinion misinterpreted the PIPES Act, but I
11 actually would prefer to read what Congress
12 sent to PHMSA, those that actually created the
13 PIPES Act. And what they stated in their
14 letter is the Notice of Proposed Rulemaking
15 exceeds PHMSA's regulatory authority granted in
16 the PIPES Act of 2020. Congress clearly stated
17 that the rule should address pipeline -- gas
18 pipeline safety and protecting the environment
19 by reducing leaks from pipelines. There was
20 no mention by Congress of PHMSA's need to
21 address environmental justice or climate
22 concerns. We are deeply concerned that PHMSA's

1 using the NPRM to push climate initiatives into
2 federal regulations at the expense of public
3 safety.

4 PHMSA's proposed rulemaking exceeds
5 statutory authority and its requirements of all
6 leaks to be repaired. Section 113 directs PHMSA
7 to promulgate a rule that establishes minimum
8 requirements for leak detection and repair
9 programs capable of identifying, locating, and
10 categorizing all leaks that are hazardous to
11 human safety or the environment or have the
12 potential to become explosive or otherwise
13 hazardous to human safety.

14 PHMSA has taken the phrase hazardous
15 to human safety or the environment to its most
16 extreme interpretation rather than the
17 appropriate targeting of repair of leaks to the
18 more specific terms that have the potential to
19 become explosive or otherwise hazardous. They
20 go on to also talk about the proposed rule's
21 cost benefit and how it's inadequate and a
22 variety of other things.

1 This was signed by the chairman of
2 the Committee of Transportation and
3 Infrastructure, the chairman of the
4 Subcommittee of Railroads, Pipelines, and
5 Hazardous Materials, and Infrastructure,
6 ranking member of the Senate Committee of
7 Commerce, Science, and Transportation, and
8 ranking member of the Subcommittee on Surface
9 Transportation, Maritime, Freight, and Ports,
10 basically the groups that created the
11 rulemaking.

12 Second, on the statements
13 inclusions. There are statements inclusions in
14 the preamble that are a bit misleading or
15 inadequate. You all mentioned the Weller
16 study. Even EPA has moved away from the Weller
17 study. They are now focused on the Lamb study.
18 Therefore, PHMSA should also move towards --
19 away from Weller and towards Lamb.

20 And then PHMSA also references IEA's
21 global methane tracking which generates
22 estimates of methane emissions from human

1 activity, but that human activity also includes
2 coal and oil, so those estimates are also
3 inaccurate.

4 All of this to say because the
5 preamble is the basis for the technical changes
6 and the cost benefit, if those are wrong, then
7 so are the technical changes that are being
8 proposed and also the cost benefit. And thank
9 you for considering the comments.

10 MR. LAMBERT: Good morning. Jason
11 Lambert from Williams Companies, an INGAA
12 member company. Just want to make a comment on
13 the proposed rulemaking there in 199 and then
14 773.

15 So we recommend in 199 the terms of
16 documented engineering analysis beyond what is
17 necessary and pressure choking. We filed a
18 comment noting that those are subjective terms.
19 We recommend that those be outlined and provide
20 more clarity in the rule as to what those are.
21 We see that difficult in the future as far as
22 enforcement goes with those terms.

1 Also with respect to the valves, the
2 need to install upstream and downstream in Part
3 199. I believe I saw the comment there in one
4 of the slides, but just want to reiterate that
5 the use of the existing valves -- that's an
6 important concept in terms of measuring the
7 effectiveness of the relief devices to use
8 existing valves. Don't necessarily need to
9 install upstream and downstream isolation
10 valves.

11 And also the section of 773 -- we
12 recommend that that -- the items proposed in
13 773 be moved to Section 739, the pressure
14 relief device and maintenance and adjustment
15 and configuration section. We believe that
16 more accurately space for that proposed
17 language in 773.

18 And then finally, the 30-day need to
19 install, if -- timeline to install. Industry
20 typically doesn't have these relief devices on
21 a shelf that we can easily go grab. So the
22 replacement as soon as practicable I think is a

1 -- we think is a more relevant term or use of
2 language there in -- just because these valves
3 often take time to acquire and install. So
4 thank you very much.

5 MR. CAREY: Good morning. I'm Pat
6 Carey with Kinder Morgan here on behalf of
7 INGAA.

8 Kinder Morgan has been using some of
9 these mitigation techniques for blowdowns for
10 several years and offered some of the comments
11 that Steve summarized I think somewhere around
12 slide 40 regarding the need for some relief on
13 how the current language is written.

14 And to provide a little color behind
15 some of our comments on this, if you look at
16 the emergency events that would trigger the
17 relief of use of those particular methods was a
18 little bit shy of what actually happens in the
19 real world.

20 You look at a scenario where we have some
21 third-party damage, a piece of heavy equipment
22 tracked across a particular line, put a gouge

1 in the line. And our current processes would
2 immediately take that pressure off that line
3 just while we do the assessment, grinding out,
4 evaluating the gouges to see whether there is a
5 more permanent repair needed. That is not
6 something that would have been covered in the
7 exclusions that are allowed under 615(a)(3), I
8 think it was. So that one scenario provides a
9 little bit of color to that.

10 Another one is the commercial
11 impacts that are associated with some of this
12 work. We had a valve with a packing leak that
13 we assessed. We were trying to make the
14 repairs on the packing. Deemed that to be an
15 unacceptable method. Had reduced the pressure
16 in order to do that, but -- this was also a
17 minor leak and wasn't a hazardous situation
18 from a safety perspective, but it was providing
19 -- this particular line was providing critical
20 service to power generation in the Houston area
21 over the summer when we had the high heat
22 issues.

1 Based on what guidance that we're
2 getting from ERCOT and the Railroad Commission
3 in Texas, taking that particular line out of
4 service in one of the severe heat days was a
5 critical item. And we deferred that repair
6 until we could get the line -- so that service
7 wasn't as critical of an item. That particular
8 issue is more of the grading issue that we'll
9 probably talk about more in detail coming up.

10 So just again to provide a little
11 bit more color to that, the other item that
12 Steve mentioned was the aggregation of the
13 leaks that we have over the course of a year.
14 The current definition of when these mitigation
15 techniques are required is -- I wouldn't say
16 vague, but it's more general in that it covers
17 everything. There needs to be some further
18 definition behind that because you've got small
19 issues of maintenance in a compressor station,
20 a filter vessel where we've got filter element
21 change-outs.

22 The cost benefit doesn't really

1 cover any engineering or piping modifications
2 that would be required in order to capture
3 those venting operations, whether it be going
4 to a flare system or recovered in some other
5 fashion, if that's possible. So the cost
6 benefit needed to be improved or provide some
7 relief because when we look at these small
8 blowdown, the volume isn't that significant,
9 but the cost to capture them would be. And if
10 we look at the overall emissions from an
11 aggregation perspective we feel more
12 comfortable that that's achievable. Thank you.

13 MS. BYRNES: Corinne Byrnes,
14 National Grid. This is with respect to the
15 relief device changes that are proposed. So
16 first, National Grid already designs, installs,
17 and maintains pressure relief devices in a
18 manner to ensure gas is delivered safely and
19 reliably and each activation is reviewed
20 closely with the intent to determine if any
21 changes are warranted.

22 Relief valve releases are a

1 necessary and fundamental occurrence in
2 ensuring pipeline safety. It is always done
3 with the interest of preserving public safety
4 and protecting against the risk of over-
5 pressurization. It is a necessary safety
6 measure in the delivery of natural gas.

7 So I respectfully ask that PHMSA
8 consider the following points. Some of these
9 points were already raised, so I'll just state
10 my agreement. Somebody commented on the
11 requirement to repair as soon as practicable,
12 but within 30 days when an activation occurs.
13 Yes, it's not always possible to perform this
14 in such a short time frame considering we
15 design, ordering and receiving parts, and
16 complete installation.

17 The language around immediate and
18 continuous action on site to stop the release,
19 agree with the comment on that. It's not
20 always possible to stop the release at that
21 time and to continue to provide gas service.

22 Another point I wanted to make, the

1 monitor control setting is set at a pressure to
2 ensure that the station outlet does not exceed
3 MEOP plus allowable buildup. In some cases
4 such as what we do operators use a combination
5 of monitor control and full relief to ensure
6 that there are additional layers of
7 overpressure protection. The configuration may
8 vary by operator and by individual
9 installation. It is important to preserve the
10 ability to set the monitor at appropriate
11 pressure based on the operator's experiences
12 and knowledge of the system and what is
13 protected downstream.

14 Operators may not always know
15 immediately when a relief valve has been
16 activated at its set activation pressure.
17 Depending on the skater monitoring in place.
18 So operators can only be held accountable for
19 taking required actions when they have this
20 knowledge. Again, the consideration of
21 confirmed discovery is important.

22 Some of our cost impact. To address

1 these concerns, National Grid will enhance our
2 existing inspection policy for relief valves to
3 limit the unlikely event of exceeding the
4 activation pressure tolerances. This cost at
5 417 relief valve locations would cost about
6 2.085 million.

7 For the concern regarding skater
8 monitoring, we are proposing to install
9 differential pressure transmitters to provide
10 gas system operations the ability to
11 immediately detect the operation of a relief
12 valve. This will indicate that the relief
13 valve is activating. Again, 417 relief valve
14 locations with a cost of 50,000 per valve,
15 totaling 20.85 million.

16 National Grid proposes that PHMSA
17 change the language of the proposed regulations
18 when new or reconfigured relief valves and
19 limiting devices are designed to operate -- to
20 activate when needed. And for 192.739 to allow
21 operators to develop written procedures to
22 evaluate the proper functioning of pressure

1 limiting or relief devices and prepare those
2 that are found malfunctioning.

3 Lastly, from a practical perspective
4 it's difficult for operators to enforce
5 pressure controls that prevent relief valves
6 from venting. Again, so long as it's within
7 the MEOP plus allowable buildup and at the same
8 time ensure that we operate our distribution
9 system at the appropriate operation pressure
10 required for system demand.

11 Also for operators' periodic
12 inspection requirements PHMSA must take into
13 consideration minimum pressure differential
14 requirements to activate the relief valve. Thank
15 you.

16 MR. DANNER: All right. Thank you.

17 I just want to remind commenters
18 that we do have limited time here, so if you
19 are -- have an urge to repeat things that have
20 been said by others, please make your comments
21 as brief as possible.

22 Otherwise, go ahead, sir.

1 MR. MURK: Thanks. I'll be quick.
2 So good morning, everyone. Always appreciate
3 the opportunity to provide public comment and
4 for -- appreciate PHMSA's holding these
5 advisory Committee meetings. I think they're
6 very important for us to work through the
7 rulemaking.

8 So I'm Dave Murk. I'm the Senior
9 Pipeline Director at the American Petroleum
10 Institute and my comment concerns the proposed
11 changes to the requirements for the design and
12 configuration of pressure relief and limiting
13 devices in accordance with 192 -- 49 CFR
14 192.199.

15 My first comment is that PHMSA
16 should clarify what is meant by the phrase
17 documented engineering analysis, which is not
18 defined in the proposed rule. If the intent is
19 to require operators to maintain records or
20 documentation for compliance purposes, PHMSA
21 should include clear language to that effect in
22 the final rule. PHMSA should not use a phrase

1 such as documented engineering analysis that is
2 otherwise undefined.

3 My second comment is that PHMSA
4 should clarify the provisions relating to
5 upstream and downstream isolation valves. The
6 proposed language does not indicate whether
7 downstream PSVs must be installed at the inlet
8 or after the discharge of the relief device. A
9 requirement to install an isolation valve on a
10 discharge side of a relief valve would
11 introduce safety risks associated with
12 inadvertent closures that could block the PSV.
13 That kind of a requirement is also unnecessary
14 as relief devices are regularly isolated by a
15 route valve located beneath the PSV.

16 A requirement to isolate the
17 pipeline upstream and downstream of the relief
18 device inlet would cause more gas to be blown
19 down or vented every time PSV maintenance is
20 conducted. So PHMSA should consider replacing
21 the upstream and downstream isolation valve
22 requirement with language indicating the relief

1 device must be capable of being isolated to
2 facilitate testing and maintenance which would
3 address the concerns. So again, appreciate the
4 opportunity.

5 MR. HERETH: Good morning. I'm Mark
6 Hereth with the Blacksmith Group. I'm here
7 representing INGAA. And I would like to draw a
8 connection between what you'll be doing over
9 the first several days of this week and what
10 you'll be doing later this week with your
11 deliberations around the class location rule.

12 As you saw this morning, one of the
13 largest sources of emissions is blowdowns. And
14 the work that you'll do later this week in
15 providing insights and input to PHMSA to help
16 them finish that rule that's been in place
17 since the early 2000s, since the first cost
18 benefit analysis was done for the first
19 integrity management rule in 2003 -- helping to
20 provide insight to PHMSA to finish that rule
21 will be a most significant way to reduce
22 blowdown emissions. Thank you.

1 MR. HITE: Hello. My name's Matt
2 Hite. I'm the Senior Vice President of
3 Government Affairs for GPA Midstream
4 Association and I had a quick comment on
5 blowdown emissions.

6 My comment concerns the proposed
7 requirements for blowdown emissions in 49 CFR
8 192.770. The proposed rule would require
9 operators to use certain methods to prevent or
10 minimize the release of gas to the environment
11 during intentional releases such as blowdowns
12 or venting for scheduled repairs, construction,
13 operations, or maintenance activities. The
14 proposed rule would require operators to
15 document the methodologies used in satisfying
16 these requirements.

17 My comment is that PHMSA should
18 clarify that the documentation requirement can
19 generally be satisfied through the development
20 and implementation of written procedures that
21 apply to the pipeline. There is no need for
22 operators to document the application of the

1 methodologies used to minimize the release of
2 gas during each specific intentional release
3 that occurs on a pipeline. Such a requirement
4 would impose undue record keeping burdens
5 particularly when applied to routine activities
6 that involve small intentional releases of gas
7 such as pigging or meter run maintenance
8 activities. Thank you.

9 MS. KURILLA: Hi. Erin Kurilla, the
10 American Public Gas Association. APGA
11 represents the nearly 1,000 communities that
12 own and operate their own natural gas system
13 around the country. Approximately 90 percent
14 of these communities are served by a single gas
15 transmission pipeline, meaning when there's
16 integrity -- important integrity management
17 work that is performed on those gas pipelines
18 and a pressure reduction is necessary those
19 systems -- their delivery is momentarily I
20 guess reduced in order for that important work
21 to happen.

22 So when we evaluate -- I'd like the

1 Committee to consider when evaluating 192.770
2 blowdowns for transmission pipelines and the
3 design considerations in 199 for relief valves
4 that you contemplate whether truly -- I know
5 Congress used the word minimize, but I think
6 functionally they mean reduce. And I think we
7 are all very supportive of trying to reduce the
8 emissions from these activities.

9 And so when PHMSA discussed in the
10 NPRM the menu of options that these
11 transmission pipelines may have when reducing
12 their emission from blowdowns it's not a
13 limitless activity. It's pick from these very
14 well-thought-out options for minimizing or
15 reducing.

16 I just want to make sure we don't
17 find ourselves in a world where we're having to
18 do all of the above, not one of the above and
19 that we aren't striving necessarily to do -- to
20 justify why we haven't done all of them when
21 we've picked one of the options that PHMSA has
22 laid out and that we can get these transmission

1 pipelines -- get the important integrity
2 management work done and then get them back up
3 and running and serving the end-use customers,
4 both to heat their homes and operate their
5 businesses. Thank you.

6 MR. COYLE: Good morning. My name
7 is Keith Coyle. I'm speaking on behalf of GPA
8 Midstream Association and the American
9 Petroleum Institute. Cameron is going to put
10 up a little visual aid here I prepared to
11 assist in my remarks. We've also passed out a
12 copy of this for those who can't see. John did
13 suggest I could have sent him a slide for that.
14 Would have saved me some money on a big poster
15 board.

16 My comment concerns the preliminary
17 risk assessment that PHMSA prepared for the
18 proposed rule. In preparing the risk
19 assessment for a proposed rule the Pipeline
20 Safety Act requires PHMSA to identify the
21 regulatory and non-regulatory options
22 considered as well as the costs and benefits

1 associated with a proposed standard. PHMSA is
2 also required to include an explanation and the
3 reasons for selecting a proposed standard in
4 lieu of the other options considered and to
5 identify the technical data or other
6 information relied upon in meeting its
7 obligations.

8 PHMSA is required to present this
9 risk assessment information to the Committee
10 for peer review. In conducting this peer
11 review the Committee is required to evaluate
12 the merit of the data and methods used in
13 developing the risk assessment and to provide
14 recommendations regarding the risk assessment
15 information and proposed standards.

16 The Committee's consideration of the
17 risk assessment is an important part of the
18 rulemaking process. The Pipeline Safety Act
19 requires PHMSA to review and provide a written
20 response to any significant comments and
21 recommendations offered by the Committee within
22 90 days. PHMSA may also revise the risk

1 assessment and the proposed rule based on the
2 Committee's comments and recommendations before
3 issuing a final regulation. This process is
4 intended to promote sound decision-making and
5 ensure that the pipeline safety regulations are
6 technically feasible, reasonable, and cost-
7 effective.

8 The stakeholders that I represent
9 have significant concerns with the risk
10 assessment for this proposed rule. We do not
11 believe that PHMSA met its obligations to
12 consider the required regulatory and non-
13 regulatory options, to identify the relevant
14 costs and benefits, and to rely upon
15 appropriate technical data and information,
16 particularly for newly jurisdictional Type C
17 gas gathering lines that are outside the scope
18 of the rulemaking mandate and Section 113 of
19 the PIPES Act.

20 We will be sharing our concerns in
21 greater details in the coming days as the
22 Committee continues its deliberations. We

1 believe that offering these comments will
2 assist the Committee in performing its peer
3 review function and ensuring that the final
4 rule is the product of reasoned decision-
5 making. Thank you.

6 MR. DANNER: Alan?

7 MR. MAYBERRY: Yes, if I may. There
8 was a question that came up from Ben up front
9 about the Section 114 report. And that's still
10 within the agency. It's close to completion.

11 We're considering posting it for public
12 comment, but we're wrapping up just final edits
13 to it.

14 We are -- by the way, it's probably known, but
15 we are late on that one. That's one of the
16 reports that we're tardy on that was due in
17 2022. But anyway, that's where we are.

18 MR. DANNER: All right. So we have
19 received the public comment. I'm now going to
20 turn to the Committee.

21 We've heard a number of issues, and
22 Steve Nanney's slide identified three issues

1 for us to consider: criteria for when blowdown
2 mitigation is required, minimum release volume
3 criteria and/or a system-wide emissions
4 reduction target, applicability of intentional
5 releases associated with planned and unplanned
6 work. And then we heard some other issues
7 about the terms minimized versus reduced, the
8 definition of documented engineering analysis,
9 a request for a review of the PRIA data, and
10 then the consideration of climate and equity as
11 being beyond the scope of the PIPES Act.

12 And I think there are others I may
13 have missed, but at this point I'd like to open
14 it up to the Committee for any thoughts that
15 members would like to share.

16 Andy Drake?

17 MR. DRAKE: This is Andy Drake with
18 Enbridge. I heard a comment that I just want
19 to make sure is out here to help frame the
20 conversations that are going to happen here. I
21 think that we're going to get into a lot of
22 details and maybe get up against the tree a

1 little close and kind of lose context where we
2 are in the woods.

3 The industry trade associations are
4 supportive of moving forward on a rulemaking to
5 reduce methane emissions, period. Okay? I
6 think the questions that we're going to find
7 here -- there have been a lot of technological
8 advancements. We want to take advantage of
9 those. It's been a long time since a
10 rulemaking was proposed in this area. A lot of
11 things have happened. This is a good
12 opportunity to advance a standard of care and
13 to help improve the consistency of how that's
14 deployed across the industry.

15 I think the questions that we're
16 going to be wrestling with are things like how
17 and how fast? And that's not -- those are not
18 trivial questions to be answering for sure.
19 It's going to take a lot of balancing.

20 The things that caught my attention
21 in my discussion is -- I hear a lot of things
22 that sound very much like aspirational goals.

1 We're going to eliminate all immediately.
2 Those are not going to be practicable. So at
3 the end of the day when we have to vote on
4 something, is it cost-efficient, is it
5 practicable, is it reasonable? I think those
6 are things I want to try to get answers to
7 myself as we listen to this group. And I think
8 we're going to hear a lot of information about
9 that.

10 But I just wanted to throw that out
11 there because we're going to start talking
12 about things in detail. I mean, it's not like
13 we don't want to do this. We do want to do
14 this. What we're trying to figure out is how
15 to do it practicably, reasonably, and
16 effectively. Thank you.

17 MR. DANNER: Thank you.

18 Any other members wish to start
19 comments? Chad Zamarin?

20 MR. ZAMARIN: Thanks. Chad Zamarin
21 with Williams. Maybe just to get -- dive into
22 a couple of those issues that were raised.

1 I do think we should be thoughtful
2 about kind of redefining engineering standards
3 for relief valve installation and just -- I
4 think it's been said, but I mean, we have
5 requirements in the code, very detailed
6 requirements on the installation of relief
7 valves. And so I think just simple language,
8 like I'm not sure why you have to -- you've got
9 here in 192.199 proposed all new, replaced,
10 relocated, or otherwise changed relief limiting
11 devices must be designed and configured. And
12 this has been a comment made as demonstrated by
13 an engineering analysis to minimize unnecessary
14 releases of gas.

15 Those kinds of additional
16 requirements that aren't well-defined may not
17 be necessary. I think we've got specific
18 prescribed requirements for how and where and
19 why we install relief valves, so you could
20 probably just strike that and you're still
21 achieving -- the intent is there that it must
22 be installed in a manner that is configured to

1 minimize unnecessary releases, but you're not
2 inserting an undefined additional requirement,
3 which is an engineering analysis.

4 And so I do think that comment is
5 one that should be thought of as we go through
6 all of the language because it was said earlier
7 in most rulemakings we're updating rules that
8 have been in place for 50 years in many cases
9 and have evolved over 50 years. Here we're
10 kind of taking the car from 0 to 60 very
11 rapidly and we're creating an entirely new set
12 of requirements. So I think that's one to
13 focus on.

14 And then in that same section I do
15 think this idea of requiring being very
16 specific around isolation valves, around relief
17 valves -- again there are literally likely
18 millions of relief valves across the pipeline
19 industry. And they have been installed over
20 decades and there are configurations that I
21 think -- we have to be careful we don't try to
22 specify.

1 I thought one of the comments that
2 were made -- just instead of saying how you
3 have to install or where you have to install
4 those isolation valves -- a comment like having
5 the ability to isolate the relief valve for
6 maintenance or for inspection I think was the
7 intent. Instead of specifying exactly that
8 configuration it may just make sense to specify
9 what the intent is that you're trying to
10 accomplish, recognizing there are a lot of
11 different configurations for how it might be
12 done. Thank you.

13 MR. DANNER: Erin Murphy?

14 MS. MURPHY: Thanks. I think my
15 comments are going to be primarily on the
16 blowdown mitigation portion of this section.

17 I did want to just start with a
18 little bit of context-setting, thinking about
19 all the public comments we just heard from,
20 which were I think entirely from gas pipeline
21 industry operators and trade associations.

22 I hope that throughout this

1 Committee's deliberations and discussion this
2 week we can also keep in mind the thousands of
3 comments from members of the public from all
4 over the country that were submitted to this
5 agency and this rulemaking docket really
6 calling on PHMSA to -- first of all supporting
7 PHMSA's strong proposal and calling for a
8 really strong final rule that will improve
9 public safety and mitigate harmful methane
10 emissions that contribute to climate change.
11 So I hope that we can keep that in the back of
12 our minds, just the real outpouring of support
13 that we've seen across the country for a strong
14 rule.

15 On blowdown mitigation in particular
16 I think establishing clear requirements and
17 processes for operators to minimize gas
18 releases during pipeline operations will reduce
19 harmful methane pollution and wasteful product
20 losses. We know that there are well-developed
21 work practices and commercially-available
22 technologies that allow operators to reduce

1 blowdown emissions by more than 50 percent.

2 I wanted to talk a little bit --
3 there are five identified methods in the
4 proposal for operators to choose from the
5 mitigate blowdowns and operational releases.
6 Four of those methods reduce methane emissions
7 by reducing the amount of gas released from the
8 system during a blowdown while the fifth, which
9 is flaring or combusting the natural gas, does
10 reduce the climate harm from directly releasing
11 methane, but is nevertheless a highly polluting
12 process which also wastes the gas through
13 flaring.

14 And flares do not always combust all
15 of the natural gas at the flare. So sometimes
16 the actual emissions reduction might be less
17 than what's optimal. And because of that sort
18 of trade-off in a series of comments that were
19 filed by environmental organizations including
20 EDF, we recommend that flaring be sort of a
21 last resort in that menu of options. And so
22 think about rather than just five options on

1 the table whether there's a way to sort of tier
2 those options in a final rule to recognize that
3 some of them may be more effective than others
4 and that those most effective options be
5 prioritized before moving to flaring again as
6 sort of a last resort.

7 I also wanted to mention in addition
8 to those five methods for blowdown mitigation
9 that are articulated in the proposal there is
10 this alternative pathway that's available in
11 the proposal. I think I have some concerns
12 with that just in the -- PHMSA articulated in
13 the proposed rule these five known methods,
14 some of which are fairly open-ended in that
15 there are multiple technologies, that could
16 sort of satisfy and fall within some of those
17 methods.

18 And if those are the proven methods
19 that are known and make sense for industry to
20 pick up to mitigate blowdown emissions, does it
21 really make sense to have an alternative
22 pathway when it's not clear what those options

1 would look like and it doesn't appear -- there
2 doesn't look to be a lot of accountability
3 right now in the proposal for how choosing that
4 alternative would work?

5 So I think one option I'd hope the
6 Committee might think about today, that we can
7 discuss, is whether a recommendation of either
8 removing that alternative or some modifications
9 to ensure that if operators select that
10 alternative they really would be maximizing the
11 mitigation of gas released. Thanks.

12 MR. DANNER: All right. Thank you.

13 Steve Squibb?

14 MR. SQUIBB: Steve Squibb, City
15 Utilities of Springfield, Missouri. I just
16 wanted to comment on the term minimize releases
17 or emissions. I think that could be
18 misinterpreted to think that we have endless
19 resources and endless -- there's no limitation
20 to minimize. And the term reduction would be
21 more appropriate. I think that was -- meets
22 the intent of the mandate. But to be careful

1 of minimization, that that could be -- there's
2 no -- could be no limit and we have -- to think
3 that we might have unlimited resources. To
4 fully minimize emissions is unreasonable.
5 Thank you.

6 MR. DANNER: All right. Thank you.

7 And, Brian?

8 MR. WEISKER: Good morning. Brian
9 Weisker with Duke Energy representing the
10 industry and this is -- so I'm a first timer
11 here, so this is really a process question
12 because we're kind of bouncing between relief
13 valves and blowdowns. And so I don't know
14 if there's -- as we work our way through the
15 comments and language we stick -- can we stick
16 with -- do relief valves first and then maybe
17 do blowdowns, or vice versa just to keep us in
18 a swim lane, so to speak?

19 MR. DANNER: No, I appreciate that.

20 The problem is I don't know that I have made an
21 exhaustive list of what all the issues are and
22 I don't want to foreclose any discussion. But

1 I think you're right. I think we could start
2 with the three that Steve Nanney put up on the
3 slides. So first is criteria for when blowdown
4 mitigation is required. And maybe we just
5 focus on that first and we'll move onto the
6 next issue.

7 Is there anyone who wants to talk
8 about that? Chad's got his tent up.

9 MR. GILBERT: Yes, I think that
10 follows kind of Erin's comments about
11 blowdowns. And maybe on the topic I think one
12 thing that was important that was said during
13 the public comment period -- I mean the best
14 way to minimize the emissions of blowdowns is
15 to minimize blowdowns. And I think the class
16 location rule. There are other requirements.
17 Blowdowns are primarily performed because of
18 planned maintenance. That's typically a
19 requirement somewhere else in the code.

20 Class location changes is a great
21 example. We've been talking about that for a
22 long time now, but the unnecessary replacement

1 of pipe creates the requirement for a blowdown.
2 And if we can demonstrate that we don't need to
3 replace pipe and we can manage integrity
4 through a means that doesn't require a
5 blowdown, I think we should do that. And
6 that's why that rulemaking is really important.
7 And other advances to the regulations that
8 allow for in-service maintenance is really
9 important because again that's the best way to
10 minimize emissions from blowdowns.

11 I do also want to just comment
12 though -- and I'm interested, Erin -- I would
13 have thought -- I'm not an environment expert,
14 but even if you could have brought the
15 emissions of blowdown down by let's say more
16 than 50 percent, it would seem to me that any
17 time you can combust methane it's better than
18 when you just vent it to atmosphere. And so I
19 think we've got to be careful that we don't
20 kind of allow for the opportunity to focus on
21 the end result, which is if you can demonstrate
22 that you can minimize emissions through any

1 method possible, then that should be I would
2 think the preferred path for utilization.

3 Because my -- the work that at least
4 -- my understanding is that any time again that
5 we're combusting methane, if we have to release
6 it, and even if we can minimize it, any time we
7 can combust it, it's better than just releasing
8 methane to atmosphere. So I'm interested if
9 that's not the case why we might want to just
10 kind of push people away from using flaring if
11 it does in fact have a good use in those kinds
12 of alternatives.

13 On the question of a minimum
14 threshold I do think it makes to have a minimum
15 threshold. There are very small pieces of
16 equipment that could require releases for
17 inspection and maintenance activities. I don't
18 know that that's even practical. If you're
19 blowing down a filter separator in a
20 compression station yard I think that you don't
21 want to have a rule that pulls in I think
22 things that aren't practical and frankly just

1 don't really make a whole of sense.

2 So something like a -- I think there
3 were commenters that proposed 1 million cubic
4 feet per day, or a million cubic feet I think
5 might have been a proposal. I think that makes
6 a lot of sense to try to focus on what the real
7 issue is. And it's the large operational
8 releases when we're blowing down sections of
9 pipeline for maintenance. I think that's the
10 intent. And if it is, I would encourage us to
11 think about a lower threshold like that. Thank
12 you.

13 MR. DANNER: Thank you. Erin?

14 MS. MURPHY: Thanks. I was going to
15 say a couple minutes ago I appreciated Brian's
16 comment on order and was going to ask if we
17 could put these slides up as we go, so I
18 appreciate doing that. I think that will be
19 helpful throughout to keep us on track.

20 Just briefly on sort of the criteria
21 for when blowdown mitigation is required. I
22 think to me PHMSA has it right in the proposal

1 that blowdown mitigation is always required as
2 a matter of course unless in the event of an
3 emergency. So from our perspective that -- or
4 from my perspective that is appropriate.

5 And, Chad, just in direct response
6 to your comments, I don't think we're in
7 disagreement and if I was unclear when I said -
8 - was articulating that from our perspective
9 flaring should be the last resort, that's the
10 last resort of the options that operators would
11 be choosing from to mitigate a blowdown. Of
12 course direct venting of natural gas is the
13 absolute last resort and what we're trying to
14 avoid here.

15 MR. DANNER: And just to be clear, I
16 think you mentioned flaring should be used only
17 when other options are determined to be unsafe
18 or impractical. I think those were the words
19 you used. Yes.

20 Okay. Diane, did --

21 MS. BURMAN: So I just really wanted
22 to make some -- what I see for myself as level-

1 setting in this conversation.

2 First, I want to thank PHMSA staff
3 and PHMSA in general for all that you're doing
4 and for the public's comments and the Committee
5 here.

6 For me, when I look at all of this,
7 it's really important that I focus on the fact
8 that the integrity and reliability of our
9 natural gas system is paramount, and at the
10 core of that is gas safety. And I look at this
11 as -- my focus as a state regulator is on how
12 important pipeline safety is to everyone:
13 regulators, the public, the gas companies, and
14 gas consumers. And I have a fiduciary
15 responsibility to the rate payers and also to
16 looking at how we're doing things that help to
17 move us forward.

18 So for me, it's important to focus
19 on -- to be a truly engaged regulator on both
20 the historical and the present context of our
21 energy regulations. And I understand that it's
22 a continuous process. And doing this can

1 really help shape our understanding of our
2 desired future regulatory needs.

3 My kind of focus here is that I want
4 to be mindful of our regulatory powers, both
5 federal and state, and focus on using
6 judicially those powers and not to be reactive,
7 but to help develop policies and set up the
8 frameworks to implement so that we're truly
9 moving forward. And so for me, I look at
10 some of the things as what are we really trying
11 to accomplish and how can we have many
12 different tools in the tool kit that we can
13 choose from so -- and broadening it. Rather
14 than saying you must do X, or you must do all,
15 being mindful of being very clear as we're
16 looking at things in that there is a process in
17 needing to have many different alternatives to
18 address and to also look at -- obviously
19 needing to explain the rationale on why someone
20 is using something, needing to give
21 opportunities to show accountability, but to
22 really not be too prescriptive that we lose

1 sight of the goals.

2 I do think that there is confusion
3 on a lot of the terms: minimize, reduce, now
4 maximize, and looking at what that is to ensure
5 that we are all speaking the same language.
6 And I am concerned really about looking at what
7 -- how are we truly assessing things? There
8 are different studies that are out there.
9 There are different sort of requirements. And
10 making sure that we are being careful in our
11 assessments and our assumptions to make sure
12 that we're really helping to move the ball
13 forward. So that's just really where I'm
14 coming from and just wanted to sort of level-
15 set from that.

16 MR. DANNER: All right. Thank you
17 very much.

18 Sara Gosman?

19 MS. GOSMAN: Okay. So I want to
20 make some opening sort of comments or just
21 share some thoughts on climate change and then
22 move to the issues around blowdown mitigation.

1 So I mean I think we all recognize
2 here that climate change is the defining
3 environmental crisis of our time, right, that
4 what we are doing here is addressing a problem
5 that has gotten so much worse over the course
6 of certainly my lifetime.

7 And so when we look at actually
8 changing the regulations to address this issue
9 we are already in crisis. And I think
10 understanding terms like reasonableness or
11 practicality in that context is really
12 important to our discussion. So -- and all we
13 have to do is look to the climate change
14 benefits from this rule to just see what those
15 otherwise costs would be, right, to the world
16 of climate. So I think that's really important
17 as we look at our standard in terms of
18 practicality, right, practicability or
19 reasonableness, taking the climate issues into
20 account and front and center, obviously not
21 wanting to at all impair safety, but again sort
22 of focusing on climate.

1 And then I also want to just make a
2 point, since I am a law professor, on risk
3 assessment and that particular process because
4 I know it was raised in the public comments. I
5 think as we think through the information that
6 PHMSA needs to provide us and we need to
7 consider we need to also think about what
8 Congress required of PHMSA. So Congress has
9 specific requirements in the PIPES Act. In
10 thinking about regulatory and non-regulatory
11 options we have to take into account what
12 Congress wanted PHMSA to do.

13 All right. And then specific to
14 blowdown mitigation. So I'll note that the way
15 this is constructed is that operators are
16 choosing methodologies or technologies and --
17 but we're not setting a performance standard.
18 That is, we don't know what that end result is
19 going to be in terms of a reduction in release
20 volume. So I think ideally we would have a
21 standard that actually looks to the question of
22 the performance of these methodologies. And I

1 think it's built in -- this 50-percent
2 reduction into the alternative methods as one
3 way of approaching that.

4 And then I think on this question of
5 alternative methods I also would like to see a
6 reconsideration of that that requires some more
7 -- a PHMSA review and approval of these types
8 of methods.

9 Finally, on flaring I agree that we
10 should leave flaring on the table, but only
11 when other options are impractical or unsafe.
12 I think that is an important piece of this.
13 Thanks very much.

14 MR. DANNER: All right. Thank you.

15 Arvind?

16 MR. RAVIKUMAR: I want to thank
17 PHMSA for all the work that they've put into
18 developing this proposed rule. I have a couple
19 of comments.

