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GHG Reporting Update

Rocky Mountain EHS Peer Group

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Disclaimer



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This material is intended to be helpful. However, this presentation is not intended to be legal advice and not intended to cover all laws that may apply to your situation.



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Outline

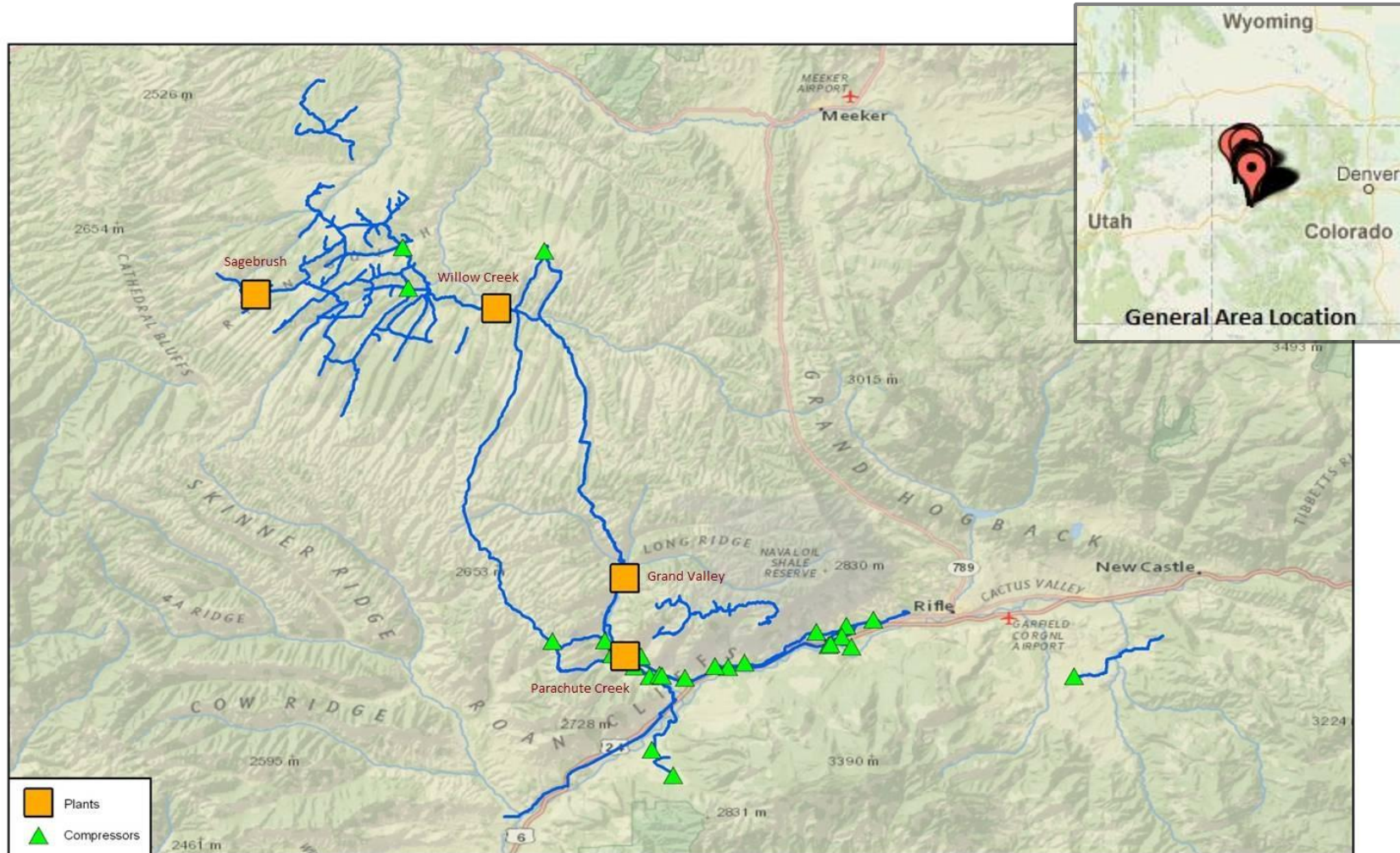
- > Introduction
- > Overview of Williams' GHG Reporting
- > Regulatory Information
 - Regulation Changes
 - Reporting Deadlines
 - Confidential Business Information (CBI)
- > GHG Submittals
 - e-GGRT Submittals
 - Missing Data Requirements
 - End Reporting
 - GHG Submittals 2013 and Beyond

