



## Natural Gas STAR Methane Challenge Program Implementation Plan

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**Partner Name**

**Current as of (date)**

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### Partner Implementation Manager

Name: \_\_\_\_\_

Title: \_\_\_\_\_

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# Natural Gas STAR Methane Challenge Program Implementation Plan

## Partner Methane Challenge Commitments<sup>1</sup>

### BMP Commitment Option

	Source	Start Date	Achievement Year
<b>Onshore Production</b>			
<input type="checkbox"/>	Pneumatic Controllers		
<input type="checkbox"/>	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>			
<input type="checkbox"/>	Pneumatic Controllers		
<input type="checkbox"/>	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/>	Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>			
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/>	Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>			
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/>	Centrifugal Compressors - Venting		
<input type="checkbox"/>	Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/>	Pneumatic Controllers		
<b>NG Distribution</b>			
<input type="checkbox"/>	Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate:</i> )		
<input type="checkbox"/>	Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/>	Distribution Pipeline Blowdowns ( <i>Commitment Rate:</i> )		
<input type="checkbox"/>	Excavation Damages		

## Partner Methane Challenge Commitments

### ONE Future Emissions Intensity Commitment Option

Segment:		Intensity Target:		Target Year:	
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<sup>1</sup> Partners may delete unused rows within the table, and may duplicate rows and add relevant details as needed (e.g., a corporate parent partner that has different commitments for each LDC can duplicate relevant rows to list the commitments for each LDC).



## Reciprocating Compressors - Milestones/Timeframes for Meeting Commitments:

Southern California Gas has elected to replace compressor rod packings on stationary natural gas fired reciprocating engines based on the 26,000 hours operating time rather than the “every 3 years” cycle. This allows the company to manage replacement activities based on actual use rather than an artificially imposed timeframe. Given the variation in compressor operations from facility to facility due to seasonal or other industry driven factors, many of the most frequently used compressors may operate less than 50% of a calendar year. Many others will operate much less than 50% over the period of a year due to existing local permit conditions and other factors. Therefore it is anticipated that some compressor rod packings will not need replacement during the 5 year implementation period as their run time will not exceed 26,000 hours. Others will be nearing the 26,000 hour run time since the last replacement at the inception of the Methane Challenge program.

Steps to achieving the commitment to replace rod packing every 26,000 hours of operation include:

- Identification of all candidate compressors;
- Identification of run hours since the last rod packing replacement
- Forecast or projection of how many replacements are expected to take place over the following time periods based on run time:
  - August 25 – December 31, 2016;
  - January 1 – December 31, 2017;
  - January 1 – December 31, 2018;
  - January 1 – December 31, 2019;
  - January 1 – December 31, 2020;
  - January 1 – August 2021
- Communication and Coordination with operations on planned shutdown periods to accommodate replacement activities;
- Identification of any operational or regulatory challenges to timely replacements;
- Annual reporting and communication with EPA regarding achievement of Methane Challenge goals/ milestones, or challenges with meeting milestones.
- Effective in 2017 the company will report all voluntary methane rod packing replacements under the EPA Methane Challenge program.

Time period	Projected # of Replacements (based on 26,000 run hours)	Actual # of Replacements	Replacement Dates	Notes
8/30 – 12/31 2016	8	TBD		
1/1 – 12/31 2017	17	TBD		
1/1 – 12/31 2018	TBD	TBD		
1/1 – 12/31 2019	12	TBD		
1/1 – 12/31 2020	32	TBD		
1/1 – 12/31 2021	TBD	TBD		



**Additional Information/Context (optional):**

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Southern California Gas has replaced reciprocating compressor rod packings as a part of its participation in the EPA Gas STAR program since 1993. These have been routinely replaced due to excessive wear, diminished performance or other operational reasons. The additional voluntary rod packing replacements under the Methane Challenge Program is expected to provide an incremental annual increase in rod packing replacement activity over the 5-year program period from August 30, 2016 to August 2021.

Due to pending development California-based methane regulations, the company will likely modify this Implementation Plan in 2017 or 2018 to reflect and incorporate more stringent or prescriptive methane reduction requirements from state and local agencies.

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## **Excavation Damages - Milestones/Timeframes for Meeting Commitments:**

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As part of its commitment to the Methane Challenge Program, the **Southern California Gas Company** will implement practices to reduce methane emissions related to Excavation Damages. In accordance with the guidance provided in the Distribution Segment Supplementary Technical Information (dated June 17, 2016), the company has elected to implement the following option:

**Conduct incident analyses (e.g. by identifying whether excavation, locating, or One-Call practices were not sufficient) to inform process improvements and reduce excavation damages.**

Implementation of this mitigation option includes the following:

- Formation of a Damage Prevention Team consisting of key stakeholders including but not limited to: District Operations Managers, Area Managers, Claims Department and Gas Operations Staff;
- Conducting monthly meetings with internal stakeholders to address damages by reviewing analytics, identifying excavators operating without tickets, etc.
- Driving training and education programs;
- Providing monthly written communications related to incidents and proposed solutions related to the company Damage Prevention Program (DPP).

The company will also report data annually beginning in 2018 until the program sunset in 2021 in accordance with EPA Methane Challenge Guidance for excavation damages. Reported information will enable the company to set Company-specific goals for future reduction efforts. Reported information will include the following:

- Total number of excavation damages;
- Total numbers of excavation damages per thousand locate calls;
- Total number of excavation damages by pipe material (steel, cast iron, copper, plastic etc.) and part of system involved (main, service, inside meter/regulator set, etc.);
- Total number of excavation damages which resulted in a release of natural gas;
- Total number of excavation damages on pipelines or facilities with supervisory control and data acquisition-based systems in place on Transmission lines.
- Total number of excavation damages where the operator was given prior notification of excavation activity;
- Total number of excavation damages by type that caused excavation damage incidents;
- Total number of excavation damages by apparent root cause.