20 I want to first start with a broader
21 comment on Mark's presentation earlier. We
22 have done some research in the Eagle Ford Shale

1 on emission from gathering pipelines and what
2 we are finding is that the benefits from VOC
3 reductions associated with methane mitigation
4 can be as large as the direct benefit from
5 methane mitigation itself. So I know it's not
6 considered in the cost benefit analysis, but
7 that's a big portion of benefits in reducing
8 emissions from gathering pipelines especially
9 in regions where gas compositions can have a
10 lot more VOCs.

11 Coming back to the blowdown
12 emissions discussion, I agree with Mr.
13 Zamarin's point about having some minimum
14 release threshold for these regulations
15 particularly because again and again as we have
16 done measurements we have found that the
17 majority of the emissions are from a very small
18 number of large emission events. And so it
19 makes sense to have some threshold. So this
20 doesn't apply to many of the smaller releases.

21 In addition I also think it makes
22 sense to have a quantity of emission reduction

1 volume thresholds that's -- in this rule that
2 says system-wide emission reduction target for
3 a couple of different reasons: So blowdown
4 emissions is one of those emission categories
5 where the emission volume can be reasonably
6 accurately estimated using line pressure and
7 other parameters. And so a setting a system-
8 wide emissions reduction target would help us
9 calculate over time how much reductions have we
10 achieved based on the operations of -- any of
11 the options that the operator might take to
12 reduce blowdown emissions.

13 And I think this is really helpful
14 because as we've been discussing about these
15 alternative methods we don't know what future
16 technology's going to be developed. We've seen
17 significant and rapid development in methane
18 emissions reduction technologies that are
19 currently being deployed across the supply
20 chain. And so having a target of emissions
21 reductions would help bring in many of these
22 alternative methods that might be available in

1 the future so that we can evaluate all of them
2 based on the emissions reductions.

3 I think the second reason is someone
4 brought up the point that the word minimize is
5 vague and having an emissions reduction target
6 would help address that issue as well.

7 MR. DANNER: All right. Thank you.

8 Chad?

9 MR. ZAMARIN: Thanks. Chad Zamarin.

10 And maybe just for a little bit of context to
11 help and explain my view on what we may need to
12 be considering here, because I actually think
13 we need more flexibility. I mean, we are only
14 -- and as Arvind mentioned, we're only a few
15 years into aggressively going after methane
16 emissions in the natural gas space. I mean we
17 just started doing recompression of blowdowns
18 in earnest over the last 24 months. And so the
19 technology is evolving rapidly. But I can also
20 tell you there are many cases where it's not
21 practical and it would have significant adverse
22 effects.

1 So the last 10 years we've increased
2 gas demand in the United States by 60 percent.
3 We've increased pipeline capacity by 27
4 percent, storage capacity by 17 percent. The
5 infrastructure is at its limit and if we're not
6 careful, we will create requirements that will
7 lead to -- we're already seeing it.

8 I mean, we're seeing -- over the
9 past three years we've seen reliability issues
10 because of lack of infrastructure. We've seen
11 price dislocations that have occurred. We have
12 pipelines that are single-feed pipelines into
13 cities and municipalities where if you are
14 required to do things that we're saying you
15 have to do here, you would put pilot lights out
16 and you would cause much greater risk to the
17 community than you would benefit to the
18 environment.

19 So we have to be careful. We have
20 to recognize the practicality of things and we
21 have to create the flexibility. I think if we
22 can all agree we have the same goal: minimizing

1 emissions while maximizing reliability and
2 affordability -- I mean it is a complex
3 equation. It's not -- we can't achieve any one
4 of those independent of the others. And so
5 that's my concern with this section. I think
6 it's an area where we need to -- we are just
7 starting on minimizing emissions through
8 blowdowns. And to get so prescriptive and
9 think we have all the answers today I think
10 really limits our ability to advance the
11 technology and the capabilities.

12 And so I actually would advocate for
13 more flexibility, not less, not -- less
14 prescription, not more, because again this is
15 evolving very rapidly and if we're not careful,
16 we're going to mandate things that are going to
17 put is in a box that we'll never get out of.
18 And we heard that from the administrator,
19 deputy administrator, that this is -- we are
20 setting the foundation for what we need to
21 evolve over the next several decades, not --
22 this is not the final answer. And so I would

1 just encourage us to think that way. Thank
2 you.

3 MR. DANNER: All right. Thank you.

4 Andy Drake?

5 MR. DRAKE: Andy Drake with
6 Enbridge. Just like to come in behind Arvind.
7 I think you're exactly right, Arvind. We need
8 to set a minimum threshold. I think the PRIDO
9 proposition would tell us that's the logical
10 thing to do, otherwise we're going to get a lot
11 of energy going into very small things that
12 don't make a lot of value. And my comment
13 actually was really going to be more along your
14 line.

15 I think the thing that we have to be
16 conscious of here is our accountability in this
17 is to provide some guidance for PHMSA to give
18 some practicable advice and guidance to the
19 enforcement folks on how to play this out. And
20 I think that one of the things that I think we
21 should be really thoughtful about is the
22 balancing act here that operators have to face,

1 and that is the reality of providing heat and
2 service to communities. And we've heard that.
3 I think there should be some provision in this
4 discussion.

5 What I'm worried about is we're
6 going to get in a cat fight in an enforcement
7 proceeding about did we do it right? And it's
8 like, okay, we are trying to consider 19
9 different things here. Did we weigh them all
10 exactly right? That's I think something we're
11 going to have to provide some guidance to, but
12 one of them is did we consult with the PUC
13 that's going to be affected by that work, and
14 did they help us make a decision about customer
15 service and reliability issues that we needed
16 to take into consideration for how long that
17 pipe was going to take to bring down, which
18 affects their service?

19 And I think -- so as we look at
20 criteria for what choices we make I think it's
21 who has the D? Who we are getting advice from
22 to make that decisions so that it doesn't end

1 up just being an enforcement discussion. I'm
2 looking at Rod because he knows what I'm
3 getting at. I mean yes, this is going to be
4 did you do it right or not? It's like, well,
5 we tried. We talked to everybody we could
6 think of. We're trying to do the right thing.

7 Was equipment available? We
8 checked. It wasn't. Well, should we wait?
9 Well, we called the PUC and said the
10 equipment's going to get here in two weeks.
11 You going to be okay with that? Because they're
12 going to be out until then.

13 We need some way to provide guidance
14 to how that conversation is going to happen so
15 that when the enforcement discussion happens
16 it's not a cat fight. It's did we walk through
17 things logically? Did we consider the
18 appropriate things, were the right people
19 counseled, and was a reasonable decision made?
20 And I think that's -- it's not all or none.
21 It's just did we go down through a process that
22 was appropriate and include the right people in

1 that conversation and reach a reasonable
2 conclusion?

3 MR. DEWAR: So, if I may opine? I
4 mean the issue seems to me we -- we're talking
5 about, okay, what are the minimum release
6 volume requirements? Well, I mean we currently
7 have some in the proposed rules that just say
8 if it's not significant. Everything above is.
9 So where do you set that? That might be the
10 cat fight that you're trying to avoid.

11 Minimize versus reduce. The problem
12 is if you're reducing just a little bit so that
13 you can check the box when you could have done
14 a lot more, that doesn't work either. So maybe
15 what we're trying to find here is some
16 precision in language. But I also don't want
17 to just in the name of flexibility reduce all
18 the requirements for carbon emissions and
19 getting as many carbon emissions reductions as
20 we can. That's the concern that I have. So
21 thank you.

22 MR. DANNER: And because there are

1 no more tent cards up, let's take a short
2 break. Well --

3 PARTICIPANT: What about --

4 MR. DANNER: Okay.

5 PARTICIPANT: -- the new guy?

6 MR. DANNER: I just -- and I'll say
7 Brian is in between us and break.

8 MR. WEISKER: All right. Real
9 quick.

10 Brian Weisker, Duke Energy, between you and
11 break. But just -- we got to be -- we have to
12 think of where is a ceiling, or floor, whatever
13 you want to call it, but a 50-percent reduction
14 isn't equal across all releases, right? So a
15 50- percent reduction of a 0.5 cubic feet
16 release is -- if that's the standard, then
17 we're -- then it's an extremely low level of a
18 release we're talking about. So I think there
19 has to be some level I think of a number that
20 sets that floor.

21 So we can go on break now.

22 MR. DANNER: All right. We're on

1 break now. How long do you want to take?

2 MR. MAYBERRY: Ten minutes?

3 MR. DANNER: Ten minutes. Let's
4 come back at --

5 MR. MAYBERRY: Let's do 11:00.

6 MR. DANNER: All right. Come back
7 at 11:00. That's a 20-minute break.

8 (Whereupon, the above-entitled
9 matter went off the record at 10:43 a.m. and
10 resumed at 11:17 a.m.)

11 MR. DANNER: All right, we said we
12 would reconvene at 11:15, and we're late. But
13 we're hitting the ground running.

14 So, Andy Drake, do you want to
15 start?

16 MR. DRAKE: In the interest of
17 providing a pinata for the proceedings of the
18 group here, I'll throw out some thoughts. I
19 think that something -- just put some words up
20 here tangible that we can look at. I think
21 that we heard a lot of good things in the
22 conversation earlier, and I'm trying to reflect

1 those.

2 I think setting some sort of minimum
3 threshold is important; trying to balance the
4 needs of customers and impacts to society is
5 also important, as well as the impact to the
6 environment.

7 So with that, I thought I'd make a
8 proposal that we could put up some language
9 here, it's something like a blowdown. That
10 this section applies for any intentional
11 release of gas that would exceed 1 million mmcf
12 for non-emergency blowdowns.

13 Arvind, I appreciate you at least
14 putting that number out there.

15 If we want to break that down by
16 segment of the industry, that's something we
17 can talk about, but to just throw out a number
18 here to start the conversation. And the
19 exceptions would be if there would be any delay
20 in emergency response or would result in a
21 safety risk or impact to customers.

22 I think that will help at least as

1 just a starting point to a conversation with
2 other stakeholders here that may be affected.
3 To at least -- so take some of the weight, you
4 know, of the discussion happening in an
5 enforcement environment and sort of sets up
6 some sort of goals and process that we would
7 work through, that can help alleviate some of
8 the angst in enforcement.

9 Anyway, I thought I'd just throw
10 that out there just to at least start a
11 conversation here on the table.

12 MR. DANNER: And by impact to
13 customers, do you mean a service disruption of
14 an extended time?

15 MR. DRAKE: I'm really looking more
16 for, again, I'm looking more at the end and
17 trying to work backwards. In an enforcement
18 discussion was the process is -- was there some
19 sort of due process of consideration for the
20 impact to a customer given, that the operator
21 talked to the PUC, an end user, a customer, to
22 make sure that they're okay with this schedule,

1 that this schedule to accommodate a scheduled
2 pulldown was appropriate, didn't have an
3 extraordinary impact on service and society.

4 MR. ROSS: Robert Ross here --
5 (Simultaneous speaking.)

6 MR. DRAKE: -- tests.

7 MR. DANNER: So hang on, hang on.
8 Did you have a question?

9 MR. ROSS: Absolutely, and also an
10 observation. My name's Robert Ross. I'm
11 Assistant Chief Counsel for Reg Affairs.

12 One thing that could be, and, Andy,
13 I acknowledge that you had the unenviable task
14 of, you know, like coming up with the proposal
15 and presenting it. One thing that could be
16 beneficial for the consideration of the
17 committee is not just an identification of the
18 proposal, but then also the basis therefore.

19 For example, like, insofar as
20 there's a minimum threshold that you've
21 floated, is there a basis in, you know, like
22 safety cost, what have you? Because, you know,

1 like as PHMSA -- if and when PHMSA considers --
2 or as PHMSA considers, you know, like, any
3 recommendation by the committee for a certain
4 threshold, we're going to need to be able to
5 justify that threshold, you know, like, so.

6 MR. DRAKE: I absolutely expect that
7 will be the next conversation that happens
8 around this table, is where did the million
9 come from. But I think Arvind had some data
10 there where the industry's filed some comments,
11 and we certainly can flesh those out.

12 MR. DANNER: Okay. Andy, was that -
13 - do you have more?

14 MR. DRAKE: I think Chad does.

15 MR. DANNER: So we're at one, two,
16 Chad, do you have a three and a four?

17 MR. ZAMARIN: No. This is Chad
18 Zamarin. I just wanted to follow up to Rob's -
19 - I don't know if it's Bob or Rob, what you go
20 by, sorry, but his comment.

21 I think on the threshold, I do think
22 intent matters. And the intent is, as we

1 discussed, is to not focus on small sections of
2 pipe, small pieces of equipment that could get
3 caught up and that, frankly, when releases
4 occur, are very, very small.

5 And so it is intended, I think, you
6 know, what we know is that the single largest
7 contributor of emissions, methane emissions,
8 are the blowdown of valve sections, or long
9 sections of pipeline for pipeline maintenance.

10 And so I think the purpose is to focus on those
11 and make sure that we're putting our effort on
12 where the impact is greatest.

13 And we've done some quick analysis
14 that would say that that would exclude small
15 pieces of equipment inside a compressor station
16 yard, but it would not exclude large-diameter
17 pipe and longer sections of pipeline.

18 MR. DANNER: All right, thank you.

19 Sara?

20 MS. GOSMAN: Yes, just a clarifying
21 question here first. So the exception that
22 you've put up there, who makes the

1 determination that that exception is correct in
2 your proposal?

3 MR. DRAKE: I think this is a really
4 good question. We talked earlier about who has
5 the D. I think this is really more of a -- to
6 me you're setting up was an appropriate
7 conversation held.

8 It's not trying to put weight on the
9 customer or the PUCs that they would decide
10 this. It's just getting data back to the
11 operator to make the decision, is that customer
12 impact unacceptable. And then I think as far
13 as from an enforcement standpoint, it's was a
14 conversation held with the customer to
15 determine, make that determination.

16 So to me, it's not putting off on
17 somebody else that decision. It's not trying
18 to say, you know, some other stakeholders told
19 us to do this. No, I think this is still the
20 operator's decision. It's just trying to make
21 sure that an appropriate discussion was held to
22 make that determination.

1 MR. DANNER: Sara?

2 MS. GOSMAN: Okay, so just to
3 respond. I mean, the language up there is very
4 broad, and I'm concerned that, you know, result
5 in a safety risk or, I assume, any impact to
6 customers. That seems like a large exception
7 to what we're talking about. So I'm wondering
8 if we can restrict that language further to
9 address the critical reliability situations
10 where we need this exception.

11 And then I guess just to also
12 address the minimum amount here for mitigation
13 on blowdowns. I would prefer to see this done
14 by type of pipeline. So transmission here
15 being different than distribution and
16 gathering. So that's, you know, maybe we need
17 to defer to PHMSA on what those numbers are,
18 but I think we as a committee should agree that
19 we need to think about this different system by
20 different system.

21 And then finally, I'd like to add to
22 this list, and I'd like to have us actually

1 vote on language that operators are limited to
2 using flaring when the other options are
3 impractical or unsafe, would be the language
4 that I would put up there. Thanks.

5 MR. DANNER: All right, thank you.
6 Chad and then Andy.

7 MR. ZAMARIN: Thank you. Chad
8 Zamarin. Just on maybe starting at the end
9 there, Sara, I would be very careful on that
10 kind of language. I mean, again, when we
11 recompress to minimize the emissions from a
12 blowdown, we often don't bring that to zero.

13 So we are looking at scenarios where
14 we can bring the pipeline down as far as
15 possible through recompression, and then there
16 may be some minimum methane emissions that have
17 to be vented. I think it makes sense in those
18 cases to explore combustion technologies that
19 further reduce emissions.

20 So I think we've got to be
21 thoughtful of how -- I think the intent I
22 totally agree with. But I think it's a tool

1 that we are evaluating as not always an
2 exclusive tool, but oftentimes as the way of
3 further reducing that last portion of methane
4 emissions that you can't reduce otherwise.

5 So maybe we need to think about how
6 that would be considered because I think you'd
7 want to be careful that you don't have somebody
8 say hey, I could have -- I could have reduced
9 emissions even more, but I did one of the
10 methods and I got to, you know, a reduction.
11 And if I'd done flaring on that final, you
12 know, amount of gas, I would have done more.
13 But the rule is mis- maybe intended in that
14 scenario.

15 I'll pause there and maybe come back
16 to the other issues since I think you may want
17 to that.

18 MR. DANNER: So before we do, Chad,
19 is that something that could be just taken care
20 of by identifying that situation?

21 MR. ZAMARIN: Yeah, I think --
22 again, I don't know what the language would

1 need to look like, but I think that, again, I
2 think we need to be careful that we don't put
3 flaring kind of as a standalone, you know, tool
4 that doesn't have a place in emissions
5 mitigation. Because I do think we are all
6 looking at tools to try to get as low as
7 possible. And it's almost never where you can
8 eliminate from a blowdown emissions entirely.
9 So I do think the --

10 (Simultaneous speaking.)

11 MR. DANNER: But, yeah, but there's,
12 you want to be careful of the language doesn't
13 create a loophole so that everybody can flare
14 to their heart's content.

15 MR. ZAMARIN: Sure, but one thing --
16 I mean, a great example is if you can reduce
17 emissions by half, let's say, in an event, I
18 mean, the difference between flaring and not
19 flaring has an impact of 10 times benefit from
20 an emissions perspective.

21 So you might just recompress versus
22 flare. And, again, I think if the issue is

1 emissions, if that's what you care about, that
2 should dictate, you know, with the practical
3 tools that you have, the cost that it would
4 take, the impact that it would have, the goal
5 should always be the greatest reduction of
6 emissions possible.

7 It may be that a flare would
8 actually reduce emissions more than
9 recompression would. But when you start saying
10 things like, you know, it's the tool of last
11 resort, I think you could have unintended
12 consequences that don't actually achieve the
13 same goals. So I don't know how you address
14 that, but I do think we need to be very
15 thoughtful and careful here.

16 MR. DANNER: All right, thank you.
17 Andy?

18 MR. DRAKE: This is Andy Drake with
19 Enbridge. I think that's a great point. This
20 is a combination of tools. It's not binary and
21 we're just going to pull down and that's, all
22 the way to zero, that will not happen. It will

1 be a combination of tools. Even if we're
2 pulling down as best we can.

3 I think that one thing that we might
4 want to throw out here is some -- and I think
5 you were hitting that a little bit, that was an
6 overarching goal, I heard that from you, too,
7 Sara. And that is, back away from the
8 treatment and look at what are we trying to
9 accomplish here is a reduction, a reduction in
10 greenhouse gas emissions.

11 So do we set some sort of target to
12 keep ourselves on point? And I don't know that
13 we can do that in the rule. I mean, that might
14 be kind of cumbersome, or at least myopic
15 anyway, but in the rule.

16 But do we set some guidance as part
17 of this committee's accountability to PHMSA to
18 do a study, to define a base year, and then
19 what is the volume in the base year, and then
20 start, keep revisiting are we making progress
21 against that goal of getting to a percent
22 reduction.

1 So I just want to throw that out
2 there. That may not be in the rule anyway, and
3 I'm not proposing that that be added to the
4 voting slide other than maybe some guidance to
5 PHMSA. So I just throw that out there.

6 MR. DANNER: All right, Erin, then
7 Sara, then Arvind, and then Diane, and then
8 Alex. And you'll be clean up.

9 MS. MURPHY: Erin Murphy, with EDF.
10 Just to kind of run down the list of the items
11 we've been discussing. I think on number one
12 from Andy's proposal, I don't feel comfortable
13 with the 1 mmcf as a minimum sort of threshold
14 for blowdown mitigation.

15 I want to note that, you know, in
16 another section of the PHMSA proposal, is that
17 reporting threshold for large volume releases
18 where the agency proposed 1 mmcf, and a number
19 of environmental organizations, as well as a
20 number of other public commenters, really were
21 emphasizing a lowering of that reporting
22 threshold that a large volume release be

1 considered 0.5 mmcf.

2 So I want to note that, which is a
3 different part of the proposal, but I think for
4 me sort of carries over here that at least, you
5 know, 0.5 mmcf be a starting point.

6 But I also want to elevate Sara's
7 idea as well, that it might be worth
8 considering sort of breaking this out across
9 transmission gathering and distribution
10 pipelines.

11 And it feels to me like we might not
12 have all of the sort of technical information
13 before us as a committee today to make a
14 precise numeric recommendation. And perhaps it
15 would be helpful for the committee to just
16 recommend that PHMSA evaluate and finalize a
17 more sort of set threshold for when blowdown
18 mitigation is obligated if the committee wants
19 to recommend that.

20 And then on the second point on sort
21 of the exceptions. This exception feels really
22 broad to me, and I'm kind of echoing Sara here

1 that as written, it's not clear sort of where
2 the responsibility lies.

3 And I think that one thought I have
4 is that this be built into reporting by
5 operators associated with blowdown mitigation
6 practices, that if an operator determines that
7 there is some sort of emergent situation that
8 prevents mitigation of a blowdown, they sort of
9 explain that situation to the agency. And then
10 the agency can review that and determine if it
11 was appropriate. And maybe that information
12 that the operator would compile and submit, you
13 know, might include information that, that they
14 received from customers, or from emergency
15 responders, or something else.

16 And then on, you know, support for
17 item number three, and I just wanted to react a
18 little to some of Chad's comments earlier. I
19 think, you know, total agreement that blowdown
20 mitigation, you know, ideal blowdown mitigation
21 involves multiple work practices and
22 technologies, and sort of a combination of sort

1 of what fits for a given situation.

2 And I just want to reiterate that,
3 you know, at least my recommendation and
4 perspective is not that flaring is not an
5 option, but that flaring is sort of a last
6 option so that an operator evaluates and
7 implements the other four sort of, you know,
8 buckets of methods that are articulated in the
9 proposal first.

10 And then I think to your point that,
11 you know, sometimes recompression or something
12 else, then you're still, you know, left with
13 some gas that would otherwise be vented. Like,
14 that's when flaring can sort of come in to do
15 the rest.

16 MR. DANNER: All right, Sara?

17 MS. GOSMAN: Yeah, so Erin stole a
18 lot of my thunder, so I think I'm just going
19 to, going to add one more thing here, which is
20 I think that it would be, you know, our goal
21 here is to reduce methane emissions across
22 systems during blowdowns. And what we're doing

1 is we're sort of taking this blowdown by
2 blowdown, and trying to sort of figure out what
3 the correct response is.

4 I think to build on what Andy was
5 saying, I think there is a role here for
6 reporting information to PHMSA that would help
7 us to actually set a standard overall for
8 systems, which I think would give some
9 flexibility to operators to do things like, you
10 know, take into account sort of reliability
11 issues.

12 So it would be a big change to the
13 regulatory proposal, and I don't -- I don't
14 want to do that. But I do think I want to add
15 a number four here, which is that report --
16 that operators would be required to report the
17 reductions in release volume for each blowdown
18 to PHMSA.

19 MR. DANNER: All right, thank you.
20 Arvind?

21 MR. RAVIKUMAR: Yes. I want to sort
22 of build on what Andy had talked about earlier.

1 I think providing operators different options
2 to reduce emissions from blowdown, depending on
3 the state of the facility or the type of the
4 operation, is important. But to achieve that,
5 I think what would be useful to add to this is
6 an overall systemwide emissions reductions
7 target, 50 percent, or some other number that
8 we all agree on.

9 And the reason is once you have a
10 target, then it doesn't matter what method you
11 use to reduce blowdowns, you can always
12 estimate emissions reductions associated with
13 that choice of mitigation and then report that
14 as one of the bullet points. I think having
15 that mitigation target is going to be
16 important, and then having it reported because
17 we want to be improving the data that's
18 available to us on emissions reductions from
19 blowdowns and other events.

20 And so that systemwide emissions
21 reductions target is going to help provide the
22 flexibility to operators on what methods they

1 choose but also give an assurance of emissions
2 reductions associated with this section.

3 MR. DANNER: All right, thank you.
4 Diane, then Alex, then Brian, then Chad.

5 MS. BURMAN: Hi. So, thank you. I
6 think this was a good conversation. I look at
7 this really as what are the principles that
8 we're trying to get out here.

9 And so for bullet one, it seems like
10 to me, the, we all are agreeing, perhaps, that
11 we could apply this section for any intentional
12 release of gas that would exceed some level of
13 mmcf for non-emergency blowdowns. And so the
14 question becomes where did folks get -- why are
15 they focused on 1 mmcf versus others.

16 And so if we can look at this as --
17 and I just want to do bullet one first. I just
18 want to get some sort of clarification on how
19 did we come up with, or how did folks come up
20 with that 1, and is there a way for us to get
21 to a principle that we all agree with, perhaps
22 why 1 mmcf is identified. And that may address

1 your concerns. Thanks.

2 MR. DANNER: So if I may. Just
3 trying to suss this out a little bit. What I'm
4 hearing is that we don't necessarily need to
5 put a number out there, that we would want to
6 have PHMSA basically set a volume level, and do
7 so for each of transmission, gathering lines,
8 and distribution separately based on data.

9 MS. BURMAN: Well, I guess for me
10 before we sort of take away that 1 mmcf, I
11 understood it as getting to the 1 mmcf really
12 was -- I think it's because it's a way to
13 differentiate, you know, significant work on a
14 pipeline or a main, or a gate station, from
15 smaller maintenance work.

16 So if we can understand that sort of
17 rationale, that may then help with why looking
18 at it for 1 mmcf, because it's related to
19 trying to differentiate between that. And that
20 sort of rationale may be able to be folded in,
21 in a way that's helpful.

22 MR. DANNER: Okay. Sorry, Alex,

1 Andy is making body language that says he needs
2 to speak first.

3 MR. DRAKE: Just in the interest of
4 timing. Not to preempt anybody else, but Andy
5 Drake with Enbridge. Great question.

6 So we tried to recognize that this
7 might be different in different sectors, you
8 know, but for transmission, what we were
9 looking at was trying to differentiate
10 significant work. So we're trying to avoid
11 having to pull down if a pig trap was vented.
12 That's not going to meet that -- well, it
13 shouldn't be -- it should be under a million.
14 So it was a little, and certainly Arvind's
15 thoughts about PERITO (phonetic) proposition
16 came into play here, too.

17 But we were trying very quickly to
18 differentiate things that would happen inside
19 the station. Small maintenance work activities
20 from big valve sections of pipelines coming
21 down large diameters. So that's where we
22 pulled this up from, was for transmission just

1 differentiating those big pieces of work from
2 small maintenance types of work.

3 MS. BURMAN: Right. And so I think
4 that that section to me is helpful because I
5 think that we all can be -- we are all probably
6 on agreement in the need for the
7 differentiation. And so if there's language
8 that we can get to, and it doesn't have to be
9 right now, on bullet one, that will pull that
10 out and not have us at loggerheads. Because I
11 think we're all in agreement with that, sort of
12 the purposes and the rationale and what that
13 looks like.

14 And so an understanding and getting
15 back to the attorneys here, needing to
16 understand the rationale in where we're getting
17 to so that it can be helpful for what gets
18 flushed out ultimately. And I really, really
19 look to Sara and Erin because I think it's
20 significantly important to the two of you.

21 MR. DANNER: Okay. I'm sorry, Alex.
22 Alan is stepping.

1 MR. MAYBERRY: I just had a
2 clarifying question or comment. I believe
3 we're dealing with 192.770, which is a
4 transmission section. So I think that helps
5 refine. And also some gathering Type A.

6 MR. DANNER: Type A.

7 MR. MAYBERRY: Yeah, Type A
8 gathering. So I think that will help isolate
9 the conversation on this one.

10 MS. BURMAN: Look at you
11 understanding all the rules there.

12 (Laughter.)

13 MR. DRAKE: Glad he's here. All
14 right.

15 MS. BURMAN: So with that, I think I
16 wonder if we're okay and I think we are.
17 Perhaps we'll come back to it if we're not.
18 But bullet two I want get to.

19 I am a little concerned with
20 exceptions if there would be a delay, or would
21 result. Because for me, there are times when
22 it's reasonable that it could be, could be a

1 delay or could result in a safety risk or
2 significant impact if you, if you do X, Y, or
3 Z, or you don't do.

4 So I would hate to see it, because
5 to me it seems very prescriptive in terms of
6 only if there would be, or would result. And
7 so there has to be some reasonableness
8 in determining, you know, hey, we can't do this
9 because of this may result in that. And I
10 don't want to water it down, but I do want to
11 not set us up for somehow having to prove the
12 thing that you avoided, if that makes sense.

13 MR. DANNER: Yeah, I mean I think
14 we'd have to wordsmith that because I think
15 could would lead to a pretty big loophole. So
16 I would just ask you to be cognizant of that.

17 Alex?

18 MS. BURMAN: Oh yeah, hold on, I'm
19 not done. Sorry.

20 MR. DANNER: Oh, oh, sorry.

21 MS. BURMAN: I was trying to go --

22 (Simultaneous speaking.)

1 MR. DANNER: Sorry, Alex.

2 MS. BURMAN: Yes, so --

3 MR. DANNER: Alex, just come back
4 after lunch.

5 MS. BURMAN: So then bullet three.
6 So I look at this as from my perspective, again
7 I'm getting to what's the principles that we're
8 trying to all agree with. And so for me, the
9 principle is that generally operators should be
10 encouraged to look to limit using flaring when
11 the other options are impractical or unsafe, if
12 feasible, and maybe somehow grapple with the
13 fact that we're trying to provide some
14 flexibility in there, understanding that we all
15 probably see it a little differently about the
16 use of flaring.

17 But giving some general principles
18 that we're trying to encourage folks as, as
19 feasible and as appropriate. And I don't know,
20 you know, if there's some wordsmithing that we
21 could get to.

22 And then bullet four, and just I'm

1 fine with reporting. I just always am very
2 concerned about not getting folks bogged down
3 by unnecessary reporting that takes them away
4 from the crucial work. And that's it, sorry.

5 MR. DANNER: All right, thank you.

6 And with regard to your comments on number
7 three, I would just opine again that be very
8 careful that you don't create a very broad
9 loophole, because you can encourage flaring.
10 And if people aren't encouraged, they will
11 flare. So, just a concern.

12 Alex?

13 MR. DEWAR: Yes, three points on
14 this. I think one, just picking up on this
15 discussion of thresholds here. I really want
16 to emphasize the point around regulatory
17 harmonization in a lot of this. And if we can
18 stay internally consistent throughout this
19 about especially with the incident reporting
20 aspect of this, I think that will be enormously
21 helpful for operators to have a clear set, a
22 clear threshold standard on that.

1 Erin, as you've raised, the 1 mmcf
2 is consistent with that, would encourage us to
3 try to remain aligned throughout on that.

4 And I think with that, I question
5 the need for point four here, if that is
6 actually picked up in the incident reporting
7 aspect of the rule as well, whether we're
8 creating multiple sort of tiers of reporting in
9 this, separate from what else, what else is in
10 it. That's point one.

11 Point two, really just wanted to
12 emphasize what others have been saying around
13 whether it's setting a, you know, holistic
14 target on this, or just bringing in language
15 about the evolving understanding and
16 availability of data on this.

17 I think important to recognize we
18 are very early days in the industry of actually
19 understanding the extent of emissions, and
20 operators respond to that. Chad, you raised
21 that comment earlier.

22 And so whatever threshold is chosen

1 today is to some degree arbitrary because we
2 just don't, frankly don't have the data
3 overall. We have some intuition, some
4 individual data points. But with the data that
5 will become available through this rule and
6 through others over time, we can make a much
7 more informed assessment of what those
8 thresholds should be in the future, and how
9 they should be differentiated. So I think
10 important to recognize in the language, that,
11 that point, as well.

12 And then third, on the flaring
13 point, fully supportive of, you know, ensuring
14 that flaring is, is sort of a last resort and
15 other options are exhausted. But I think the -
16 - limiting it, or including the language about
17 limiting it may actually have unintended
18 consequences in part because other options may
19 actually be more greenhouse gas emissions
20 intensive overall than flaring in some
21 instances.

22 So I think it's worth while

1 recognizing measures like recompression if
2 you're using gas reciprocating engines, that
3 can have methane slip as well to it. And so
4 important to sort of have enough of that
5 flexibility while, of course, encouraging other
6 actions before flaring is the last resort.
7 Thank you.

8 MR. DANNER: All right, thank you.
9 Alan, you want to step in?

10 MR. MAYBERRY: Just wanted to
11 address your comment or question related to
12 reporting. Typically in a rulemaking process
13 there's, it's really a two-step process. We
14 have the rule, we develop the policy.

15 There's also a reporting loop that
16 comes in after that where we, that's also
17 controlled by OMB where we post for comment
18 proposed reporting requirements for new rules.

19 I expect that this type of reporting
20 would be covered by, say, an annual report.
21 And it would be subject to review by us, and
22 then we would follow up, or our state partner

1 would follow up in an inspection that would
2 also, you know, look at how the system and how
3 it was justified, and that sort of thing. But
4 there's a whole separate process for developing
5 the actual reporting requirement.

6 MR. DANNER: All right, thank you.
7 Chad, Brian, Sara, Peter, and Erin in that
8 order. So, Chad?

9 MR. ZAMARIN: Thanks, Chad Zamarin.
10 First, I wonder if, because I think this is
11 going to come up a lot. I do think we need to
12 be careful about creating a lot of additional
13 reporting where it's not necessarily needed, or
14 there are other parts of the code. I wonder if
15 you could just say that it needs to be a
16 documented, you know, a circumstance that
17 exception would be where there's a documented
18 safety risk, or a significant impact to
19 customers.

20 Again, we have to document
21 decisions, and then PHMSA inspects and audits
22 those decisions. And that's how we figure out

1 whether or not we made the right judgment in a
2 code where we're never going to be able to
3 prescribe every single factor, and how we did
4 or didn't make a decision.

5 And there's a lot still to be
6 learned in this, in this area. Significant
7 impact to customers, that's going to be
8 something that we're going to have to make
9 judgments on. And then, you know, we're going
10 to try to make the best, most prudent judgment.
11 If you're going to lose five homes for three
12 more days by doing a pulldown, is that
13 significant, or is 1,000 homes?

14 We're not going to be able to figure
15 that out around this table. That's going to be
16 learned over time. And I think we need to
17 document those decisions. PHMSA needs to come
18 in and audit those, and over time I think we'll
19 get it right through that process. That's how
20 the code works virtually everywhere else.

21 And then on the could versus would,
22 I do think that's an area where the idea I

1 think, again, of a loophole. The whole code is
2 set up like I just described such that we have
3 to make decisions, and those decisions are then
4 validated, audited, and if not made correctly,
5 are enforced upon. And so I don't worry about
6 that. I do worry about the unintended
7 consequences, as was discussed about, you know,
8 you have to prove something that doesn't, that
9 didn't happen.

10 Like, that's a very difficult
11 challenge, but the idea of recognizing that if
12 you do have impacts to customers, you have to
13 document it. You have to support it. And then
14 ultimately, that has to stand the test of audit
15 and inspection, I think is the right way that
16 the code should, should function.

17 And then the last one, I still,
18 like, I'm having a really hard time on this
19 flaring discussion. I think the idea of
20 picking winners and losers from a technology
21 perspective is a bad idea. I worry, listening
22 to the comments, that it's like, you know, a

1 bad word that people have gotten fixated on
2 because of flaring in the Permian.

3 Like, I don't know what, you know,
4 again, like you could in the way this is
5 written, you could choose a methodology that
6 would reduce methane emissions by 50 percent.
7 And your alternative is to use a flare that
8 would cut those emissions by 10 times. Like,
9 we should not be picking technology winners and
10 losers; we should be focused on getting the
11 best solution implemented for the situation at
12 hand.

13 And so I would strongly just
14 encourage us to think about we're establishing
15 a set of guidelines that are driving us towards
16 trying to get the greatest emissions reduction
17 possible during a blowdown. And if a flare is
18 the best way to do that, we should not exclude
19 it or drive operators to use other tools that
20 may not have as great an impact. And so I just
21 worry we're going to have some serious
22 unintended consequences.

