



PHMSA Leak Detection Rulemaking

Public Meeting

May 5, 2021



About INGAA

- The Interstate Natural Gas Association of America (INGAA) is a trade organization that advocates regulatory and legislative positions of importance to the natural gas pipeline industry in North America.
- INGAA is comprised of 26 members, representing the vast majority of the interstate natural gas transmission pipeline companies in the U.S. and Canada.
- INGAA's members operate almost 200,000 miles of pipeline.

Overview

- INGAA and its members are grateful to Congress for passing the PIPES Act of 2020.
- INGAA looks forward to working with PHMSA, the public, and other stakeholders on the leak detection rulemaking to enhance public safety and protect the environment.

INGAA's 2018 Methane Emissions Commitments



In 2018, members of INGAA committed to voluntarily minimizing methane emissions from interstate natural gas assets, including pipelines.

- To reduce methane emissions from blowdowns, members committed to evaluating and implementing voluntary practices such as those identified in EPA's Natural Gas STAR Program
- Members also committed to select air-driven, low-bleed or intermittent pneumatic controllers unless a different device is required for safe operations.

In 2021, members of INGAA went further by committing to addressing methane and CO2 emissions by:

- Working as an industry towards reaching net-zero GHG emissions from natural gas transmission and storage operations by no later than 2050, supported by necessary technology advancements and sound public policy initiatives.
- Reducing both the carbon intensity of our natural gas infrastructure, as well as supporting the reduction of net global GHG emissions by adopting and investing in more innovative technologies such as renewable natural gas (RNG), carbon capture, and other carbon solutions and transporting low or no-carbon fuels.

Methane Emissions Reduction History



- INGAA's member companies have been measuring and monitoring emission sources for years. Regularly reviewing these data for trends has allowed industry to target sources with the greatest potential for emissions improvements and implement cost-effective reduction strategies.
- According to EPA and EIA, the natural gas transmission and storage sector **reduced its methane emissions by 35%** from 1990 to 2019, even while total U.S. natural gas production increased by 91% during the same time frame.

EPA Methane Challenge Program - Reductions Reported in 2018



- In 2018, 52 companies participating in the EPA Methane Challenge Program reported voluntary methane reductions associated with 420 facilities
- Total reductions reported: ~3 million metric tons carbon dioxide equivalent (CO₂e)
- Methane Challenge Partners in the transmission and storage segment achieved reductions through voluntary actions such as:
 - Reducing methane emissions from over 600 planned pipeline blowdowns
 - Performing repair or replacement of leaking equipment components

Leak Detection Methods

- **Ground-Based Mobile Surveys**
 - Foot patrol
 - Human sensing
 - Handheld sensors
 - Vehicle mounted sensor
- **Air/Space-Based Mobile Surveys (Visual and Sensors)**
 - Manned fixed wing (airplane)
 - Manned rotary (helicopter)
 - Unmanned fixed wing / rotary (drone) mounted sensors
 - Satellite
- **Continuous Monitoring**
 - Above ground stationary
 - In-ditch stationary

Initial Thoughts on PHMSA's Leak Detection Rulemaking



- PHMSA should consider the following issues:
 - Site specificity
 - Risk specificity
 - Setting frequency of leak monitoring based on threat levels
- Industry welcomes advanced leak detection technology
 - Flexibility for operators to detect emissions is key to successfully eliminating them
 - Technologies change over time and effective regulation should encourage their continued advancement
 - However, costs of new technologies can be burdensome