



MIDSTREAM'S GREATEST RESOURCE

eBrief

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GPA working to establish an office in Washington, D.C.

The two most recent GPA board meetings in Dallas and Austin have included discussions of an initiative to establish a GPA office of federal affairs in Washington, D.C. The overarching goal of this initiative is to elevate GPA's visibility by establishing brand identity in Washington, D.C., and developing a meaningful rapport with policymakers, agencies and other national industry associations. An active presence in D.C. is essential to building meaningful alliances at the federal level to ensure GPA is identified as the voice for all legislative and regulatory activities pertaining to the U.S. midstream industry.

This initiative is intended to enhance the value of GPA membership, while building upon our existing capabilities without sacrificing any of GPA's present services. To that end, we have kept the following guiding principles in the forefront of our activities:

- Maintain the state affairs function that GPA has developed in recent years
- Build upon GPA's existing strengths in federal advocacy
- Continue GPA's historical role as the leader in technical knowledge and industry standards
- Pay our way (meaning GPA will have to cover the additional staffing and office expenses through dues increases and/or other considerations)

Based upon this, we have identified and are considering these elements in order to take this initiative from concept to reality:

- Staffing
- Physical office requirements
- Financing and budget
- Implementation
- Establishing a GPA/GPSA PAC

Our Executive and Finance Committee is evaluating each of these elements with the primary emphasis on developing a list of potential leaders for our Washington office. We expect to have a final proposal to be submitted for a vote at the upcoming fall board meeting scheduled for Oct. 23.

GPA files comments addressing Energy Information Administration's proposed Form EIA-915

GPA and its membership have a history of working cooperatively with the Energy Information Administration (EIA) on data collection issues relevant to GPA members. GPA has significant concerns with the EIA's proposal to collect and release plant-specific data to the general public (with only a six month lag period). To ensure that GPA members' concerns are fully considered, GPA submitted comments (and subsequent supplemental comments at EIA's request) on the Proposed Agency Information Collection Notice and Request for Comments that was published in the Federal Register on Aug. 1, 2012.

The data to be collected and proposed for release will encompass information that has heretofore been considered confidential by GPA members. Publication of the plant-specific information will impair the competitive position of GPA members participating in the filing of Form EIA-915. GPA does not oppose the release of appropriately aggregated data by Petroleum Administration for Defense District (PADD), but EIA's plan to rapidly release data after collection that the industry has always treated as confidential is a change from its current practice and will have significant adverse competitive effects. The plant-specific data that EIA would collect on Form EIA-915 and then release is the type of information that agencies should refrain from releasing. GPA believes this is the type of information that should be exempt from disclosure under the Freedom of Information Act.

Preserving the ongoing confidentiality of the foregoing information is critical to maintain a level playing field in the highly competitive midstream sector of the oil and gas business. GPA and its members remain committed to the cooperative relationship we have enjoyed with the EIA and will continue dialogue on remaining issues concerning the Form EIA-915.

One spot left: GPA's School of Gas Chromatography

GPA's 41st annual School of Gas Chromatography scheduled for Aug. 4 – 8 in Tulsa, Okla., has filled 99 of its 100 spots. To secure the last spot for this top chromatography training or learn more, visit www.GPAGlobal.org/chromo.

GPA considers offering additional targeted midstream training opportunities

GPA leadership has placed "training" on its priority list of strategic initiatives, and Chairman-Elect John Mollenkopf, MarkWest Energy Partners, is leading the effort. The training task force is evaluating options for targeted and highly sought after training opportunities like GPA's annual chromatography school.

Initial conversations have centered on using the GPSA Engineering Data Book as a basis for developing a curriculum that could be used for potential training offerings. Much work remains, but the GPA and GPSA boards of directors have voted to provide funds to develop the curriculum, while the training task force continues dialogue on issues such as:

- Locations/timing (for instance, one week-long course versus separate breakout courses)
- Depth that the chapter organizations will be involved
- How the curriculum should be used (in-house only, allow third parties to use, or a combination of both)
- How can this initial training be used to springboard into other training possibilities

More information will be communicated in future eBrief issues and on the GPA web site as it becomes available.