1 Thank you.

2 MR. DANNER: Thank you. Brian?

3 MR. WEISKER: Just a couple items.

4 One, on the fourth bullet I struggle with
5 because it's reporting an emission that never
6 happened, right. I mean, that's what, I think
7 that as written it would be operators would
8 report reductions in release volume for each
9 blowdown.

10 So it's a emission that never
11 happened. So, and I support if we have to do
12 reporting it, that we would change that to be
13 documenting.

14 And then I'm proposing a fifth item
15 that we would include. It's part of the
16 language as proposed in 770 around operators
17 documenting the methodology used in paragraph
18 (a), which is where we reference the need for
19 the blowdown.

20 In describing how the methodology
21 minimized the release, I propose that we would
22 strike that requirement to document the

1 methodology used and the methodologies, how it
2 minimized the release.

3 MR. DANNER: All right, Sara?

4 MS. GOSMAN: All right, so first
5 apologies for bringing in the other systems in
6 number one there. I think I was looking
7 forward because I think we are interested in
8 applying these provisions to gathering and then
9 distribution. But I understand that that's a
10 separate conversation.

11 I would feel a lot more comfortable
12 with deferring to PHMSA on that, on that
13 minimum. I don't think, you know, if we are
14 going to go with a minimum, I think we should
15 match EPA's. So it has 500 mcf in their
16 subpart W proposal. It seems to me to make
17 sense to go with that minimum.

18 Otherwise, I think rather than
19 fighting about numbers, we could say to PHMSA
20 we would like you to consider having this
21 minimum, and we defer to you on, on that
22 number.

1 In terms of flaring, I think, you
2 know, a couple concerns, Chad, that I have. I
3 guess one is, you know, I think that incomplete
4 combustion is an issue with flaring. And so
5 just in terms of what the result is, we have a
6 little more uncertainty about sort of what the
7 climate impact is going to be.

8 So, you know, I think one way to
9 handle your concern is to say like, you know,
10 operators are limited to using flaring when
11 other options are impractical or unsafe. Or,
12 right, or would result in less impact to the
13 climate, right. Some language like that, that
14 gets us at that issue that actually flaring
15 would ultimately result in the outcome that we
16 want here, which is less impact to the climate.

17 And then on the final piece there,
18 you know, I think reporting here, I think
19 there's a question about the threshold. I
20 think I want to put in 500 mcf as our threshold
21 so, to avoid sort of those small ones. But
22 then I think the reporting requirement is also

1 for the public and researchers, right, not just
2 for the internal enforcement consideration of
3 what operators are doing, but because this
4 helps us understand whether this particular
5 regulatory measure is working.

6 And I think in addition to just that
7 release volume, you know, which is of course
8 already in the proposed rule although I am
9 suggesting a change to that minimum, but I also
10 think things like, you know, average operating
11 pressure of the line, mitigation method, right,
12 basically the reporting requirements that help
13 us to understand whether this particular
14 provision is working.

15 So I would add that so unmitigated
16 release volume, including average operating
17 pressure of the line, actual release volume,
18 and mitigation method to that reporting
19 requirement.

20 So, I admit I'm adding more to the
21 reporting requirement rather than less, but I
22 think this is important data that the public

1 and PHMSA needs to know.

2 MR. DANNER: All right, Alan?

3 MR. MAYBERRY: I just wanted to make
4 a comment for the committee to consider or keep
5 in mind. Part of Section 114 of the PIPES Act
6 included a report requirement for us to develop
7 with recommendations, and that was asked about
8 earlier by Ben Kochman from INGAA.

9 And just keep in mind that, you
10 know, that would be another bite at the apple,
11 so to speak. That'll be -- and there's a
12 requirement too, to go to rulemaking to address
13 any, you know, recommendations that came out of
14 that study.

15 So, there will be another, you know,
16 as we learn more, and that's a lot of what you
17 do when you collect data is, you know, you get
18 a feel for what's out there, the experience.
19 So there will be an opportunity after that
20 report comes out, finalized hopefully later in
21 2024, and so we'll have another opportunity to
22 address this as well.

1 MR. DANNER: All right, thank you.
2 Robert Ross, did you need to step in?

3 MR. ROSS: Please. I was just going
4 to make another lawyerly observation. Insofar
5 as, you know, there are certain elements of the
6 recommendation for consideration by the
7 committee that are broad in scope of
8 application. For example, if we look at the
9 first bullet, which characterizes the
10 application of the exception, or the threshold
11 requirement to the section as a whole, i.e.,
12 the entirety of 192.770.

13 One thing for the committee to
14 consider as they're voting or deliberating
15 about it, is whether there are certain
16 exceptions that are, or thresholds that should
17 be applicable to some elements of 192.770 as
18 proposed, or the entirety. So that's for the
19 committee to decide, not for PHMSA. But I just
20 want to make sure that you're sensitive to that
21 nuance.

22 MR. DANNER: All right, thank you

1 for that. Peter?

2 MR. CHASE: Yeah, thank you for
3 clarifying we're talking specifically about
4 changes to 192.770.

5 For the first bullet point, I do
6 think there should be some sort of de minimis
7 exception because I think the way this is
8 written right now, every time, as you
9 mentioned, every time you launch a pig or check
10 a relief valve, these requirements could apply.

11 Maybe it's adequate to exempt de
12 minimis releases; don't know. Better legal
13 minds than mine will have to figure that one
14 out. But I think there, I do, I think I'm
15 convinced of the need for some kind of a floor.

16 Number two, honestly, I'm not really
17 sure how that's different from the current
18 language in 770(b) regarding exceptions by
19 implementing an emergency response plan.

20 Number three, flaring, the flaring
21 discussion. I mean, I think the instructions
22 we see from Congress, right, were to minimize

1 methane emissions, and flaring does that.
2 Based on the instructions we received from
3 Congress, I quite frankly don't understand the
4 rationale for limiting its use.

5 For four, well, I had some comments
6 on release volume reporting, but, Alan, I think
7 you've answered those for me. I guess that's
8 all I have. Thank you.

9 MR. DANNER: All right, thank you.
10 Erin?

11 MS. MURPHY: Thanks. Erin Murphy
12 with EDF. So I just wanted to sort of circle
13 back to points that Arvind and others made
14 earlier, which is the idea of an overall
15 systemwide emissions reduction target.

16 And wanted to say that I'm
17 supportive of that and think, you know, it
18 could be really effective for this sector of
19 the industry. But it feels like a lot to sort
20 of add into a rulemaking that's already
21 underway.

22 I know Andy mentioned earlier the

1 idea of, you know, recommending, the committee
2 recommending that PHMSA undertake a study on
3 that point. And I think, you know, there's
4 been some discussion about reporting, and it
5 feels to me like even before recommending that
6 PHMSA, you know, study that further, there's
7 this baseline need for more information about
8 how blowdown mitigations are going and what
9 operators are able to achieve.

10 And so I think the way the NPRM is
11 structured makes a lot of sense to me in this
12 early stage, which is giving operators
13 flexibility to choose between a number of
14 methods. But I do think that reporting is
15 really important here so that PHMSA, the
16 public, and, you know, industry, can sort of
17 see how this is going in terms of which
18 mitigation options are operator selecting, what
19 mitigation is being achieved by those different
20 options and the combinations of those different
21 options, and just kind of getting that more
22 documented.

1 So I'm supportive. I don't know if
2 it got, made it onto the screen, but Sara
3 mentioned a number of reporting requirements.
4 And I just wanted to raise up some language
5 that was in comments filed by the joint
6 environmental commenters, which is that
7 operators should be required to document and
8 report which practices were used, the estimated
9 mitigation achieved by each practice, and the
10 quantification of gas released with mitigation.

11 I think there's probably some even
12 more technical items that might also be helpful
13 to sort of better understand the circumstances
14 around different blowdowns, and be able to draw
15 out and think about trends across the industry,
16 such as the average pipeline pressure over,
17 like, the last month or some amount of time
18 before the blowdown, and then the pressure at
19 the time of the blowdown. Just trying to get
20 closer to that ability to estimate the
21 mitigation that was achieved, and what the full
22 extent of the blowdown might have been without

1 mitigation.

2 So I definitely am not comfortable,
3 I don't think, with item five about the --
4 striking the language for documenting the
5 methodology for choosing the mitigation method.
6 That feels really important.

7 And then want to just emphasize the
8 idea of adding in some, some useful reporting
9 in part so that PHMSA and others can evaluate
10 in the future the idea of an overall systemwide
11 emissions reduction target.

12 MR. DANNER: All right, thank you.
13 Arvind?

14 MR. RAVIKUMAR: Thanks. So, maybe
15 two proposals for consideration. If you look
16 at nominal emissions reductions assuming
17 flaring works as expected, and if you flare a
18 volume of gas that would otherwise be vented,
19 that corresponds to about an 85 percent
20 reduction in greenhouse gas emissions.

21 For other methods of mitigation, the
22 number could be different. So for bullet point

1 three that says limited to flaring when other
2 options are impractical or unsafe, perhaps one
3 option there is to say require demonstrated
4 methods that mitigate emissions by at least 50
5 percent. So not any specific method, but
6 whatever method is chosen, there has to be a
7 demonstration that it mitigates emissions by at
8 least 50 percent, or some number. And flaring
9 could be one of those because it does at 85
10 percent or so.

11 The second point I want to make is
12 on the fourth one, reporting requirements, I
13 think just a modification to address some of
14 the concerns that we heard here. Reporting
15 quantification of gas released with whatever
16 mitigation has been undertaken. So report
17 actual emissions volumes, which could be
18 through a direct measurement or incident
19 calculation, as opposed to estimating what the
20 potential reductions were.

21 MR. DANNER: All right, thank you
22 very much. Andy?

1 MR. DRAKE: Andy Drake, with
2 Enbridge. I just want to make a couple points.
3 First of all, Erin, I agree with you. We're in
4 vertical learning here. We need to respect
5 that, and I think gathering the data to help us
6 make informed decisions for the next steps is
7 really important.

8 So we should balance that between
9 gathering extraordinary amounts of information,
10 but we should be very intentional to gather the
11 information that's happening in this next
12 couple years as we move into this.

13 I had a question for, really for
14 Sara. And that was the discussion about the
15 threshold. We have on the board 1 million and
16 you were citing 500. And I want to make sure
17 I'm, it's not 500,000.

18 Because EPA is really about
19 reporting requirements. This is about an
20 action effort. And so if we're going to talk
21 about 500, 500 is very small. Very, very, very
22 small. That would be everything that we do in

1 a station. Every maintenance activity would
2 meet that criteria.

3 So I just want to make sure we're on
4 the right criteria here. Is it, you know, is
5 it 500 or .5? But I think those are big deals.
6 Because at 500 we report everything we do.
7 Everything that happened would be reporting, or
8 minimizing the blowdown.

9 MR. DANNER: All right, thank you.
10 Chad?

11 MR. ZAMARIN: Thanks, Chad Zamarin.
12 Yeah, I do think maybe adding to three based on
13 what Arvind and Sara had said, something, I
14 don't know if we need to be specific to a
15 percentage, or just say that limited using
16 flaring when other options are impractical or
17 unsafe, or provide less benefit from emissions
18 reduction perspective. Or if there is some
19 threshold.

20 But I think qualifying that, it
21 sounds like there's support for. If that's
22 your best tool for reducing emissions the most,

1 then you know, it should be available. So I
2 don't know if you can add something to the end
3 of three there.

4 And, yes, I agree with Andy. I
5 think it's important to reiterate when we
6 compare things like EPA reporting thresholds to
7 what this is, which is an action threshold.
8 Like, this requires us to go out and spend --
9 literally this is going to cost, this -- and
10 we're already doing this as an industry. I
11 want to make it clear.

12 But this is significant investment
13 in sending recompression equipment out to
14 sites, installing new equipment at blowdown
15 facilities. And we're modifying pipeline
16 installations. I mean, this is costing and
17 will cost -- this will be one of the most
18 expensive portions of the rule. I think
19 industry has said this makes a lot of sense.
20 We're already doing a lot of this, and trying,
21 getting started on doing this.

22 But this is an action threshold, not

1 a reporting threshold. So, I do think it needs
2 to be some level that captures, again, the,
3 we're focused on eating the elephant kind of
4 one bite at a time, but let's take the biggest
5 bites for the benefit possible to begin with.
6 And, you know, chasing small equipment
7 evacuations around compressor stations,
8 wouldn't make a lot of sense. Thanks.

9 MR. DANNER: All right, thank you.

10 Sara?

11 MS. GOSMAN: Yes, so I did suggest a
12 very low threshold here, and, you know, we're
13 starting from a place where all of this would
14 actually be regulated. So from that
15 perspective I'm moving on. But I agree, it's a
16 low threshold, and to me, this conversation
17 tell -- is an indicator that we should defer to
18 PHMSA, the sort of expert agency, on the
19 appropriate threshold.

20 I mean, there are going to be
21 different interests here in terms of how broad
22 we want this regulatory requirement to, you

1 know, the applicability of it.

2 I think our job is to say you know
3 what, there is, there needs to be a de minimis
4 threshold here. And rather than tell PHMSA
5 these are the folks you can regulate and these
6 are the folks you can't, I feel like that's --
7 unless we are all in agreement on that number,
8 and I just don't think we are, I don't think
9 it's a good idea to have it in our
10 recommendations.

11 MR. DANNER: And just to clarify,
12 are we talking about flaring or are we talking
13 about number one?

14 MS. GOSMAN: Sorry, that was number
15 one.

16 MR. DANNER: Okay.

17 MS. GOSMAN: Was the conversation I
18 thought we were having.

19 MR. DANNER: Yes, that's, I just
20 wanted some clarity on that. Chad?

21 MR. ZAMARIN: Yeah, and on that
22 point, I don't think we disagree conceptually.

1 I think we probably do disagree with the
2 threshold. Because I think we do, de minimis is
3 a pretty, you know, again it can be defined
4 differently by different people.

5 And what I'm advocating for and I
6 think makes the most sense as an initial focus
7 area is -- and we've seen the data. I mean,
8 the most significant contributor of methane
9 emissions in the transmission space, which is
10 where this applies, is large blowdowns of
11 pipeline segments.

12 And that's, I truly believe that is
13 the intent of this section, and should be the
14 intent of this section. And frankly, when we
15 get beyond that, it becomes impracticable. It
16 becomes the cost benefit doesn't work.

17 And we're still figuring out, and I
18 think we're going to talk more about those
19 during leak detection and reporting. We've got
20 a lot of work to do to find those smaller
21 releases. Frankly, they're not blowdowns.

22 So I just -- I think it's good and

1 fine if PHMSA looks at it and sets that
2 threshold. But hopefully we can all agree on
3 what the threshold is trying to accomplish.

4 MR. DANNER: And I just want to say
5 I agree that we could put some more instruction
6 in number one. Just basically, PHMSA should
7 establish a minimum volume for non-emergency
8 blowdowns that excludes non-significant, or, I
9 mean, choose your adjective and choose it
10 carefully. But just basically, you know,
11 instruct PHMSA what it is we are trying to
12 achieve here.

13 Diane?

14 MS. BURMAN: So I think that gets
15 to, I'm going to actually ask Robert, because
16 they do need us to establish the rationale.
17 And so making sure that for bullet one, we are
18 kind of hitting the mark in terms of what they
19 need from a rationale perspective.

20 MR. ROSS: And, thank you,
21 Commissioner. I think that it's, you know,
22 we've in the back and forth, you know, like

1 we've certainly got a couple of, you know, like
2 things that we can point to, for example,
3 similitude with, you know, like the proposed
4 reporting standards over in part 191 for large
5 volume releases.

6 There are other, you know, like kind
7 of bases for the one -- for whatever threshold
8 is established, that's helpful, too.

9 Also as well, like insofar as if as
10 the committee makes a recommendation and it
11 feels comfortable doing so, if it could also be
12 clear on, you know, if there are different,
13 say, for example, if the recommendation should
14 apply to all the different species of pipeline.
15 You know, like to which this provision would
16 otherwise apply. Say, for example, is the de
17 minimis threshold -- you know, like, cost
18 effect and all that for transmission lines, but
19 maybe not for that subset of gathering lines
20 that would be subject to it, that would be
21 quite helpful for us. Thanks.

22 MR. DANNER: Okay, and so 770 is

1 mostly transmission and some gathering. So if
2 we're going to talk about 770, I would just
3 include all pipelines covered by 770.

4 Okay, Erin?

5 MS. MURPHY: Erin Murphy with EDF.
6 I just am looking at my notes. I wanted to
7 circle back to one just discussion from earlier
8 on flaring.

9 You know, I feel like we're, we've
10 heard a lot today and there's a lot of comments
11 in the record from industry about how some of
12 these technologies and blowdown mitigation
13 practices are newer, and that industry is, you
14 know, using them and developing comfort with
15 them. I do want to acknowledge that are --
16 there are, you know, industry leaders that have
17 been implementing these technologies for years
18 now.

19 But I just worry that, you know, the
20 idea that flaring, you know, needs to be sort
21 of on an equal footing because it's such a
22 practical solution sort of falls back to this

1 place where there's more comfort with flaring
2 as a practice. There's more familiarity with
3 it.

4 But because the objective here is to
5 not only mitigate methane emissions, but also,
6 you know, mitigate waste, right, reduce
7 economic waste, to the extent there are these
8 technologies that enable the gas to not be
9 vented or combusted, making sure that those are
10 prioritized and really picked up and, you know,
11 put to use and explored by operators to really
12 sort of figure out their maximum effectiveness,
13 drive that, you know, technology development
14 forward, is just, to me, another reason why the
15 idea that having operators start with the
16 evaluation and use of those technologies before
17 resorting to flaring is an important
18 recommendation, I think, and worthwhile for the
19 committee to keep in there.

20 I also just want to talk about the
21 numeric threshold, which now maybe the numeric
22 threshold has been taken out of number one.

1 But this discussion of, you know, the 1 mmcf in
2 another part of the NPRM is reporting. And I
3 want to, again, reiterate that, you know, EDF
4 and many other commenters have strongly
5 recommended that PHMSA reduce that large volume
6 release reporting requirement to 0.5 mmcf.

7 Because we think that, you know,
8 half a million mcf is relevant, is a large
9 release, and should be documented and reported
10 and known to the public. But recognize the
11 point others have made that, you know, that
12 discussion about reporting might be different
13 from sort of, you know, an action threshold.

14 And I think for me, that just brings
15 me back to what makes most sense for this
16 committee is to recommend to PHMSA, that PHMSA
17 evaluate and establish, as appropriate, a
18 minimum threshold for blowdown mitigation.

19 MR. DANNER: All right, thank you.

20 Arvind?

21 MR. RAVIKUMAR: Just a point of
22 clarification on one of Chad's and perhaps

1 Andy's comment, as well. We have done a lot of
2 measurements of blowdowns at compressor
3 stations, and correct me if I'm wrong here.

4 Anything that's -- anything that happens in the
5 station in terms of blowdown emission is far
6 less than even a .1 mmcf.

7 So, you know, this discussion over
8 .5 or 1 mmcf as a threshold, is less relevant
9 because if it's less than 100 -- if it's
10 anything more than 100,000 mcf or .1 mmcf, it
11 will exclude everything that happens on the
12 station itself.

13 It's only sort of pipe segment
14 blowdowns that will even achieve this threshold
15 of .1 or .2 mmcf. I just wanted to make sure
16 that that's in the discussion as well.

17 MR. DANNER: All right, thank you.
18 Diane?

19 MS. BURMAN: So I am, I like that
20 we're changing the language in bullet one. My
21 only concern is moving away from the actual
22 numeric number. Because we originally started

1 out with the numeric number, and didn't explain
2 the rationale for what -- where that number
3 came from and why.

4 And so I feel like in some ways,
5 we're kind of making it now a little bit more
6 confusing. So we're trying to get at here that
7 we're differentiating between the significant
8 work versus smaller, routine maintenance.

9 And so in some ways, shouldn't we
10 have some type of backstop in terms of the
11 number that's already here. Because if we
12 can't identify that, then how's PHMSA's going
13 to be able to do that?

14 And so it's like, and maybe it's
15 just I don't like loss of control here, but I
16 just want to make sure that we look carefully
17 at what we're saying. And if we are all in
18 agreement, that it is to differentiate the
19 larger work versus the smaller, is there not
20 some understanding of what that number is?

21 That we can at least be clearer so
22 that it's not just pick a number that, you

1 know, maybe even be different from, you know,
2 where industry is versus others. And I just
3 wonder if there's any thought on that. I just
4 get concerned.

5 MR. DANNER: So I'll share my
6 thoughts, which is I don't think we've reached
7 consensus on what a number would be that's
8 agreeable to the committee.

9 So I think what we could add to
10 number one is that, you know, this delineation
11 should be based on data. And I think Arvind
12 has made clear that that data is available.
13 But I just don't think we can land on a number
14 because I don't think we have consensus here.

15 Okay, I've got Brian, and then Andy,
16 and Chad.

17 MR. WEISKER: Well, I'm kind of
18 going back to what Diane just said. But, I
19 mean, in the rule, or in the proposed rule is a
20 1 million cubic feet for a large volume
21 release. So I think there's some justification
22 for that 1 million number that we've been

1 talking about.

2 And so I agree with what you're
3 saying, Diane. I think we have to propose a
4 number. I'm not sure that we're going to get
5 consensus, but I just, as written, it just, I
6 don't know that I -- it doesn't feel like you
7 can support it. It's just, it's pretty vague.

8 MR. DANNER: Yeah, okay. I just,
9 again, my position is I don't think we're going
10 to reach a number. And I think as long as we
11 give clear direction that this is supposed to
12 be based on data, and distinguishes between
13 smaller releases from routine maintenance from
14 others that are more significant, might be the
15 best we can get here.

16 I'm sorry, so I think Andy, and then
17 Chad.

18 MR. DRAKE: This is Andy Drake, with
19 Enbridge. I appreciate Commissioner Burman's
20 point. I think we need some clarity here. I
21 think the thing that may help us is harking
22 back 20 years ago to a discussion about

1 integrity management.

2 Well, we should deploy integrity
3 management everywhere. They said well, that's
4 not practical. So we decided where would we
5 get the biggest bang for the buck. We decided
6 we'd deploy it in HCAs. Then we would
7 iteratively step it up to MCAs. Then we'd
8 iteratively step it up to LCAs.

9 I think we're just starting here.
10 We are working kind of off our heels a little
11 bit here with an absence of data, but that
12 doesn't mean we have nothing.

13 We have some things to work with
14 here. And we're, I would be very cautious
15 about trying to leave this so vague. I think
16 that's just going to cause a lot of
17 consternation in application, which is not
18 helpful to anybody.

19 Even if we just pick a number that
20 it generally represents what we think a valve
21 section blowdown looks like on large-diameter
22 transmission pipe, which is what this is about,

1 and quantify that. And I think to Arvind's
2 point, those numbers are not unobtainium. We
3 can box that, and start, and gather data, to
4 your point, Erin, and then make another choice
5 if we need to tighten it up, or where we need
6 to make adjustments.

7 But I think we're, I just encourage
8 us not to look so binary like, at this. Like,
9 it's a one and done and we're never going to
10 visit this again. I think we're right at the
11 front of getting data to make a better choice.
12 I think a number in the -- certainly above .1,
13 but somewhere in the .5 range would be
14 reasonable for a valve section of gas
15 transmission pipe.

16 MR. DANNER: All right. Chad, and
17 then Brian?

18 MR. ZAMARIN: Thanks. Chad Zamarin.
19 Yeah, I agree, and I do think it would be
20 helpful to establish some number. And maybe
21 you can say to be confirmed by PHMSA, but I
22 think it gives more clear guidance. I also

1 just, I appreciate the challenge we're going to
2 have this week. You mentioned consensus, I'm
3 not sure we're going to get unanimous on
4 everything, so I do think there may be points
5 at which we need to vote on language.

6 And there may be different versions
7 that we that we weigh in on, I don't know.
8 But, I do think we need to be able to -- and
9 even as I look at this, I'm not sure I could
10 even vote as a single package. And so, I do
11 think we got to think about for the week, how
12 we get on the record on some very clear
13 recommendations, and then kind of move on from
14 there. Thank you.

15 MR. DANNER: All right, thank you.
16 Any other -- yes, Sara?

17 MS. LONGAN: Thank you, Mr.
18 Chairman. Sara Longan, Army Corps of
19 Engineers. I want to harken back to something
20 that Commissioner Diane -- Commissioner Burman
21 said earlier, that I don't know that the
22 discussion has allowed to really honor the

1 comments followed up by you, Brian, in terms of
2 just looking at what is before us. And that
3 the rationale for the threshold that was
4 provided in the proposed rule is also what the
5 Committee and DOT has before us, based on
6 public comments.

7 Therefore, I think I am supporting
8 at least further fleshing out an understanding.
9 We have the rationale, we can have further
10 discussion to advise DOT, PHMSA on whether that
11 rationale is justified or not. But, a number
12 was provided in the proposed rule and I would
13 support moving away from doing something that
14 is more vague than that. Thank you.

15 MR. DANNER: Thank you. Arvind?

16 MR. RAVIKUMAR: Just one quick point
17 on Number Four. I think somebody brought this
18 up earlier, but I would be more comfortable
19 changing that to say reporting emissions for
20 each blowdown, as opposed to reporting a
21 reduction for each blowdown. Because, that's a
22 theoretical calculation, at that point.

1 MR. DANNER: All right, thank you.
2 Sara?

3 MS. GOSMAN: So, I do think we've
4 reached an early point here, where we have to
5 decide if we're trying to reach for consensus
6 here on these provisions or we are going to go
7 to a vote, and what we care about is the
8 majority. I think there is a middle ground
9 here, which we could certainly reference in
10 this voting slide, the range of figures that
11 the Committee talked about. And indicate that,
12 in fact, there was disagreement among the
13 Committee about which specific threshold number
14 there should be.

15 I think that reflects for the
16 record, as well as for our vote, that we have
17 differences as to the number, but that we agree
18 on the principal, right, which is to have this
19 threshold. And I think agreeing on the
20 principle is important as a Committee, and as a
21 -- so, as we review these particular
22 provisions, I'd like to see us be able to do

1 that unanimously while reflecting the
2 differences within the vote language.

3 MR. DANNER: Chad?

4 MR. ZAMARIN: Yeah, I just want to
5 respond to that, because I do think the
6 principle -- the detail of the principle
7 matters. I don't think the principle is that
8 we just want to establish a threshold. The
9 principle that we're advocating for is that we
10 establish a threshold that appropriately
11 applies these requirements to large blowdowns,
12 which is what I believe the intent of this
13 section is and should be.

14 And so, you know, setting a 500
15 cubic feet requirement, versus a half-million
16 or million cubic feet requirement -- that is a
17 very different intent. And I think, if that's
18 the proposal that's on the table, I think we
19 need to vote on those and be clear what we
20 think the real intent should be. It may not be
21 unanimous, but I think the intent is more than
22 just establishing a threshold.

1 I think it's establishing -- our
2 proposal is to establish a threshold that sets
3 a focus on large intentional releases and
4 doesn't -- I mean, to be honest, we've looked
5 at this, if we go out and we send people in
6 trucks and equipment, chasing 500 cubic feet
7 releases in order to -- and run recompression
8 equipment -- we're going to create more
9 emissions in driving trucks to locations than
10 we are in reducing methane emissions.

11 So, we've got to make sure we're
12 focused on the real issue. And on transmission
13 pipelines, it's going after blowdowns of
14 pipeline segments, like, that's the issue we
15 need to be focused on. Thank you.

16 MR. DANNER: And Chad, do you think
17 there's a way of doing that without a number,
18 or do you think you need a number to do that?

19 MR. ZAMARIN: I mean, I think we've
20 got -- we've heard pretty strong support for
21 the million cubic feet. I mean, we've heard
22 that -- I mean, we know that that will capture

1 large -- that will capture pipeline blowdowns,
2 we know that it will exclude small compressor
3 station venting activities. And so, I think it
4 makes sense to have a number -- and like I
5 said, maybe to be validated by PHMSA.

6 Or, at a minimum, we need to be more
7 clear that the threshold will be set such that
8 it will focus on pipeline blowdowns and not on,
9 you know, equipment and compressor station
10 venting activities. One way or another, I
11 think we need to be clear on the intent.

12 MR. DANNER: All right, thank you.
13 Peter, and then Erin?

14 MR. CHACE: Yes. Pete Chace, NAPSR.
15 Real quick. I'll be honest with you, I don't
16 think I understand enough about transmission
17 system operations to know that if you were to
18 ask me to vote on what's the right number -- a
19 million, half a million, a hundred thousand --
20 I don't know. You won't get an intelligent
21 opinion out of me off of that. So, honestly my
22 preference would be to have PHMSA's technical

1 experts take a look at it, after they
2 understand what we think the intent of the
3 regulation ought to be. That's all I have.

4 MR. DANNER: All right, thank you.
5 Erin?

6 MS. MURPHY: Yeah, thanks. I don't
7 want to keep repeating myself, but I am just
8 struggling -- there's not a technical analysis
9 before us about, you know, at what point
10 blowdown mitigation is cost-effective. And
11 I'm, you know, trying to rack my brain. And I
12 recollect, you know, looking at documentation
13 of operators mitigating blowdowns that are not,
14 you know, necessarily so large in scale. Like
15 distribution operators that mitigate blowdowns
16 on parts of their systems.

17 And so, that just makes me very, you
18 know, unable to support this, you know, 1mmcf
19 threshold. And really not comfortable with a
20 numeric threshold, it just doesn't feel
21 appropriate to me for the Committee to do that
22 when there's not a real technical basis for

1 taking that position. And, you know, sort of
2 sending this recommendation back to PHMSA to
3 further evaluate, you know, feels more
4 appropriate.

5 I also wanted to jump a little bit -
6 - and this is, like, really digging back to
7 earlier in the discussion. But, Peter, Mr.
8 Chace made a comment a while ago, looking at
9 Number Two, the idea that there would be an
10 exception if there would be a delay in
11 emergency response or would result in a safety
12 risk or significant impact to customers.

13 I think I said earlier that I had a
14 lot of concern that that was really open-ended
15 and that at minimum, you know, the idea of
16 documenting -- and I would say not just
17 documenting, but documenting and reporting the
18 reasons is important -- so, that second
19 sentence is appreciated. But, Mr. Chace had
20 mentioned, if I am getting it right, that
21 language felt really similar to the exception
22 that's already in the NPRM at 192.770(b) which

1 requires, you know, an emergency release
2 conducted without mitigation must be
3 documented, including the justification for
4 release without mitigation. And it sort of
5 lays out what constitutes an emergency.

6 And, as I'm looking at the language
7 in Two, it feels to me like, in a lot of ways,
8 is what we're describing an emergency. And
9 does it really need to be a recommendation for
10 an additional exception or is it more about
11 clarifying what constitutes an emergency under,
12 you know, what's already articulated in the
13 NPRM.

14 So, I guess I'm, you know, seeking
15 discussion on the idea of removing Item Two as
16 a Committee recommendation.

17 MR. DANNER: All right. Chad?

18 MR. ZAMARIN: Yeah, I think the
19 challenge with that is it doesn't -- emergency
20 response plans are typically only initiated for
21 safety purposes, and not for customer
22 reliability purposes. And so, that's the

1 intent of trying to ensure -- because a lot of
2 what we're seeing with the challenges in those
3 circumstances where you can't -- or, a
4 mitigation would delay an outage, the issue is
5 it would not activate your emergency response
6 plan, but it could put at risk markets and
7 customers.

8 And so, that was the rationale for
9 making sure we were clear that it's not just
10 avoiding a safety issue that would trigger an
11 emergency response, but also a potential outage
12 or impacts to customers that would be a
13 problem.

14 MR. DANNER: So, I wonder on that
15 one if we could bifurcate it so that
16 exceptions, if there was an emergency as
17 described in 770(b), or if the operator
18 determines that there would be a service
19 disruption or significant impact customers, and
20 then they must document those reasons after
21 they make a determination, so.

22 MR. ZAMARIN: Yeah, I think that was

1 the goal of what we tried to do. So, they're
2 saying, if it would delay an emergency response
3 -- so it would cause a problem with some form
4 of emergency response. That was I think trying
5 to be consistent with the original language.
6 And then, or result in a safety risk or
7 significant impact to customers -- so, I think
8 that was what we were trying to achieve.

9 MR. DANNER: So again, we got this
10 word significant, which is not entirely without
11 some subjectivity. If it's impact to two
12 customers, is that sufficient if it's a
13 significant impact to them, or is it an impact
14 to a significant number of customers? I mean,
15 so, we do have a little fleshing out to do
16 here.

17 MR. ZAMARIN: Yeah, I think that's
18 for the -- I mean, that exists everywhere
19 throughout the code, virtually. And again,
20 like, I think in a situation like this where
21 you don't even know the variable inputs to the
22 decision-making, it's really hard to prescribe

1 it. So, I do think that puts the onus on the
2 operator to determine significance, and then we
3 will be subject to audit and, you know,
4 enforcement if the right decision-making wasn't
5 made.

6 But, I think at this earlier stage
7 it's really hard to know all the different
8 decision-making factors that could go into
9 that.

10 MR. DANNER: All right, thank you.

11 Erin?

12 MS. MURPHY: Yeah, thanks.

13 Appreciate that explanation. Just wanted to
14 directly respond -- I think, you know, based on
15 what's already in the NPRM, it doesn't seem
16 like the Committee needs to make a
17 recommendation for an exception related to
18 emergency response. Because, it's my
19 understanding that that's addressed in what's
20 already in 192.770(b).

21 So, talking about what a outage or a
22 reliability impact looks like -- I think I'm

1 just kind of building on what Chair Danner was
2 saying, that, you know, the significant impact
3 -- the phrasing feels vague. And the idea here
4 is to mitigate blowdown emissions, mitigate,
5 you know, the lost gas and the climate impact
6 of methane emissions as much as possible. And
7 so, I think, you know, making this as clear as
8 possible so that it's not just an inconvenience
9 to a customer, it's a real, you know, outage
10 situation that can't be avoided, would be
11 useful.

12 MR. DANNER: Thank you. Chad?

13 MR. ZAMARIN: I was just going to
14 say, I think the record hopefully would support
15 that. We're trying to say significant, meaning
16 that you can't just flippantly say that this
17 would be an inconvenience to your customers.
18 So, I don't think we can solve that definition
19 here today, would be my perspective. But, I
20 would hope that the record, you know, supports
21 that our intent here -- because, it's not
22 reduce emissions at all costs.

1 I mean, there is a cost to the
2 customer, there is the potential impact to the
3 market and to our, you know, utility bills.

4 There's obviously safety concerns that are
5 downstream of the pipeline that we don't
6 control, if you have pilot lights that go out
7 creates significant safety issues. And so, I
8 just think hopefully the record -- it sounds
9 like there's pretty clear consensus that if
10 there could be negative, significant impacts to
11 customers, that that would be a situation where
12 the benefit is not worth the activity, because
13 you're creating significant potential harm.

14 And so, I don't know that we can
15 better define it, but I feel like there's
16 generally consensus around the concept.

17 MR. DANNER: Yeah, thanks. I did
18 have a question earlier that I asked Andy
19 about, the term significant impact. I mean,
20 are we talking about just a service disruption
21 or are there other significant impacts that are
22 -- I mean, safety is already called out here,

1 emergency response is already called out --
2 although, I think we could just cite to 770(b).
3 But, what are you thinking about when you say
4 significant impacts? Because, I'm not clear on
5 what that is, if it's not a service disruption.
6 Andy?

7 MR. DRAKE: Andy Drake with
8 Enbridge. I agree with Erin, I think we can
9 take out emergency response out of here. The
10 point really was about this debate between
11 customer interruption and environmental impact,
12 we're trying to figure out how to balance that.
13 And keeping it in here is important because
14 that's the crux of the conversation, is it's
15 not a zero sum game, how do you balance out
16 this decision?

