

## **Proposed BMP: Targeting Unit Isolation & Blowdown Valves**

2019 Natural Gas Star & <u>Methan</u>e Challenge Workshop

November 5, 2019 Presented by Josh Ennis, PE

## Safe Harbor For Forward Looking Statements



This presentation may contain "forward-looking statements" as defined by the Private Securities Litigation Reform Act of 1995, including statements regarding future prospects, plans, objectives, goals, projections, estimates of oil and gas quantities, strategies, future events or performance and underlying assumptions, capital structure, anticipated capital expenditures, completion of construction projects, projections for pension and other post-retirement benefit obligations, impacts of the adoption of new accounting rules, and possible outcomes of litigation or regulatory proceedings, as well as statements that are identified by the use of the words "anticipates," "estimates," "expects," "forecasts," "intends," "plans," "predicts," "projects," "believes," "seeks," "will," "may," and similar expressions. Forward-looking statements involve risks and uncertainties which could cause actual results or outcomes to differ materially from those expressed in the forward-looking statements. The Company's expectations, beliefs and projections are expressed in good faith and are believed by the Company to have a reasonable basis, but there can be no assurance that management's expectations, beliefs or projections will result or be achieved or accomplished.

In addition to other factors, the following are important factors that could cause actual results to differ materially from those discussed in the forward-looking statements: changes in laws, regulations or judicial interpretations to which the Company is subject, including those involving derivatives, taxes, safety, employment, climate change, other environmental matters, real property, and exploration and production activities such as hydraulic fracturing; delays or changes in costs or plans with respect to Company projects or related projects of other companies, including difficulties or delays in obtaining necessary governmental approvals, permits or orders or in obtaining the cooperation of interconnecting facility operators; governmental/regulatory actions, initiatives and proceedings, including those involving rate cases (which address, among other things, target rates of return, rate design and retained natural gas), environmental/safety requirements, affiliate relationships, industry structure, and franchise renewal; financial and economic conditions, including the availability of credit, and occurrences affecting the Company's ability to obtain financing on acceptable terms for working capital, capital expenditures and other investments, including any downgrades in the Company's credit ratings and changes in interest rates and other capital market conditions; changes in the price of natural gas or oil; impairments under the SEC's full cost ceiling test for natural gas and oil reserves; factors affecting the Company's ability to successfully identify. drill for and produce economically viable natural gas and oil reserves, including among others geology, lease availability, title disputes, weather conditions, shortages, delays or unavailability of equipment and services required in drilling operations, insufficient gathering, processing and transportation capacity, the need to obtain governmental approvals and permits, and compliance with environmental laws and regulations; increasing health care costs and the resulting effect on health insurance premiums and on the obligation to provide other post-retirement benefits; changes in price differentials between similar quantities of natural gas or oil sold at different geographic locations, and the effect of such changes on commodity production, revenues and demand for pipeline transportation capacity to or from such locations; other changes in price differentials between similar quantities of natural gas or oil having different quality, heating value, hydrocarbon mix or delivery date; the cost and effects of legal and administrative claims against the Company or activist shareholder campaigns to effect changes at the Company; uncertainty of oil and gas reserve estimates; significant differences between the Company's projected and actual production levels for natural gas or oil; changes in demographic patterns and weather conditions; changes in the availability, price or accounting treatment of derivative financial instruments; changes in laws, actuarial assumptions, the interest rate environment and the return on plan/trust assets related to the Company's pension and other post-retirement benefits, which can affect future funding obligations and costs and plan liabilities; changes in economic conditions, including global, national or regional recessions, and their effect on the demand for, and customers' ability to pay for, the Company's products and services; the creditworthiness or performance of the Company's key suppliers, customers and counterparties; the impact of information technology, cybersecurity or data security breaches; economic disruptions or uninsured losses resulting from major accidents, fires, severe weather, natural disasters, terrorist activities or acts of war; significant differences between the Company's projected and actual capital expenditures and operating expenses; or increasing costs of insurance, changes in coverage and the ability to obtain insurance.

