



eBrief

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GPA board approves dues increase, changes to GPA office and staff

During its late October meeting held in Irving, Texas, the GPA board of directors approved a 35 percent membership dues increase, effective January 2015, to support its federal advocacy initiative, which will bring big changes, and benefits, to the association and its members.

For more than a year, GPA board meetings have included discussions of an initiative to establish a GPA office of federal affairs in Washington, D.C., an effort identified as a priority item by the leaders of GPA member companies in recognition that the midstream industry needs greater visibility at the federal level of government. While some existing funding will be used for start-up, the effort must be fully funded through increasing membership dues to ensure sustainability. With the recent approval of the dues increase, GPA plans to hire a senior level staff member in Washington, D.C., in early 2015 and add a director level position soon thereafter. GPA staff and Executive & Finance Committee members interviewed several candidates in late September and have since narrowed the pool. Finalists will go through another round of interviews in Houston next week, and GPA intends for the senior level staffer to be in place by first quarter 2015. The new staff member will assist with opening the D.C. office in early 2015 and hiring the director-level staff member.

The board also approved moving GPA headquarters from its existing building to a leased location and will remain in Tulsa, Okla. See the article below for more information about the relocation.

GPA, GPSA to relocate in Tulsa, Okla.

GPA and GPSA jointly own their existing office building in Tulsa, Okla., where the two associations have operated since 1986. In recent years, both associations have approved funding for building improvements to increase curb appeal and provide necessary interior updates. Since April, the GPA and GPSA boards of directors have discussed other renovations to add a conference room and to provide additional office space for a growing staff.

To accommodate additional space needs stemming from the ongoing federal and training initiatives, the GPA and GPSA boards unanimously approved for staff to sell the owned building and relocate to a leased space nearly twice the square footage of the current GPA and GPSA headquarters. The new office will be located about one mile from the current building in Tulsa, Okla.

GPA and GPSA are targeting second quarter 2015 for the move.

GPSA to examine dues structure

At its October meeting in Irving, Texas, the GPSA board of directors approved appointing an ad hoc committee to review its current dues structure. Based upon several factors, such as an outdated operating agreement to provide GPA staff support, increasing the value of association membership, and increasing costs to do business, a recommendation was made to examine the dues structure to ensure it is equitable to all members going forward. The ad hoc committee will study the issue and provide a recommendation to the board in 2015.

GPA comments on EPA's request for information on risk management plan

On July 31, in response to Executive Order 13650, the U.S. Environmental Protection Agency (EPA) published a request for information (RFI) related to potential revisions to its Risk Management Plan (RMP) regulation. In the RFI, EPA asks for information and data on specific rulemaking and policy options. GPA submitted comments Oct. 29 in response to the request. The comments were developed by an ad hoc GPA task force from Safety and Environmental Committee members and led by Safety Committee member Mark Prewitt, DCP Midstream.

Numerous questions were included in the RFI, and many required lengthy and in-depth responses. One question is included below as an example:

Would expanding the scope of the RMP regulation to require additional management-system elements, or expanding the scope of existing RMP management-system elements, improve the protection of human health and the environment? Should EPA require safety culture assessments, job safety analyses, or any of the other new management system elements described above? If so, please describe the elements, the safety benefits, any economic impacts associated with expanding the scope of the RMP regulation in this way, and any special circumstances involving small entities that EPA should consider. Would current staff at a facility be able to implement these additional elements or would new staff need to be hired?

We appreciate the great amount of time that the task force spent answering these questions.

RICE MACT case one step closer to resolution

Washington, D.C., attorney William Wehrum represented GPA before the U.S. Court of Appeals – D.C. Circuit, in oral arguments in the RICE MACT case on Sept. 26, which was heard by Judges Garland, Williams and Randolph. Most of the argument time was spent addressing the 100-hour emergency demand-response provision in the Environmental Protection Agency's (EPA) rule. Several minutes of the argument, however, were devoted to the remote engine provision.

Argument opened with petitioners Calpine Corp., FirstEnergy Solutions Corp., PSEG Power LLC, and Conservation Law Foundation, represented by David W. DeBruin. Their arguments focused exclusively on the 100-hour provision. Each of the judges had questions, but Judge Williams in particular seemed dubious of the arguments presented by these petitioners.