17 And I think what the intent was here
18 was to try to set in place a process that would
19 involve the right people to make an informed
20 decision. And I like where Chad's going --
21 this is going to evolve over time. To try to
22 define that number -- well, it's two houses,

1 well that's too many. Well, I don't know, who
2 the heck's in that house? I mean, maybe it's a
3 hospital -- we're not going to put a number up
4 there that makes sense to anybody that's
5 informed.

6 But, I think the fact that you're
7 going through a process to talk to those
8 customers, to talk to the PUCs (phonetic), to
9 make an informed choice about an impact is
10 going to clarify that over time. But, I think
11 the real value here is that you're forcing
12 people to have that conversation, to work
13 through understanding that impact and that
14 trade.

15 And I think that that's going to
16 tighten up over time. I don't know that we can
17 tighten it up right away. I don't know what we
18 would do to do that, other than force people to
19 have the conversation, and then, you know,
20 evolve that conversation through enforcement
21 with PHMSA. I really don't, I don't know what
22 else we would do at this point. But, it's not

1 the end, that's the good news. I mean, that's
2 the start.

3 MR. DANNER: All right. And so, you
4 don't feel that we need to clarify what
5 significant impact means, just leave it as
6 significant impact?

7 MR. DRAKE: I don't know that we
8 need to do that here. I think the record
9 should be -- back to Diane Burman's comment.
10 This is more about are we touching the key
11 points here? Are we doing the right things to
12 create the right outcome eventually? And that
13 is, are we considering the right things in that
14 decision? And that should be, you know, on the
15 record, this conversation for PHMSA. Not just
16 in the rule-making, but even as they move to
17 enforcement.

18 And for operators, the intent was
19 minimize the blowdowns. It wasn't some check-
20 the-box exercise, it was a genuine effort to
21 consider how do we minimize those blowdowns
22 without creating unacceptable societal impact.

1 MR. DANNER: All right, thank you.
2 Chad, and then Erin?

3 MR. ZAMARIN: Yeah, I was just going
4 to try to give maybe, like, an example. And I
5 think your question's a good one. But, I think
6 it's really hard, again, to define it at this
7 stage with enough specificity to cover all
8 scenarios.

9 But, you know, we do integrity
10 management activities -- as we all know,
11 required by the code. And if you ran a tool
12 and you found a certain defect, and you had to
13 make an immediate repair to that defect, and it
14 were in the middle of the winter, you know, you
15 would have to go out to that pipeline, we'd
16 have to blow down the pipeline in order to make
17 the repair. And if you're in the winter, on a
18 multi-line pipeline where you can recompress
19 into another pipeline without impacting service
20 to your customers, that's what we're doing
21 today.

22 I mean, we are identifying those

1 scenarios where we can do that without
2 impacting market. If you're in the middle of
3 Winter Storm Uri and you're on a single
4 pipeline feeding a city or a town, and you
5 don't have the ability to implement that -- or,
6 by implementing it, it would increase, and it
7 does, it would increase the duration of the
8 outage many days and could put at risk
9 customers. I think that's the kind of
10 differentiation we're trying to identify that
11 we're seeing in real life.

12 I mean, those are the scenarios
13 where we're saying this, you know, doesn't
14 check that box of can I do this and not put at
15 risk my customers and the people that live and
16 depend upon the gas that we're trying to serve?
17 And so, that's an example, but there are a lot
18 of different situations I think that are hard
19 to define. Thank you.

20 MR. DANNER: All right, well, thank
21 you for that explanation. Erin?

22 MS. MURPHY: I think I forgot what I

1 was going to say. Listening to what Chad just
2 sort of walked through, I guess I want to make
3 sure that I understand -- and maybe this is
4 like clarification question to PHMSA staff --
5 that, like, a customer outage is not covered
6 under the activation of an emergency plan?

7 MR. ZAMARIN: It's not.

8 MS. MURPHY: So, it feels to me
9 like, again, looking at the language of Number
10 Two, safety risk, you know, we've discussed is
11 safety is what the emergency plan is for. So,
12 I don't think the Committee needs -- there's a
13 need for the Committee to recommend an
14 additional safety risk exception. This is only
15 about an exception if there's this significant
16 impact to customers.

17 And I mean, I would propose, you
18 know, significant outage risk to customers --
19 or, it feels like outage is the primary impact
20 that we're talking about. I also want to make
21 sure, you know, we're zooming out and
22 contemplating that a blowdown means a

1 suspension of flow on a pipeline for some
2 period of time, while the blowdown takes place
3 -- and that's happening when an operator has to
4 do a planned blowdown. The concern that is
5 being -- in my understanding, the concern
6 that's being discussed is that that might take
7 longer because of the mitigation practices that
8 would have to be implemented.

9 So, I just want to make sure there's
10 a lot of clarity here that this is about the
11 length of time that the suspension might last,
12 and if that time length would be extended
13 because of implementation of mitigation
14 practices. So, it just -- and maybe this isn't
15 helpful because there's no way we're going to
16 get clarity on this, but it's just, from my
17 perspective, like, the current phrasing feels
18 really open-ended. And again, I don't think
19 the safety risk needs to be in there and I
20 think the significant impact to customers could
21 maybe be further clarified.

22 MR. DANNER: All right, thank you.

1 Chad, last word and then we're going to have to
2 take stock.

3 MR. ZAMARIN: Yeah, I'm just trying
4 to give a little more perspective. I think
5 that's the challenge with trying to set
6 prescriptive, like, scenarios here at an
7 initial regulation. I mean, the idea that
8 we're going to start requiring these activities
9 on large blowdowns, we're going to report on
10 them, we're going to start documenting the
11 results -- we're going to require that
12 operators have to document and support if they
13 can't use these methods or they would cause
14 risk to customers, I think that's the way you
15 have to start a regulation in this framework.

16 Because -- and to answer your
17 question, yes, the primary issue is any one of
18 these methods could extend the length of an
19 outage, could reduce the pressure on a pipeline
20 that otherwise would be required to serve
21 customers. And so, I think there are a lot of
22 unintended consequences. But again, I think to

1 try to be more specific, I'm not sure we can
2 capture every unknown.

3 And so, I think when you say
4 something like significant impact to customers,
5 it requires an operator to demonstrate that
6 there would have been a significant impact.
7 And like I said, that kind of language exists
8 in many parts of the regulatory framework. And
9 it is debated, but over time I think the record
10 usually supports what the right definition
11 would be. And so, I'm not sure we can do
12 better than that at this stage, but I think
13 it's a significant improvement from where we
14 are today.

15 MR. DANNER: All right. It is
16 12:40, and we've had a very productive morning.
17 I am a little disappointed that we haven't
18 finished the entire leak detection rule by now,
19 but I think -- let's take our lunch break and
20 then we will come back. And at that point
21 we'll try and get an assessment of the language
22 that we have up here, what further refinements,

1 if any, need to be made, and then see if we can
2 get a vote on the ONM and venting.

3 So, with that we will be back at
4 1:45. Thank you.

5 (Whereupon, the above-entitled
6 matter went off the record at 12:40 p.m. and
7 resumed at 1:52 p.m.)

8 MR. DANNER: All right, we're going
9 to call this meeting back to order. Hope you
10 had a good lunch.

11 We are now going to talk about the
12 language that we have in front of us. Let me
13 call on Andy Drake.

14 Andy, do you want to set up the
15 conversation?

16 MR. DRAKE: Yeah, I appreciate this.
17 I'm Andy Drake with Enbridge. Good
18 conversation at lunch, appreciate so many
19 people, you know, taking some time and helping
20 us kind of frame some things.

21 What we thought we would do is maybe
22 put language up here, take each of those

1 proposals one at a time. And let's break them
2 down to principles.

3 I think Commissioner Burman had a
4 good idea there, and I think that really may
5 help Robert Ross with what is it we're trying
6 to do here and create some -- or tangibility
7 and context to the criteria of the principles
8 we're trying to protect in each one of those
9 bullets.

10 So I think if we start with the
11 first bullet. I don't know where, John, did
12 you get some language there? If you want to
13 just flip that up there. Yeah, just throw it
14 up there.

15 I think when we look at what we're
16 really trying to do is really this was intended
17 to address large diameter pipeline blowdowns.
18 It was not intended to address things like
19 station work. It wasn't intended to address
20 things like maintenance work on meter stations.
21 It wasn't intended to deal with things like
22 ESDs.

1 So we were trying to give some more
2 criteria in this that would really help define
3 what we're trying to do, what were the
4 principles associated with that first bullet.

5 And if we could as a committee agree
6 to those principles, then the number is a
7 product of maybe some more data that can get to
8 in another, in a second iteration here, or some
9 threshold, some more tangibility around it
10 could be a separate secondary conversation.

11 But I think this piece right here is
12 really reflective of that conversation. But I
13 just want to throw that up there maybe as a
14 straw man for folks to comment on.

15 And then we could move into the
16 second bullet, which the second one was really
17 about the intent as to address scenarios that
18 would affect customer outages. But that would
19 be the principle around that second bullet.

20 So let's just maybe start with the
21 first bullet and with that, I'll just kind of
22 open the floor.

1 MR. DANNER: So just to clarify, are
2 -- would you be looking to replace No. 1 with
3 this, or to throw this onto No. 1?

4 MR. DRAKE: Right now I think we're
5 just sort of suspending a vote on the first,
6 the previous proposal and just making sure this
7 group is all aligned on the principles, which
8 is really the request I think that Commissioner
9 Burman asked prior to break.

10 So we just said, well, these are the
11 principles that we are trying to work to on the
12 first criteria. If we agree to that, then
13 maybe we can have another conversation that
14 might provide more tangible code language.
15 They're a recommendation, not code language, a
16 recommendation to PHMSA. Does that make sense,
17 Commissioner?

18 MR. DANNER: Yeah, it does. Okay,
19 Arvind?

20 MR. RAVIKUMAR: Thanks, Andy. And
21 so I agree with this approach on the principles
22 of what emissions to include and exclude for

1 this specific criteria. Let me build on top of
2 this.

3 Just over the lunch, I was looking
4 at all the data that are available on blowdown-
5 related emissions, and it covers I think one,
6 two, and three for the most part for which we
7 already, we have available data on. So what
8 I'm thinking is we know this.

9 If we agree on this, then we'll look
10 at what are all the emissions that we know of
11 from blowdowns associated with these events,
12 and set a threshold that's way beyond that so
13 that we know for sure the threshold excludes
14 all of these emissions.

15 And just by looking at the data,
16 that threshold is anywhere between .2 and .5
17 mmcf. And if we take as a threshold, by
18 definition that threshold will exclude
19 emissions from all of these categories.

20 MR. DANNER: Any response to that?
21 So one of the things that we did have in the
22 No. 1 that was up on the other screen was a

1 reference to data. That's something we want to
2 retain, Andy.

3 MR. DRAKE: This is Andy Drake. I
4 think fundamentally, and I appreciate Erin's
5 point. We're at the front of the ship here.
6 We are in an information-gathering place right
7 now. And I think that we want to try to get as
8 much information coming into the machine as
9 efficiently as we can to make better choices
10 going on.

11 I think it's its own discussion. I
12 think there's a reporting section of the
13 regulation -- of this discussion here, No. 6,
14 that we're going to talk about reporting. I
15 think the thing that I saw that was important
16 in this specific proposal was that we want to
17 document the reasons why we made the choices we
18 made.

19 That's important. Reporting other
20 things, I would move that to Section Six
21 discussion so that we talk, I think it's really
22 important to have that conversation about data

1 collection, whether it's documentation or
2 reporting, in one consolidated place so that we
3 know how we're getting all this information.

4 I don't think it serves us well to
5 do it piecemeal. So the piece about reporting
6 that I think is relative to me on this proposal
7 is that we should be able to document the
8 decisions they were -- why they were made.

9 And that's the documentation piece
10 here. But data collection about how much
11 emissions we're doing, that's later. I'm not
12 saying we don't want to talk about it, I'm just
13 saying it's Section Six, not this section.

14 MR. DANNER: Other thoughts?
15 Commissioner Burman?

16 MS. BURMAN: So thank you for
17 putting this up there. I think it's really
18 helpful because, again, I come back to what are
19 the principles that we all can agree on. And
20 looking at this helps us then make sure that
21 we're all on the same page as we move to the
22 next.

1 And Arvind, I think your comments
2 were very helpful for that next sort of step.

3 I just want to make sure that, you know, as I
4 see it, that this is principles that we can all
5 agree with and you know, make sure that we're
6 not missing something that, you know, or
7 characterizing it differently than it is.

8 But I think it's great, so thanks.

9 MR. DANNER: All right. Sara?

10 MS. GOSMAN: Yeah, so I like these
11 principles. And I also feel the need to
12 clarify again because I don't think I was clear
13 before that actually the number I was
14 suggesting was .5, right, mmcf, just to make
15 sure that everybody understood.

16 So you know, I think Arvind's data
17 is really important to this discussion. I
18 think it's on the record. I like having that
19 on the record. I think this helps us to
20 understand again sort of what we're trying to
21 get at here, and for that reason I like it.

22 I don't think we need a number on

1 the record, but if we were to have that, right,
2 I think I'd want to do the range that Arvind
3 mentioned.

4 And then on reporting, I'm fine with
5 having that discussion later. I will say, you
6 know, there are specifics related to this
7 blowdown mitigation that we're interested in
8 getting, things like the methods used. And so
9 I just don't want to forget that piece when we
10 address that reporting requirement later,
11 because it is very specific I think to this
12 particular provision.

13 MR. DANNER: So I am not seeing any
14 further cards. I'm hearing that we have a
15 consensus that this language would serve as our
16 first sentence in our recommendations. Is --
17 Erin Murphy?

18 MS. MURPHY: So I may just not
19 totally understand the process. We're
20 discussing including this language as part of
21 the committee's recommendations to the agency
22 in addition to the other list of items that

1 we'd previously developed?

2 MR. DANNER: This would be in lieu
3 of the first item on the other sheet, as I
4 understand it.

5 Andy Drake?

6 MR. DRAKE: Andy Drake with
7 Enbridge. Right now my intent was just to get
8 us aligned on principles, not actually to come
9 up with recommended language to PHMSA. This is
10 really more for creating a record, frankly, and
11 getting alignment.

12 I think the next step might be, I
13 don't mean to speak for everyone at the table,
14 might be to propose language that we would give
15 to PHMSA on this specifically. So I wouldn't
16 say this supplants the prior one. I think this
17 is just sort of a timeout to get alignment on
18 principles.

19 MR. DANNER: Okay, but just to be
20 clear that when we vote, we're going to be
21 voting on this language, not the first sentence
22 of the other sheet. Is that your intent, Andy?

1 MR. ZAMARIN: This is Chad Zamarin.
2 I think the other -- there's maybe an intro on
3 the other language that says a threshold should
4 be established and that these are the
5 principles against which a threshold should be
6 established.

7 So I do think there's a little bit
8 of maybe combination of the two, but the idea
9 being that we're not going to -- I don't know
10 that we're going to solve a number here. We've
11 got some good I think data that Arvind brought
12 on the record.

13 But the idea that a threshold needs
14 to be established that should be consistent
15 with these principles, I think that's what's
16 being proposed.

17 MR. DANNER: Okay, so what we're
18 doing is we're hanging this language onto
19 sentence -- after this first sentence. Still
20 bullet point one.

21 MR. ZAMARIN: Yeah, it looks like
22 that's been -- that's been updated. I think

1 that would be I think the proposal on the
2 table.

3 MR. DANNER: Okay. Commissioner
4 Burman, did you?

5 MS. BURMAN: No, I just wanted to
6 sort of echo that. I think that it's really
7 important that as we move forward, that the
8 committee to the extent that we are level-
9 setting what we can agree to as principles and
10 delve into some of these issues.

11 There will be thornier issues that
12 we'll have to look to, but to the extent that
13 we're trying to establish that we are as a body
14 collaborating together and trying to make sure
15 that we're all on the same page, it's really
16 important that we speak as much as we can with
17 one voice, incorporating everyone's diverse
18 perspectives.

19 And so I think that the discussion
20 earlier today was helpful to then get us to
21 take a step back in terms of not locking into a
22 specific numerical number. However,

1 understanding that the intent and what we're
2 trying to do is really being brought out here.

3 And then we can get to other perhaps
4 areas that we will need to, but first and
5 foremost is to establish where we have
6 agreement and what, again, getting back to, you
7 know, the attorneys who keep bugging me over
8 here. Sorry.

9 That it's really important that they
10 have the legal -- they hear from us our
11 rationale and considerations so that there's
12 some, you know, legal considerations that are
13 being looked at as we move forward so that they
14 can do their job that they need to do as well.

15 MR. DANNER: All right, Erin?

16 MS. MURPHY: Thanks, all. That's
17 helpful clarification.

18 I think -- can we flip back to the
19 principal slide, please. Thank you. Yeah, I
20 think you know my first read of this was just a
21 bit of discomfort that, you know, the intent of
22 the provision was the provision was not aimed

1 at, you know, feels to me like we're kind of
2 telling PHMSA was the intent of its own NPRM
3 is, which doesn't feel like the right posture
4 for the committee.

5 But if this in fact is the intent of
6 the committee is, or the committee's
7 understanding is that the intent of this
8 section of the NPRM is to address large
9 diameter pipeline blowdowns, I think, you know,
10 that makes more sense to me.

11 But this list of de minimis
12 emissions is new, right? It's not something
13 that was in the NPRM.

14 So I guess I'm not sure that I am
15 comfortable with this level of detail in a, you
16 know, recommendation to vote on. But I am
17 trying not to bog us down if that's not, if
18 this is not, you know, language we're trying to
19 all get to consensus on right now.

20 I understand, you know, the sort of
21 explanation that these are smaller events with,
22 you know, a smaller blowdown event, and

1 therefore less mitigation. And that maybe not
2 focusing on these and focusing on the larger
3 events would make more sense for a
4 recommendation to the agency.

5 MR. DANNER: So would you want to
6 change this to say the committee intends that
7 this provision address?

8 MS. MURPHY: Well, I don't think we
9 are -- my perception was that this is a
10 discussion of principles, and then based on
11 this we would draft new language for number
12 one. So I didn't think we were trying to
13 finalize this language, but I defer to the
14 chair.

15 MR. DANNER: It's my understanding -
16 - well, you know, we have a few other items to
17 get to this week. So I'm hoping that this --
18 that we could clarify what the intent of No. 1
19 is. I think it we're keeping the language on
20 the other slide and this is additional, then
21 this is really meant to illustrate what our
22 intention is and to provide PHMSA with guidance

1 and they're developing the rules.

2 MS. BURMAN: Can I offer a
3 suggestion?

4 MR. DANNER: Yes.

5 MS. BURMAN: Okay. So I think that
6 really what we're trying to say is the GPAC
7 committee, as a body, believes that the intent
8 of this provision is to address large diameter
9 pipeline blowdowns. And understanding that the
10 provision does not seek to, and again, I
11 understand you might want to switch the was not
12 aimed at.

13 And this includes the principles of,
14 and these are the things that we're laying out.
15 So that it really is the intent for our
16 sharing, our principles is to address scenarios
17 that would consumer -- customer outages. So
18 really it's the GPAC is giving a flavor for how
19 the -- how we're coming up with principles and
20 perhaps recommendations for consideration as we
21 move forward.

22 And so it is needing to all of us be

1 on the same page about what the intent of the
2 provision is. We can't obviously say it is
3 clearly intended to do X because everybody may
4 have a different interpretation. But as we see
5 it, we believe that the intent of this is to do
6 this. And these are the principles that we
7 hold with that for consideration.

8 MR. DANNER: All right, and I would,
9 as a friendly amendment, I would change the was
10 to is in the first sentence there.

11 I've lost track of who's next.
12 Brian?

13 MR. WEISKER: I just had a question.
14 Arvind, you mentioned the data that you looked
15 at earlier is -- was that .2 to .5, was that
16 for, I guess for stations, is that? Or was
17 that for actual, for pipeline segments?

18 MR. RAVIKUMAR: Stations.

19 MR. WEISKER: For stations?

20 MR. RAVIKUMAR: So everything that
21 have data on blowdowns, were blowdowns at
22 stations for some of these exclusion

1 categories. We actually don't have any data on
2 pipe segment blowdowns, which are the large
3 numbers that we discussed.

4 Which is why I said we know what we
5 won't exclude and we know what the emissions
6 are. So you set threshold way above that that
7 should automatically take care of these things.

8 MR. WEISKER: And those were
9 transmission stations.

10 MR. RAVIKUMAR: Yeah, transmission
11 storage compressor stations.

12 MR. WEISKER: Thank you.

13 MR. DANNER: All right, Sara?

14 MS. GOSMAN: All right, so not to
15 wordsmith too much here, but just as a lawyer,
16 I feel like the answer is we are excluding de
17 minimis submissions, right. De minimis
18 submissions include this list of possible
19 scenarios.

20 Just think that that's -- I don't --
21 I also don't like the intent issue because
22 we're not here to judge PHMSA's intent or

1 really the intent of what this policy is about.

2 We're saying we're recommending an
3 exclusion. Our exclusion is for de minimis
4 submissions. And we have this series of
5 examples of de minimis scenarios, right, for
6 that exception. And we leave it there.

7 MR. DANNER: Would you like to
8 suggest some language on the first sentence
9 there?

10 MS. GOSMAN: Yeah, okay. (Off mic
11 comments.)

12 MR. DANNER: And de minimis is M-I-S
13 at the end.

14 MS. GOSMAN: So I would say, PHMSA
15 recommends that -- sorry, apologies. The GPAC
16 recommends that PHMSA exclude de minimis
17 submissions, which would include one through
18 five there.

19 MR. DANNER: Andy Drake or Chad, do
20 you have some views on that?

21 MR. DRAKE: I think it may be
22 helpful also to not just talk about what it's

1 not about. But I think it would be helpful to
2 talk about what it is about. It is intended,
3 however we want to word that, to address large
4 pipe blowdowns, large diameter section pipeline
5 blowdowns.

6 Because that, that is what it's
7 about. We're trying to give guidance to PHMSA.
8 To talk about what it isn't is sort of helpful,
9 but helping what it is also helps. So I just
10 offer that in thought.

11 MR. ZAMARIN: Yeah, and this is Chad
12 Zamarin. I wonder if, going back to the
13 language, I'm not sure, I agree, I don't think
14 it's our job to define what PHMSA's intent is.
15 But maybe we say the GPAC recommends that this
16 section address large diameter blowdowns and
17 not be focused on the de minimis emissions
18 events including.

19 So I think it's -- I think it's
20 taking the language as it was, but instead of
21 saying that this is PHMSA's intent or the
22 intent of the section, that the GPAC recommends

1 that, you know, this address -- this section
2 addresses and excludes.

3 And maybe it needs to say that sets
4 a threshold, because I know we've talked about
5 thresholds here. I know we're not saying we're
6 going to set that threshold, but maybe we just
7 need to.

8 MR. DANNER: I think we had that in
9 the other language that we're hanging this
10 onto. So if we took your --

11 MR. ZAMARIN: Oh, you're right, I'm
12 sorry.

13 MR. DANNER: Edits here --

14 MR. ZAMARIN: You're right, yup,
15 thank you.

16 MR. DANNER: And hung it on the
17 other, I think we've got that captured. Erin?

18 MS. MURPHY: Thanks. You know, to
19 respond, the proposed -- the proposal issued by
20 PHMSA is not focused only on large blowdowns.
21 It's phrased to apply to all blowdowns except
22 for emergency situations.

1 So I just want to recognize that the
2 committee is discussing a recommendation to the
3 agency to narrow the proposal. And so I think
4 that's why I'm feeling, you know, a little like
5 it doesn't really make sense for the committee
6 to represent that from the start, PHMSA was
7 aiming to only focus on large blowdowns.

8 So that's why I think the GPAC
9 recommendation to exclude de minimis
10 submissions feels like sort of that is, that's
11 what we're recommending, right, that the
12 smaller events.

13 MR. ZAMARIN: Yeah, I think we
14 agree. And hopeful does that language work for
15 you then? I think what we're saying is this is
16 a GPAC recommendation. This is not our
17 interpretation of PHMSA's intent. This is us
18 recommending this section addresses blowdowns
19 of these segments and not these de minimis
20 events.

21 MR. DANNER: Yeah, but she's saying
22 it's more than just the blowdowns in large

1 pipeline segments, is that correct?

2 MS. MURPHY: I think I'm saying that
3 I don't have the technical expertise to know if
4 blowdowns of large pipeline segments and then
5 this list of one through five is the entire
6 universe of sort of potential blowdown events
7 that might be encompassed by the NPRM.

8 And so it feels like the area where
9 we have consensus is the exclusion -- is
10 recommending, you know, the exclusion of these
11 smaller scale events. And I'd feel more
12 comfortable just sort of putting that specific
13 statement in the recommendation and not saying
14 that we recommend it only address the blowdowns
15 of large pipeline segments.

16 If I'm not making sense, you can
17 tell me that for sure.

18 MR. DANNER: While you're mulling
19 that, Peter.

20 MR. CHACE: Thank you. Pete Chace,
21 NAPSRS.

22 Quick question. When you say ESD

1 testing, what kind of testing are we talking
2 about? Because I can picture that being a
3 truly impressive amount of emissions.

4 MR. DRAKE: It could include an
5 entire compressor station, multiple pipelines,
6 quite significant.

7 MR. CHACE: Well, is that the type
8 of thing we want to exclude?

9 MR. ZAMARIN: Yeah, again, I think
10 we need to go back to the data on that. I
11 mean, it's -- those are not the scenarios where
12 we have great options for recompression.

13 I mean, again, when I think about
14 where this, the intent of this segment was,
15 which is why I do think, Erin, I think it's
16 important to -- and I appreciate we're adding
17 more specificity than was in the original
18 language.

19 But the focus has been on mainline
20 pipeline blowdowns and mitigation activities
21 that we can implement to minimize the emissions
22 from those blowdowns. We don't have the same

1 size of emissions from our compressor stations.

2 But also, I mean, again, we're
3 talking about the difference between a 50-mile
4 segment of a pipe and a single facility. And
5 the technologies that we're working on are
6 designed to recompress gas from a long, large
7 segment of pipe.

8 Those aren't being -- those are not
9 the same capabilities that we have in like a
10 compressor station where we have to test the
11 ESDs, the emergency shutdown device, we have to
12 test that device.

13 Again, I think we've got to start
14 with what the real issue has been and that
15 we're focused on, which, when I look at the
16 language, it's very clear to me that it only
17 works for pipeline blowdowns. And but it has
18 the potential to pull in things that weren't --
19 that will not be practical.

20 MR. DANNER: Could we just modify
21 No. 5 by just saying certain ESD testing and
22 leave it -- leave it alone otherwise?

1 All right, Andy, you have your card
2 up.

3 MR. DRAKE: This is Andy Drake with
4 Enbridge. I really think that what strikes me
5 in the reason to include, you know, to argue.
6 But I think if we're not going to come out with
7 a definitive threshold number, which I think is
8 sort of, we're sort of tabling that right now.

9 We're trying to give more context
10 and clarity about what it is to give guidance
11 to PHMSA to define in enforcement. What is it?

12 I'm sorry, but Rod, you're the man
13 of the hour. So we're trying to help provide
14 them clarity about what is it that we're trying
15 to get them to focus on. And so we're sort of
16 backing into it a little bit.

17 It's like, you know, we look at
18 Arvind's numbers and other numbers, and they're
19 telling us large section blowdowns are, you
20 know, 500, you know, a million, whatever. And
21 I think now we're just taking the number out.
22 And we're saying things like this and things

1 not like that.

2 So things not like, you know,
3 station work. We don't want to do barrels, we
4 don't want to do meter station work. We don't
5 want to do routine work in the compressor
6 station. Those aren't the things that are the
7 big volumes.

8 So in the absence of giving a
9 number, we're trying to give characterization.
10 That's really where the what-is-it part came
11 from. It wasn't meant to, let me see, meant to
12 exclude. I guess it was kind of meant to
13 exclude. It was meant to focus on what it is
14 that they should be looking at when they come
15 to enforce.

16 I don't know if that helps, but that
17 was the intent of the conversation.

18 MR. DANNER: All right. And I do
19 want to remind us that we are sort of focused
20 here on this as a principle, not as legally
21 binding. And of course, you know, this is to
22 help PHMSA actually draft the rules, and we're

1 just advising.

2 So Chad?

3 MR. GILBERT: Yes, my thoughts from
4 hearing the very good collaboration, and to
5 thank PHMSA for the job that you have done
6 putting together the NPRM.

7 But the threshold should be
8 established, and that would eliminate the type
9 of conversation that we're having now. And I
10 feel that PHMSA would be the one that would
11 have the data in the communication to establish
12 that threshold. Thank you.

13 MR. DANNER: Thank you. All right,
14 I think at this point maybe we need to call the
15 question on this one. We have some language
16 here that we would append to the No. 1 on the
17 other slide. And this would be -- so this is
18 basically our recommendation to PHMSA.

19 And I think we've negotiated some
20 language here that I can live with. And so
21 could I just get -- this isn't going to be the
22 formal vote. We'll take a formal vote when we

1 get through all five of these.

2 But can I just get a sense, are we
3 ready to move on from this one? Anybody not
4 ready to move on from this one?

5 Erin, you're frowning. Diane?

6 MS. BURMAN: Yeah, I just, I think
7 it's really important that we take a collective
8 vote, but I also think it's important that we
9 have initially unanimous agreement here.
10 Because I do think that we're laying the
11 framework for how we're then going to delve
12 into other things.

13 And so for me, the first vote should
14 be non-controversial in that we're coming to
15 agreement, we're understanding where we are.
16 We started out with, you know, disagreement on
17 what that number should be. And I think we've
18 gone now to trying to understand each other and
19 trying to incorporate the principles that will
20 help for consideration that PHMSA will then
21 have to look at.

22 And there's nothing technically

1 legally binding in that these are our
2 recommendations for PHMSA to consider. And so
3 we're really trying to give them the tools
4 based on our collective voices here.

5 So I just want to make sure that we
6 don't sort of -- if there are still needs for
7 some, you know, tweaking, that we do that
8 before we vote, we jump into something.

9 MR. DANNER: Yeah. Chad and then
10 Sara? Oh, okay, your tent card's up.

11 MR. GILBERT: Oh, I'm sorry.

12 MR. DANNER: Sara?

13 MS. GOSMAN: Yeah, so I'm in
14 agreement with this and I appreciate the way in
15 which we've come to a middle here and using
16 principles to understand what the policy issue
17 is. I will just put forward what's meant to be
18 a friendly amendment, which is I think de
19 minimis matters here. That's the term we use
20 in the principles.

21 So I think if we could add that here
22 instead of minimum volume, it just connects

1 this language to the principles language that
2 we have in that next slide. And it also makes
3 clear that what we really care about here is,
4 you know, we're not putting a number here,
5 right. But what we're trying to get at are
6 these smaller blowdowns.

7 And that it's not about sort of
8 methods, right. We have methods are another
9 question. It's really about the volume here.
10 And so de minimis captures that I think very
11 well. So friendly amendment.

12 MR. DANNER: Okay, so as it is
13 written up here now? Any thoughts or anyone
14 opposed to that amendment? Okay. So I think
15 we are ready to -- John?

16 MR. GALE: Can we get somebody to
17 read the principles into the record so it gets
18 into the transcript?

19 MR. DANNER: Yeah, do we need to do
20 that now or can we do that when --

21 MR. GALE: We can do it later --

22 MR. DANNER: When we take the final

1 vote, yeah. And it might be if you can cut and
2 paste and put this onto the other slide, it
3 would be very helpful.

4 So No. 2, exceptions if there would
5 be a safety risk or significant impact to
6 customers, operators must document the
7 justification and rationale for such
8 exceptions.

9 Anyone have any issues with this
10 one? Brian?

11 MR. WEISKER: This is Brian Weisker,
12 Duke Energy. I'll wait for No. 4 to come up,
13 sorry.

14 MR. DANNER: All right. Anyone want
15 to comment on this one? Diane?

16 MS. BURMAN: Yeah, I'm just
17 concerned that we're going to get off track or
18 lose track if we don't have, take the first
19 vote on the first bullet combined with the
20 principles. We can do that and then get to the
21 next sort of bullets and go through in I think
22 a much more deliberative fashion. And also

1 make sure that we're all on the same page.

2 Otherwise I'm afraid we'll start
3 slipping back into, you know, what we -- what
4 we didn't vote on and wanting to tweak. So I
5 feel like if we take the first, it helps us.

6 MR. DANNER: Well, that means we may
7 have five votes then.

8 MS. BURMAN: That's fine.

9 MR. DANNER: That's all right with
10 you?

11 MS. BURMAN: Ten votes are good by
12 me.

13 MR. DANNER: I think we can limit it
14 to five.

15 All right, can we see the -- it is
16 possible to cut and paste the -- okay. But I
17 will begin reading this one.

18 So, it is before the committee to
19 approve the following language. PHMSA should
20 create an exception to Section 192.770 for non-
21 emergency blowdowns with a de minimis volume
22 consistent with the principles outlined by

1 Member Drake and considering available data on
2 releases -- releases from blowdowns.

3 The GPAC recommends this section
4 address blowdown of large pipeline segments,
5 but exclude de minimis submissions, including,
6 one, blowdowns of launchers and receivers that
7 may be -- may not be within the confines of a
8 compressor station. Two, blowdowns from work
9 on measurement and regulation stations.

10 Three, blowdowns from maintenance
11 work on compressor units and associated
12 equipment including relief systems and filter
13 separators. Four, blowdowns to conduct an
14 immediate anomaly and excavation. And five,
15 ESD testing.

16 So that is the language before us.
17 I think there are some friendly amendments to
18 clarify things.

19 Andy?

20 MR. DRAKE: This is Andy Drake with
21 Enbridge. I would recommend that we take my
22 name out of there. I think that --

1 MR. DANNER: I was going to -- I was
2 going to do that too. Actually I was going to
3 -- I thought we'd want to memorialize your
4 participation here.

5 MR. DRAKE: I appreciate that right
6 before I retire.

7 MR. DANNER: Yeah.

8 MR. DRAKE: That I would be
9 memorialized somehow.

10 MR. DANNER: Yeah, this would be the
11 Andy Drake rule. So Erin?

12 MS. MURPHY: Were we going to add
13 certain ESD testing?

14 MR. DANNER: I did propose that. Is
15 there a -- because Peter raised concerns that
16 ESD testing could be very large and
17 significant. And I just, I threw out the word
18 certain there just to clarify that not all ESD
19 testing is the same.

20 Peter?

21 MR. CHACE: And just my
22 understanding of ESD testing, right, you can

1 essentially simulate the electronics of lifting
2 things. Or you can just cut it loose, and I
3 mean the ground shakes like it's a -- well.
4 There's ESD testing and there's ESD testing.

5 Another point is blowdowns to
6 conduct an immediate anomaly. There's always
7 the option of taking a pressure reduction until
8 you can get the gear out there. So some of
9 this --

10 MR. DANNER: So --

11 MR. CHACE: I think there's some
12 devils in these details.

13 MR. DANNER: Okay, Brian, did you --
14 oh, you just set your card down. Did you want
15 to say anything?

16 MR. WEISKER: I have some for the
17 last bullet. But I think he should answer --

18 MR. DANNER: Okay, Chad.

19 MR. WEISKER: Help answer Peter's
20 question.

21 MR. DANNER: Chad, you want to?

22 MR. ZAMARIN: Yeah, just one cleanup

1 note. I don't know that we need that very,
2 very last bullet below five on scenarios
3 affecting customer outages. I thought that was
4 on a different topic.

5 MR. DANNER: It is, that's not part
6 of this recommendation.

7 MR. ZAMARIN: Okay. And then on the
8 point about ESDs, I don't disagree, but I would
9 also save that maybe for a different
10 discussion.

11 I mean, right now operators are
12 trying to fit -- trying to develop methods for,
13 again, I think of when I list, when I read all
14 the requirements of this section, it's about
15 mitigating emissions of blowdowns where the
16 tools that we've identified could be
17 applicable.

