



## Natural Gas STAR Methane Challenge Program Implementation Plan

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<b>Partner Name</b>	<b>Current as of (date)</b>
<u>Iroquois Pipeline Operating System</u>	<u>Jan 1, 2021</u>

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### Partner Implementation Manager

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

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

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Telephone/Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

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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 checked="" type="checkbox"/>	Transmission Pipeline Blowdowns between Compressor Stations	Jan 1, 2021	2025
<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).

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## Milestones/Timeframes for Meeting Commitments

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*Provide information on steps for achieving commitments such as anticipated rate of progress, key milestones, or other context (e.g., referencing work to be done during the next planned shutdown of a facility).*

### **Company Background**

Iroquois Gas Transmission System, L.P. is an interstate natural gas transmission pipeline extending 414 miles from the US-Canadian border at Waddington, NY, through upstate New York, then through the state of Connecticut to South Commack, Long Island, NY and continuing on from Northport, Long Island, NY through the Long Island Sound to Hunts Point, Bronx, NY. Iroquois is exclusively a transporter of natural gas in interstate commerce and is regulated by the Federal Energy Regulatory Commission ("FERC"). Since commencement of service in December 1991, the Company has added 5 short lateral lines, 13 meter stations, and 7 compressor stations with an approximate International Organization for Standardization ("ISO") total of 115,900 nominal horsepower located at Wright, Croghan, Athens, Boonville, and Dover, NY, as well as Brookfield and Milford, CT.

Iroquois joined the EPA's Natural Gas Star Program in 1996 and has continued membership since.

### **Commitment**

Iroquois was accepted into the Methane Challenge Program on March 16th, 2020. Iroquois has committed to the EPA that it will reduce pipeline venting by 50% in volume on or before 2025. Iroquois is proposing the following measures in order to meet that commitment:

#### Pipeline Pressure Reduction Before Blowdowns

Iroquois' system (Pipeline, Laterals, and Meter Stations) are rated at an Maximum Allowable Operating Pressure (MAOP) of 1440 psig and its compressor stations are rated at 1480 psig. In order to reduce the amount of gas that will need to be released during maintenance or construction activities, Iroquois will reduce the pressure in the section(s) of line involved as much as possible before a pipeline vent, contingent on current operations, market conditions, weather, safety, and other applicable situations that may be identified.

Iroquois has gained some experience with utilizing this method in the past and believes that it can successfully implement this measure on a case by case basis. This commitment will begin January 1, 2021.

#### Transfer Compression

After the section(s) of line involved has been reduced as much as possible, transfer compression will be utilized when possible to move gas into sections of line outside the scope of work of the project. Iroquois will evaluate each project on a case by case basis to determine if transfer compressor is technically viable and feasible for that particular situation.

On a few past projects, Iroquois has utilized transfer compressors to determine if they are feasible on our system. Based on that experience, Iroquois believes it can successfully utilize transfer compression on a case by case basis. The use of Transfer Compression began in 2020 and will continue into the future.

#### Hot Taps

In certain situations, Hot Taps may be utilized to greatly reduce or eliminate the need for venting. Iroquois will evaluate each situation and determine if the project is an appropriate, safe, and technically feasible candidate for Hot Tapping. Iroquois will utilize the Hot Tap method for at least 50% of its projects that are deemed acceptable per the previous criteria.

Iroquois has used Hot Taps in past years and will continue to use Hot Tapping in appropriate situations into the future.

### **Record Keeping**

Iroquois has an internal system to track blowdowns on our system (Iroquois Form GM-22). This system will be utilized to track the reductions of our system and compared from year to year and will run on a calendar year basis. Record keeping for this commitment will begin in January, 2021.

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

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*Use this space, if desired, to provide other information about Program participation, such as plans for expanding Methane Challenge commitments, how historical actions informed Methane Challenge commitments, or other information on how the Program will be implemented.*