



## Natural Gas STAR Methane Challenge Program Implementation Plan

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<b>Partner Name</b>	<b>Current as of (date)</b>
<u>Black Hills Energy</u>	<u>Oct 30, 2020</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 type="checkbox"/>	Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/>	Pneumatic Controllers		
<b>NG Distribution</b>			
<input checked="" type="checkbox"/>	Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: 5% </i> )	Jan 1, 2021	2026
<input checked="" type="checkbox"/>	Services – Cast Iron and Unprotected Steel	Jan 1, 2021	2026
<input type="checkbox"/>	Distribution Pipeline Blowdowns ( <i>Commitment Rate: </i> )		
<input checked="" type="checkbox"/>	Excavation Damages	Jan 1, 2021	2026

## 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).*

Black Hills Energy was pleased to join the EPA in a partnership to reduce methane emissions. Continued investment in natural gas distribution infrastructure minimizes the risk of natural gas leakage which provides safety, environmental, and financial benefits. Black Hills Energy is a natural gas distribution company that operates in several states including Arkansas, Colorado, Iowa, Kansas, Nebraska, and Wyoming.

### **Mains and Services - Cast Iron and Unprotected Steel**

Black Hills Energy's Distribution Integrity Management Program (DIMP) has identified the Mains - Cast Iron and Unprotected Steel BMP Commitment, and Services - Cast Iron and Unprotected Steel BMP Commitment, to address methane emissions sources in our integrity plans for each service territory. This source is described as unprotected steel distribution mains and services which natural gas is distributed via pipelines to serve our customers, Black Hills Energy no longer has any cast iron pipes in our system. Based on our 2020 baseline inventory of unprotected steel distribution mains and services, our initial commitment is to reduce unprotected steel mains at a minimum rate of five percent (5%) per year by 2026 for this portion of the EPA's Methane Challenge. The mitigation will include replacing or cathodically protect unprotected steel mains and services. Black Hills Energy will submit detailed information on the rate of unprotected steel mains and services replaced in the future as part of this portion of the EPA's Methane Challenge.

### **Excavation Damages**

Black Hills Energy's Damage Prevention Group has identified excavation damage as one of the greatest threat to the integrity of our natural gas distribution system. Black Hills Energy is committed to tracking and reducing these damages as doing so is not only beneficial to the environment but increases public safety and reduces the cost of providing natural gas service. The goal of our Methane Challenge program will be to consolidate the data we already collect, assure the accuracy of the data, and expand our data analysis to cover all the metrics required for this portion of the EPA's Methane Challenge. Additionally, Black Hills Energy has or will implement by 2026 the following strategies to reduce the number of leaks due to excavations:

- Collaborate with third-party locators to improve practices.
- Improve the response rate and quality of third-party damage investigation.
- Ensure that all new gas lines are traceable and work to make existing lines as locatable as possible.
- Improve maps and records to facilitate better asset location/identification.
- Advocate for 811 calling practices.

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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.*