18 That would not be applicable in a
19 station ESD test. We are working on
20 methodologies to minimize, and to your point,
21 to test different methodologies that simulate
22 an ESD but don't require a blowdown in the

1 facility.

2 I don't think it fits in this
3 section. In this section, if that falls under
4 the -- into the discussion, we'll be doing
5 things like recompression and those just don't
6 -- those aren't designed for station ESD tests.
7 So I do think you have to be clear.

8 And if that's an issue that needs to
9 be further addressed from the regulations
10 perspective, I think it fits somewhere else. I
11 just don't think it fits here.

12 MR. DANNER: So you want to take out
13 five altogether, or?

14 MR. ZAMARIN: No, I would leave ESD
15 testing. And I would, again, I wouldn't say
16 certain ESD testing unless somebody can show
17 that the methodologies that are identified that
18 need to be implemented could be implemented for
19 ESD testing and reducing emissions.

20 I think they are -- it is clear to
21 me as an operator that when I read those lists
22 of mitigation measures, that those are focused

1 on what you would do to minimize the blowdown
2 of a pipeline segment, not of a station test of
3 an ESD system.

4 MR. DANNER: So again, this is just
5 a principle that we're sending to PHMSA, and I
6 think based on the discussion, PHMSA knows what
7 we're talking about. And I think they'd know
8 what we're talking about either way.

9 MR. ZAMARIN: Yeah.

10 MR. DANNER: So what is the sense of
11 the group, does the word certain go or stay?

12 Brian?

13 MR. WEISKER: Brian Weisker. I
14 suggest it goes. Just because when I think
15 about ESD testing, it's designed for, I mean,
16 you think about probably the most important
17 critical test that we perform at a compressor
18 station to assure that in an emergency that
19 it'll shut, your unit will shut down safely.
20 And I think that's the reason behind having an
21 ESD test.

22 And so I just think, I think it

1 needs --

2 MR. DANNER: All right, Peter, you
3 have thoughts on this?

4 MR. CHACE: Yeah, I think that's
5 fair, that's just.

6 MR. DANNER: All right. Sara?

7 MS. GOSMAN: Yeah, so. So we are so
8 close. So I think that Chad, what I'm hearing
9 from you is that there's a different concern
10 here. It doesn't relate to sort of the de
11 minimis piece, it relates to something about
12 whether this just works, right, in this
13 situation.

14 I don't feel like that's our list.
15 Like our list is really about de minimis, which
16 is why I think that volume thing matters. So I
17 think certain gets at that issue and doesn't
18 create a new exclusion. I feel like what
19 you're recommending is sort of a different
20 category of exclusions.

21 And frankly I don't have enough of
22 the technical knowledge to know what that would

1 look like, right. So I think rather than, you
2 know, you get that on the record, right. You
3 get your concern on the record.

4 We acknowledge that not all of that
5 ESD testing may be subject to this exclusion.
6 We leave it to PHMSA to make that
7 determination. Then we vote and move on.

8 MR. DANNER: So my problem is I'm
9 okay either way. So I have to leave it to you
10 to decide where we go.

11 Chad, yes.

12 MR. ZAMARIN: Yeah, I think I
13 understand. I'm not -- I think the problem
14 with having it in there implies that there are
15 certain ESDs for which this section should
16 apply. And I think we're trying to give clear
17 guidance on how the threshold should be
18 established and what PHMSA should be mitigating
19 emissions for.

20 And you know, these are just
21 examples and there are others. But this seems
22 like a pretty obvious one to me where when you

1 look at the data you look at station ESD
2 testing, you can't have a threshold that pulls
3 in a station ESD test and then applies a bunch
4 of techniques that don't work for a station
5 ESD.

6 So I worry that having the language
7 -- having certain added implies that there are
8 some station ESDs that we think are intended to
9 be addressed. And I just don't think that's
10 the case.

11 I can go on the record with that
12 concern, and we can move on, but I think,
13 again, I think clarity matters. And I think
14 this makes it less clear and opens it up to
15 interpretation.

16 MR. DANNER: All right. Diane.

17 MS. BURMAN: I wonder if we could
18 strike certain and do an ESD testing as
19 relevant or as relevant to the intent or
20 something, so that it's clear and you don't --
21 because I do think that if you see certain ESD
22 testing, you know, a regulator like the state

1 regulator may say, well, what's in, what's out.

2 And so the ESD testing is relevant,
3 PHMSA will understand what that is. And I
4 think it won't create a confusion. I don't
5 know if that helps, if that gets us to all
6 being okay with it. But it doesn't get rid of
7 your concern, Erin. It makes sure that it's
8 there.

9 MR. DANNER: So, thoughts on this?
10 Okay, I think you've come up with a solution.

11 Peter?

12 MR. CHACE: My point was just that I
13 would not describe ESD testing as a de minimis
14 activity whatsoever. If it's outside of the
15 scope of what we're trying to achieve, that's
16 fine.

17 MR. DANNER: Okay, but if it's
18 relevant, it's included, if it's not relevant,
19 it's not. So I think -- I think we've got it.
20 With the language that is up on the screen,
21 John Gale, do I have to read this again, or do
22 we think it's captured?

1 MR. GALE: John Gale, PHMSA.
2 Chairman, it would be best if we actually had a
3 motion and that a committee member made a
4 motion. But we can -- I think it's also
5 important actually for the staff that it gets
6 read into the transcript. Because right now,
7 it is not read into the transcript.

8 MR. DANNER: All right. All right,
9 this truly is the Andy Drake rule.

10 Andy, would you like to make a
11 motion?

12 MR. DRAKE: Andy Drake with
13 Enbridge. I thought that would come back to me
14 somehow, so I just thought I'd be proactive in
15 that.

16 I'd like to propose that the
17 proposed rule as published in the Federal
18 Register and as supported by the Preliminary
19 Regulatory Impact Analysis and Draft
20 Environmental Assessments with regard to
21 blowdown mitigation, Section 192.770, is
22 technically feasible, reasonable, and cost-

1 effective and practicable if the following
2 changes are made.

3 One, that PHSMA should create an
4 exception to 192.770 for non-emergency
5 blowdowns with a de minimis volume consistent
6 with the principles outlined below and
7 considering available data to release on
8 releases from blowdowns.

9 One, that GPAC recommends the
10 section address blowdowns of large diameter
11 pipeline segments but exclude de minimis
12 emissions, including: 1, blowdowns of launchers
13 and receivers that may not be within the
14 confines of a compressor station. 2, blowdowns
15 from work on measurement and regulation
16 stations.

17 3, blowdowns from maintenance work
18 on compressor units and associated equipment
19 including relief systems and filter separators.
20 4, blowdowns to conduct an immediate anomaly
21 repair and excavation. And 5, ESD testing as
22 relevant.

1 MR. DANNER: Thank you very much.

2 Is there a second? Sara?

3 MS. GOSMAN: I second.

4 MR. DANNER: Thank you very much.

5 All right, we're ready for the vote.

6 Cameron, do you want to take roll?

7 MR. SATTERTHWAITE: Sorry. Okay. I
8 will say your name, and if you agree, say yes,
9 if not, say no, and I will tally the votes.

10 I'll start off with Diane Burman.

11 MS. BURMAN: Yes.

12 MR. SATTERTHWAITE: Peter Chace?

13 MR. CHACE: Yes.

14 MR. SATTERTHWAITE: David Danner?

15 MR. DANNER: Yes.

16 MR. SATTERTHWAITE: Sara Longan?

17 MS. LONGAN: Yes.

18 MR. SATTERTHWAITE: Terry Turpin?

19 MR. TURPIN: Yes.

20 MR. SATTERTHWAITE: Brian Weisker?

21 MR. WEISKER: Yes.

22 MR. SATTERTHWAITE: Andy Drake?

1 MR. DRAKE: Yes.

2 MR. SATTERTHWAITE: Alex Dewar?

3 MR. DEWAR: Yes.

4 MR. SATTERTHWAITE: Steve Squibb?

5 MR. SQUIBB: Yes.

6 MR. SATTERTHWAITE: Chad Zamarin?

7 MR. ZAMARIN: Yes.

8 MR. SATTERTHWAITE: Chad Gilbert?

9 MR. GILBERT: Yes.

10 MR. SATTERTHWAITE: I heard that
11 yes. Arvind Ravikumar?

12 MR. RAVIKUMAR: Yes.

13 MR. SATTERTHWAITE: Erin Murphy?

14 MS. MURPHY: Yes.

15 MR. SATTERTHWAITE: Sara Gosman?

16 MS. GOSMAN: Yes.

17 MR. SATTERTHWAITE: Sam Ariaratnam?

18 MR. ARIARATNAM: Yes.

19 MR. SATTERTHWAITE: It is unanimous.

20 The motion carries.

21 MR. DANNER: All right, thank you

22 very much. Let's move on to the next sentence

1 that, formerly No. 2 on the -- on the slide.

2 Sure. (Off mic comments.)

3 Okay, so now we have language before
4 us. Exceptions if there would be a safety risk
5 or significant impact to customers, operators
6 must document the justification and rationale
7 for such exceptions.

8 Is there anyone with concerns about
9 this language?

10 Sara?

11 MS. GOSMAN: Yes. So, again, a
12 friendly amendment here. I think we want to be
13 focusing on outages, that is customer impacts
14 at the end, as opposed to market impacts
15 related to higher prices. And so I would like
16 to see significant impact to -- negative
17 significant impact to customers such as
18 customer outages in that language.

19 And if somebody has better, a better
20 suggestion in terms of language but gets at
21 that same issue, I'm completely open to it.

22 MR. DANNER: All right, thank you.

1 Diane?

2 MS. BURMAN: I think the language
3 that we had gotten rid of at the end of the
4 first one is what was relevant here, if I
5 remember. We took out customer outages, PHSMA
6 shall consider.

7 MR. DANNER: So --

8 MS. BURMAN: When we had bullet one,
9 and at the bottom we had a sentence, I think
10 that sentence was intended for this bullet
11 here.

12 MR. DANNER: Oh, okay. So can we --

13 MS. BURMAN: And I don't remember
14 exactly, but I remember --

15 MR. DANNER: Go back to the other
16 slide then, John?

17 MS. BURMAN: That language may
18 address Sara's issue.

19 MR. DANNER: Yeah, we have to go
20 back to the original.

21 MS. BURMAN: And it wasn't the
22 intent. It was I think GPAC -- and again, I'm

1 sorry, but I think that language, that sentence
2 was what was meant here. Yes, yeah.

3 MR. DANNER: All right, Sara Gosman,
4 does that address your concerns?

5 MS. GOSMAN: Yes, I think that's
6 fine.

7 MR. DANNER: Okay. Any other --
8 Chad?

9 MR. ZAMARIN: Yeah, I do think this
10 raises an important discussion. I maybe hear
11 from some of the state commissioners. I mean,
12 there have been incidents in the last several
13 years where pipeline constraints have led to
14 significant costs to customers.

15 And frankly, I think, you know, if
16 we were to be forced with making decisions, and
17 there will be times when we'll be forced to
18 make decisions based on whether or not we can
19 reduce emissions some amount or put at risk
20 significantly higher cost to consumers.

21 And I do think that's a decision
22 that should be adjudicated elsewhere at the --

1 at the local level. And I do think that those
2 are important considerations. And just to put
3 it in context, we were talking about there are
4 markets that have seen gas prices go from \$3 to
5 \$100, \$300.

6 And so I don't know that you want to
7 -- I don't know that I'm comfortable saying
8 that we're the right group to determine whether
9 or not that's a significant impact or not and
10 should or shouldn't warrant, you know, a
11 certain behavior.

12 And I'm more interested in hearing
13 from the utility commissioners, because this is
14 a -- I will say on our system, I mean we span
15 across the entire United States. And over the
16 last three years, we've seen more volatility in
17 price during, in particular, storm events. And
18 those sometimes are the same times where you
19 have outages that could be impacted by what
20 we're talking about today.

21 MS. BURMAN: So I --

22 MR. DANNER: Commissioner Burman.

1 MS. BURMAN: I think it's really
2 important that we recognize that reliability
3 and safety of the system and the costs are very
4 important. And that when we're looking at
5 customer outages, there's a whole host of
6 issues that must be considered.

7 And we need to ensure that the
8 operators are making decisions without having
9 to worry about, you know, putting safety in
10 jeopardy. And so from my perspective, to the
11 extent that we have enabled operators to have
12 the flexibility in what they're doing without -
13 - and documenting it, I think that's very
14 helpful.

15 I do think that there is a
16 discussion to be had, perhaps not here, on
17 who's responsible for the oversight of all of
18 that. And so PHMSA, PHMSA needs to care about
19 reliability just as much as the regulator, the
20 state regulator. But the scenarios on
21 affecting customer outages, you know, will have
22 different lenses.

1 So I do think that we have to get
2 back to what's the principle here that we are
3 trying to address to give PHMSA some
4 understanding of where GPAC is landing. For
5 me, the reliability of the system is paramount.

6 And I do think that customer
7 outages, you know, we saw, you know, winter,
8 winter storm Elliot is a perfect example, and
9 the FERC discussion over the system in New York
10 City is significantly relevant and weighs on us
11 as we're coming up to Christmas Eve and
12 Christmas Day again.

13 So how do we do this in a way that
14 makes sure that folks are not blocked in their
15 decisionmaking. And I don't know, but I think
16 it's significant.

17 MR. DANNER: So I just, speaking as
18 a regulator, I think there's a difference
19 between upward pressure on rates and
20 significant rate shock. And I think that
21 insofar as, you know, there's upward pressure
22 on rates, I don't think that is something that

1 we should be talking about here.

2 If it is talking about significant
3 rate shock, for example, after a pipeline has
4 ruptured and suddenly the costs go up, as Chad
5 was talking about, and we've seen that in the
6 Northwest, that I think if we added the
7 language either to the first sentence or the
8 third sentence to just add or significant rate
9 shock, I would be okay adding that language.

10 But I want to be very careful that
11 we're not talking about just upward pressure on
12 rates. Because you know, any kind of climate
13 reduction, climate emissions reductions is
14 going to have some impact on rates. And that
15 shouldn't be a ticket to have an exception.

16 Erin?

17 MS. MURPHY: Appreciate the
18 discussion. Oh, Erin Murphy with EDF.

19 I agree with the language that Chair
20 Danner just proposed. It doesn't necessarily
21 feel appropriate to me to be diving in here to
22 an exception to this really important blowdown

1 mitigation provision when blowdowns are such a
2 major source of emissions from transmission
3 pipelines for sort of general customer cost to
4 be relevant to weighing whether or not to
5 mitigate a blowdown.

6 But here the concern around, you
7 know, safety and reliability is paramount and
8 avoiding outages or a significant rate shock is
9 relevant to the process.

10 So I think I want to go back to a
11 point I made earlier, which is that I think
12 that safety risk language could be removed.
13 There's already in the NPRM a provision related
14 to emergencies that addresses safety, so I
15 don't think the committee needs to make an
16 additional recommendation on something that's
17 already in the NPRM.

18 And then, also, in the second
19 sentence, I would propose adding that operators
20 must document and report the justification and
21 rationale for such exceptions so that that
22 information goes to PHMSA.

1 MR. DANNER: All right, any
2 discussion on Erin's proposal?

3 MR. ZAMARIN: Chad Zamarin with
4 Williams. I just want to make clear I agree,
5 and I think the language in this section does
6 address safety issues. I wouldn't want us to
7 exclude that and have it interpreted that we
8 didn't mean for that to be one of those
9 exceptions. And I don't think that's what
10 you're saying.

11 That was the only reason why I was
12 comfortable with that language in there. And
13 I'm also comfortable, the rate shock issue was
14 the issue that I was hoping that would be
15 addressed. So I think this language works on
16 that front.

17 But I do think that it's important
18 that our recommendation not having the
19 reference to safety and emergency events
20 doesn't mean that we don't think that that's an
21 important part of the language. Because I
22 think it's in there now as part of the NPRM,

1 and I think we're saying it should remain in
2 there, I think is what I'm hearing. Okay,
3 thanks.

4 MR. DANNER: Okay, can we put that
5 language back in? Because I think it's been
6 removed. Yeah, all right, is there any --
7 Commissioner Burman, are you comfortable with
8 this?

9 MS. BURMAN: Can I just read it out
10 loud so I make sure I am hearing it? In
11 addition to the proposed exception for when
12 there is a negative impact on safety, add an
13 exception for when there would be a significant
14 negative impact to customers, such as outages
15 or significant rate shock.

16 Operators must document and report
17 the justification and rationale for such
18 exceptions. The GPAC recommends PHMSA address
19 scenarios that would affect customer outages.

20 I would just want to add in, GPAC
21 recommends PHMSA address, as appropriate,
22 scenarios that would affect customers' outages.

1 Is that -- yeah, I think that's -- because I
2 don't, I think that -- I want to make sure that
3 we are understanding the role of the state
4 regulator versus the federal regulator. And so
5 as appropriate.

6 MR. DANNER: All right, any
7 discussion on that? Brian?

8 MR. WEISKER: Brian Weisker, Duke
9 Energy. Similar to what we talked about
10 earlier about reporting being covered later, I
11 suggest that we remove and report, that the
12 operators must document the justification and
13 rationale, and we'll talk about reporting
14 later.

15 MR. DANNER: Okay, Andy and then
16 Erin.

17 MR. DRAKE: This is Andy Drake with
18 Enbridge. I'm fine, actually, with taking out
19 the issue about safety. I think we've got it
20 on the record here what we were talking about.
21 That's covered in other segments. I think we -
22 - whether it's in our out, I think that's -- to

1 me.

2 But I do want to make a point for
3 the record, and that is that we're talking
4 about rates. That's one dimension. I think
5 there's some dimension of impact to society. I
6 mean, when it gets cold and we're down, the
7 rates may not adjust because it's happening too
8 quickly. Somebody's just out of gas. And we're
9 trying to deal with that that quickly.

10 And I just want that recorded at
11 least in the record of this discussion. When
12 we talk to somebody like a customer or the PUC
13 or somebody, they may say we're not talking
14 about rates, we're talking about keeping that
15 subdivision in gas this winter, today.

16 MR. DANNER: Yeah. You may have
17 noticed there was a disruption in British
18 Columbia recently. And power or gas was cut
19 off to a dairy that produces a lot of the milk
20 that people actually have to drink to get by.
21 And so there was a certain impact there.

22 And so I don't disagree, but I do

1 note the language says such as, which means
2 it's not intended to be an exclusive list --

3 MR. DRAKE: I agree. And that's why
4 I said I'm not sure if asking for the language
5 to be changed, I just want it for the record.
6 Because as we have this conversation going
7 forward, it's really did the operator make
8 appropriate considerations in the discussions.
9 Were they talking to the right people about the
10 right things?

11 And it wasn't about rates, it was
12 about a lot of things. It may be about just
13 service to a customer on a cold day, you know,
14 not a house, a neighborhood, a hospital,
15 somebody significant to.

16 MR. DANNER: Yeah, thank you. For
17 my purposes, I think that this discussion
18 clarifies what -- and I thought when I saw the
19 language such as.

20 Erin?

21 MS. MURPHY: Erin Murphy with EDF.
22 Just I want to express concern about Brian's

1 proposal to remove reporting here. I
2 absolutely recognize there's a later, you know,
3 discussion scheduled for some of the other
4 reporting requirements that are in the NPRM.

5 But I think for me, you know, part
6 of what's important about creating an
7 additional exception to blowdown emissions
8 mitigation is that that, you know, information
9 for what sort of led to the operator exercising
10 the exception is reported to the agency.

11 So it's harder to feel comfortable
12 supporting this if there's no reporting
13 requirement here, and that's something that may
14 or may not, you know, be supported by the
15 committee later in the discussion. So from my
16 perspective, that's important to include.

17 MR. DANNER: Okay, and just from my
18 point of view, I also agree that that language
19 should stay in.

20 And I also just note this is a
21 recommendation to PHMSA. PHMSA can harmonize
22 this requirement with the other discussions we

1 have about reporting. And they can accept or
2 reject what we are putting in here.

3 So I am very comfortable having and
4 report in there, just for what that's worth.

5 Okay, Chad, I think you were next.

6 MR. ZAMARIN: Yeah, thank you. Chad
7 Zamarin with Williams. I'm comfortable with
8 the concept, but I do wonder if we should state
9 that reporting should be addressed in the
10 section on reporting.

11 I think the concern is that if you
12 start putting reporting requirements, you know,
13 I think for example adding something to the
14 annual reporting requirements for blowdown
15 mitigation and the results, you know. I think
16 we have to be careful that if you just add and
17 report in sections throughout the code and you
18 don't include that in the reporting section, I
19 think things can get very messy and hard to
20 harmonize, to your point.

21 And so I just wonder if we say, you
22 know, you should document this, and PHSMA

1 should include reporting requirements in
2 Section 6, which is the section on reporting.

3 MR. DANNER: What if we took out the
4 words and report there, and then at the end of
5 that sentence, put a comma and said subject to
6 the reporting requirements of Section 6?

7 MR. DRAKE: Yeah, I think something
8 to that effect that just -- because what
9 happens if we put it in this section that a
10 reporting requirement should be included in
11 this section, we'll get specific reporting
12 requirements sprinkled throughout the code
13 instead of where I think it makes sense, in a
14 more consolidated place.

15 MR. DANNER: Erin, would that be a
16 suitable compromise?

17 MS. MURPHY: I guess. I don't read
18 our recommendation as being so specific that
19 we're telling PHMSA which, you know, part of
20 the CFR, you know, we recommend they
21 incorporate the reporting requirement. So I
22 don't have that same concern.

1 But if it's helpful to others, I'm
2 comfortable with I think the language that
3 Chair Danner said, to sort of add it at the end
4 as adding a reporting requirement in the other
5 section.

6 MR. DANNER: So is there any other
7 thoughts on that language proposal? So at the
8 end of the sentence it would say subject to
9 reporting requirements of Section 6.

10 Peter?

11 MR. CHACE: Thanks. Pete Chace,
12 NAPS, just something I honestly just want to
13 get off my chest. I'm a little uncomfortable
14 having mentioned rates in the safety
15 regulations. I don't know what to do about it.
16 I mean really I think what we want is, look, if
17 political reality collides with the rules, pick
18 up the phone and call Tristan and tell him that
19 you want to keep the line going. I don't know.
20 I don't have any concrete proposals, but I mean
21 this is a safety regulation.

22 Also, just as a general comment with

1 reporting, if there is a large-scale outage,
2 that's really going to be of interest to the
3 state commissions and we'd love to see a
4 reporting requirement also extend to the state
5 programs so we can just have the knowledge of
6 the potential outages and risks that are coming
7 our way.

8 MR. DANNER: Thank you. You know, I
9 just want to say I understand what you're
10 saying about the rate shock language in there.
11 And generally, it would probably be me having
12 to make that call to Tristan. But again, this
13 is not the rule itself, this is a
14 recommendation. So if they have situational
15 awareness about what our concerns are, and I
16 think it's really important that we let them
17 know that this is a concern, just as having a
18 high impact on a particular industry that is an
19 essential industry is also a concern. So I am
20 willing to make an exception to the concerns
21 you raise in terms of this language because
22 again, I think it is situational awareness to

1 PHMSA.

2 Yes, Arvind?

3 MR. RAVIKUMAR: I just want to
4 highlight one point specific to the reporting
5 requirements here. Emissions from pipeline
6 blowdowns, they're not routine events. They
7 are very large emissions. They hopefully
8 happen rarely and they are not routine. I
9 think where it's reported here or in the
10 reported section it should be separately
11 reported as a large release, even category, as
12 opposed to regular reporting on station
13 blowdowns and other routine emissions.

14 MR. DANNER: Is there particular
15 language that you would want to put in?

16 MR. RAVIKUMAR: No, I think the
17 language is fine. It's just when we get to
18 reporting that I hear or in that section it
19 needs to be a separate category.

20 MR. DANNER: Okay. I think that's
21 duly noted.

22 All right, we have language here --

1 oh, Diane, yes.

2 MS. BURMAN: So, I think that the
3 language on significant rate shock I think I
4 understand what we're trying to do. I think
5 that as I look forward though, that's for me
6 it's more about the mitigation of costs that
7 are really related to anticipated long duration
8 outages, the need to secure alternate supply,
9 restoration, et cetera. So I think we just --
10 I think I just need to kind of process what
11 we're saying because the significant rate
12 shocks that can happen from many different
13 things. And so what we're really trying to do
14 here -- I don't know, I think I'm just
15 grappling with making sure that we're all
16 understanding because what we're saying on
17 significant rate shock.

18 MR. DANNER: Yes, I mean this is one
19 that as I grapple with this, I mean it's
20 customer outages are probably what most of what
21 this is going to be about. The significant
22 rate shocks, I really -- I intend for that to

1 be a very, very high bar, that this is
2 something that we've seen it in the Northwest
3 where the prices go up six or seven times or
4 ten times over night and there could be
5 something where if we are able to negotiate an
6 exception then we can mitigate those impacts.
7 So again, I see this as kind of raising
8 situational awareness and I'm not sure how
9 PHMSA would do that. But that's my -- that
10 would my intent of leaving it.

11 MS. BURMAN: And I do -- I think I
12 want to offer up a friendly amendment, too, at
13 the end where it says operators must document
14 the justification and rationale for such
15 exceptions period. And then say the GPAC
16 recommends PHMSA also address appropriate
17 reporting requirements period. The GPAC
18 recommends them and then the next section,
19 because otherwise it's just like we're really
20 all we did was move the reporting to the end of
21 that sentence and really, it's to the extent
22 that there needs to be a discussion on

1 reporting, I think it should stand alone. I
2 don't know. I don't want to over think it, but
3 I am concerned that --

4 MR. DANNER: Yes, I think that that
5 makes sense. I'd be interested to hear what
6 others have to say on that good fix.

7 Erin?

8 MS. MURPHY: I think I'm a little
9 confused now what the committee's
10 recommendation is. My recommendation was that
11 the documentation of the justification and
12 rationale for exercising this exception should
13 be reported to the agency and that GPAC
14 recommend that PHMSA require operators to
15 document their justification and rationale and
16 report it to the agency.

17 Are we now -- this language, I
18 guess, starts to make me feel like we're going
19 to debate whether or not this should be
20 reported when we get to a later day.

21 MR. DANNER: So I think that the
22 former language made sure that this

1 documentation was subject to the reporting
2 requirements in Section 6. And Commissioner
3 Burman is suggesting that we break that out.

4 MS. MURPHY: Yes.

5 MR. DANNER: What I'm hearing is a
6 concern that that somehow just becomes a vague
7 PHMSA should discuss reporting requirements as
8 opposed to this justification should be
9 reported subject to the requirements of Section
10 6.

11 MS. BURMAN: So here it says
12 operators must document a report -- and report,
13 I think is coming out regardless whether we
14 have a new sentence or not. So if it says
15 operators must document the justification and
16 rationale for such exceptions period. GPAC
17 recommends PHMSA -- and now I forget what I
18 said. But -- PHMSA address --

19 MR. DANNER: Establish reporting
20 requirements.

21 MS. BURMAN: Right.

22 MR. DANNER: And if you put in the

1 language for this documentation in Section 6, I
2 think that might address --

3 MS. BURMAN: It actually is also --
4 what I'm trying to do is make sure that
5 regardless of what happens with reporting, that
6 the documentation must be done, must document.
7 And then it is for PHMSA to also look what the
8 reporting requirements may need to be.

9 Now there will probably be a lot of
10 debate among folks later on the different
11 reporting requirements and how much. But to
12 the extent that we are making clear that that
13 has to be addressed. How it gets addressed may
14 be different and we may have different
15 recommendations for it, but right now, we're
16 documenting the justification and rationale for
17 such exceptions period. And we're also making
18 clear, Erin, that your issue doesn't fall off
19 the table by making sure that we are asking
20 PHMSA to address the reporting requirements.

21 MR. DANNER: But what I'm hearing is
22 a concern that when PHMSA addresses the

1 reporting requirements, they will say that this
2 documentation does not have to be reported and
3 I think that that's the subject that is a bone
4 of contention here.

5 MS. BURMAN: Yes, but isn't that
6 also another issue for another -- when we get
7 to the reporting? I mean isn't that what we've
8 been focused on is that we recognize that
9 reporting issues are going to be challenging,
10 but also that PHMSA is being given clear
11 direction here that operators must document and
12 we also recognize that as a group, we have to -
13 - PHMSA has to address the reporting issue.

14 MR. DANNER: All right. Chad?

15 MR. ZAMARIN: Yes, Chad Zamarin. I
16 think that's right. I think we need to focus
17 on the task at hand which is I think the
18 exception allowance and what that is limited
19 to. I do think we go down the rabbit hole of
20 what the appropriate amount of reporting is. I
21 actually think it works much better when we get
22 to the section on reporting after we've seen

1 the totality of the rule and I mean we could go
2 down this path right now, but it is not as
3 simple as just reporting the decision making.
4 I think we need to see it in the context of how
5 we make decisions, document those, but then
6 what actually gets reported to PHMSA and why,
7 on what frequency, and in what format. To me,
8 that's a whole other -- and I think as the
9 Commissioner said, that's a whole other topic
10 of discussion. I don't think we should lose
11 the significant requirements that are being
12 included, that then may need to be included in
13 that reporting requirement, but I do think that
14 is going to require more discussion.

15 MR. DANNER: Erin?

16 MS. MURPHY: Yes, I just want to
17 sort of take a step back and recognize that the
18 committee has already voted on one sort of
19 recommendation to narrow the application of the
20 blowdown emissions mitigation research in the
21 NPRM. And this is a fairly open-ended
22 additional exception that we're debating

1 whether to recommend to PHMSA. And to me, an
2 open-ended exception like this with terms like
3 significant negative impact which is not a
4 defined term and I don't think we should try to
5 define that, but it's a pretty open-ended
6 exception. And so without reporting, to me,
7 there's a real lack of accountability and a
8 concern.

9 So I hear that others don't want to
10 include that, but to me, that makes this hard
11 to support.

12 MR. DANNER: And I guess I would add
13 because we have significant rate shock in there
14 and I would think it would be very important
15 that that documentation be shared, so I've gone
16 back and forth, but I actually think we need to
17 go back to the language that we had before,
18 subject to the reporting requirements in agenda
19 item six. That's just my view.

20 Alex.

21 MR. DEWAR: Yes, on the subject, it
22 may be helpful, Erin, as you said, take a step

1 back -- Alex Dewar from BCG, by the way -- as
2 we take a step back on this to maybe align on
3 what the principles are here for the reporting.

4 I think if I'm reading them
5 correctly, we're all in the place of going
6 forward, recognizing that the industry will be
7 grappling with a different set of parameters
8 and conditions and how they operate when they
9 start to bring in methane emissions abatement
10 into their practices. And so normal operating
11 procedures may change. And I think there's a
12 number of benefits from reporting and from
13 understanding how those decisions are being
14 made that can both inform that rulemaking down
15 the line, but also have other ancillary types
16 of benefits for helping operators think through
17 this knowledge sharing, learning, et cetera.

18 So I think at this stage, it's
19 actually hard to say -- I think we can all
20 agree that there is benefits from reporting.
21 The question is how. And so if we can maybe
22 come back to more of a principled discussion

1 here and use language, as I think we did on
2 point one, to at least embed in this as
3 principle that reporting that valuable, can be
4 utilized by PHMSA, by operators, et cetera.
5 The question is under what structure that's
6 done. Maybe that's a place that we can kind of
7 get alignment on what's in this language here I
8 propose.

9 MR. DANNER: Well, we have a number
10 of different sentences here, different clauses
11 to use. I mean again, I think I am most
12 comfortable with subject to reporting
13 requirements in agenda item six just knowing
14 that we'll get to that and we'll do that. I
15 mean as a State Commissioner, I have the
16 ability to require any company regulated by us
17 to turn over whatever records they have and if
18 they have done documentation that's required
19 here, they have to turn it over to me.

20 But I also think that we should
21 create the expectation that this documentation
22 will be reported. So I like the subject to the

1 reporting requirements better. That's my
2 preferred language, for what it's worth.

3 Sara?

4 CHAIR GREEN: I agree that the
5 subject language is helpful. I think that we
6 do want to establish a principle of reporting
7 here. I think it's critical to, at least for
8 me, to agree to this exception because I do
9 feel like it is an important exception that I
10 want PHMSA's eyes on and so I would -- I'm okay
11 with that subject to the reporting
12 requirement's language, but I would really like
13 documents and reports. I think it's a fair
14 request, right? This is a narrow set of issues
15 that relates to customer outages and
16 significant rate shock. It is an exception to
17 a general program where we are agreeing, right,
18 to blowdown mitigation, emissions mitigation,
19 and I think that we should expect that there
20 would be some review requirements.

21 Let me step back, some reporting
22 requirement to justify why somebody would take

1 this action. I think that's fair and
2 transparent.

3 MR. DANNER: Chad?

4 MR. ZAMARIN: Yes, I think -- again,
5 I think that's a discussion for Section 6.
6 That is not generally the way it works within
7 the code and it's generally not all that
8 practical. I mean when we talk about what we
9 report, at least I'm think -- I'll foreshadow,
10 I guess if we're starting to go somewhat down
11 that rabbit role if it's required, but
12 typically, we don't send in reports of
13 justification kind of decision making that
14 occurs. Now we would report the number of
15 blowdowns that occurred, the number of -- when
16 we talk about reporting, I would be advocating
17 for us to report statistics. And if the
18 statistics are showing that this exception is
19 being used more than someone thinks it should,
20 then that should drive PHMSA to dig deeper.
21 But normally, that is not -- we don't just send
22 in reports to PHMSA. PHMSA is not staffed to

1 review reports that way. We try to fit that in
2 to that reporting section so that it's
3 generally data that can be analyzed and
4 interpreted. And if the data is saying
5 something that needs follow up, follow up can
6 occur.

7 And I think that's the conversation
8 we want to get into and the section on
9 reporting is coming out of all this, what is
10 the amount of reporting we can require of
11 operators that get useful information that we
12 can then use. But I think dropping in a
13 reporting requirement on a decision-making
14 process is not a very practical way. And it's
15 not the way that we're really set up to measure
16 how things are being done.

17 MR. DANNER: Sara?

18 MS. GOSMAN: I agree that, in
19 general, when we look at documentation say in
20 the IM program, right, what we're doing is
21 we're documenting various actions and decisions
22 made by operators and then we look at those

1 through the lens of inspection, right, and then
2 compliance and enforcement.

3 I think here what -- this is a
4 difference that I'm proposing and I think Erin
5 is as well, but it's important for
6 understanding this exception because we're
7 doing something different here, right? We are
8 creating an exception for certain situations
9 based on really societal impacts and economic
10 impacts. And I think those should properly be
11 reported to the agency. It's a narrow set of
12 issues and I don't think that we are
13 undermining in any way the sort of standard
14 system, but I do think here there's real
15 validity to having a different limited, right,
16 but different reporting system.

17 MR. DANNER: Peter.

18 MR. CHACE: Thank you, Pete Chace,
19 NAPS. I have to agree with what Sara said. I
20 think I personally believe that we're moving
21 away from safety decisions towards more
22 economic impact type decisions. I may go

1 further instead of notification required and
2 that's perhaps if you get in a situation where
3 you feel the need -- there's the need to make
4 this exception, telephonic notice or the
5 equivalent, to get that on the map right away.

6 Again, I don't feel comfortable
7 trying to codify what I see as economic and
8 political decisions in the safety code.

9 MR. DANNER: Yes, noted. Andy?

10 MR. DRAKE: Andy Drake with
11 Enbridge. I think just needs to be
12 transparent. I don't think -- I don't think
13 that's in question here. I think what I hear
14 the question is is how and how quickly and how
15 often? So maybe that's to your question if
16 this is infrequent, big exceptions, this should
17 be a big deal. I don't know that we know.

18 I think the question to me seems to
19 be there's so many other notification and
20 reporting requirements that are going to come
21 out of this larger discussion, I think part of
22 us is going to have decide do we want to

1 reinvent that reporting vehicle a little bit to
2 handle this new requirement?

