



eBrief

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GPA files Petitions for Review and Reconsideration of EPA's new oil and gas regulations

Background information

April 17: The Environmental Protection Agency (EPA) signed a Final Rule for the Oil and Gas Sector, New Source Performance Standards, Subpart OOOO, and National Emission Standards for Hazardous Air Pollutants, Subpart HH and HHH. These rules cover compressors, pneumatic controllers, flowback emissions from hydraulically fractured gas wells, amine units, TEG dehydration units, fugitive emissions and storage tanks. The rules also regulate production, gathering, processing and transmission.

July 24: GPA Environmental Committee submitted comments on the draft regulations, and submitted a list of questions to EPA regarding implementation of the new rules.

Aug. 16: EPA published the Final Rule in the Federal Register. A working group of GPA Environmental Committee members met with EPA on Aug. 23 to discuss our questions and the need for a reply before the compliance date of Oct. 15. We have not yet received a response to our inquiry.

Oct. 15: GPA filed a timely Petition for Review of the final rules with the U.S. Court of Appeals for the District of Columbia. We also filed a timely Petition for Reconsideration, listing almost 30 items of concern, with EPA on Oct. 16.

The latest information:

We expect EPA to begin discussions with industry petitioners addressing issues of concern. We anticipate we will see in EPA's response to our questions, that the 6 tons per year threshold limit for storage vessels applicability is based on "Potential To Emit," considering enforceable permit limits, and that Vapor Recovery Units are not considered control devices. These clarifications would save the industry, and GPA member companies, millions of dollars in control, monitoring, recordkeeping and reporting requirements. Additionally, we hope to get a revised definition of storage vessel, clarification to seemingly contradictory requirements, and an extension of some compliance deadlines.

GPA Pipeline Safety Committee partners on PHMSA gathering line survey

In an effort to provide the Pipeline and Hazardous Materials Safety Administration (PHMSA) with additional information on gathering lines, a joint effort was initiated to collect data on gathering lines in Class 1 areas. While the comment period for this Advanced Notice of Proposed Rulemaking closed in February 2012, this supplemental information is being provided to the docket for PHMSA's additional consideration.

- The number of deaths and injuries from gathering systems remain lower than those of transmission pipelines.

Thank you to all who assisted in this important effort. We hope this new information will be helpful to PHMSA as it considers the future regulation of gathering lines.

Association staff changes

The voice you hear when calling GPA and GPSA offices has been identified! Please join us in welcoming Janet Griggs, who joined us Nov. 1. Her responsibilities include assisting with web site account logins (GPA & GPSA), GPA publications, GPSA Data Book sales and administration, GPA's School of Gas Chromatography, and anything else we can find to pile on! We're pleased to have Janet on staff and hope you'll help welcome her when you call in.

GPA's 2013 R&D program set

At its recent meeting in Dallas, the GPA board of directors approved the association's 2013 budget. In approving the budget, the board also approved \$275,000 (GPA membership support) of a total \$575,000 research and development (R&D) program. This program was submitted by Technical Section F - Research, approved by the GPA Technical Committee and finally approved by the board, as is required in the association's bylaws. The program includes \$325,000 for three continuing projects and \$250,000 in funding for three new projects. Full details of the program may be viewed in GPA's 2013 Research Brochure, which is available here: <https://www.gpaglobal.org/research/>.

GPA appoints Markwest to PERC

The Propane Education and Research Council (PERC) is composed of 21 industry members dedicated to promoting the safe, efficient use of propane through programs in research and development, training and safety. As a reminder, GPA is responsible for appointing the nine propane producer representatives of the council.

GPA recently appointed Roxanne Fowles, Markwest, to replace Tom Redd, Martin Midstream, who had previously served on the council. Other producer representatives serving include:

Jeff White, Aux Sable
Mike Barnes, BP Energy
Joe Gump, ConocoPhillips
Sharon Beemer, DCP Midstream
Greg Dighero, EnCana
Sam Hawley, Enterprise Products
David Regan, Targa Resources
T.J. Rinke, Williams Midstream

GPA greatly appreciates the time and efforts of these individuals in serving this industry.

GPA unveils new association tagline

It's official now ... GPA's new tagline to accompany the association's logo is "Midstream's Greatest Resource," reflecting our broad responsibilities in serving our membership of midstream operating companies. The tagline is visible in an updated logo that you may have noticed in this eBrief's header and also on the GPA web site, plus it has also now been unveiled beyond that of our membership via a press release distributed to the media.

GPA members voted for a bylaws change in 2010, allowing GPA to restructure its membership to better include companies with operations beyond gas processing alone. Since then, we have taken deliberate steps toward becoming a midstream trade association by taking a more proactive role in legislative and regulatory issues and including research & development support in all members' dues.