Changes to GPA Convention exhibit/Vendor Night sign-up process

One of the most common questions GPA receives regarding the convention each year is "how can I sign up as an exhibitor?" Companies that have participated in, or have tried to sign up for, the Vendor Night exhibit option know that the demand is high and space is limited, making it difficult to secure a space. After much discussion and debate at the recent GPSA board of directors meeting in Austin, Texas, the 2015 Vendor Night selection process will be handled using a lottery system instead of the first-paid, first-served approach as it has been for the past three years.

Last year when sponsorship and Vendor Night registration opened, the 25 Vendor Night spaces sold out in less than 10 minutes and at least 20 companies commented that they were mid-registration when the Vendor Night option "disappeared" because it had already sold out. The lottery system is an answer to many requests for a more fair sign-up process than the process used in the past. While the lottery system still leaves the selection process up to chance, it also provides companies that have been engaged in GPA and GPSA activities with more entries to award them for their involvement without excluding non-members and other companies that haven't been as involved.

Companies interested in applying for one of the 25 Vendor Night spaces for 2015 should make note of the following:

- **The Vendor Night enrollment period opens on Aug. 18 at 8 a.m. and closes on Aug. 29 at 5 p.m. Central time.** Absolutely no additional entries will be accepted after the enrollment period closes.
- All companies interested in a Vendor Night space must register for the lottery using the online sign-up form during the enrollment period – no sign-ups by phone, e-mail or fax will be accepted.
- All companies that sign up using the online form will receive one entry in the Vendor Night lottery; companies are eligible for up to 16 additional entries if they meet the criteria as outlined on www.GPAconvention.org/exhibit
- The Vendor Night drawing will take place on Sept. 3 and 25 winners, as well as 5 alternates, will be announced that day. Companies awarded Vendor Night positions are required to pay in full within 30 days or the position will be awarded to an alternate.
- The 2015 GPA Promotional Opportunities packet outlining all sponsorship options will become available for review on Sept. 3.
- Sponsorship registration will open Sept. 16, and opportunities will be awarded on a first-paid, first-served basis.

For detailed information about the Vendor Night lottery system, visit www.GPAconvention.org/exhibit.

New PERC appointments

At its June meeting, the GPA board of directors approved reappointing three and adding two new producer representatives to the Propane Education and Research Council (PERC). Reappointed individuals include Greg Dighero, EnCana Oil and Gas; Roxanne Fowles, MarkWest Energy Partners; and Glenn Luce, Aux Sable Midstream.

Rob Hemsworth, DCP Midstream, will replace Sharon Beemer, DCP Midstream; Bruce Leonard, Targa Resources, will replace David Regan, Targa Resources.

Chapter Leadership Summit brings value to domestic chapter organizations

GPA's annual Chapter Leadership Summit was held July 10 - 11 in Albuquerque, NM, and GPA's six domestic chapters were represented. Bill Ward, Superior Pipeline, and Chris Lindenberg, Western Filter Co., attended as liaisons from the GPA and GPSA boards of directors, respectively. This meeting continues to assist chapters in fulfilling the goals and objectives respective to each organization. Many issues were vetted, and major topics included:

- Evolving GPA/GPSA staff support
- Changing chapter activities
- IRS 501 (c) designations
- Chapter leadership and transition issues
- Education/training/university outreach efforts
- Young Professional activities

Specific agenda items were discussed, but additional value came from the roundtable discussions where chapters provided attendees with successes and issues each chapter is working through. The free flow of information provided attendees with many ideas that they could take back to their respective areas.

Attendees agreed that the meeting continues to be valuable to chapters and planned to meet in Denver in July 2015.

GPA to comment on Interim Chemical Accident Prevention Advisory - Design of LPG installations at natural gas processing plants

As reported in last month's eBrief, the Environmental Protection Agency (EPA) issued an interim advisory stating their concern that some natural gas processing plants that store and process liquefied petroleum gas (LPG) may not be designed in accordance with applicable industry standards and codes. GPA Technical Section A - Facilities Design & Optimization formed a task force consisting of members from the section along with members from GPA's Environmental Committee and Safety Committee to develop comments addressing their concerns. Comments are due on July 31, and the task force is in the final stages of commenting. The comments state that midstream operations are sufficiently regulated for safety and environmental concerns.