3 I think that we can have that
4 discussion right now or we can have that
5 discussion when get to Section 6. I'd rather
6 have it all at one time, so that we can talk
7 about how we're going to talk to PHMSA about an
8 entirely new conversation on a lot of things.
9 That's kind of where I am.

10 Doing this fragmented form here is
11 not helpful because I think we're going to
12 reinvent this entire conversation about how to
13 talk about this issue, whether that's threshold
14 equipment use choices all the way down all of
15 these nine or ten sections. And I'd just as
16 soon put all those conversations together in
17 one time.

18 I thought that's what Commissioner
19 Burman was proposing. We want to talk about
20 this. We want to document it and we want to
21 resolve reporting in Section 6 in aggregate
22 with all the other things that we're going to

1 talk about reporting because this may warrant a
2 little bit more than just some sort of
3 anecdotal report to PHMSA about one issue.
4 This may three or four other tangential issues
5 we want to tie to it in that conversation, but
6 we haven't gotten to those sections yet. So
7 that's just where I am anyway.

8 MR. DANNER: Well, I just wanted to
9 make sure that it's flagged here so that we're
10 not going to get to Section 6 and then forget
11 all about this. Quite frankly, if it were just
12 me I would put in and report. I realize we
13 have to -- we have to do some compromises here,
14 but I don't want to lose that conversation and
15 so I'm okay leaving it to agenda item six, as
16 long as we don't lose this. Again, I'm just
17 speaking for myself here.

18 All right, Sara.

19 MS. GOSMAN: So I think the
20 fundamental issue is whether we think this
21 information should be put in front of PHMSA,
22 whether we use report or telephonic notice and

1 I think if we were to agree on that, right, and
2 then the specifics come with how we're going to
3 re-conceptualize perhaps the reporting set of
4 issues, that's fine, right? But I think if we
5 delay the question about whether PHMSA should
6 know about this and have information in front
7 of it, then that's where sort of I think the
8 issue is for me. So I can handle details
9 later. What I can't do is sort of push this
10 off and then at that point realize that we are
11 not going to be doing any form of reporting or
12 notification.

13 MR. DANNER: Yes, I mean the reason
14 I don't want to lose sight of this is these are
15 significant negative impacts to customers. It's
16 not going to be happening that often. This is a
17 rare event. It's kind of an -- it's an
18 exception and so the reporting isn't just some
19 sort of standard that's going to create a whole
20 lot of work. This is a real exception. It's a
21 rare exception, so when you have this rare
22 exception, you have reporting. So I am -- I

1 understand what Sara is saying. I'm trying to
2 get something that we can all agree to and it
3 might be that we need to have the discussion on
4 agenda item six.

5 Well, anyway, Chad.

6 MR. ZAMARIN: Yes, I don't disagree
7 that these may be rare occurrences, but I also
8 think that we have to keep it in the context of
9 what should trigger the need to report to
10 PHMSA. And I think we need to have that
11 discussion. We're talking about an exception
12 where, when implemented, would be the decision
13 not to use mitigation measures versus using
14 mitigation measures.

15 There are exceptions throughout the
16 code that you can debate whether or not they're
17 equivalent in severity or importance, but there
18 are exceptions throughout the code. We don't
19 submit engineering reports or documents. We
20 document the decision-making process. Those
21 are subject to audit. On an annual basis or on
22 a periodic basis as defined in reporting, we

1 report information on the results of what
2 decisions were made.

3 And I just think we need to be very
4 careful going through individual sections and
5 creating new individual reporting requirements
6 without thinking about that in the totality.
7 Just because something is a rare event doesn't
8 mean we should consider it needs reporting. I
9 think we need to put it in the context of
10 everything else that we -- the activity that we
11 do and what does or doesn't constitute
12 something warrants a notification, a report, or
13 annual reporting information that can be
14 analyzed and then used and acted upon as
15 needed.

16 I personally think this is one that
17 fits in the camp of you have to document your
18 decision-making process. I think when we get
19 to Section 6, what I think makes the most sense
20 is you have to include in the annual report
21 reporting on these blowdown events, the
22 mitigation that you take, and when you don't,

1 and that allows for the analysis to see if the
2 right results are being achieved.

3 MR. DANNER: All right, thank you.
4 Chad Gilbert.

5 MR. GILBERT: Yes. Chad Gilbert with
6 United Association of Plumbers and Pipefitters.
7 So basically, the language we have on the board
8 says reporting requirement. So my question is
9 I mean we have to have some type of reporting
10 on the issue, so I mean all we're asking for
11 here is the reporting requirements. We're not
12 specifying what those requirements will be,
13 correct?

14 MR. DANNER: Well, my understanding
15 is that agenda item six is going to talk about
16 reporting requirements generally and not just
17 reporting requirements about these exceptions
18 here in this paragraph.

19 MR. GILBERT: Yes, I tend to agree
20 with the chair and with Erin on this particular
21 matter. Thank you.

22 MR. DANNER: All right, and Erin?

1 MS. MURPHY: I kind of feel like
2 we've been talking about this one for a while
3 and I don't know if we're going to reach a
4 consensus, so I would move for a vote on the
5 language before us, unless there is a desire
6 for further discussion.

7 MR. DANNER: All right, can I get
8 some clarification though, Erin. So you would
9 not be okay with the language that is up there
10 subject to the reporting requirements of agenda
11 item six. You would insist on document and
12 report?

13 MS. MURPHY: Yes. Well, I guess I
14 was calling a vote on the way it was phrased
15 which had both options in there. But yes, I
16 think I would prefer document and report.

17 MR. DANNER: Okay. Understood that
18 you prefer document and report. You would
19 object or oppose subject to the reporting
20 requirements in agenda item six?

21 MS. MURPHY: I can support that as
22 well.

1 MR. DANNER: Okay. That helps frame
2 the debate. Diane?

3 MS. BURMAN: Yes, so I think if we
4 take out and report and leave in then -- does
5 it just go away?

6 MR. DANNER: It did.

7 MS. BURMAN: All right. So we take
8 out -- so it's operate as most documents a
9 justification and rationale for such exceptions
10 subject to the reporting requirements in agenda
11 item six. And I think that marries the two.

12 MR. DANNER: Okay. It also -- make
13 sure that we will be having that discussion
14 when we get to agenda item six.

15 Andy?

16 MR. DRAKE: Andy Drake with
17 Enbridge. I would agree with Commissioner
18 Burman. I think we have yet to have that
19 conversation. I don't even know what reporting
20 looks like in this, for this. I'd like to at
21 least know what that is before I'm voting on
22 it. It could be quite onerous and I just want

1 to know what that is. So this helps. At least
2 it's in front of us. We're going to talk about
3 it. I'm not trying to kick the can down the
4 road, I just want to be able to -- I just want
5 to know what it is I'm voting on.

6 MR. DANNER: All right, anyone else?
7 Chad Gilbert, you have your hand up. Okay.

8 All right, we have language before
9 us and I see no tents, so -- what's that?

10 (Off mic comments.)

11 I don't know that we raise that
12 next. We have items 2, 3, 4 in front of us.

13 MS. BURMAN: Let's vote on what we
14 kind of worked through before we get to 2, 3,
15 and 4. I think it makes it easier for all of
16 us to move forward on consensus items.

17 MR. DANNER: All right. Would you
18 like to make motion?

19 MS. BURMAN: Sure. I'll read it.
20 I'd like to make a motion. The proposed rule,
21 as published in the Federal Register and as
22 supported by the Preliminary Regulatory Impact

1 Analysis and Draft Environmental Assessment,
2 with regard to blowdown mitigation, Section
3 192.770 is technically feasible, reasonable,
4 cost effective, and practicable if the
5 following changes are made. In addition to the
6 proposed exception for when there is a negative
7 impact on safety, as an exception for when
8 there would be a significant negative impact to
9 customers such as outages or significant rate
10 shock. Operators must document the
11 justification and rationale for such exception
12 subject to reporting requirements in agenda
13 item six. The GPAC recommends PHMSA address, as
14 appropriate, scenarios that would affect
15 customer outages.

16 MR. DANNER: All right, is there a
17 second?

18 MR. GILBERT: Second.

19 MR. DANNER: Okay, Chad Gilbert has
20 seconded. Cameron, do you want to take the
21 vote?

22 MR. SATTERTHWAITTE: Okay. I'll say

1 your name and if you agree, say yes. If not,
2 say no. Diane Burman?

3 MS. BURMAN: Yes.

4 MR. SATTERTHWAITE: Peter Chace?

5 MR. CHACE: No.

6 MR. SATTERTHWAITE: David Danner?

7 MR. DANNER: Yes.

8 MR. SATTERTHWAITE: Sara Logan?

9 MS. LONGAN: Yes.

10 MR. SATTERTHWAITE: Terry Turpin?

11 MR. TURPIN: Yes.

12 MR. SATTERTHWAITE: Brian Weisker?

13 MR. WEISKER: Yes.

14 MR. SATTERTHWAITE: Andy Drake?

15 MR. DRAKE: Yes.

16 MR. SATTERTHWAITE: Alex Dewar?

17 MR. DEWAR: Yes.

18 MR. SATTERTHWAITE: Steve Squibb.

19 MR. SQUIBB: Yes.

20 MR. SATTERTHWAITE: Chad Zamarin?

21 MR. ZAMARIN: Yes.

22 MR. SATTERTHWAITE: Chad Gilbert?

1 MR. GILBERT: Yes.

2 MR. SATTERTHWAITE: Arvind
3 Ravikumar?

4 MR. RAVIKUMAR: Yes.

5 MR. SATTERTHWAITE: Erin Murphy?

6 MS. MURPHY: Yes.

7 MR. SATTERTHWAITE: Sara Gosman?

8 MS. GOSMAN: Yes.

9 MR. SATTERTHWAITE: Sam Ariaratnam?

10 MR. ARIARATNAM: Yes.

11 MR. SATTERTHWAITE: Motion carries,
12 14 to 1.

13 MR. DANNER: All right, thank you
14 very much. Now let's go to -- oh, it is 3:20.
15 Can we take a short break and be back at 3:30?
16 Let's be back at 3:30.

17 (Whereupon, the above-entitled
18 matter went off the record at 3:22 p.m. and
19 resumed at 3:35 p.m.)

20 MR. DANNER: All right, we are back
21 on the record. Let's come back to order,
22 please, and please take your seats.

1 Okay, we are back, and we are
2 starting our discussion. All right, thank you.

3 So we have Chairman's prerogative
4 here. We have a couple of people who have
5 flown in from quite a distance and have to
6 catch a plane and need to leave here at 4:15,
7 and they wanted to provide public comment on
8 leak surveys and patrols, so we're going to
9 suspend the conversation here for a few minutes
10 so that we can hear from Patricia Nelson and
11 Laurie Anderson on the leak survey and patrol
12 proposals.

13 So, Patricia Nelson and Laurie
14 Anderson, if you are here, could you form a
15 line on the right? And there's a microphone up
16 in front of the committee.

17 MS. ANDERSON: Thank you. My name
18 is Laurie Anderson, and I live in Broomfield,
19 Colorado. I'm in town only for today, so thank
20 you for this. I am a councilmember for the
21 City and County of Broomfield, representing
22 constituents who are impacted by large-scale

1 oil and gas developments in our communities.

2 I am also a Colorado field organizer
3 for Moms Clean Air Force, a community of over
4 1.5 million moms and dads united against air
5 pollution, including the urgent crisis of our
6 changing climate to protect our children's
7 health.

8 I am here to share our broad support
9 for policies that protect safety and the
10 environment, and I call on the Gas Pipeline
11 Advisory Committee to support rapid action by
12 PHMSA to finalize strong advanced leak
13 detection standards, including expanding the
14 mileage of gas gathering lines that must be
15 leak surveyed, more frequent inspections using
16 the best available technology, and ensuring
17 quick repair of identified leaks.

18 The oil and gas industry is very
19 present in northern Broomfield. In 2017,
20 several of our well-established communities,
21 including a retirement community, were faced
22 with unprecedented residential fracking

1 operations and the supporting gathering and
2 distribution lines.

3 These lines run right past schools
4 and homes in my community. This development
5 rightfully caused much angst, and protecting
6 health and safety was clearly the top concern.
7 Strong federal oversight of this infrastructure
8 will ensure that every breath is clean, that
9 people that live here are safe, and the climate
10 is protected.

11 Broomfield currently funds and
12 operates an enhanced air quality monitoring
13 program to capture pollution spikes from the
14 large-scale well pads in close proximity to our
15 communities, but these monitors have
16 inadvertently discovered multiple midstream
17 pipeline leaks, which were subsequently
18 repaired once ownership was determined.

19 There are certainly more leaks like
20 these that are just waiting to be discovered.
21 However, time is of the essence since
22 undetected defects and corrosion pose the

1 potential for catastrophic impacts such as
2 pipeline explosions, which, although rare, are
3 an inherent danger for communities like mine.

4 By expanding reporting requirements
5 to ensure that all gathering pipeline mileage
6 is reported to the National Pipeline Mapping
7 System, decision makers in communities can
8 better understand the physical properties and
9 environments of this infrastructure and assess
10 whether additional oversight is needed.

11 The Colorado PUC is currently
12 considering new rules as we work diligently to
13 meet our statutorily required GHG reductions,
14 including 26 by 2025, 90 percent by 2045, below
15 2005 levels.

16 States like Colorado are following
17 the leadership of PHMSA. For example, in the
18 recent decision by the Colorado PUC, they
19 deferred enacting regulations on the advanced
20 leak detection technology program until PHMSA
21 finalized its rules.

22 Regardless of which jurisdiction a

1 pipeline falls under, the concerns remain the
2 same. A strong federal rule that states like
3 Colorado can follow will provide consistency
4 between jurisdictions.

5 Although there are many examples of
6 the devastation undetected leaks can cause, I
7 want to highlight the story of Mark and Julie
8 Nygren of Weld County, Colorado, who lost their
9 home and livelihood due to contamination from a
10 midstream pipeline leak, and four years later,
11 have not been able to return to their farm.

12 The remediation so far has created a
13 pit 20 feet deep and three acres wide to remove
14 the contamination on their property. Rural
15 residents like the Nygrens should be afforded
16 the same protections from pipeline leaks as
17 those that live in more urban locations.

18 And finally, beyond the climate and
19 safety aspects of reduced leaks is another
20 critical matter. The entire Denver Metro and
21 North Front Range area, including my city,
22 remains in severe ozone non-attainment due to

1 our unique topography, with the Rocky Mountains
2 that trap the pollution, heavy gas and oil
3 development in this area, and background
4 pollution from out-of-state resources.

5 We are now facing federal
6 interventions if Colorado does not put forward
7 an approvable state implementation plan,
8 including significant reductions in ozone
9 forming pollutants. Since these pollutants
10 coexist with methane, the good news is that
11 finding and fixing pipeline leaks will help
12 reduce ozone pollution to safer levels. In
13 fact, a 2022 carbon mapper study found that
14 gathering pipelines made up 23 percent of point
15 source emissions and were the second largest
16 source of emissions, so strong regulations will
17 also help us tackle ozone.

18 These are just some of the examples
19 of what we are facing. So, I thank you for
20 your time and your diligence on developing
21 rules that are effective in protecting health,
22 safety, and the environment. Thank you.

1 MR. DANNER: All right, thank you
2 very much. Okay, and again, I ask that you
3 keep your comments as brief as you can and
4 don't repeat what others have said.

5 MS. NELSON: Yes, sir, thank you.
6 Hello and good afternoon and good evening. My
7 name is Patricia. I am the daughter of Ofelia,
8 the granddaughter of Maria del Rafugio, and the
9 granddaughter of Augustina Luna. I am the
10 Colorado Fossil Fuel Just Transition Advocate
11 for GreenLatinos Colorado. As I cannot be here
12 for the whole week, thank you so much for
13 letting me skip the line today.

14 I would like to ask the committee to
15 recommend the most protective standards
16 possible for the sake of Latino communities and
17 those communities like mine that have been
18 historically and disproportionately impacted by
19 oil and gas infrastructure. These rules must
20 protect our communities and our energy workers.

21 A study published last year showed
22 that communities of color and low-income

1 populations experience more gas leaks. The
2 average leak density increased by 37 percent
3 for these communities compared by predominantly
4 white neighborhoods, leaving our communities
5 sicker and missing more days of school and work
6 due to adverse health impacts caused by poor
7 air quality.

8 We must acknowledge that the current
9 regulations do not go far enough to protect
10 communities like mine. Any time a pipeline is
11 left without repair for too long, the risk is
12 too high for a repair for a leak that is a
13 probable future hazard. We need action now.

14 I am also a member of the Colorado
15 Midstream Steering Committee, a technical
16 working group tasked with reducing emissions
17 statewide from fuel combusting equipment along
18 the midstream. I have worked with some of the
19 largest operators in Colorado, and they agree
20 that not only can this be done, but it is
21 necessary.

22 Industry people constantly talk

1 about how their operations are the safest and
2 they use the best technology available, but at
3 the same time, we are still hearing the excuses
4 about costs or feasibility. It's 2023, and we
5 have the technology available. Owners and
6 operators of these companies that do methane
7 mitigation are standing by and ready to work.

8 Methane mitigation is an opportunity
9 for the fossil fuel industry to finally be the
10 good neighbor that they said they were going to
11 be, an effective way to protect our
12 communities. These jobs available require
13 skills and expertise that most fossil fuel
14 workers already have.

15 With an average salary ten percent
16 higher than the national average and some
17 starting salaries at \$140,000 a year, we can
18 help ensure that current energy workers are not
19 left behind in our pursuit for a just
20 transition. I have family members and friends
21 that rely on this industry for work. They
22 deserve to have a safe place to work.

1 I was born and raised in Weld County
2 in northeastern Colorado. We are the top-
3 producing oil and gas county in the state, and
4 some days, in the nation. We have the poor air
5 quality to prove it. The proposed rule will
6 directly impact how my community will survive
7 the bust after the boom.

8 I would like to end my public
9 comment with a reminder to the committee of
10 PHMSA's mission and purpose. PHMSA's mission -
11 - excuse me. PHMSA's mission is to protect
12 people, not an operator's bottom line, and the
13 environment by advancing safe transportation of
14 energy and other hazardous materials. These
15 are essential for our daily lives, but our
16 communities need to come first. Thank you so
17 much for your time.

18 MR. DANNER: Thank you very much,
19 and safe travels home. All right, we have one
20 more public comment, this one from Alaska, so
21 also with a plane to catch.

22 MS. EPSTEIN: Yes, thank you very

1 much to the Chair and to the committee. I will
2 be leaving this evening. Good afternoon, my
3 name is Lois Epstein, and I am a licensed
4 professional engineer in Alaska and President
5 of LNE Engineering and Policy, a consulting
6 firm that includes extensive work on Arctic oil
7 and gas issues.

8 I am a former member for 12 years of
9 the Liquid Pipeline Advisory Committee, and I
10 currently serve as a Board Member of the
11 Pipeline Safety Trust. My comment is provided
12 as a member of the public.

13 I understand that part of this
14 committee's agenda focuses on North Slope leak
15 detection, an Alaska-specific issue. I
16 understand that there has been a request by
17 industry that North Slope operators only
18 utilize advanced leak detection one time per
19 year because advanced leak detection does not
20 work as well at, quote-unquote, extreme
21 temperatures.

22 Because the North Slope does not

1 have extreme temperatures from late spring
2 until early fall, I oppose this request and
3 recommend that the final rule include leak
4 detection two times per year, likely during May
5 and October, which are five months apart.
6 Temperatures during those months are not in the
7 extreme range.

8 The average North Slope Borough
9 temperature in May is a low of 23 and a high of
10 33 Fahrenheit, and in October, there is a low
11 of 15 and a high of 25 Fahrenheit. It is
12 particularly important to utilize advanced leak
13 detection as soon as possible after winter
14 because the season's harsh conditions could
15 result in new, significant methane leaks.

16 I do not know the low temperature
17 threshold for effective advanced leak
18 detection. I'm sure someone in this room knows
19 that. But it's also possible that effective
20 advanced leak detection could occur during late
21 April and early November in the Arctic. I
22 encourage the committee to explore the

1 effectiveness of advanced leak detection at the
2 temperatures typically present on the North
3 Slope during those months.

4 My recommendation to GPAC is that
5 the committee ensure that leak detection on the
6 North Slope occurred twice each year, not once,
7 as that approach is not justified given Arctic
8 temperatures, which only are getting warmer
9 each year. This year, for example, the North
10 Slope near Prudhoe Bay is expected to be 10
11 degrees Fahrenheit above normal from November 1
12 through 26, and that's a chart I saw today.

13 Last, I encourage PHMSA to have all
14 committee meetings available virtually. In
15 addition to potentially increasing the
16 audience, doing so would reduce greenhouse gas
17 emissions from some of those who now travel to
18 D.C. to attend. Thank you very much for your
19 consideration of these comments.

20 MR. DANNER: All right, thank you
21 very much, and safe travels home. Okay, we are
22 going to go back to our discussion here, the

1 voting slide in front of us. We have three
2 more items. You can read them yourselves in
3 front of you, and I would just open it up to
4 the floor. What do we want to include of these
5 in our final recommendations?

6 Any -- all right, let me put it this
7 way. These will be included unless --

8 MS. BURMAN: So, looking at --

9 MR. DANNER: Oh, okay, Diane?

10 MS. BURMAN: Looking at bullet one,
11 which was, I think, old bullet three, if I --
12 just to level set us, I think I remember sole
13 use of flaring is limited to when the other
14 options are impractical, unsafe, or result in
15 lower emissions abatement. I think this was
16 language that we collaborated around.

17 I don't know that we resolved
18 issues, but just kind of taking a pulse, if
19 everybody has any other language to add to that
20 bullet, does it satisfy some of the concerns,
21 does it not? Where were we left, I think, is -
22 -

1 MR. DANNER: Thank you, and I have
2 to say I am fine with this language. We did
3 have some discussion on it, and we added some
4 language to it, and I think it covers the
5 ground. Sara?

6 MS. GOSMAN: Yes, thank you. I
7 think that I want to narrow this issue as much
8 as possible. I want to be clear that I'm not
9 against flaring generally as a methodology
10 here, nor am I certainly against any technology
11 improvements, right, in this area. And I don't
12 want this particular provision to imply that
13 GPAC as a whole is.

14 I think the interest that I had was
15 in just making sure that if an operator is only
16 going to use flaring, right, that we have some
17 standard that says look, you considered these
18 other methodologies and you chose to use
19 flaring in this particular context because of
20 good reasons, right.

21 And the good reasons I can think
22 about are these other methodologies are

1 impractical, or unsafe, or actually flaring
2 would do better for climate. So, that was the
3 sort of rationale behind this, and again, I
4 want to be as limited as possible here in this
5 because I do view it as a very narrow
6 exception.

7 MR. DANNER: All right. Chad?

8 MR. ZAMARIN: Yeah, I don't think
9 we're very far off conceptually, but I do
10 worry, as I mentioned, about -- I think we want
11 to create performance expectations and not pick
12 solutions. Because, as we discussed, you know,
13 there are companies out there that are working
14 on combustion technologies that, you know, this
15 is not production flaring where we have flares
16 that are flaring for months at a time,
17 sometimes years at a time, which I think is
18 where flaring has become a real problem.

19 It allows for, you know, certain
20 activities that could be maybe handled
21 differently, but, you know, I would hate to see
22 us say that we should stop that kind of

1 investment and technology development where,
2 you know, that kind of tech --

3 I mean, some of the solutions that
4 are proposed here, they require much longer
5 outages, much longer reductions in throughput,
6 and again, I don't know if you can specify by
7 just saying in a lower emissions abatement or
8 if -- I like the comments that you just made.
9 I think we have the same intent. I mean, the
10 way I want to think about it is that we have
11 all of these tools to use.

12 Ideally, we're setting performance
13 expectations, and the best tool should win no
14 matter what, you know, which one it is, or a
15 combination of tools. And so I just always get
16 concerned when we pick specific technologies in
17 a regulation versus establishing standards.

18 And so, I don't, I still don't like
19 calling out one specific technology as being
20 inferior when we could say the expectations of
21 any technology should be this, and if it
22 doesn't meet that, then maybe you have to use

1 something else. I don't know how you address
2 that.

3 MR. DANNER: Thank you. Andy Drake?

4 MR. DRAKE: Andy Drake with
5 Enbridge. I appreciate two particular points
6 of this proposal that you put up there, and
7 that is one sole. The word sole is important
8 because we use this and it's absolutely
9 critical in combination with other venues.

10 If we get down to a low enough
11 pressure, we have to get rid of the gas
12 somehow. We can't keep pulling it down to
13 zero, so we have to get rid of it somehow.
14 That's -- flaring oftentimes is the best way to
15 do that environmentally and physically.

16 And the last piece I really
17 appreciate, to Chad's point, result in a lower
18 emissions abatement, let's keep our eye on the
19 bigger prize. You know, we're not talking
20 about production flaring where the flares stay
21 on, and on, and on, and on, and on.

22 No, this is an activity that happens

1 very specifically, very locally for a very
2 specific amount of time, and then looking at
3 this in that context, and trying to keep
4 ourselves open to technologies that actually
5 lower environmental footprint is the right
6 thing to be looking at.

7 And I understand the emotion around
8 flaring, but we have to translate it into this
9 application and look at it in that lens, and I
10 think you may find, and I think you will find,
11 that there are situations where flaring is the
12 right answer to do for the environment, and I
13 don't want to have that put upside down where
14 people are being discouraged from doing that.
15 I think that won't serve anybody here. That
16 doesn't mean we give everybody a free pass
17 either. That's not the point.

18 MR. DANNER: Sara?

19 MS. GOSMAN: Thank you. And just, I
20 mean, in terms of time, I know we've spent a
21 fair amount of time so far on these issues. I
22 don't want to, you know, just have a longer

1 discussion here.

2 I guess a couple of thoughts I have,
3 number one is we could put in that first
4 sentence that we don't intend to have this
5 particular provision be one that limits
6 technology advancement in any way. We can also
7 have this be solely about emissions abatement,
8 right? Which one is the best one for emissions
9 abatement and we hold it there. I think both
10 of those things are fine with me.

11 I think, again, my interest here is
12 in trying to sort of take a very narrow set of
13 issues and make sure that we are thinking about
14 those in the context of methodologies, because
15 we don't otherwise have a set of criteria about
16 choosing these, right? There's nothing in the
17 proposed regulation that I see other than sort
18 of the end goal of prevention and minimization.

19 So, if either one of those -- I can
20 share. I can give particular language if
21 that's helpful, but I just want to see whether
22 that addresses the concerns that my colleagues

1 have raised.

2 MR. DANNER: Thank you. If you have
3 language prepared, I think it would be fine to
4 share that. Chad?

5 MR. ZAMARIN: Yeah, and I just want
6 to -- again, I think we're in agreement, but I
7 think getting it right does matter, so I think
8 the language would be good. But just for
9 example, I mean, we are working on solutions
10 across the energy ecosystem that would take
11 combustion technologies and create zero
12 emissions outputs, right?

13 And so, I mean, there could be a day
14 where the very best solution for -- I think
15 when you say flaring, it's going to imply a
16 very specific type of flaring application, but
17 there could very well be technologies that are
18 developed that use combustion, and flares
19 capture the CO2 emissions and create a zero
20 emission solution.

21 I mean, those are the kinds of
22 investments in this space that are happening,

1 and so that's, again, why I just worry about
2 creating this space for the kind of innovation
3 and technology selection that makes the most
4 sense for the application that you're trying to
5 solve for. And I don't -- I guess we'll just
6 see if there's language that may help us do
7 that.

8 MR. DANNER: So, do you have
9 language you would want to share right now?

10 MS. GOSMAN: All right, let me see
11 if I can do this. Okay, so --

12 MR. DANNER: Okay.

13 MS. GOSMAN: So, you know, this is
14 sort of unusual. We don't usually have
15 language like this, but I guess I want to try
16 something like, GPAC does not intend for this
17 recommendation to limit technology advancement
18 in this area, period. And then I think that
19 would go to the end of that first sentence. We
20 -- yeah, I think that's where I want to stop
21 and see if that's sufficient.

22 MR. DANNER: Any thoughts?

1 MS. GOSMAN: Open to friendly
2 amendments.

3 MS. BURMAN: So, I think that's a
4 really good start. I think that I would like
5 to add to that something to the extent of, GPAC
6 supports the need for continued research and
7 development to create opportunities for
8 technologies that will help further advance,
9 you know, or something like that, so that it's
10 actually a positive of, like, we are actually
11 encouraging that use.

12 MR. DANNER: Is that something that
13 would end up in a rule, just a statement of our
14 position?

15 MS. BURMAN: Well, one, I think it's
16 aligned with PHMSA's, you know, support of
17 advanced research and development with
18 technologies, so it's clear, but I think it's
19 important that it's not just about blocking.
20 It's about actually supporting that, you know,
21 doing that. I don't know how else to say it.

22 MR. DANNER: All right, thank you.

1 And Sara Gosman, do you have any issues with
2 that language being included?

3 MS. GOSMAN: No, thank you very much
4 for that language.

5 MR. DANNER: All right, anyone else
6 want to weigh in on this? All right,
7 Commissioner Burman, do you want to vote on
8 this now or do you want to --

9 MS. BURMAN: Yeah, if we could --

10 MR. DANNER: -- think we can finish
11 the other two --

12 (Simultaneous speaking.)

13 MS. BURMAN: Unless we hear anyone
14 else having language concerns, I think voting
15 on that as a separate item, I think it, you
16 know, I think it's good, so.

17 MR. DANNER: All right, then I would
18 entertain a motion, and whoever makes the
19 motion would need to read the top down to the
20 bottom of paragraph one.

21 MS. GOSMAN: We have our research
22 and development guy.

1 MR. RAVIKUMAR: All right, yeah.
2 The proposed rule, as published in the Federal
3 Register, and as supported by the preliminary
4 regulatory impact analysis and draft
5 environmental assessment with regard to
6 blowdown mitigation, Section 192.770, is
7 technically feasible, reasonable, cost-
8 effective, and practicable if the following
9 changes are made:

10 Sole use of flaring is limited to
11 when the other options are impractical, unsafe,
12 or result in lower emissions abatement. GPAC
13 supports continued research and development to
14 advance technology, and does not intend for
15 this recommendation to limit technological
16 advancement in this area. Is there a second?

17 MS. LONGAN: Sara Longan, second.

18 MR. DANNER: Arvind Ravikumar has
19 made the motion, and I'm sorry, I missed who
20 seconded.

21 MS. LONGAN: Sara Longan, second.

22 MR. DANNER: Sara, okay, Sara Longan

1 seconded. And so, Cameron, can you count the
2 votes?

3 MR. SATTERTHWAITE: All right, I
4 will say your name, and if you agree with the
5 motion, you say yes, if not, you can say no.
6 Diane Burman?

7 MS. BURMAN: Yes.

8 MR. SATTERTHWAITE: Peter Chace?

9 MR. CHACE: Yes.

10 MR. SATTERTHWAITE: David Danner?

11 MR. DANNER: Yes.

12 MR. SATTERTHWAITE: Sara Longan?

13 MS. LONGAN: Yes.

14 MR. SATTERTHWAITE: Terry Turpin?

15 MR. TURPIN: Yes.

16 MR. SATTERTHWAITE: Brian Weisker?

17 MR. WEISKER: Yes.

18 MR. SATTERTHWAITE: Andy Drake?

19 MR. DRAKE: Yes.

20 MR. SATTERTHWAITE: Alex Dewar?

21 MR. DEWAR: Yes.

22 MR. SATTERTHWAITE: Steve Squibb?

1 MR. SQUIBB: Yes.

2 MR. SATTERTHWAITE: Chad Zamarin?

3 MR. ZAMARIN: Yes.

4 MR. SATTERTHWAITE: Chad Gilbert?

5 MR. GILBERT: Yes.

6 MR. SATTERTHWAITE: Arvind

7 Ravikumar?

8 MR. RAVIKUMAR: Yes.

9 MR. SATTERTHWAITE: Erin Murphy?

10 MR. MURPHY: Yes.

11 MR. SATTERTHWAITE: Sara Gosman?

12 MS. GOSMAN: Yes.

13 MR. SATTERTHWAITE: Sam Ariaratnam?

14 MR. ARIARATNAM: Yes.

15 MR. SATTERTHWAITE: It is unanimous.

16 The motion carries.

17 MR. DANNER: All right, thank you
18 very much. Now we've got two more to consider
19 this afternoon. One is about reporting
20 emissions for each blowdown. Anyone want to
21 start the discussion here? Andy Drake?

22 MR. DRAKE: My proposal would be

1 that we have this discussion in section six and
2 kind of talk about that a little bit, so my
3 recommendation is to take this away from the
4 current voting and just carry this on in
5 section six as a cohesive conversation.

6 MR. DANNER: All right, Sara Gosman,
7 you had your card up?

8 MS. GOSMAN: I'll actually defer to
9 Arvind --

10 MR. DANNER: Okay.

11 MS. GOSMAN: -- and then I'll share
12 my thoughts.

13 MR. DANNER: Arvind?

14 MR. RAVIKUMAR: Point of
15 clarification, is there a difference between
16 report emissions versus report estimated
17 volume? That is, from a technical perspective,
18 that seems the same thing to me.

19 MR. ZAMARIN: I think what it --
20 sorry, this is Chad Zamarin. I think what it
21 means is the estimated volume without
22 mitigation and then the actual emissions. I

1 would assume that's what it means, but maybe
2 PHMSA can clarify?

3 Because I do think that's something
4 that we probably, when we get to the reporting
5 discussion, I think we want to calculate what
6 the emissions would have been with the absence
7 of mitigation, but then also report what they
8 actually were with mitigation.

9 MR. DANNER: All right, Alex?

10 MR. DEWAR: Yeah, no, I support the
11 motion to, I don't know, to table or whatnot,
12 but to discuss it later. I think there was a
13 great discussion earlier around overall target
14 setting for this that is probably better had in
15 a larger context about reporting because I'd
16 like to pick up that point again that, Arvind,
17 you raised it earlier, but useful to have it in
18 a more kind of holistic way.

19 MR. DANNER: Okay, Brian, did you
20 agree?

21 MR. WEISKER: I did. I think the
22 estimated volume, like you mentioned, because

1 earlier, this related to item number one, and
2 when we started, item number one had a million
3 cubic feet, and so I think that reported to,
4 you know, if it's a million cubic feet or
5 greater, what was the estimated volume that we
6 -- of the segment, and then what was the actual
7 emission, was what this was intended for, but I
8 totally agree this should be in section six.

9 MR. DANNER: All right, Arvind and
10 then Sara?

11 MR. RAVIKUMAR: Yes, so I want to
12 emphasize that reporting on the emissions
13 volume, both mitigated and the baseline, is
14 really important because a lot of discussion
15 earlier this morning, and we see that every
16 time we do research on this, is that the
17 biggest challenge to having any numerical
18 targets is the availability of good data on all
19 of these emissions.

20 And so, to be able to take advantage
21 of all the new technologies, all the potential
22 mitigation options that will be available in

1 the near future, we have to make sure that we
2 get better data as we develop these rules as
3 well.

4 So, one of the things I would be
5 comfortable with is having a line here that
6 says, you know, GPAC recommends that operators
7 report emissions for each blowdown and
8 estimated volume of blowdown segments subject
9 to reporting requirements in whatever that
10 section is.

11 MR. DANNER: So, basically what
12 you're saying is operators would be required to
13 report emissions for each blowdown and
14 estimated volume of the blowdown segment
15 subject to the requirements in agenda item six?

16 MR. RAVIKUMAR: Yes, to, sorry, to
17 be able to discuss the reporting requirements
18 in that section.

19 MR. DANNER: Erin? Oh, I'm sorry,
20 Sara and then Erin?

21 MS. GOSMAN: Yes, so I like the
22 subject to section six language. I'm also,

1 frankly, fine with pushing this to the full
2 discussion of reporting later that we are going
3 to have, again, in the interests of time.