Williams' Piceance Basin Facilities

- > Gathering, Treating and Processing
 - 350 miles of pipeline ranging up to 30"
 - 4 Gas Plants
 - 7 Amine Sweetening
 - 23 Compressor Stations



Area Map of Piceance Basin Assets



Piceance Basin Reporting Facilities

- > **Subpart C** – General Stationary Combustion Fuel Sources
 - 6 Compressor Stations
 - 1 Natural Gas Processing Plant
- > **Subpart W** – Petroleum and Natural Gas Systems
 - 2 Natural Gas Processing Plants
- > **Subpart PP** – Suppliers of Carbon Dioxide
 - 1 Natural Gas Processing Plant



Regulation Changes

- Subpart A
 - 2011 Technical Revisions and Clarifications – Final Rule 12/23/2011
- Subpart C
 - 2011 Final Rulemaking for Confidentiality Determinations – Final Rule 5/26/2011
- Subpart W
 - Revisions to Best Available Monitoring Methods (BAMM) – Final Rule 9/27/2011
 - 2011 Technical Revisions and Clarifications – Final Rule 12/23/2011
 - 2012 Technical Corrections and Clarifications – Final Rule 8/24/2012





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Reporting Deadlines

- > **Subpart C – March 31st (April 1st, 2013)**
 - RY 2010 – add to previous report and resubmit via e-GGRT
 - RY 2011 – add to previous report and resubmit via e-GGRT
 - RY 2012 – include the inputs
- > **Subpart W (Past Deadline)**
 - BMM 2013 - September 30th, 2012 (October 1, 2012)
- > **Subpart W - March 31st (April 1st, 2013)**
 - RY 2012



Subpart C and Confidential Business Information (CBI)



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- > Change applies to inputs requirements that were deferred until 2013
- > Bulk XML upload available
 - Could require re-entry
- > New input fields in e-GGRT
- > Ready February
- > Upcoming Webinars

| Subpart | Reporting Years (RY) for Which 2013 Inputs Must be Reported by April 1, 2013 |
|---|--|
| C (Stationary Fuel Combustion) ¹ | RY 2010, RY 2011, RY 2012 |
| D (Electricity Generation) ² | RY 2010, RY 2011, RY 2012 |
| DD (SF6 from Electric Equipment Use) | RY 2011, RY 2012 |
| FF (Underground Coal Mines) | RY 2011, RY 2012 |
| HH (Municipal Landfills) | RY 2010, RY 2011, RY 2012 |
| II (Industrial Wastewater Treatment) ¹ | RY 2011, RY 2012 |
| SS (Electric T&D Equipment Manufacturing) | RY 2011, RY 2012 |
| TT (Industrial Waste Landfills) ¹ | RY 2011, RY 2012 |



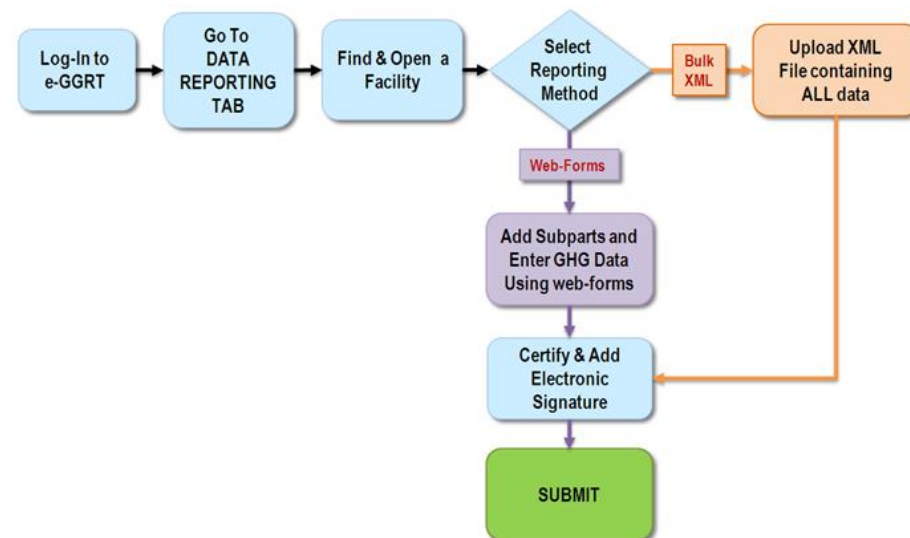
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Subpart W and CBI

