



MIDSTREAM'S GREATEST RESOURCE

eBrief

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[GPA Environmental Committee provides comments to EPA on methane emissions](#)

GPA Environmental Committee provides comments to EPA on methane emissions

The Obama Administration is exploring potential regulation of methane emissions from oil and natural gas infrastructure. As an initial step in that process, the Environmental Protection Agency (EPA) issued a series of “technical white papers” in April reviewing the state of knowledge about sources of methane emissions and means of control. Three of the papers covered compressors, pneumatic devices and leak detection and repair.

On June 16, the GPA Environmental Committee submitted 21 pages of comments to EPA on the methane white papers. GPA comments provided information from the real-world experience of member companies and identified several flaws and errors in the white papers. Among other things, the comments made the point that EPA regularly cites emission factors that are nearly 20 years old.

According to a “Methane Strategy” issued by the White House in March, EPA will use information gathered through the white paper process to determine by this fall how to address methane emissions from the oil and natural gas sector –possibly through regulation. The GPA Environmental Committee will remain engaged on this issue as the process moves forward.

GPA participates in National Petroleum Council Emergency Preparedness Federal Engagement Meeting

GPA was invited to participate in a recent stakeholder engagement session in Washington D.C. for the study on natural gas and oil infrastructure emergency preparedness for natural disasters. The National Petroleum Council (NPC) conducted this study at the request of Secretary of Energy Dr. Ernest Moniz.

GPA Vice President of Government Affairs Jeff Applekamp joined other key stakeholders to discuss supply chains, market dynamics, interdependencies, the challenges posed when adversely impacted by natural disasters, and the framework to restore normal operations and expeditiously supply consumers with fuel (including refined products and natural gas).

"Supply Chain Understanding" included discussions on best practices and improvement ideas. An important point discussed is that the owner of a facility, who may be contacted by emergency personnel with requests (or demands) for information and access of product, may not be the owner of the product.

"Situational Awareness and Analysis" discussions focused on the need to develop robust infrastructure to prevent delivery problems before a catastrophe, or extreme weather, happens. This is an issue GPA leaders have been addressing for some time. The problems of propane delivery this past winter was part of this discussion.

Applekamp says it is beneficial, crucial, for GPA to be engaged with NPC as they work to develop emergency procedures. Such procedures could affect GPA members' operations and will likely include identifying facilities that should be included on restoration priority lists during emergencies. Another important part of this discussion, and certainly validates GPA involvement, is the role industry organizations have in collecting data during emergencies.

GPA to file comments in response to proposed FERC revisions

GPA's Regulatory Committee remains heavily engaged in discussions about moving the start of the "natural gas operating day" to an earlier time of 4 a.m. (Central time zone), which will negatively impact operational and commercial areas of companies in the midstream energy sector.

The discussions stem from the Federal Energy Regulatory Commission (FERC) Notice of Proposed Rulemaking (NOPR) issued in late March, which proposes to amend FERC Regulation 284.12. The proposed changes not only deal with moving the start of the operating day but also address scheduling practices used by interstate pipelines to schedule natural gas transportation service.

GPA actively participated in the North American Energy Standards Board (NAESB) Gas-Electric Harmonization forum, a series of four meetings set up to help interested participants develop consensus and shape the NAESB response to the NOPR.

Despite the lack of a consensus, NAESB is preparing standards on "gas day" neutral processes, such as the timely, evening and intraday cycles. GPA members are strongly encouraged to participate in the development of these standards. From there, GPA and its members will have the opportunity to file comments with FERC on the NOPR and any standards passed by NAESB by Nov. 28. A final rule is expected to be issued in 2015.

Deadline approaching: GPA School of Gas Chromatography

July 11 is the deadline to save \$100 on registration for the GPA School of Gas Chromatography, scheduled Aug. 4 - 8 at the University of Tulsa (Oklahoma). In its 41st year, this intensive one-week school has proven to be one of the best available worldwide. GPA will take up to 100 students this year, and GPA's Analysis and Test Methods Section (Technical Section B) will manage, direct and conduct the school as in past years.

Registration is available on a first-come, first-served basis and is filling quickly. We typically have a waiting list for this school, so we encourage you to register early not only to guarantee a spot but also to save on registration fees.

Early Bird Registration (by July 11)

\$650 - GPA / GPSA Members
\$950 - Non-Members

Standard Registration (after July 11)

\$750 - GPA / GPSA Members
\$1,050 - Non-Members

For more information, visit www.GPAGlobal.org/chromo/ or contact Debbie Beaver, (918) 493-7062.

Propane Education Research Council meeting recap

GPA staff attended the Propane Education Research Council's (PERC) research committee meeting earlier this month. A few items of importance discussed during the meeting included:

- Additives and Filters for Deposit Prevention Studies - #15938 - The goal of this project is to evaluate potential solutions for deposit formation in propane engine fuel systems. The project focuses on testing the effectiveness of additives and filters.