4 MR. DANNER: Okay, so then you would
5 concur with Andy Drake then? We simply set
6 this one aside for now?

7 MS. GOSMAN: I would, yes.

8 MR. DANNER: Okay, Erin?

9 MR. MURPHY: I just want to -- Erin
10 Murphy with EDF. I want to elevate a concern
11 that I think there are a lot of components of
12 the NPRM where, you know, PHMSA is directing
13 operators to employ work practices and
14 technologies that might be new for some
15 operators.

16 Other operators, you know, who have
17 been sort of leading and pushing ahead might be
18 more familiar with them, but that reporting and
19 transparency and accountability is so crucial
20 to understanding, you know, how implementation
21 of these standards is going, and to really
22 ensure that PHMSA is able to, you know, take a

1 look back in the years to come and think about
2 how to evaluate future improvements.

3 There's been so much discussion
4 today, specifically about this, you know,
5 operations maintenance and venting section that
6 there is -- this is kind of new, right? And
7 so, if there is not good reporting, if there's
8 not good information and data as Arvind just
9 said, it makes it really hard to think about,
10 you know, how is implementation going and what
11 does improvement look like.

12 So, I hear folks wanting to sort of
13 push discussion, but I think there could be a
14 number of really key reporting elements, and if
15 we just push everything to the end, I'm a
16 little concerned that we're not going to fully
17 explore them.

18 So, one recommendation I might make
19 is that we sort of start a side list of some
20 sort of all of these different reporting pieces
21 that are being discussed and make sure that
22 they're all sort of listed on the agenda for

1 when we get to item six.

2 MR. DANNER: Okay, Diane?

3 MS. BURMAN: Yeah, I think putting
4 this off without forgetting about it is
5 important, and I do think that that list is
6 sort of already being compiled by PHMSA, but
7 also this language itself should be captured so
8 that we can make sure that it stays there, so I
9 support moving this.

10 MR. DANNER: All right, Andy?

11 MR. DEWAR: Andy Drake with
12 Enbridge. I agree with Erin. I think we need
13 to keep track of these conversations. I don't
14 -- I want to be very clear. My intent is not
15 to kick the can down the road on the formatting
16 of reporting. I think we need to reinvent the
17 reporting conversation.

18 We need to rethink in the context of
19 not just trying to make the existing tools work
20 because they might not, and I think we need to
21 bring a fulsome conversation to reporting and a
22 new construct with new tools in that bag to

1 solve this problem, because this is a different
2 problem than what the existing reporting
3 formats were brought to bear.

4 So, that's really my intent, but I
5 agree. Let's keep track of them, bring it into
6 that conversation and rethink the formatting of
7 how we do reporting all together. It doesn't
8 have to just be annual reporting and then a
9 detailed incident report. There could be other
10 tools we create here for the purpose of moving
11 the ball on this.

12 MR. DANNER: So, what I hear is some
13 people say let's just set this aside and keep
14 track of it. Others are saying we need a
15 motion to include this as a recommendation.
16 So, I heard wrong?

17 MS. BURMAN: We don't need a motion.
18 There was not a motion on the table. It's just
19 we're just deciding this area is going to be
20 moved. So, if no one makes a motion, we're
21 moving on anyway.

22 MR. DANNER: Okay, that -- I just --

1 what I thought I heard you say, Commissioner,
2 was that you wanted us to move on this item,
3 so, okay. So, I am hearing a consensus that we
4 will take note of this, set it aside for now,
5 and come back to it when we get to agenda item
6 six. Is everyone in agreement? Anyone not in
7 agreement? Okay, so the last one we
8 have here: Strike the language in 192.770(c),
9 requiring documentation of the methodology for
10 choosing the mitigation method. I can't
11 remember who proposed this. Brian, I think
12 this is yours.

13 MR. WEISKER: Brian Weisker, Duke
14 Energy. This was mine and I like it as it is.

15 MR. DANNER: Any other thoughts?
16 Sara?

17 MS. GOSMAN: Soul of brevity. All
18 right, so I will also try to be brief. I think
19 the documentation for some of the reasons that
20 we've been talking about in relation to
21 reporting is really critical to understanding
22 the decision making by operators, here. And I

1 don't envision it as an onerous requirement,
2 but it does allow for something on paper that
3 tells us why the methodology, this particular
4 methodology or combination of methodologies was
5 chosen. And for that reason, I would oppose
6 this.

7 MR. DANNER: All right, other
8 thoughts? Brian?

9 MR. WEISKER: I just -- Brian
10 Weisker, Duke Energy. Sorry, I keep screwing
11 that up. I just think, you know, we've already
12 went over and reviewed the idea of let's
13 document what we do, and then I think we'll be
14 getting the documenting the volumes, and then
15 we'll be getting to reporting on those volumes.

16 But the methodology of decision
17 making and documenting that time, and time, and
18 time again, I think it just doesn't make sense
19 to me when we're doing these. You know, we're
20 making a decision, implementing it, reducing
21 emissions. I just think this is unnecessary
22 and burdensome.

1 MR. DANNER: Well, let me ask you,
2 if we were actually to get -- to have this
3 language in, it doesn't talk about
4 justification for the methodology chosen. It
5 also requires identification of the methodology
6 used, and if this goes into effect, then you
7 would not need to identify the methodology
8 used. Is that what you intended?

9 MR. WEISKER: I intended -- so the
10 way it was written is describing how the
11 methodology minimizes the release. We've
12 already defined several of what, of the items
13 that -- you know, we've made a laundry list of
14 items that will minimize release. Reiterating
15 the how every time we pick an option, it just
16 seems to me, is redundant and doesn't
17 necessarily make sense.

18 MR. DANNER: Andy and Chad, I don't
19 know which one of you was first, so flip a
20 coin. Andy?

21 MR. ZAMARIN: Age before -- sorry.

22 MR. DRAKE: Don't say it. That's

1 not going to win you anything. Andy Drake with
2 Enbridge. I have a hard time with it as it's
3 written right now because we talked so much
4 about documentation. I think I would have to
5 ask for clarification.

6 I know, Brian, you're supportive of
7 some documentation. I'm quite certain of that,
8 so maybe you could help articulate what
9 documentation that you think is required in
10 association with this language up here, because
11 I don't want to turn this into binaries, like,
12 all or none.

13 I know we've all been talking for
14 all day about we're going to document the basis
15 for decisions, so there's some documentation
16 that we're going to require. Can you help
17 differentiate what we are -- what you see that
18 we would be requiring?

19 MR. WEISKER: I'm not sure exactly -
20 - oh, sorry, Brian Weisker, Duke Energy.

21 MR. DANNER: Go right ahead. Thank
22 you.

1 MR. WEISKER: I'm not sure, as I
2 read the language, you know, what is -- what
3 will be the requirement of each? The concern
4 would be do -- each time that we do, let's say
5 we do a mitigating factor, do we have to
6 analyze all six each time, document all six,
7 what the equivalency of each six, all six would
8 be, and choosing the minimum, whatever is the
9 minimum one, no matter what other option, what
10 other alternatives may exist? So, that's the
11 major concern with this as written.

12 MR. DANNER: Thank you. All right,
13 Chad, Erin, Peter, and Arvind in that order.
14 Chad?

15 MR. ZAMARIN: Chad Zamarin with
16 Williams. I think, going back to my
17 discussion, I think I can get comfortable with
18 this language. I think it's important. I
19 believe in us documenting what we do and why we
20 do it. I think a different discussion when we
21 talk about what we report, as I mentioned.

22 Now, I don't know if it's, if it

1 makes better sense to just make this, you know,
2 that we must document and justify the
3 methodologies used in paragraph A full-stop,
4 and not be as specific or make it easier, but I
5 think we need to -- I think we should be
6 comfortable with documenting how we're
7 complying with this section and applying this
8 section in our operations, and so I'm
9 supportive of the concept of documentation.

10 Could the language be improved?
11 Maybe, but -- and if so, my recommendation
12 would be simplifying and just saying you have
13 to document the methodology -- you have to
14 document and justify the methodology used in
15 paragraph A, but, again, I think I can get
16 comfortable.

17 MR. DANNER: All right, thank you
18 very much. Erin?

19 MR. MURPHY: Yeah, I support the
20 language in the NPRM and don't see a need for
21 the committee to recommend any changes.

22 MR. DANNER: All right, thank you.

1 Peter?

2 MR. CHACE: Pete Chace, NAPSR. As a
3 -- if I was performing a pipeline safety
4 inspection and I was checking for compliance
5 with this code section, I would read the
6 company's procedures, I would look at their
7 documentation on what they did and make sure
8 that their actions complied with their
9 procedures.

10 So, I do have to agree. I'm not
11 sure justifying the methodology chosen for each
12 job really makes, provides much that's useful.
13 I think it's just essentially a statement that
14 yes, we followed our procedures, and here is a
15 couple pieces of paper describing how we did
16 it. If they're following their procedures,
17 that should already be clear, so --

18 MR. DANNER: But insofar as they
19 would have some discretion on what methodology
20 to use, wouldn't you want them to identify the
21 methodology that they use?

22 MR. CHACE: Oh, certainly, yes, they

1 should identify the methodology, but I don't --
2 to me, to describe how the methodologies
3 minimize the release of gas to the environment,
4 that should be something captured in the
5 company procedures.

6 I don't -- I'd like to know the
7 methodology they chose, but I'm not sure I
8 would need a justification of every single job,
9 why I picked the methodology described in my
10 procedures as an adequate methodology.

11 MR. DANNER: All right, thank you
12 very much. Arvind?

13 MR. RAVIKUMAR: Yes, Arvind
14 Ravikumar, University of Texas. I don't know
15 why I've never said that before. I support
16 Chad's comments saying that -- you know,
17 modifying this to operators must document and
18 justify the methodologies used in paragraph A.

19 The second part on how it minimizes
20 release of gas, that's taken care of by our
21 official discussion on reporting requirements.
22 If you're reporting estimated emissions and

1 emissions mitigated, that should give you the
2 minimization of whatever amount of gas is
3 estimated.

4 MR. DANNER: All right, what would
5 you see as necessary to, for justification,
6 just identifying the methodology and saying
7 this is what it will achieve?

8 MR. RAVIKUMAR: Identifying the
9 methodology and why that was the best possible
10 method in that situation. So, there are four
11 or five different options, plus an additional
12 alternative technology option, why they chose
13 that particular one as opposed to the others.
14 I think that's what Chad was referring to, but
15 he can clarify as well.

16 MR. DANNER: All right, thank you
17 very much. Diane, then Sara, then Brian?

18 MS. BURMAN: Thank you. So, I guess
19 I look at this a little bit like when my kids
20 had to do new math and they would get credit
21 for the answer, but they had to also show all
22 of their work. And it always seemed like they

1 kept not doing well because the methodology
2 they used was a different one than the teacher
3 thought that they should use.

4 So, in looking at that and trying to
5 understand what are we trying to accomplish, I
6 can understand the need to document why they
7 didn't use something, and if necessary, to then
8 explain, you know, further. I'm just trying to
9 understand if this makes sense to go down the
10 rabbit hole of having, and I'm undecided, but
11 having to document the methodologies always
12 used versus --

13 Again, it's coming back to what's
14 PHMSA going to do with this, and I worry that
15 it's going to chill and lead a little bit to
16 some second guessing. So I wonder if there's
17 some way of dealing with the need for
18 documentation, but with some flexibility built
19 in there.

20 MR. DANNER: All right, thank you.
21 Sara?

22 MS. GOSMAN: Sara Gosman. I

1 introduced myself. Okay, so I'm just -- maybe
2 I want to step back a little bit because I want
3 to look at the language that's actually
4 proposed. So, the language that is proposed is
5 operators must document the methodologies used
6 in paragraph A of this section, and describe
7 how the methodologies minimized the release of
8 gas to the environment.

9 So, what I see there is the
10 documentation of which one of these options or
11 combination of these options is used, and then,
12 as well, describing how effective that was,
13 right? What was the result here? So, I wanted
14 to check my interpretation with PHMSA to make
15 sure that's their understanding too.

16 That is -- I don't see a requirement
17 here actually for justification of a particular
18 methodology. I think that would be a great
19 idea, right, but it's not -- I don't see it in
20 the text of the NPRM.

21 MR. DANNER: Yes, so it's not a
22 defense of. It's an explanation of what it

1 does.

2 MS. GOSMAN: Okay, so PHMSA says
3 yes, so I guess, I mean, if we stick with the
4 language in the NPRM right now, what I
5 understand operators are required to do is
6 document the options that they took and also
7 describe how they minimized the release of gas
8 to the environment. So, that seems like your
9 concern here is actually something that isn't
10 in the requirement as of now.

11 MR. DANNER: All right, thank you.
12 Brian?

13 MR. WEISKER: Brian Weisker, Duke
14 Energy. After listening to Peter and -- thank
15 you -- Sara, as well, I think where I would
16 clarify is if we would say that operators must
17 document in their procedures the methodologies
18 that they use.

19 So, we would describe within our
20 procedures the methodologies that we use, and
21 then I think that would clear it up for me,
22 that it would make it crystal clear that we

1 document in our procedures, like you mentioned,
2 Peter, that that would be something that you
3 would use as an audit when you went out and
4 audited an operator, and then we would document
5 whenever we followed this procedure. We'd
6 document this as the procedure or the process
7 that we used, and document it as we described
8 earlier.

9 MR. DANNER: All right, thank you.
10 Alex, did you -- Diane Burman?

11 MS. BURMAN: Yeah, I liked Sara, you
12 know, kind of getting under the hood of what
13 are we trying to accomplish, and I don't think
14 it's intended to be broad for every single
15 thing, having to document.

16 So, I wonder if there's, taking sort
17 of Brian's friendly amendment to his language,
18 if there's some way that it mirrors back to,
19 Sara, what you were saying in trying to get to
20 the heart of what is actually the -- why we're
21 trying to get to this. What are we trying to
22 accomplish?

1 MR. DANNER: Thank you. Erin?

2 MR. MURPHY: Erin Murphy, EDF. I
3 appreciate the amendment that Brian just
4 proposed. As I'm, you know, looking at the
5 language of this section, one thing that jumped
6 out to me that we haven't discussed yet is, in
7 192.770(a)(6), there's the alternative method
8 pathway.

9 And the way part C, which is the
10 requirement for operators to document the
11 methodologies is phrased in the NPRM actually
12 only references that, you know, list of options
13 in paragraph A. Oh, sorry, I'm learning as I
14 read here and realizing that six is a subpart
15 of A. I think I'm tired at the end of the day.

16 What I was getting at is a concern
17 that the phrasing in the NPRM did not encompass
18 the choice to go with the alternative pathway,
19 but now I realize that it does, so I think
20 that's great. Good job, PHMSA, but, yeah, I am
21 comfortable with what Brian proposed for the
22 documentation and procedures.

1 MR. DANNER: Okay, and for --
2 Sayler, do you need Brian to repeat his
3 proposal?

4 MR. PALABRICA: We tried it and we
5 were going to see if Brian can read the
6 language we put up?

7 MR. DANNER: Brian, does that look
8 familiar?

9 MR. WEISKER: Brian Weisker, Duke
10 Energy. Yes.

11 MR. DANNER: Okay, Chad, you had
12 your card up? All right, there are no more
13 cards up, and bad news, Erin, it's not near the
14 end of the day, but we will push on. Is there
15 anyone who opposes this language? All right,
16 is there anyone who would like to move that we
17 adopt this language?

18 MR. WEISKER: I guess I might.

19 MR. DANNER: Brian?

20 MR. WEISKER: Brian Weisker, Duke
21 Energy. The proposed rule, as published in the
22 Federal Register and as supported by the

1 preliminary regulatory impact analysis and
2 draft environmental assessment, with regard to
3 blowdown mitigation, is technically feasible,
4 reasonable, cost-effective, and practicable if
5 the following changes are made, one, revise
6 Section 192.77(c) to specify that operators
7 document in their procedures the methodology
8 for choosing mitigation methods.

9 MR. DANNER: Is there a second?

10 MS. GOSMAN: Oh, not a second. I
11 apologize. I know this is out of turn, but can
12 I -- Brian, can I just quickly ask a clarifying
13 question? Is this language meant to replace C,
14 or is it meant to clarify the language in
15 relation to methodology?

16 Because there is that minimizing the
17 release, explaining that, that I think should
18 stay in C, so I'm just wanting to make sure
19 that that's your understanding, that's the
20 committee's understanding of this proposal.
21 Otherwise, we're voting on two different
22 things.

1 MR. WEISKER: Brian Weisker, Duke
2 Energy. I was thinking this would replace that
3 section.

4 MR. DANNER: So, all right, the
5 language here is revised, which could be read
6 as edit or amend to, so I think we need to
7 clarify this as replace the language in, but we
8 have a motion now standing.

9 So, where are folks? Sara, where
10 are you? If this is a replacement of 770(c),
11 is that a different thing that if this is
12 additional, or could it be additional? Is it
13 consistent?

14 MS. GOSMAN: So, if documenting in
15 their procedures the methodology for choosing
16 mitigation methods includes looking at the
17 environmental impact, here, the emissions, that
18 piece of what was there, I think I'm fine with
19 it.

20 MR. DANNER: All right, does anyone
21 else have a comment? Erin?

22 MR. MURPHY: I wonder if I could

1 offer a friendly amendment to clarify that.
2 So, document in their procedures the
3 methodology for choosing mitigation methods,
4 comma, including evaluation of environmental
5 impacts.

6 MR. DANNER: Brian, would that be
7 acceptable to you?

8 MR. WEISKER: Is someone typing that
9 up there? Excuse me, Brian Weisker, Duke
10 Energy. There it is. I can accept that.

11 MR. DANNER: Okay, that friendly
12 amendment has been accepted. This changes the
13 motion, and, John, I don't know if we need to
14 read this again or if the record has captured
15 this.

16 PARTICIPANT: Sara has a question.

17 MR. DANNER: Oh, Sara Longan?

18 MS. LONGAN: Mr. Chairman, I know
19 we're trying to be productive, and I appreciate
20 that, but to me, adding including evaluating of
21 environmental impacts, I support the notion,
22 but you're introducing new terms that are more

1 vague than what is in the NPRM. Could we just
2 consider going back to what was already part of
3 this, and methodologies minimize the release of
4 gas to the environment? It's much more clear
5 to me. Thank you.

6 MR. DANNER: Erin?

7 MR. MURPHY: Yeah, I would be fine
8 with that too.

9 MR. DANNER: Chad Zamarin?

10 MR. ZAMARIN: Chad Zamarin with
11 Williams. I like the proposal that was made,
12 that I think might have just been erased, only
13 because it specifies in kind of the earlier
14 section of this to prevent and minimize
15 emissions.

16 This is the documentation portion
17 and I think it makes sense for this to be clear
18 that the intent is to document in your company
19 procedures how you'll basically be implementing
20 this section, but I don't know why we would
21 further define things. So, I like the friendly
22 amendment that Erin made better than the way it

1 was drafted.

2 MR. DANNER: So, you would prefer
3 the language that is up there now, including
4 evaluation of environmental impacts?

5 MR. ZAMARIN: I would, yes.

6 MR. DANNER: Okay, Sara Longan,
7 based on what you've heard, does that change
8 your view?

9 MS. LONGAN: I'm close. I think
10 we're really working on semantics here. As a
11 regulator and someone who is used to being in
12 the field, I hearken back to Peter's earlier
13 comments, albeit on a different subject,
14 including evaluation of environmental impacts.

15 Boy, I'd want an associated in there
16 somewhere because to me that new language just
17 opens the door to potentially more than what
18 the intention of the revision includes. Thank
19 you.

20 MR. DANNER: So, you would propose
21 putting evaluation of associated environmental
22 impacts in there just to limit it so that we're

1 not going to be talking about --

2 MS. LONGAN: It helps me.

3 MR. DANNER: Yeah.

4 MS. LONGAN: To me, in the field as
5 an auditor, it still changes what was in the
6 NPRM, but again, I think this is semantics and
7 I can be there either way. Thank you.

8 MR. DANNER: All right, Peter?

9 MR. CHACE: Pete Chace, NAPS. What
10 environmental impacts are we worried about
11 other than release of gas to the environment?

12 MR. DANNER: Well, if it's not
13 associated, I mean, it could be water quality.
14 It could be air quality. It could be impact on
15 flora and fauna. I mean, it depends on what
16 you think that your inspectors -- like, what
17 your inspectors would want to look at. Erin?

18 MR. MURPHY: Thanks, Erin Murphy,
19 EDF. Apologies if I've gone in circles, but I
20 think as the discussion sort of moves around,
21 it does seem to me more appropriate, maybe, to
22 stick with the language in the NPRM to require

1 the explanation for how, you know, the
2 evaluation minimizes the release of gas to the
3 environment, because I think that, you know,
4 that is consistent with the language in subpart
5 A.

6 MR. DANNER: All right, Commissioner
7 Burman?

8 MS. BURMAN: I agree with Erin. I
9 think that -- and Sara Longan. I think we
10 should revise to say the operators must
11 document in their procedures the methodologies
12 used in paragraph A of the section and describe
13 how the methodologies minimize the release of
14 gas to the environment. It's clear here that
15 we're taking what was proposed by PHMSA and
16 putting it now into the procedures, and then we
17 don't have, you know, conflicting what does it
18 mean, what we're saying.

19 MR. DANNER: All right, Brian?

20 MR. WEISKER: Brian Weisker, Duke
21 Energy. As proposed, the bottom one there, the
22 192.7 as proposed with the five asterisks, if

1 we change minimize to reduce, so we would
2 describe how these procedures and methodologies
3 reduce the release of gas to the environment.

4 MR. DANNER: All right, that opens
5 up a different debate.

6 (Laughter.)

7 MR. DANNER: So it is 4:30, and I
8 hope no one has dinner plans. So, Erin?

9 MS. MURPHY: Yeah, I think, you know
10 -- Erin Murphy, EDF -- my circling around to,
11 to wanting to support the language in the NPRM
12 is, you know realizing that language is
13 consistent with the earlier part of this
14 section that requires operators to evaluate a
15 number of available methods. And that
16 language, that section uses, you know, the
17 language to minimize the release of gas. And
18 that's consistent with the statutory language
19 in the PSAC of 2020.

20 So, I think it's appropriate to
21 retain the term minimize, not reduce.

22 MR. DANNER: Peter Chace?

1 Oh, all right. Sara?

2 MS. LONGAN: This is Sara Longan.

3 Just for some of us who do have
4 dinner plans -- I'm not one of those people --
5 I fully understand where Erin is coming from.
6 And I think, just to offer a friendly
7 amendment, if not a consideration at this
8 juncture, we're talking about mitigation. The
9 word prior is referring specifically to
10 mitigation methods.

11 Could we consider, instead of
12 choosing reduce or minimize that triggered
13 hours of conversation earlier today,
14 methodology mitigates the release of gas to the
15 environment.

16 MR. DANNER: Chad?

17 MR. ZAMARIN: Yeah. I would support
18 that.

19 But, again, I go back to I think we
20 have to be careful that we're not trying to
21 kind of reestablish requirements that were
22 created in other parts of the language. And I

1 think that the section of the language
2 describes what this, what the intent is in
3 selecting methodologies. This is what you're
4 supposed to document.

5 And to me, documenting how you went
6 through this section is, I think, the intent of
7 this section. So, I mean, I would support that
8 language. But I would be careful making it too
9 specific in this section and having it
10 misinterpreted.

11 So, I, again, I like it where we
12 just said -- I actually like operators must
13 document and justify in their procedures. And
14 that's how it is used in the course of this
15 section. I think I got, you know, numbered on
16 that one. But because I thought everything
17 else we talked about is addressed in other
18 parts of this section already.

19 But, again, I -- those are my
20 thoughts. Thanks.

21 MR. DANNER: So, I guess my question
22 to you is, is the language at the bottom of the

1 page there okay?

2 MR. ZAMARIN: Yeah. I think what I
3 said is I will agree to wherever the committee,
4 I think, ends on this issue. This is not -- I
5 don't love the potential misinterpretation of
6 two different portions of this section. I
7 think this being the document how you, you
8 know, implemented this section in your
9 procedures.

10 But, yes, I would support that.

11 MR. DANNER: Okay.

12 Sara?

13 MS. GOSMAN: Yeah. So, I think
14 we've morphed into a discussion about the
15 actual language in (a), which is prevent or
16 minimize.

17 So, it seems to me that whatever
18 documentation is done should be based on the
19 requirement on the operator. And that language
20 is to prevent or minimize.

21 So, if we're going to have a
22 discussion about the prevent or minimize

1 language, I feel like we should do it there and
2 not in the documentation requirements.

3 MR. ZAMARIN: Yeah. That's exactly
4 -- Chad Zamarin again -- that's exactly why I
5 would strike it from this section and I would
6 just say document how you complied with
7 paragraph (a) which includes that language
8 already.

9 And that, that was my original
10 proposal is just say we're trying to make clear
11 here that operators must document how they're
12 navigating through this section (a) and making
13 the determination. Let section (a) dictate
14 what criteria needs to be used to make that
15 decision.

16 MR. DANNER: And would that be
17 acceptable to others?

18 MS. GOSMAN: It's acceptable. Sara
19 Gosman. It's acceptable to me, but I still
20 feel like we're dancing around the issue.
21 Right?

22 I mean, that is if the real concern

1 here is about that language, about prevention
2 and minimization, then we should -- I can't
3 believe I'm saying this -- but we should have
4 that conversation rather than try to make the
5 reporting or, sorry, documentation language
6 more vague, right, to address whatever's in (a)
7 if whatever is in (a) is not, is not something
8 that folks on the committee want.

9 MR. ZAMARIN: Could we say something
10 like operators must document in their
11 procedures the methodologies used to comply
12 with paragraph (a) of this section?

13 MS. GOSMAN: That's fine with me.

14 But, again, I just feel like this is
15 a conversation that's actually about something
16 else. I'll just say that.

17 MR. DANNER: Would that be
18 acceptable to you where you said methodologies
19 used to comply with paragraph (a) of this
20 section? Any thoughts on that?

21 MR. WEISKER: Could we strike the
22 and describe all the way through the end of the

1 sentence there?

2 MR. DANNER: Yeah. Because then now
3 we're requiring that they describe their
4 compliance with paragraph (a), which also talks
5 about, you know, everything in it. For this,
6 yes. For this, yes.

7 MR. WEISKER: All right.

8 MR. DANNER: Erin Murphy?

9 MS. MURPHY: Yeah. I think the
10 second clause of the sentence was included in
11 the NRPM by PHMSA and is appropriate to retain.
12 And I don't think I would support removing
13 that.

14 I'm comfortable with the language
15 and what Chad was proposing, which I think is
16 what's on the screen now.

17 MR. DANNER: Okay. Trying to get a
18 sense of the committee.

19 Can anyone speak up if they have
20 opposition to what is on the screen now?

21 As soon as we get the screen down.

22 I am not hearing any opposition to

1 what's up there now.

2 Sara?

3 MS. GOSMAN: I'm confused about the
4 language that's up there now.

5 So, methodologies used to comply.
6 Oh, now it's gone away. Okay.

7 So, we are limited to the
8 methodologies used to comply with paragraph (a)
9 of this section. Is that where we are?

10 MR. DANNER: Well, that's where we
11 were. And then I hear Erin say that she wanted
12 the second clause. And we had some agreement
13 with some industry people.

14 Is that right? Okay.

15 MS. GOSMAN: Okay. Can we put that
16 language up?

17 MR. DANNER: So, it would be
18 operators must document their procedures,
19 methodologies used in paragraph (a) of this
20 section and describe how the methodologies
21 mitigate the release of gas to the environment.

22 We're keeping Sayler on his toes

1 here.

2 All right. Mitigate the release of
3 gas to the environment.

4 Oh, okay. Erin?

5 MS. MURPHY: So, I was -- I do
6 support this language. I, I was expressing
7 support for the revision that I think Chad had
8 proposed, but he can correct me. But to make
9 that second clause describe how methodologies
10 satisfy the standard.

11 I don't remember what it was.
12 Right?

13 MS. BURMAN: It was comply with.

14 MS. MURPHY: Comply with. Thank
15 you.

16 MS. BURMAN: So, you're taking out,
17 if I -- Operators must document in their
18 procedures the methodologies used in paragraph
19 (a) of this section and how they comply with.

20 MR. DANNER: Comply with that
21 paragraph.

22 MS. BURMAN: Yes.

1 MS. MURPHY: Yeah.

2 MS. BURMAN: And, and then I think
3 the rest comes out.

4 MR. DANNER: Yeah.

5 Okay, I think, yeah, you can say
6 that. Or you can say comply with, that, that
7 paragraph, period.

8 Are people okay with this paragraph?

9 Brian?

10 MR. WEISKER: I was getting ready to
11 make a motion.

12 MR. DANNER: Okay. Well, actually,
13 first you need to withdraw your earlier motion.

14 MR. WEISKER: Withdraw the -- Do I
15 have to read all the way through?

16 MR. DANNER: You bet you do.

17 MR. WEISKER: All right. So, I am
18 withdrawing my previous motion of the proposed
19 rule as published in the Federal Register and
20 as supported by the preliminary regulatory
21 impact analysis and draft environmental
22 assessment with regard to blowdown mitigation,

1 section 192.770, is technically feasible,
2 reasonable, cost-effective, and practical if
3 the following changes are made.

4 That's not what it -- there was,
5 what was originally up there is not there now.

6 Can I just with -- can I just say I
7 withdraw that and then, and then propose a new
8 motion?

9 MR. DANNER: Wait. So, what is up
10 there now is not what you want to propose?

11 MR. WEISKER: No, it is. But you
12 said I needed to read, completely re-read the
13 one that I want to withdraw.

14 MR. DANNER: Oh, no. You just keep
15 reading, you just keep reading it.

16 MR. WEISKER: Okay. And so, now --

17 MR. DANNER: Start with revise.
18 That's where you left off.

19 MR. WEISKER: And now I'm going to
20 revise 192.777(c) to read as follows:

21 Operators must document in their
22 procedures the methodologies used in paragraph

1 (a) of this section, and describe how the
2 methodologies comply with that paragraph.

3 MR. DANNER: All right. There is a
4 motion before us.

5 Is there a second?

6 MS. MURPHY: Second.

7 MR. DANNER: All right. Erin Murphy
8 seconded.

9 And, Cameron, can you take the vote?

10 MR. SATTERTHWAITE: All right. I
11 will say your name. If you agree with the
12 motion, just say yes. If you do not, say no.

13 Diane Burman.

14 MS. BURMAN: Yes.

15 MR. SATTERTHWAITE: Peter Chace.

16 MR. CHACE: Yes.

17 MR. SATTERTHWAITE: David Danner.

18 MR. DANNER: Yes.

19 MR. SATTERTHWAITE: Sara Longan.

20 MS. LONGAN: Yes.

21 MR. SATTERTHWAITE: Terry Turpin.

22 MR. TURPIN: Yes.

1 MR. SATTERTHWAITE: Brian Weisker.
2 MR. WEISKER: Yes.
3 MR. SATTERTHWAITE: Andy Drake.
4 MR. DRAKE: Yes.
5 MR. SATTERTHWAITE: Alex Dewar.
6 MR. DEWAR: Yes.
7 MR. SATTERTHWAITE: Steve Squibb.
8 MR. SQUIBB: Yes.
9 MR. SATTERTHWAITE: Chad Zamarin.
10 MR. ZAMARIN: Yes.
11 MR. SATTERTHWAITE: Chad Gilbert.
12 MR. GILBERT: Yes.
13 MR. SATTERTHWAITE: Arvind
14 Ravikumar.
15 MR. RAVIKUMAR: Yes.
16 MR. SATTERTHWAITE: Erin Murphy.
17 MS. MURPHY: Yes.
18 MR. SATTERTHWAITE: Sara Gosman.
19 MS. GOSMAN: Yes.
20 MR. SATTERTHWAITE: Sam Ariaratnam.
21 MR. ARIARATNAM: Yes.
22 MR. SATTERTHWAITE: It is unanimous.

1 The motion carries.

2 MR. DANNER: All right. Thank you
3 very much. Appreciate it.

4 We have a couple of loose ends here
5 that I feel compelled to bring up.

6 One was do we need to have a
7 definition of documented engineering analysis?

8 And the other is what do we want to
9 do with regard to relief valves?

10 John?

11 MR. GALE: I believe -- Thank you,
12 Chairman. I believe some of the members may
13 have a recommendation on relief valve language.
14 Is that correct?

15 MR. ZAMARIN: This is Chad Zamarin.

16 I think I raised those two issues as
17 ones I felt like we should discuss. I don't
18 know that I've got a language recommendation.
19 I was more interested in just making sure we
20 discussed it.

21 But I do, I think my proposal in the
22 discussion was I'm not sure you needed to

1 specify the need for an engineering analysis.
2 You said you got to basically -- I can't
3 remember the language. I don't have it in
4 front of me. But strike that with removing
5 undefined -- an undefined term that I think
6 would create a lot of confusion and is
7 unnecessary.

8 And then I think that we, we've been
9 looking at the language around isolation of
10 relief valves. And it feels like that could be
11 made more flexible to allow for the vast, you
12 know, variety of different kind of designs that
13 exist.

14 MR. GALE: Yeah. I believe, Member
15 Squibb, do you by chance have some language
16 that you're recommending we put on the screen?
17 Yeah, gotcha.

18 We can pull it up if you like.

19 I'm not seeing it.

20 The recommended language, Member
21 Squibb, was actually sent to staff. And we can
22 pull it up if you'd like to read it from there.

1 MR. SQUIBB: That would be great.

2 MR. GALE: Okay. Pulled it up.

3 MR. SQUIBB: So this is our number
4 one, was the way it's on here, one. PHMSA
5 should refrain from using the undefined concept
6 of a documented engineering analysis.

7 Take these one at a time.

8 MR. GALE: If you could maybe just
9 read through it and then we'll let the chairman
10 decide how he wants to go from there.

11 MR. SQUIBB: Yeah. Why don't we,
12 why don't we deal with all of these at one
13 time.

14 Okay. Two, PHMSA should incorporate
15 the changes to device maintenance in existing
16 192.739.

17 Three, operators must take immediate
18 action, not continuous action, to address
19 malfunctions.

20 Four, repairs must occur as soon as
21 practicable. And PHMSA should remove the
22 prescriptive requirement to repair or replace

1 within 30 days.

2 Five, remove the requirement for
3 upstream and downstream isolation valves and,
4 instead, require the ability to isolate the
5 relief valve for maintenance and testing.

6 Six, pressure choking should not be
7 included in design considerations as it is a
8 phenomenon that may be unavoidable.

9 MR. DANNER: All right. Thank you
10 very much.

11 I guess this was one where I don't
12 have a sense of if we refrain from using the
13 undefined concept of a documented engineering
14 analysis is there language that PHMSA could
15 use? Because I think we all have a sense of
16 what they're talking about.

17 Is there another concept that would
18 substitute for that?

19 Chad?

20 MR. ZAMARIN: Thank you, Chair.
21 Chad Zamarin, Williams. I think if you read
22 that sentence, I'm just not sure it's

1 necessary. The sentence, as I'll read it, is
2 all new, replaced, relocated, or otherwise
3 changed pressure relief and limiting devices
4 must be designed and configured, and then it
5 says, as demonstrated by documented engineering
6 analysis to minimize unnecessary release of gas
7 by ensuring each of the following.

8 I mean, you already have a
9 requirement there. It's just adding to, to
10 have a documented engineering analysis.

11 MR. DANNER: So, you would just
12 remove those three words from the sentence?

13 MR. ZAMARIN: I would just remove
14 those words because they're undefined. I think
15 it will create a lot of uncertainty.

16 And, you know, having this very
17 specific requirement is going to require
18 standards to be updated, procedures to be
19 updated, design requirements to be updated.
20 And that's, I think, where that will live, and
21 should.

22 MR. DANNER: All right. Is there

1 any discussion?