Delaware, represented by Valerie S. Edge, was next to present. Delaware devoted a significant amount of its five minutes of argument time to the remote engine provision. Delaware argued that engine maintenance requirements do not effectively control air pollution and that "... installing the equivalent of an automobile catalytic converter at remote sources would not be burdensome." Delaware also stated that the remote engine provisions were intended to shield 90 percent of formerly regulated sources and, under NRDC v. EPA, creating a subcategory to shield it from regulation is unlawful. Delaware did not present a strong case, and the judges did not engage the arguments. Next, Austin Saylor, attorney for the Department of Justice, presented argument on behalf of the government. EPA addressed the remote engine provision only in passing. The majority of EPA's argument time was consumed by questions from the judges about the adequacy of EPA's record support for the 100-hour demand-response provision and EPA's alleged failure to respond to significant comments. EPA had a difficult time responding to the judges' questions. Judge Garland ultimately requested a "one-sentence" letter identifying record support for specific elements of EPA's rule.

Argument on behalf of GPA and National Rural Electric Cooperative Association followed. Wehrum began by responding to Delaware's standing assertions, pointing out that Delaware failed to include evidence of standing in its opening brief, as required by the D.C. Circuit, and that the information it provided in its reply brief did not establish that emissions from any remote source contributed to air pollution in Delaware. Judge Garland then asked about Delaware's NRDC v. EPA argument. Wehrum responded, "Delaware was comparing apples and oranges. That case

involved de-listing of subcategories, while this case involves sub-categorization for the purpose of regulating." After responding to arguments and questions, Wehrum provided background on the remote engines addressed by the rule, explaining why it was reasonable to regulate them differently than other sources.

"I am optimistic that the court will uphold the remote engine provision," commented Wehrum following the hearing.

Ad hoc committee formed to study brazed aluminum plate-fin exchangers

Representatives of The Williams Companies reported on recent failures (and imminent failures) of brazed aluminum plate-fin exchangers to Technical Section A - Facilities Design, Technical Section M - Operations & Maintenance and the Technical Committee in late October. Several companies reported failures similar to those experienced by Williams, and the representatives suggested that the two sections and the Technical Committee address design, operation and maintenance practices for these types of equipment. An ad hoc committee composed of members of Sections A and M will be formed to address the issue. The ad hoc committee's goal will be to develop a GPA guidance document on mechanical integrity inspections around the exchangers and how to best prevent failures.

Call for comments on NFPA 56

A report was given to Technical Section A - Facilities Design and Technical Section M - Operations & Maintenance last month on the review of National Fire Protection Association (NFPA) 56, *Standard for Fire and Explosion Prevention during Cleaning and Purging of Flammable Gas Piping Systems*. Scott Neal, DCP Midstream, and Brett Wheelock, Enable Midstream Partners, are members of the NFPA Technical Committee that hosts this publication. As currently written, the standard could be interpreted to apply to gathering systems. Comments for revision of the standard are due in January 2015, and the Technical Committee will prepare comments for submission to NFPA. Individual companies are also encouraged to submit comments. An American Gas Association (AGA) representative reported that a related AGA publication (AGA XK0101 - *Purging Principles and Practices*) was also under review and invited GPA to comment.

GPA's 2015 research and development program set

At its recent meeting in Irving, Texas, the GPA board of directors approved the association's 2015 budget. In approving the budget, the board also approved \$290,000 (GPA membership support) of a total \$625,000 research and development program. This program was submitted by Technical Section F - Research and Technical Section B - Analysis & Test Methods, approved by the GPA Technical Committee and finally approved by the board, as is required in the association's bylaws.

The program includes \$395,000 for four continuing projects and \$230,000 in funding for two new projects. Full details of the program may be viewed in [GPA's 2015 Research Brochure](#).

Get recognized for environmental excellence: award application deadline is Jan. 30

GPA's Environmental Committee Chair Doug Jordan encourages GPA members to submit applications for this project-based award that acknowledges and honors companies' achievements in energy conservation and environmental support. The nomination process is open for companies to be considered for the 2014 award recognition at the GPA Convention, April 12 - 15, 2015, in San Antonio, Texas. There, award winners will be able to display their projects so that other member companies may benefit from this knowledge and information.

To encourage more participation in our Environmental Excellence Award program, award categories have been expanded to two divisions for GPA members. GPA member companies classified as 01 and 02 members will compete for the Division 1 award. All other GPA member companies, including international and associate members, will compete for the Division II award.