- Fuel Sampling and Trouble Shooting Program - #18213 - This program will enable PERC to respond to customers and troubleshoot problems by working with Southwest Research Institute, which has the capabilities to determine the fuel composition and to investigate causes and potential contaminants that may be causing the performance issues.
- Electronic Hand-Held Odorant Detector for Propane - #17257 - Funding for the development of an instrument that can measure the concentration of ethyl mercaptan in gaseous propane. For measuring odorant concentration in gaseous propane, the quartz crystal microbalance (QCM) is proposed as a sensitive and cost effective solution.
- Promotion of Autogas – Campaign to promote propane autogas to fleet managers
- Random Fuel Sampling Program - #20064 - The proposed project is to perform a national propane survey. Propane samples will be collected from selected sites across the continental U.S. The samples will be subjected to specification tests drawn from ASTM D1835/GPA 2140. In addition, heavy-ends and sulfur compounds will be speciated to provide a break-down of contaminants. This fuel quality data may help identify fuel quality trends that may affect the performance and reliability of LPG fueled appliances, engines and vehicles, thus impacting PERC's primary strategic goal of increasing propane usage.

Recently published GPA Research Reports

The following GPA Research Reports have been published and are available for purchase on www.GPAGlobal.org:

- RR-215: Equilibrium Data (SLE and VLE) for Heavy and Light Hydrocarbons at Cryogenic Temperatures, dated June 2014
- RR-222: Corrosion in Acid Gas Injection Systems, dated June 2014
- RR-223: Freeze Valve Water Content in LPG Systems, dated June 2014

Interim Chemical Accident Prevention Advisory - Design of LPG installations at natural gas processing plants

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 has formed a task group consisting of members from the section along with members from GPA's Environmental Committee and Safety Committee to develop comments addressing their concerns.

In its advisory, EPA mentions API 2510, *Design and Construction of Liquefied Petroleum Gas Installations*, and API 2510(a), *Fire Protection Considerations for the Design and Operations of Liquefied Petroleum Gas (LPG) Storage Facilities*, and NFPA 58, *Liquefied Petroleum Gas Code*, as the standards currently being followed by industry.

Three subcommittees have been formed to provide technical comments on the standards and codes mentioned in the advisory, specifically:

1. Clarify the scope of API 2510, led by Dan McKenzie, Enbridge
2. NFPA 58 vs. API 2510, led by Mickey Clifford, Black & Veatch
3. List of other industry standards currently being followed, led by Theresa Gustafson, Enterprise Products.

Comments will be accepted until July 10 and then submitted to the EPA by GPA's Environmental Committee on July 29.

Notice to all holders of the GPSA Engineering Data Book

We encourage all Data Book purchasers to register their books online at no charge to ensure they will receive useful information.

Errata contain:

- Necessary changes before the book is scheduled for revision or re-printing
- Required additions to clarify an item
- Needed corrections because of an error found in the book

Registered users will receive a notice next month on how they can download soon-to-be-issued errata for the 13th Edition. [Register your book\(s\) here: http://gpsa.gpaglobal.org/databook/register/](http://gpsa.gpaglobal.org/databook/register/).

Maintenance of the Data Book is ongoing, so your feedback is important and always welcome. Contact GPSA with questions, comments, or to report a needed errata: gpsa@GPAglobal.org.

Task group formed to study online chromatograph

Technical Section B - Analysis & Test Methods has formed a task group to evaluate the sampling and handling of natural gas liquids by online chromatographs. Thanks to the members of the task group leading this effort:

Greg Clark, Enterprise

Ned Davis, MarkWest

Mark Scripsick, Enbridge

Lane Hedrick, DCP Midstream

Ron Carnahan, MarkWest

Eric Estrada, Targa Resources

New projects considered in Technical Section A

Technical Section A - Facilities Design & Optimization has formed four new task groups:

1. Offshore Gas Processing Plant Design, led by Juan Manzano-Ruiz, Bechtel
 2. Modular/Remote Controlled Plants, led by Mahdi Nouri, CH2MHill
 3. Water Conservation and Re-Use, led by Shane Rife, Nalco
 4. Vapor Recovery Design Guidelines, led by Dan McKenzie, Enbridge
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GPA/GPSA Calendar

July

10-11 - Chapter Leadership Meeting

25 - Rocky Mountain GPA Golf Tournament

31 - Rocky Mountain GPA Training, "Basic Petroleum Economics"

August

4-8 - GPA School of Gas Chromatography

Gas Processors Association

6526 E. 60th St.

Tulsa, OK 74128

(918) 493-3872

www.GPAglobal.org

GPA@GPAglobal.org