2 Erin?

3 MS. MURPHY: So, my under -- Erin
4 Murphy, EDF -- my understanding is that there
5 is the concern is the lack of clarity around
6 the term.

7 Could the committee not also
8 recommend that PHMSA consider a definition for
9 the term so that there's clarity for operators
10 rather than removing what seems like an
11 important analysis, potentially?

12 MR. ZAMARIN: Sorry, Chair. This is
13 Chad Zamarin again.

14 If you go back to this actual
15 section as proposed, it has a whole series of
16 requirements that I think kind of define what
17 the engineering requirements are. So, I
18 didn't, I didn't finish the end.

19 It says as demonstrated by
20 documented engineering analysis to minimize
21 unnecessary releases of gas, and then it says
22 by ensuring each of the following. And there

1 are several requirements that are included.

2 Again, it just feels like, I mean,
3 it feels like we're creating a term but we've
4 already defined kind of the standard
5 expectation and all of the requirements that,
6 the minimum requirements that fall within it.

7 And so, I did think it, it could be
8 interpreted to mean that for every single
9 relief valve -- I mean, the way this is
10 practically going to happen is, I think,
11 engineering standards are going to be updated
12 based on these requirements and that that will
13 become the way that we design and install
14 relief valves.

15 MR. DANNER: Yeah. I guess my
16 concern is if you take, if you just ask PHMSA
17 to define that term then we're going to have to
18 have a discussion about what that definition
19 is.

20 MR. ZAMARIN: Right. And that's my
21 point. I think it's defined, I think the
22 requirements of it are effectively defined by

1 the criteria that are listed in that section.
2 So, I don't know if members need a chance to
3 look at it, but there's quite a bit of
4 specificity in there that I think mitigates the
5 need for that term.

6 MR. DANNER: All right. Any other
7 discussion on that?

8 Could you raise, go up? I mean
9 down. So, there. That's --

10 MR. ZAMARIN: I don't actually think
11 that's the right language. I think this is
12 192.199(i). There you go.

13 MR. DANNER: Can you keep scrolling
14 up. Or down.

15 MS. BURMAN: Can you go back up?

16 So, what we're saying is all new
17 replaced, relocated, or otherwise changed
18 pressure release and limiting devices must be
19 designed and configured. And we take out as
20 demonstrated by a documented, perhaps take out
21 as demonstrated by a documented engineering
22 analysis.

1 And the why we're doing this is to
2 minimize unnecessary releases of gas by
3 ensuring each of the following.

4 And then the numbers are setting
5 forth the criteria and analysis.

6 So, I think, Erin, if I'm not
7 mistaken, this demonstrates by a documented
8 energy -- engineering analysis is unnecessary
9 because the criteria is set forth in there.

10 But just to make clear, sort of
11 pause, because I think each section -- Can you
12 go now up to, well, go one, two, keep going,
13 one, two, and three. So, all of these are the
14 criteria analysis. And so, we don't need to
15 worry about how to define documented
16 engineering analysis because it's this set of
17 criteria that's defining what the why is and
18 what's required.

19 MR. DANNER: Thank you.

20 Sara Gosman?

21 MS. GOSMAN: So, I'm not wedded to
22 the term engineering analysis, but I wonder

1 what is the documentation then? If these are
2 particular actions to be taken by operators,
3 how is PHMSA going to know whether the
4 operators have taken these steps?

5 And do we have language here that we
6 can just use in terms of documentation as
7 opposed to engineering analysis?

8 MR. DANNER: Chad?

9 MR. ZAMARIN: Yeah. Chad Zamarin
10 with Williams.

11 Yeah, I think there could be some
12 language. I mean, I think in practical
13 application this will lead to updates to
14 engineering standards, operating and
15 maintenance procedures. And I think that
16 that's where you ultimately demonstrate, then,
17 your compliance with these requirements.

18 So, and if necessary, there are
19 engineering standards and third party standards
20 that may be updated. I don't know. But that's
21 usually where those kind of consensus standards
22 would contain the support for those changes.

1 But I think maybe it references like
2 we did in the last one that it's documented in
3 your, in your ensuring standards or operating
4 and maintenance procedures. Something to that
5 effect.

6 MR. DANNER: Diane?

7 MS. BURMAN: Maybe, also, when we
8 are recommending to remove as demonstrated by a
9 documented engineering analysis we make clear
10 that it is sufficient to have the criteria set
11 forth. But we're not, we're not asking for the
12 criteria analysis laid out one to three to be
13 removed.

14 MR. DANNER: All right, thank you.
15 Erin, did you have your card up?
16 No. Okay.

17 Peter? Okay.

18 All right, it looks like it has been
19 suggested that we remove that term and
20 documented. Does that meet with everyone's
21 approval here?

22 Sara Gosman?

1 MS. GOSMAN: That's fine. I mean, I
2 think it sounds like there could be more
3 specificity in terms of, let's say, procedures,
4 like which is language we used before. I guess
5 I would prefer that. But I'm also fine with
6 the language documented.

7 MR. DANNER: Chad?

8 MR. ZAMARIN: Yeah, Chad Zamarin,
9 Williams.

10 And just to be clear, and I think we
11 can say documented, and there could be, like we
12 did in the last one, more specificity.

13 But when you have engineering
14 standards and requirements in a code like this,
15 operators are going to have to demonstrate that
16 they incorporate those into their standards and
17 procedures. I mean that's, that's how the
18 entire code works.

19 If the code has a requirement, you
20 don't have to say that it's documented in your,
21 in your procedures. We have to demonstrate
22 that we comply with that.

1 But I think it's fine to state it.
2 But that's, that's in practical application
3 that's how it works. I mean, the regulator
4 will bring this out and will say, show me how
5 you comply with this requirement. And if it's
6 not in your procedures, or your standards, or
7 you haven't documented it when you make that
8 modification or installation, you're not going
9 to be in compliance.

10 So, I think by having, having the
11 requirement that you must do this, this
12 hopefully brings some comfort that that means
13 operators will have to incorporate these into
14 their standards and procedures.

15 MR. DANNER: All right, thank you.

16 Peter?

17 MR. CHACE: Pete Chace, NAPSR.

18 I will say as a compliance
19 investigator I will echo what Chad said. If
20 you've got a requirement in the code that says
21 design and configure, you're going to have
22 engineering design standards where acceptable

1 components and design parameters are spelled
2 out. I personally believe design and configure
3 is adequate.

4 MR. DANNER: But you don't object to
5 the word and documented in there?

6 MR. CHACE: No. I just think it's
7 redundant.

8 MR. DANNER: Yeah. All right.
9 Sara.

10 MS. GOSMAN: Because the language
11 included as demonstrated by a documented
12 engineering analysis, I guess my only concern
13 is I completely understand the point that this
14 would otherwise be documented, but I feel like
15 keeping the documentation language in there is
16 a story that we are telling, right, because we
17 are advising the language around engineering
18 analysis.

19 So, I would prefer, I recognize that
20 it is repetitive, but I would, I would prefer
21 having and documenting in the language.

22 MR. DANNER: All right. Is there

1 any further discussion on these amendments?

2 MS. BURMAN: Can we go back to the
3 page that had, well, I think we -- Yeah.

4 MR. DANNER: Yeah.

5 MS. BURMAN: So, number one, PHMSA
6 should remove the term.

7 Number two, PHMSA should incorporate
8 the changes to device maintenance in existing
9 192.

10 I think the only thing, the only
11 thing on four, repairs must occur as soon as
12 practicable, and PHMSA should remove
13 prescriptive requirements to repair or replace
14 within 30 days, I support. I think it should
15 be as soon as practicable.

16 But I am concerned that it does
17 sometimes cause, as a state regulator, if we
18 don't have sort of a bookend end date, it's
19 hard for us to get folks to, you know, perhaps
20 it'll be harder to get them to repair or
21 replace, or to get buy-in in terms of cost
22 recovery as it related to the state regulator.

1 MR. DANNER: Yeah, thank you.

2 When I was looking at that I was, I
3 was wondering if we could say something like
4 within 30 days or as soon as practical -- or
5 practicable. Or, alternatively, just set an
6 outer date to say as soon as practical, but
7 within X number of days. And if 30 is not
8 enough, you know, go to 40, 45.

9 I'm just wondering if there's some
10 way we could do, do that? And the concern is
11 30 days could be too short. But I agree with
12 you that we should have some kind of a bookend
13 there.

14 Okay. Terry Turpin?

15 MR. TURPIN: Terry Turpin from the
16 Federal Energy Regulatory Commission.

17 I would add on the 30 days I think
18 you're going to find in some circumstances
19 getting out there and getting the environmental
20 clearances and permits you might need in some
21 circumstances is never going to be possible in
22 that time frame. It's not going to be possible

1 in 45 days either.

2 So, I think what, what you've got
3 with the 30 days is it will probably work in
4 many areas where it's just, you know,
5 mechanical replacement. But if there is any
6 activity that involves getting equipment out
7 onto a right-of-way, then 30 days is never
8 going to be achievable.

9 You've got to tie this to as soon as
10 practical after the necessary environmental
11 clearances have been obtained or something like
12 that.

13 MR. DANNER: Would you be okay with
14 something that said within 30 days or as soon
15 as practicable?

16 MR. TURPIN: Yeah. I think as long
17 as folks understand that that as soon as
18 practicable encompasses getting those
19 environmental clearances.

20 MR. DANNER: Well, yeah. I think
21 the concern here is we don't want this to drag
22 on longer than it has to. And as soon as

1 practicable might be in the eyes of the
2 beholder. And that's what we're to avoid.

3 Okay. Arvind?

4 MR. RAVIKUMAR: Arvind Ravikumar,
5 University of Texas.

6 I agree with Commissioner Burman's
7 point about having an end date for this. So,
8 perhaps something like as soon as practicable
9 but not to exceed three months or six months,
10 whatever that maximum time frame is.

11 MR. DANNER: The issue becomes there
12 what's, you know, what's the floor and what's
13 the ceiling? Because if you say, if you say
14 60, that's what people will take. If you say
15 90, that's what, that's what people will take.
16 Even if it says as soon as practicable.

17 But, you know, I, I keep coming back
18 to I would leave the 30 days or as soon as
19 practicable. But I don't know, I don't know
20 what works here.

21 But Chad does.

22 MR. ZAMARIN: Yeah. Thank you.

1 Chad Zamarin. I don't know about that either.

2 Chad Zamarin with Williams.

3 I do think, again, this context
4 helps in this if you read the entire section.
5 This is applicable for when a pressure relief
6 device is malfunctioning. You have to
7 immediately stop any emissions that are being
8 caused as a result of the malfunction of the
9 device. And then it's setting a 30-day
10 requirement to repair or replace the device.

11 So, this is not like we're, we're
12 not talking about allowing the device to be
13 venting for 30 days or longer. I do think we,
14 we have to have -- we have in this section an
15 immediate action to stop the release until the
16 device is repaired, but then it says it's then
17 limiting the timeline for repair to 30 days.

18 I think that having a practicable
19 standard is important. I mean, supply chain
20 issues, permitting issues, relief valves, once
21 the issue has been addressed I think operators
22 need the ability to schedule those repairs and,

1 and manage those appropriately.

2 So, I do just want to point out I
3 think it's important to see the whole section.
4 That we're not talking about allowing an event
5 to go beyond 30 days, we're only talking about
6 the timeline to address that piece of equipment
7 so that the next time it needs to operate, it
8 operates appropriately.

9 MR. DANNER: So, I mean, the reason
10 I was partial to the PHMSA language is I, I do
11 feel you want to sort of give folks an idea of
12 what your expectations are. Perhaps as soon as
13 practicable is, is stronger. I'm not sure that
14 it is.

15 MR. ZAMARIN: Yeah, sorry. Chad
16 Zamarin.

17 I, again, I agree. But, I mean, I
18 would, I would propose if you did need to put
19 an outer bound on it for it to be, you know, 6
20 months or even 12 months.

21 I mean, we're talking about, we're
22 talking about construction activity that does

1 require you, you have to immediately address
2 the issue that's occurring. But then you have
3 the ability to schedule the repair
4 appropriately.

5 And that's how we address most
6 things in the code, in a way where you can take
7 into account -- I mean, you may have to take an
8 outage to make a relief valve repair. You
9 know, if you put a 30-day requirement on that
10 and the relief valves fails, it's not just a
11 permanent issue, this might be in the middle of
12 winter, and it doesn't make sense to replace
13 the relief valve until you get to the next
14 spring and you're in a shoulder mode.

15 And so --

16 MR. DANNER: And you don't think
17 that would be caught under saying 30 days or as
18 soon as practicable?

19 MR. ZAMARIN: I think you'd have to
20 make sure the language is in a way that it's
21 clear, that the 30 days is not a limit.
22 Because when I hear that, it sounds like a

1 limit. You know, you have -- I would -- it's
2 always the thing --

3 MR. DANNER: But, again, or as soon
4 as practicable. So, if it's not practicable,
5 the 30 days gets extended until you can get it
6 done.

7 MR. ZAMARIN: Yeah. I, I'd be fine
8 with that conceptually, except for the fact
9 that I'm not sure where I get the 30 days as a
10 target or a goal, but.

11 MR. DANNER: Okay.

12 MR. ZAMARIN: Yeah.

13 MR. DANNER: Thank you.

14 Brian and then Peter, Diane, and
15 Sara.

16 MR. WEISKER: Brian Weisker, Duke
17 Energy.

18 And Chad covered most of what I was
19 going to say. But, I mean, it's permitting,
20 it's materials, it's planning. So, I think
21 we've beat 30 days to a horse here, but I
22 definitely support the as soon as practicable.

1 MR. DANNER: Peter?

2 MR. CHACE: Pete Chace, NAPSR.

3 I'll say first of all I think
4 industry's concerns about the 30 hard cap are
5 legitimate.

6 I'll also say that as compliance
7 inspectors we've always been talking through
8 Frequently Asked Questions or, you know,
9 interpretation that as soon as practicable
10 means until the next scheduled inspection,
11 which I think is annual in this case.

12 MR. DANNER: So, again, the language
13 that says 30 days or as soon as practicable,
14 you see that as meaning 30 days and not 30 days
15 or as soon as practicable?

16 MR. CHACE: FAQs can be changed.
17 I'm just saying that that's what, as state and
18 inspectors, that's what we've always been
19 taught as far as enforcing as soon as
20 practicable.

21 MR. DANNER: Okay. Thank you.

22 Diane?

1 MS. BURMAN: So, I recognize that
2 there can be supply chain issues. I am
3 concerned, though, that as a state regulator it
4 becomes difficult if we don't have, you know, a
5 backstop.

6 To me it's within 30 days or as soon
7 as practicable. This is dealing with maximum
8 allowable operating pressure. And it does
9 become a challenge if we don't have, you know,
10 it's in the eyes of the beholder, and sometimes
11 it becomes an issue.

12 So, if we're going to extend the
13 time, if we're not going to have it within 30
14 days or as soon as practicable, I'd rather go
15 back to repairs must occur as soon as
16 practicable. But I am concerned about looking
17 at saying within 90 days or six months. It's
18 maximum allowable operating pressure, and it
19 should be done.

20 And I do think that part of the
21 challenge is, especially when it comes to, you
22 know, getting us as state regulators to make

1 sure that this is front and center, we need to
2 work with our utilities and say they've got to
3 do it. And they've got to do it ASAP.

4 And I'm just concerned about it.

5 MR. DANNER: So, it's your view we
6 should just simply remove number four and leave
7 it the way it is?

8 MS. BURMAN: No. I think that, I
9 mean, I'd like to see within 30 days or as soon
10 as practicable. But if we're talking about
11 extending that time period, I'd rather, then,
12 go to the first which was repair must occur as
13 soon as practicable.

14 But, you know, I think it's an
15 issue.

16 MR. DANNER: Sara?

17 MS. GOSMAN: Yeah. I feel like this
18 conversation is all about what is practicable,
19 and so how much fits into that category.

20 I think that we can put 30 days in
21 there, particularly since it was in the NPRM.
22 And then, you know, maybe most of this goes to

1 practicability. That's fine; right? But that
2 absolutely covers it.

3 So, I would like a shorter time
4 period because I think that that's important
5 for you to signal.

6 And then, again, as soon as
7 practicable covers all of the issues related to
8 things like getting on site and the other
9 things.

10 But, so I'd agree with Commissioner
11 Burman.

12 MR. DANNER: Okay, Pete?

13 All right. Can I get a sense of the
14 group?

15 My own view is I'm fine with the
16 language that PHMSA has proposed here because I
17 do think that, basically, the backstop is as
18 soon as practicable. The 30 days is basically
19 what the default is, unless it's not
20 practicable.

21 And that's where I would be. But,
22 Chad?

1 MR. ZAMARIN: Chad Zamarin,
2 Williams.

3 And maybe the language you just said
4 would be better. Because I agree with Peter,
5 if I saw this language I would interpret this
6 to mean as fast as you can but not to exceed 30
7 days.

8 And I think that's how, if we're not
9 careful, that it will be interpreted. And I
10 think any, most inspectors I think would likely
11 read that and say, you got to do it as soon as
12 practicable, but, but within 30 days.

13 And I think there are places in the
14 code where that actually gets clearly
15 interpreted that way.

16 MR. DANNER: So, what you said is
17 within 30 days unless, unless that period is
18 not practicable?

19 MR. ZAMARIN: I think that clarifies
20 it.

21 MR. DANNER: But then you'd have to
22 say as soon as practicable?

1 MR. ZAMARIN: I like as soon as
2 practicable. I think that's the best term that
3 -- Yeah.

4 MR. DANNER: All right. Sense of
5 the group. Do we just want to go with what's
6 in four here?

7 Sara?

8 MS. GOSMAN: I'm just left thinking
9 that, I mean, there's text, and understanding
10 that text; right? The text is or.

11 So, when I read that text, as a
12 lawyer I think 30 days or as soon as
13 practicable. Those are both possibilities.

14 MR. DANNER: Yes.

15 MS. GOSMAN: And I think that is how
16 it should be read. And if we need a FAQ to
17 make that clear, that's fine; right?

18 But I, I think -- I don't think we
19 have to do a lot of complicated sort of
20 language here because the language as is with
21 the or covers it.

22 MR. DANNER: All right. We have a

1 hard stop at 5:30. So, I want everyone to
2 think about this quickly.

3 Again, my view is maybe take out the
4 parentheses with just 30 days or as soon as
5 practicable, because that is a choice. You
6 have 30 days or you have as soon as
7 practicable. And that, that's where I would
8 go.

9 I would hear some other views. I
10 just want to know how, where, where people are.

11 Andy?

12 MR. DRAKE: This is Andy Drake with
13 Enbridge.

14 I think the good thing that we're
15 having here is this is creating a record which
16 is clear guidance on what the intent was. And
17 I think I can live with as soon as practicable
18 in the construct of this conversation.

19 It cannot be applied as less than 30
20 days is the expectation. It won't happen. So,
21 think we just need to go on record. If we can
22 think of some words -- Chairman Danner your

1 words might be helpful there -- converting this
2 a little bit, that would be great. But I think
3 the record we're creating here suffices. I
4 agree with Sara.

5 MR. DANNER: Okay. I actually like
6 what was just written there for four.

7 Sara? Sara Longan.

8 MS. LONGAN: Thank you, Mr.
9 Chairman. I was just trying to read four.

10 I think we're all closer than what
11 it sounds like we are on this. And coming from
12 Alaska, I don't want to assure you, but I want
13 to remind you that 30 days will not happen when
14 we have base conditions, no roads, no
15 possibility of getting to field, and things are
16 buried in frozen ground.

17 I prefer what is written in four out
18 of the parentheses, 30 days or.

19 MR. DANNER: So, in your case 30
20 days --

21 MS. LONGAN: -- as soon as
22 practicable.

1 MR. DANNER: -- 30 days is an
2 aspiration.

3 MS. LONGAN: Thirty days --

4 MR. DANNER: And in some of my areas
5 30 days is possible.

6 MS. LONGAN: -- likely will not
7 happen. If it's difficult in Texas, please
8 think about how difficult it is in the Arctic.

9 Thank you.

10 MR. DANNER: Well, and that's why
11 you have a choice of 30 days or as soon as
12 practicable.

13 Andy.

14 MR. DRAKE: Andy Drake, Enbridge.

15 I like what the revision wording you
16 just put up there is. That reflects the intent
17 of this conversation.

18 MR. DANNER: And I, I agree.

19 Others? Erin?

20 MS. MURPHY: Erin Murphy, EDF.

21 Listening to the discussion I just
22 want to emphasize, you know, and remind the

1 committee of some of the really detailed
2 explanation that PHMSA provided in the NPRM to
3 support some of these proposed standards.

4 And what really, you know, stood out
5 to me is that in the period from 2010 to 2022
6 operators submitted 112 incident reports for
7 the releases from pressure relief devices on
8 transmission and regulated gas gathering lines.
9 And that there was an average release volume of
10 12.5 mmcf.

11 That's a pretty significant release.
12 And that's a number of incidents. And that's
13 an average, which means there were some
14 incidents with, with even greater releases.

15 So, I think, you know, the standards
16 proposed in this section are really important.
17 And the flow rate that occurs during one of
18 these incidents can be so significant that time
19 does really seem to be of the essence to me.
20 So, I think the 30-day timeline that the agency
21 proposed makes a lot of sense.

22 Hearing the discussion around

1 impracticability, but just want to emphasize
2 that tight timeline was proposed for, for a
3 reason.

4 MR. DANNER: All right. Thank you
5 for that.

6 Sara Longan? Oh, okay.

7 Andy Drake.

8 MR. DRAKE: This is Andy Drake with
9 Enbridge.

10 I appreciate your comment, Erin.
11 But I think the key here is there's incidents,
12 there's response to the incident, and then
13 there's repair. I think don't skip over that
14 middle part, that just because we have an
15 incident that it continues to blow down until
16 we, or continues to vent until this happens.

17 I think Chad mentioned that earlier.
18 There is a repair section that happens in
19 there. And then there's a response segment
20 that happens in there. And then that may take
21 a while to repair that relief device. But
22 maybe, those may be very separate events.

1 I wouldn't skip over that middle
2 part that just because there was an incident
3 that we let it go on and on bleeding gas for
4 forever until we replaced -- until we repaired
5 it. I think that's really important to note
6 here that the incident and this aren't the only
7 things that are happening.

8 MR. DANNER: Yeah.

9 MR. DRAKE: There is a response to
10 the incident that happens immediately.

11 MR. DANNER: But I don't -- I didn't
12 hear from Erin that she opposed the language
13 that's up there now.

14 Do you?

15 MR. ZAMARIN: No, I didn't.

16 MR. DANNER: Okay. You didn't take
17 this -- Okay.

18 Chad?

19 MR. ZAMARIN: Thanks. Chad Zamarin,
20 Williams.

21 I do want to reiterate that I think
22 the data you just presented is important data

1 but I think it's a different issue. And that
2 is, making sure that relief valves don't vent
3 to begin with.

4 This requirement is once a relief
5 valve malfunctions you have to immediately stop
6 the venting. And then you have some period of
7 time.

8 I think it's not in that data you
9 described, but if we went back to that data my
10 guess is very few, if any, of those were repeat
11 malfunctions of a relief valve. Once it
12 malfunctioned this is requiring the operator to
13 stop the venting immediately and then giving
14 the operator a practical amount of time to
15 replace that relief valve. But it won't be
16 venting during that period of time.

17 So, I just want to be clear. But I
18 think that data is a little misrepresenting.
19 That's can we stop relief valves from venting
20 to begin with?

21 This is once they have, we need to
22 stop the venting and then we have a practical

1 amount of time to repair them.

2 Thank you.

3 MR. DANNER: All right, thank you.

4 We have 15 minutes remaining.

5 Diane.

6 MS. BURMAN: Thank you. I thought
7 this conversation was very helpful in terms of
8 clarifying, you know, sort of where we all
9 were. I do see it as in New York we probably
10 treat this as a Type 1 leak, and the company
11 would be on site until it was fixed.

12 I do recognize the distinction in
13 terms of response and repair.

14 I do think the language now
15 clarifies repair timelines to be 30 days unless
16 the repair timeline is impractical, in which
17 case the repair must be completed as soon as
18 practical, gets us to a comfort level. And I
19 could support that.

20 MR. DANNER: All right, thank you.

21 Anyone else on that one?

22 So, we have discussed one and four.

1 Does anyone want to take on one of the others?

2 Chad Zamarin?

3 MR. ZAMARIN: Yeah. I was just
4 hoping that on number five -- I hope it's not
5 controversial -- but it's back in the same
6 section that we talked about on engineering
7 analysis. And it's just the specificity around
8 isolating of relief valves.

9 And I think that one of the public
10 comments was I think pretty wise to just say
11 you need the ability to isolate the relief
12 valve, but maybe not be specific on where you
13 have to install valves, because there are so
14 many different configurations of relief valves.

15 And so, trying to find where that
16 language is.

17 Yeah, 199.3? Yeah, sorry. It says,
18 installation of the pressure relief valve
19 device must include upstream and downstream
20 isolation valves to facilitate the seam
21 maintenance.

22 There are some relief valves that

1 don't have downstream piping, they're just
2 there's a valve that will isolate the relief
3 valve because the relief valve is on the end of
4 a stem. So, I don't know why we don't just say
5 installation -- the ability -- somebody had
6 proposed language, I thought, that the ability
7 to isolate -- does it say up there?

8 Yeah. Instead, require the ability
9 to isolate the relief valve for maintenance and
10 testing. That seems like a better language.

11 MR. DANNER: All right. Thank you.

12 And, Sara Gosman?

13 MS. GOSMAN: As for the rest of
14 them, I'm looking at two and three, which we
15 haven't discussed yet.

16 I think the committee's job is to
17 propose changes to policy, not necessarily
18 where to put things in the code. And so, if
19 this is the recommendation as it relates to
20 where to put things in the code, I would prefer
21 that PHMSA make that judgment.

22 If there's more to it than that, I

1 would like to know.

2 And then in terms of number three, I
3 assume that this relates to the concern that
4 you'd have to actually continually be
5 addressing this as opposed to the, the issue of
6 having it be immediate, that is, soon, sooner
7 rather than later.

8 I'm not against this language, but I
9 just think that immediate action, right, is
10 important here because we are talking I think
11 that needs to be addressed sooner. And
12 continuous action seems to me to be about,
13 like, actually getting on the site and doing
14 the work. And I don't know why we would not
15 want that, I guess.

16 MR. DANNER: All right. Any
17 response to those thoughts?

18 Brian. Brian?

19 MR. WEISKER: Sorry. It's getting
20 late in the day.

21 Brian Weisker, Duke Energy.

22 As far as the immediate, I mean, so

1 the idea is there's a malfunction, we take
2 immediate action and go out and respond to it.
3 And then that, that corrective action could be
4 complete and we could be in a stable condition
5 that you don't need to have someone there,
6 continuously there, until you get to a point
7 later.

8 That's the concept behind immediate
9 and continuous.

10 MR. DANNER: Others? Chad?

11 MR. ZAMARIN: Yeah. So, Sara, maybe
12 I don't think it was saying take immediate
13 away. It's saying require immediate action,
14 but just not specify continuous action if it's
15 not required.

16 Is that?

17 MS. GOSMAN: So, is there -- I guess
18 maybe my question is, all right, so we're
19 keeping immediate action. Are we deferring any
20 important decisions here in getting rid of
21 continuous? Because continuous seems to be an
22 indication to continually work on the problem.

1 MR. ZAMARIN: Yeah. Chad Zamarin,
2 Williams, again.

3 The way this section is written, and
4 I think Brian was right, I mean this is if a
5 relief valve malfunctions, you have to take
6 immediate action, you have to stop the
7 malfunction of the relief valve. But then it
8 does take time to repair the valve.

9 The way this section is written is
10 it says you must then take -- you must take
11 immediate and continuous action with onsite
12 personnel to stop the release until the device
13 is repaired or replaced.

14 As we've just discussed, you know,
15 it may be, it may be 30 days, but it may be,
16 you know, Wyoming or Alaska or a place where
17 you can't. But if you've gotten to the
18 location, you've addressed it from an immediate
19 perspective, and it's safe until the repair can
20 be made, this section would require someone to
21 be there continuously until the repair is made.

22 And I don't -- I think -- I don't

1 think that makes sense from our perspective.

2 MR. DANNER: Peter?

3 MR. ZAMARIN: Zamarin. I'm sorry.

4 I'll give you an example. And this
5 happens in Wyoming, because in the wintertime
6 we do have upset conditions. It's a lot like
7 Alaska. And you will go out to a site, you
8 will isolate the location, and the relief valve
9 will then be isolated from the pipeline
10 infrastructure.

11 But then you will come back after
12 the winter and you'll make the repair to the
13 relief valve. You won't have somebody
14 continuously on site at that location, you
15 will, you will implement it in isolation of
16 that.

17 MR. DANNER: All right. Pete?

18 MR. CHACE: I think we've got a
19 couple issues; right? One is you stop the
20 release. And then you figure out alternative
21 way of controlling pressure to meet MAOP
22 requirements.

1 And then you've got to repair the
2 components.

3 I wonder if the immediate, the
4 continuous was intended as a way to ensure
5 pressure relief. Maybe there's a different way
6 to do that.

7 But I think that's what the intent
8 was here is, so, you've got a failed relief
9 valve, you shut it down, you isolate it. Are
10 you going to make sure you maintained MAOP?

11 I don't know the answer. I'm --

12 MR. ZAMARIN: Yeah. I think we have
13 to. I mean, the code requires us to.

14 So, to your point, I think, you
15 know, that, that would be a requirement I would
16 assume.

17 MR. DANNER: Erin.

18 MR. CHACE: I'm sorry. So, is the
19 continuous necessary or is the code as it
20 exists adequate to ensure that pressure control
21 is going to be maintained even with an isolated
22 relief valve?

1 MR. DANNER: Well, I think that's,
2 that's what we have to discuss.

3 MR. CHACE: Yeah.

4 MR. DANNER: So, Erin?

5 MS. MURPHY: Erin Murphy, EDF.

6 I think I'd like to take a step back
7 here, because, you know, we are debating a
8 number of proposals that were just put forward
9 I think by a committee member but, also,
10 seemingly emailed in by some member of the
11 public in the audience. And, you know, we have
12 so much material to cover and get through this
13 week.

14 And there were a number of bullet
15 points that were distributed to committee
16 members, you know, identifying the areas where
17 PHMSA has requested feedback from this advisory
18 committee. And we're working diligently to
19 make our way through those.

20 And it feels to me like we've now
21 just delved into an additional area of issues
22 that were not previously identified for the

1 committee. And that, you know, makes it tough
2 for me to sort of evaluate in the moment
3 without having technical familiarity with all
4 these issues.

5 And so, just thinking about, you
6 know, the need to make progress over the time
7 this committee is convened, these matters feel
8 to me like things that, you know, are
9 appropriately raised in public comments by the
10 folks who are concerned about them.

11 MR. DANNER: So, we have just a few
12 minutes left. I wonder if you could put the
13 list of six items back up there.

14 I think we have had a discussion
15 about number one, number four, and number five.
16 And we haven't had time to discuss the others.

17 And I'm just wondering what the
18 sense of the committee is. Should we, if we're
19 okay with one, four, and five, can we take a
20 vote on those, call it a day, come back and see
21 if we want to discuss the others?

22 All right, I'm seeing heads nodding.

1 Erin?

2 MS. MURPHY: I understand, you know,
3 an interest in taking a vote on the items that
4 have already been discussed.

5 I would suggest the items that
6 haven't been discussed, you know, be set to the
7 side for the end of the deliberations on this
8 rule, if time allows.

9 MR. DANNER: Chad?

10 MR. ZAMARIN: Thanks. Chad Zamarin,
11 Williams.

12 Yeah, I think, I do think this is an
13 important discussion because I think it's our
14 job as a committee to come together. And I
15 think the process that we've been kind of
16 navigating through this time is different than
17 in the past.

18 In the past we would have gone
19 through every single change to every section of
20 the rule, and we would have had deliberations
21 on those. I think it is absolutely appropriate
22 and essential for the committee to raise, not

1 just debate those issues that are identified by
2 PHMSA, but for us to bring our expertise to
3 issues that we raise.

4 And so, I, I think we have to go
5 through these sections, and not only address
6 the questions that are being asked of us, but
7 listen to the comments of the public. If there
8 are issues that warrant discussion and debate
9 around this table, I think that's the process
10 we have to engage in.

11 So, I, I think working through these
12 is the right process. And I don't think we can
13 just focus on a very limited number. If there
14 are legitimate issues that committee members
15 want to raise based on the comments, I think we
16 have to address those.

17 MR. DANNER: Well, yeah. And I'll
18 just add, throw in my thoughts.

19 I think that they are legitimate
20 issues. They are ones that are technical that
21 involve reading the code. And we haven't been
22 able to do those on these yet.

1 So, what I suggest is that we take a
2 vote on one, four, and five, set the others
3 aside. And we can decide in the morning
4 whether we want to take those up or set those
5 aside till after we're done with other things.
6 But let's just get these three out of the way.

7 Diane?

8 MS. BURMAN: I think everybody, at
9 least me, is tired. And I think that it might
10 be helpful, since we've gone through this with
11 processing a lot, to use this slide one through
12 six as our first item to look at tomorrow. And
13 we'll have a little fresher eye rather than
14 voting.

15 I know it's different from what we
16 did before, but I think here they kind, they
17 all kind of go together. And I, I do think
18 that we may be able to easily get through this
19 but also, you know, just incorporate any issues
20 that we have before the meeting tomorrow. We
21 might be able to talk through that.

22 MR. DANNER: Well, I'm fine with

1 that. I am just concerned that we have two
2 days left to complete all of these, two, maybe
3 two and a half days left to get through --

4 MS. BURMAN: So, what I would say --

5 MR. DANNER: -- leak protection.

6 So, if we can start at 8:30 in the
7 morning and take up two, three, and six, and
8 then we can vote on the whole package.

9 MS. BURMAN: So, what I would also
10 say is I do recognize that we're all kind of
11 looking towards the end goal of getting through
12 this, plus class location. I do believe that
13 if we take a step back and look, that we may
14 get through this week, in needing to readjust
15 our schedule. And class location may need to
16 be set aside.

17 I know. Don't, don't get upset.

18 And that this way it gives us a
19 little bit more breather. Plus, that I don't
20 have to chair the second half of it.

21 (Laughter.)

22 MS. BURMAN: But, that way some of

1 the things that I think we're hearing as on the
2 table, we can make sure that doesn't get short
3 shrift because of time constraints.

4 And so, for me, I think it's a good
5 time for us to break and use this slide for all
6 six to come back.

7 MR. DANNER: Great. I would just
8 ask, please, for those who are advocating for
9 two, three, and six, please bring some
10 information for us about, you know, what do,
11 what do the sections say, answer some of the
12 questions that we don't have answer for, and we
13 can take this up in the morning.

14 So, I'm going to turn it back to
15 Alan, because it is 5:29. And you're going to
16 get the hook here in 30 seconds.

17 MR. MAYBERRY: Yeah. Thank you.

18 Congratulations to everyone for
19 making it through day one and for bearing with
20 us on the new process. I think you've done
21 well.

22 I think it always starts out slow.

1 So, let's be positive and say we're going to
2 get through this week and get through what we
3 have to do.

4 Tomorrow, after we get through the
5 unfinished business here, we do have patrolling
6 and leak survey frequency. So, it's something
7 you can, you know, take to bed and read,
8 perhaps.

9 And that's after you over the next
10 hour or so you talk about these, you know, the
11 items we have up here. No.

12 But, anyway, look forward to having
13 you back tomorrow. And I'll turn it back to
14 you, Mr. Chair.

15 MR. DANNER: All right. And with
16 that, we are in recess till 8:30 in the
17 morning.

18 Thank you all.

19 (Whereupon, the above-entitled
20 matter went off the record at 5:30 p.m.)
21
22

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This is to certify that the foregoing transcript


In the matter of: Gas Pipeline Advisory Committee

Before: PHSMA

Date: 11-27-23

Place: Arlington, Virginia

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