



Natural Gas STAR Methane Challenge Program Implementation Plan

Partner Name

Current as of (date)

Partner Implementation Manager

Name: _____

Title: _____

Address: _____

City/State/Zip: _____

Telephone/Fax: _____

E-mail: _____

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Partner Methane Challenge Commitments¹

BMP Commitment Option

	Source	Start Date	Achievement Year
Onshore Production			
<input type="checkbox"/>	Pneumatic Controllers		
<input type="checkbox"/>	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
Gathering and Boosting			
<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		
Natural Gas (NG) Processing			
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/>	Centrifugal Compressors - Venting		
NG Transmission & Underground Storage			
<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		
NG Distribution			
<input type="checkbox"/>	Mains – Cast Iron and Unprotected Steel (<i>Commitment Rate:</i>)		
<input type="checkbox"/>	Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/>	Distribution Pipeline Blowdowns (<i>Commitment Rate:</i>)		
<input type="checkbox"/>	Excavation Damages		

Partner Methane Challenge Commitments

ONE Future Emissions Intensity Commitment Option

Segment:		Intensity Target:		Target Year:	
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¹ 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

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).

Seneca Resources Company, LLC, (Seneca) will demonstrate its commitment to the EPA's Methane Challenge Program through the selected EPA recommended strategies by utilizing the mitigation tactics detailed below. Where several mitigation options are listed for any one of the industry segment's emission source types, the most appropriate option or combination of options will be selected taking into consideration operational need, economic viability, and mitigation effectiveness.

SELECTED EPA RECOMMENDED STRATEGIES AND MITIGATION TACTICS:

Onshore Production:

- Pneumatic Controllers:

Mitigation Options:

- Utilize natural gas-actuated pneumatic controllers with a continuous bleed rate less than or equal to 6 scf of gas per hour, or
- Utilize zero emitting controllers (e.g. instrument air, solar, electric, or mechanical controllers), or
- Remove natural gas pneumatic controllers from service with no replacement.

- Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks:

Mitigation Tactics: Seneca is committing to install vapor recovery units at all future and existing hydrocarbon liquid storage tanks.

Gathering and Boosting:

- Pneumatic Controllers:

Mitigation Options:

- Utilize natural gas-actuated pneumatic controllers with a continuous bleed rate less than or equal to 6 scf of gas per hour, or
- Utilize zero emitting controllers (e.g. instrument air, solar, electric, or mechanical controllers), or
- Remove natural gas pneumatic controllers from service with no replacement.

- Reciprocating Compressors - Rod Packing Vent:

Mitigation Tactic: Seneca is committing to implement a combination of the following methane mitigation techniques across all future and existing facilities.

- Replace the reciprocating compressor rod packing every 26,000 hours of operation, or
- Route rod packing vent to a capture system for beneficial use, to flare, or to a control device to achieve at least a 95% reduction in methane emissions.

Natural Gas Processing:

- Reciprocating Compressors - Rod Packing Vent:

Mitigation Tactic: Seneca is committing to implement a combination of the following methane mitigation techniques across all future and existing facilities.

- Replace the reciprocating compressor rod packing every 26,000 hours of operation, or
- Route rod packing vent to a capture system for beneficial use, to flare, or to a control device to achieve at least a 95% reduction in methane emissions.

IMPLEMENTATION TIMEFRAME

Where not already achieved, Seneca will implement the proposed mitigation tactics to all of its existing operations within 3 years of Seneca's Commitment start date. For all new operations, the proposed mitigation tactics will be included into Seneca's normal standard operating procedures and will be executed at each project's commencement. In regards to newly acquired assets, Seneca will work to incorporate these practices within a reasonable time period not to exceed 5 years from acquisition.

When mitigation efforts are needed, our intentions are to perform modifications while taking into account the aggregate methane emissions associated from other planned modification and maintenance at a well site or facility.

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Additional Information/Context (optional)

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.

FUTURE EXPANSION OF METHANE CHALLENGE COMMITMENTS

Seneca is committed to continuous improvement efforts to reduce greenhouse gas emissions and limit its potential environment footprint.

Seneca is excited about the addition of BMPs for our operating segments. Once the following BMPs are finalized we will evaluate them quickly and hope to add them to our efforts; Equipment Leaks/Fugitive Emissions (Onshore Production & Gathering and Boosting), Pneumatic Pumps (Onshore Production & Gathering and Boosting), and Liquids Unloading (Onshore Production).