The winner of each division will receive a traveling trophy (Stanley Cup style) to display at its site for one year and will have the opportunity to present the trophy to the following year's winner at the GPA Convention. Winners in both divisions will also receive a plaque as a keepsake and will have the opportunity to purchase additional plaques.

MarkWest Liberty Bluestone was honored with a 2013 Environmental Excellence Award for its facility modification projects that incorporated environmental best management practices and construction design standards to their 2012 acquisitions of the Bluestone and Sarsen natural gas processing facilities and a compressor station in Butler County, Pa.

Saudi Arabian Oil Co. earned the 2013 award distinction for a Flare Gas Recovery System, the first of its kind among Saudi Aramco facilities, initiated at its Shedgum Gas Plant in the eastern region of the Kingdom of Saudi Arabia.

The application deadline is January 30, 2015. [View details and download the application form](#). Contact [Jeff Applekamp](#) for more information.

Amy Myers Jaffe named 2015 GPA Convention keynote speaker

The Program Committee recently announced that Amy Myers Jaffe will provide the keynote address during the opening General Session of the 2015 GPA Convention in San Antonio, Texas.

Jaffe is a leading expert on the geopolitics of oil and gas and energy security and is an influential thought leader on global energy policy and sustainability. She is chair of the World Economic Forum (Davos) Global Agenda Council on The Future of Oil and Gas and is executive director for Energy and Sustainability at University of California, Davis.

Jaffe provided the keynote address to convention attendees in 2005 and was a crowd favorite because of the relevance of her message and her presentation style. The Program Committee named Jaffe as their top choice for 2015 and was able to secure her for next year's conference. We look forward to welcoming her back in April.

GPSA announces 2015 convention entertainment

GPSA has named 2014 CMA "Vocal Duo of the Year" nominees The Swon Brothers and star of the hit CBS television series *Mike & Molly*, Billy Gardell, as the featured entertainers for the Tuesday night GPSA party at the 2015 GPA Convention, which will be held April 12 - 15 in San Antonio, Texas.

Performing professionally since childhood and honored with the Rising Star award by the Oklahoma Music Hall of Fame, The Swon Brothers first hit the national radar charming fans with their incredible harmonies and fun-loving personalities as finalists in season 4 of NBC's *The Voice*.

Fans got their first taste of the resulting self-titled album when the Swons debuted their opening single, "Later On," during a triumphant return to *The Voice*, which propelled the song to the top of the iTunes country singles chart within 24 hours.

Billy Gardell stars as Officer Mike Biggs in *Mike & Molly*. The popular CBS sitcom garners about 13 million viewers each week. Before *Mike & Molly*, Gardell co-starred in the critically acclaimed television series *Lucky*. His other television credits include *Yes Dear*, *Judging Amy*, *My Name is Earl*, *The Practice*, *Monk* and *Gary the Rat*.

Gardell's stand-up show is a powerhouse. As a standup comic, his comedy specials *Billy Gardell: Halftime* premiered on Comedy Central and *Billy Gardell Presents Road Dogs* premiered on Showtime. He also makes regular appearances on *NFL Today* on CBS Sports.

The comedy and musical acts are sure to bring the GPSA Party audience to their feet. GPSA couldn't make this party happen without our entertainment sponsors. Thanks to the following companies that have already committed to making this a great event:

Air Products	Hetsco Inc.
Allied Equipment	Hunt, Guillot & Associates
Anguil Environmental	Huntsman
Ariel Corp.	J.H. Foglietta Consulting LLC
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Catalytic Combustion	Ortloff Engineers Ltd.
Catalytic Products International	Pentair Oil & Gas Separations
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EnLink Midstream	Valerus
Exterran	ZAP Engineering & Construction Services Inc.
Gulf Coast Measurement Inc.	Zeeco Inc.

GPA/GPSA Calendar

November

- 6 North Texas GPA Annual Meeting
- 6-7 Technical Section F – Research, Subgroup 1 and Subgroup 2 Meetings
- 12 Houston GPA Luncheon
- 12 GPSA Editorial Review Board Meeting
- 13 Rocky Mountain GPA Regional Conference
- 13 North Texas GPA Lunch and Learn
- 14 Rocky Mountain GPA 2nd Annual Holiday Event
- 16-20 GPA-Gulf Cooperation Council Chapter Gas Treating & Sulfur Recovery Workshop
- 18 Appalachian Basin GPA Chapter Luncheon

December

- 4 MidContinent GPA Christmas Party