"GPA has always been a respected trade organization with a mindful eye on gas processing technical support and NGL specifications, but now, we're so much more than that," said Mark Sutton, GPA executive director. "With a volunteer corps representing more than 120 member companies of every level, our association consists of expert leadership that spans all facets of the midstream industry, from research to technology to regulations.

"Regarding the latter, we've really stepped up our advocacy efforts in recent years, which is critical to our membership and something in which we have a much stronger voice when combining expertise and numbers. With the knowledge and assets of this group coming together under the GPA umbrella, and working collectively toward responsible energy and environmental objectives, we strongly believe this association is Midstream's Greatest Resource."

GPA's board of directors approved the new tagline earlier this year, but the official announcement was withheld so it could be revealed in conjunction with the 2013 GPA Convention theme, "Gathering Knowledge, Sharing Practices."

pleased with how the 2013 program is shaping up and look forward to revealing session topics soon.”

The committee has also secured John Hofmeister as the convention’s keynote speaker. Hofmeister, upon retirement from Shell Oil Co. in 2008, founded and heads the non-profit Citizens for Affordable Energy. The Washington, D.C.-registered, public policy education firm promotes sound U.S. energy security solutions for the nation. Hofmeister has held key leadership positions in General Electric, Nortel and AlliedSignal (now Honeywell International), and serves on a number of energy-focused boards of directors. He is also the author of “Why We Hate the Oil Companies: Straight Talk from an Energy Insider.” We look forward to hearing Hofmeister’s insightful keynote address during the Monday morning General Session, which is open to all attendees.

Convention attendees will have the option of purchasing a ticket to the Tuesday Prayer Breakfast, which will feature speaker Randy Phillips, pastor of the Austin, Texas-based Promiseland West Church and part of the contemporary Christian music trio Phillips, Craig and Dean. Since forming the group in 1991, they have released 12 albums and earned 18 No. 1 radio singles. Phillips will deliver a faith-based and inspirational message for those wishing to attend.

Convention registration to open next month

Online registration for the 92nd annual GPA Convention will open on Tuesday, Dec. 11. We’ll send an e-mail announcement that morning, but you may also find a direct link on the GPA web site, which you can find in the right-hand column with convention information. The convention promotional brochure, with information about session topics and a schedule of events, will mail in early January. If your mailing address or company information has changed, please send an email to gpa@GPAglobal.org to ensure we have your current information.

GPA board of directors agrees to awards program revisions

Each year at our annual GPA Convention, we recognize a number of outstanding individuals who have provided invaluable service to the midstream industry and our association. The board agreed to awards program revisions presented at the Oct. 31 meeting, with highlights including the addition of the Entrepreneur Award, Lifetime Achievement Award and Impact Award.

We extend our thanks to the ad hoc committee that developed the revised program, which included Bob Dunn (chair), Bill Cepica, Francis Foret, Bob Jackson, Jim Mogg, Sharon Robinson, Gene Thomas, Mark Sutton and Johnny Dreyer.

Details on the new program are available on the GPA Awards Program page: <https://www.gpaglobal.org/awards/>.

Please provide nominations for any of these awards to jdreyer@gpaglobal.org by Dec. 31.

Environmental Excellence Award application deadline is approaching

The GPA Environmental Excellence Award is a project-based award that honors companies’ achievements in energy conservation and environmental support. The self-nomination process is open for companies to be considered for the award recognition at the 2013 GPA Convention. The company recognized with this honor will be able to demonstrate its project at the convention so other member companies may benefit from this knowledge and information.

The application deadline is **Dec. 31**. Full program details, examples of previously submitted projects and application forms are available here: <https://www.gpaglobal.org/awards/envexcellence/>

GPSA Engineering Data Book dedication recognizes industry leaders

The 13th Edition of the GPSA Engineering Data Book, which was released earlier this year, has been dedicated to four gentlemen remembered as working leaders, all whom made significant contributions to the midstream industry and personified the integrity of its people.

Please join us in honoring Ron Brunner, Ron Cannon, Robert Maddox and Gustavo Soto Soto, each recognized with a brief biography on the Data Book’s dedication page, for their contributions.

Reminder – new GPSA Data Book edition is available

The 13th Edition of the GPSA Engineering Data Book is available for purchase. This new edition contains updates to all 26 sections from the 2004 edition. The Data Book is considered the worldwide authoritative resource for technical and design information pertaining to the midstream industry and its approved practices and procedures. For more information, including how to order, visit <http://gpsa.gpaglobal.org/databook/>.

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