Technical Section members: please confirm voting status

GPA member companies represented on a technical section receive one vote on GPA ballots, and often times a company has more than one employee on a committee/section, so GPA recently sent e-mails to its technical sections' members asking for confirmation of voting member status. This is an effort to help GPA staff get an accurate vote on revisions to GPA standards and publications. Even though not all members will be able to vote, all will still receive

notice of revisions so they can give their thoughts to the voting member within their respective companies. Thanks to those section members that have already responded.

Technical sections' fall meetings scheduled

GPA's technical section meetings will be held in conjunction with the GPA/GPSA board meetings on Oct. 22 at the Omni Mandalay, Las Colinas (Dallas). Technical Sections A and B will meet from 8 a.m. until noon. Section C, H, and M will meet from 1 - 5 p.m. Technical section members will receive more details later this month.

GPA Environmental Committee developing comments on managing emissions on tribal land

Editor's note: United States Code, Title 18, defines "Indian country" as follows:

"Except as otherwise provided in sections 1154 and 1156 of this title, the term 'Indian country,' as used in this chapter, means (a) all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and, including rights-of-way running through the reservation, (b) all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state, and (c) all Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same."

In 2011, the Environmental Protection Agency promulgated a final rule establishing New Source Review (NSR) permitting in Indian country (see the legal definition of "Indian country" above), and part of this rule included minor NSR permitting. Under that rule, an owner or operator of a site must obtain a preconstruction permit on or after Sept. 2, 2014, if the source will either construct a new true minor source or modify an existing true minor source in Indian country.

With the development of shale plays, midstream companies are increasing operations in Indian country and because of the rule's potential impact on GPA members, the GPA Environmental Committee formed a work group earlier this year to develop comments on EPA's proposed rule.

The group submitted comments for the Jan. 14, 2014, proposed rule on "General Permits and Permits by Rule for the Federal Minor New Source Review (NSR) Program in Indian Country." On June 5, EPA published an Advanced Notice of Proposed Rulemaking (ANPR) for oil and natural gas minor sources. EPA also published a proposed rule to extend the September 2, 2014, deadline to March 2, 2016, to allow time to develop a streamlined permitting program. The agency has also published an ANPR to solicit comments on the upcoming proposed rulemaking.

Led by GPA Environmental Committee Vice Chair Melanie Roberts, Targa Resources, the work group is preparing additional comments to submit to EPA on midstream operations and the need for a streamlined air permitting program that will give our industry a predictable and timely permitting process in Indian country similar to state permitting programs with significant oil and gas resources.

GPA Environmental Committee submits comments on EPA's rule revisions regarding confidential business information and greenhouse gas rule reporting

Many data elements reported under the federal Greenhouse Gas (GHG) Reporting Rule were previously determined to be confidential business information. The Environmental Protection Agency (EPA) intends to aggregate and publish certain data elements. The GPA Environmental Committee, led by Laura Weber, DCP Midstream Partners, submitted comments and suggested changes to EPA to ensure that confidential information remains confidential and to ensure that published data is appropriately characterized by the EPA so as to not mislead the public on our industry's operations and emissions.

GPA Regulatory Committee working on possible new "Gas Day" start

For the past two months, GPA Regulatory Committee members have been engaged in the North American Energy Standards Board efforts to develop "Gas Day" neutral standards, with the goal of approving and filing with the Federal Energy Regulatory Commission by the end of September. At the same time, committee members are working with the Texas Pipeline Association to prepare comments regarding the potential adverse consequences of a proposed 4 a.m. start of the natural gas operating day.

GPA/GPSA Calendar

August

- 4-8 41st Annual GPA School of Gas Chromatography
- 11 North Texas GPA Lunch and Learn
- 14 Rocky Mountain GPA YP "Come Cheer on the Colorado Rockies"

Gas Processors Association

6526 E. 60th St.

Tulsa, OK 74128

(918) 493-3872

www.GPAglobal.org

GPA@GPAglobal.org