Forward-looking statements include estimates of oil and gas quantities. Proved oil and gas reserves are those quantities of oil and gas which, by analysis of geoscience and engineering data, can be estimated with reasonable certainty to be economically producible under existing economic conditions, operating methods and government regulations. Other estimates of oil and gas quantities, including estimates of probable reserves, possible reserves, and resource potential, are by their nature more speculative than estimates of proved reserves. Accordingly, estimates other than proved reserves are subject to substantially greater risk of being actually realized. Investors are urged to consider closely the disclosure in our Form 10-K available at <u>www.nationalfuelgas.com</u>. You can also obtain this form on the SEC's website at <u>www.sec.gov</u>.

For a discussion of the risks set forth above and other factors that could cause actual results to differ materially from results referred to in the forward-looking statements, see "Risk Factors" in the Company's Form 10-K for the fiscal year ended September 30, 2018 and the Forms 10-Q for the quarter ended December 31, 2018, March 31, 2019, and June 30, 2019. The Company disclaims any obligation to update any forward-looking statements to reflect events or circumstances after the date thereof or to reflect the occurrence of unanticipated events.

# **Corporate Overview**

## NFG: A Diversified, Integrated Natural Gas Company



More than 100 years of Operating History, with Uniquely Integrated Assets Across the Natural Gas Value Chain

- Buffalo, New York headquartered company, incorporated in 1902
- Geographic and operational integration across
  Western New York and Pennsylvania
- Serving local communities providing natural gas service to over 750,000 customers in New York and Pennsylvania
- Over 2,000 employees in New York, Pennsylvania, Texas, and California.





# **Corporate Overview**



## Upstream



## **Exploration & Production**



## Midstream





## **Pipeline & Storage**





## **Downstream**





## **Energy Marketing**

DEREGULATED NATURAL GAS EXPERTISE

# Methane Challenge Commitments

Overview

# **Background Information**



- April 2018 Pipeline Research Council International (PRCI) report analyzed Subpart W data from natural gas T&S facilities.
  - Over 10,000 compressor-related measurements were analyzed from 2011 – 2016 GHGRP Subpart W data (14,000 Total - Acoustical Data Filtered Out)
  - Data confirms isolation valves, and, to a lesser extent, blowdown valves are key emissions source when leakage occurs
- The EPA annual GHG inventory data indicates that about 90% of transmission and 80% of storage compressor stations GHG emissions are from compressor components (versus the balance of the facility).





# **Background Information - Continued**

- Compressor components include:
  - Compressor isolation valves,
  - Blowdown valves, &
  - Seals
    - Reciprocating compressor rod packing and
    - Centrifugal compressor wet or dry seals



- Supply developed and submitted a proposed BMP under the Methane Challenge "Continuous Improvement Process"
  - Addresses through-valve leakage from compressor isolation and blowdown valves
  - Submitted: March 21, 2019 under Methane Challenge Continuous Improvement Program



# Methane Challenge Commitments – Supply, Empire, & Midstream



### Committed in 2018

#### **Pneumatic Controllers**

- Supply, Empire, & Midstream
- Prioritize compressor stations
- Conduct inventories and replace high bleed pneumatic devices when practical

**National Fuel**°

### Committed in 2018

### **Rod Packing**

- Supply & Midstream
- Commit to maintenance schedule of 26,000 operating hours
- Document results annually as they occur

### Approval Pending

## **Equipment Leaks/Fugitives\***

- Supply
- Commit to measuring leaks from Isolation & Blowdown Valves
- Develop a valve maintenance, repair, and replacement program

\*Proposed BMP submitted on 3/21/2019

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# Schematics – Isolation and Blowdown Valves

- Facility Schematic
  - Suction & Discharge Isolation valves
  - Blowdown valves

- Two Primary Modes of Operation
  - Operating Pressurized Mode
  - Not Operating Depressurized Mode



Example Facility Schematic



# Mode of Operation – Operating Pressurized Mode

- Isolation valves are <u>open</u> and the blowdown valve(s) is <u>closed</u> against both high-pressure suction and discharge compressor gas
- Natural gas may leak to atmosphere via <u>blowdown valve(s)</u>
- Blowdown valve leakage is typically routed to the atmosphere via the blowdown valve vent line
- Vent lines are considered "Elevated vent sources," and visualized using optical gas imaging
- 1" Ports on vent lines allow for leak measurement and quantification





Potential Leak during Operating Pressurized Mode

# Mode of Operation – Not Operating Depressurized

- Isolation valves are <u>closed</u> against both highpressure suction and discharge pipeline gas and the blowdown valve(s) is <u>open</u>
- Natural gas may leak to atmosphere via isolation valves
- Isolation valve leakage is typically routed to the atmosphere via the open blowdown valve vent line
- Vent lines are considered "Elevated vent sources," and visualized using optical gas imaging
- 1" Ports on vent lines allow for leak measurement and quantification





Potential Leak during Not Operating Depressurized Mode

# Valve Repair or Replacement- Challenges

## > Challenges:

- > Significant Cost Example: 8" plug valve replacement  $\approx$  \$50k
- > Replacement valve purchasing long lead times  $\approx$  6 months+
- Station downtime from valve repairs or replacement
- Need improved isolation valve technologies 2019 PRCI Study
- Gas loss (and emissions) from station blowdowns
- New valves may have through-valve leaks when (re)commissioned





# **Proposed BMP Addresses**

## Proposed Valve BMP Addresses:

- 1) Methods to identify and measure through-valve leakage
- 2) Enhanced maintenance practices for isolation valves
- 3) Compressor station design considerations to facilitate improved access to isolation valves for maintenance, repair, and replacement
- 4) Isolation valves that are less prone to through-valve leakage
- 5) Leaking isolation valve repair or replacement decision guidelines



# Proposed BMP – Key Program Elements

- Annual valve survey across all T&S compressor stations within 5 years
  - Prioritize Stations based on GHGRP data, age, utilization, etc.
  - Additional 20% of facilities incorporated each year
  - After end of 5 year period all stations have annual survey completed each year
- Build a more detailed valve inventory for all T&S compressor stations
  - Type, Manufacturer, Size, Model, etc.
- Develop & Implement <u>enhanced</u> maintenance program across all T&S compressor stations within 5 years
  - Specific for Isolation & Blowdown Valves
    - Manufacturer's recommendations
    - Specialized Training
    - Documentation



# Proposed BMP – Key Program Elements

- Leak rate measurement will utilize Methodologies from Subpart W of the GHGRP
  - Measurement data will be utilized for program applicability maintenance, repair or replacement
  - Emission reductions will be based on leak rate *measurements*

## • Valve <u>repairs</u> and/or <u>replacement</u> will be completed when/where practical, and within 3 years

- Operational issues such as the need for system/facility blowdown, scheduled outages for maintenance, parts, availability of repair personnel, etc. will be considered when determining the valve repair or replacement schedule
- Annual facility-level reporting will include:
  - Program results, status, and future plans survey, maintenance, repair, and replacement data
  - 5th year will include a discussion of "lessons learned" regarding leak counts, year-to-year leak changes, repair methods and practices, equipment / valve-specific recommendations, maintenance plan results and costs





# NFG Case Study: Iso Valve Enhanced Maintenance & Replacement

# NFG Case Study: Pre 2015 Compressor Components

Summary of Measured and Estimated GHG Emissions from Case Study





# NFG Case Study: Enhanced Maintenance Program

• Enhanced program started 2015

ational Fuel

- Expansion of standard valve maintenance
  - Prepopulated library of valve numbers, location description, size, type, sealant
  - Field operations indicates date, employee number, and % injected (i.e.,15%, 25%, 50%, and 100%)

	Ball Valves						
	Valve	Volumes in oz's					
	Size	100%	50%	25%	15%		
	1						
	2	4 oz	2 oz	1 oz	.5 oz		
	4	8 oz	4 oz	2 oz	1.2 oz		
	6	12 oz	6 oz	3 oz	1.8 oz		
	8	16 oz	8 oz	4 oz	2.4 oz		
5,	10	20 oz	10 oz	5 oz	3 oz		
nt	12	24 oz	12 oz	6 oz	3.6 oz		
	16	32 oz	16 oz	8 oz	4.8 oz		
	20	40 oz	20 oz	10 oz	6 oz		
	24	48 oz	24 oz	12 oz	7.2 oz		

5		Maximum Injection	Plug Valves				
es in oz's		Pressure Valve Volumes in o			in oz's		
25%	15%		Size	100%	50%	25%	15%
		Forged Steel & High	1	1 oz	.5 oz	.25 oz	.15 oz
1 oz	.5 oz	Pressure Plug Valves	2	2 oz	1 oz	.5 oz	.3 oz
2 oz	1.2 oz	9000 psi max	4	4 oz	2 oz	1 oz	.5 oz
3 oz	1.8 oz		6	9 oz	4.5 oz	2 oz	1.3 oz
4 oz	2.4 oz	High Pressure Ball Valves	8	12 oz	6 oz	3 oz	1.8 oz
5 oz	3 oz	4500 psi max	10	15 oz	7.5	3.7 oz	2.25 oz
6 oz	3.6 oz		12	18 oz	9 oz	4.5 oz	2.7 oz
8 oz	4.8 oz	Low Pressure and Cast	16	40 oz	20 oz	10 oz	6 oz
10 oz	6 oz	Iron Plug Valves 2500	20	72 oz	36 oz	18 oz	10.8 oz
12 oz	7.2 oz	psi max	24	88 oz	44 oz	22 oz	13.2 oz
Hydraulic Hand Pump 45 - 50 strokes per ounce							

Activ-8 Injection Pump - One stroke of the Jack loads 2 ounces

## Reference guide at the bottom of every field form

	Unit 1A - Valve Sealant/Lubricant Injected (Activity Number 530452)						
Date	Employee number	Valve Number	Location	Size	Туре	Sealant Used	Percent Injected
		5010	Suction Valve	10	[] Ball	[] Equalube	[] 15% []25%
		2919	16" Suction Header	10	[x] Plug	[x] 1033	[] 50% []100%

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# NFG Case Study: 2015 + Maintenance & Replacement



# Compressor Venting Emissions (Metric Tons of CO<sub>2</sub>e)

Enhanced Maintenance Program commenced in 2015 led to reductions

2014 - 2018 Total Compressor Venting  $\approx 54\%$  decrease



# NFG Case Study: 2015 + Valve Replacement

## Case Study: Isolation Valve Emissions (2014 - 2019)



\*2019 Values are Projections Only for Remainder of Year

**National Fuel**°

- Replacement of the Suction Isolation Valves on Units 5, 6, & 7 occurred in late 2017 and resulted in further reductions
- In total 9 Suction Isolation Valves were replaced

Reductions	Unit 5	Unit 6	Unit 7
'14/'15 – '16	74%	67%	55%
'14/'15 – '17	81%	N/A*	82%
'14/'15 – '18	95%	97%	90%
'14/'15 – '19	95%	99%	N/A*

\*N/A = no measurement taken

# Closing

## • NFG moving forward ...

- Completing detailed valve inventory
- Developing enhanced valve maintenance program
- Implementing enhanced valve maintenance program at additional 20% of facilities incorporated each year
- Replacement of isolation valves at additional facility Fall 2019
- Working with EPA for finalization of proposed BMP
- Draft BMP for public review and comment forthcoming





# Thank you!