- E-GGRT reflects the final rule
- Subpart W required inputs September 2012:
 - Activity data
 - Annual throughput
 - Annual CO₂, CH₄, and N₂O emissions reported separately for each industry segment
 - CO₂, CH₄, and N₂O emissions within each industry segment
 - CO₂, CH₄, and N₂O emissions reported separately for portable equipment
- Future rulemaking will be made for Subpart W inputs whose reporting deadline was deferred until 2015

E-GGRT Submittals

- Facility Registration
- e-GGRT available February 2013
- XML upload
- EPA reporting forms-manual entry
- Data Validation Issues
- Subpart C Draft XML now available
- Certification



Subpart C

Missing Data Requirements



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- > Units subject to Acid Rain Program – follow 40 CFR 75
- > For units that use Tier 1, Tier 2, Tier 3, and Tier 4 calculation methodologies
 - For missing values use average for missing value
 - high heating value
 - carbon content
 - molecular weight of the
 - For missing records use best available process data
 - CO₂ concentration
 - stack gas flow rate
 - percent moisture
 - fuel usage
 - sorbent usage

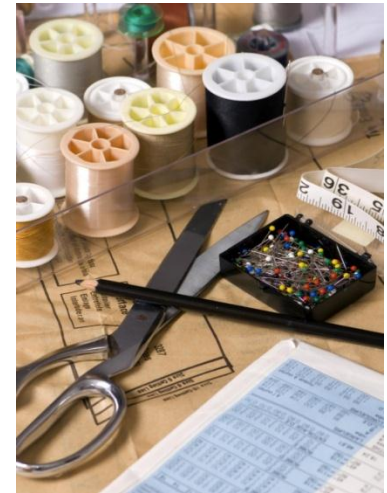
Subpart W

Missing Data Requirements



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- > If data are lost -> repeat the estimation/measurement
- > Data used to substitute lost data cannot be used for that subsequent year's emissions estimation
- > At least 30 days must separate estimation/measurement
- > For continuously monitored or measured data, use best available data for use in emissions determinations
 - Record and report the basis for the best available data



End Reporting?

- > CO₂e <25,000 metric tons/yr for 5 consecutive years
- > CO₂e <15,000 metric tons/yr for 3 consecutive years
- > Shutdown of all processes/units/supply operations
- > Notify EPA by March 31 of the year after

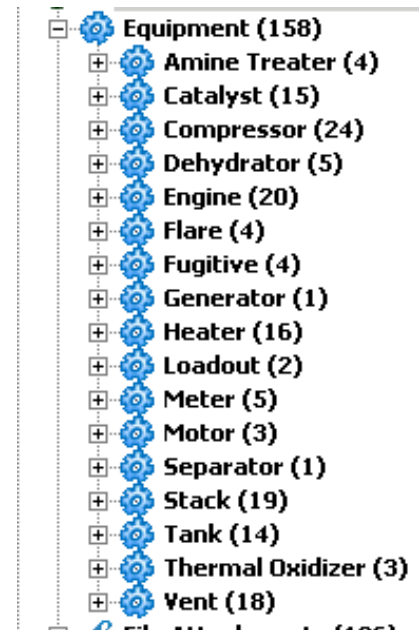




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GHG Submittals 2013 and beyond

- Evaluate all facilities
 - New/modified facilities
- Review accuracy of equipment inventory
- Review data needs
- Data management
- Plan for XML upload
- Previous years' assumptions/interpretations





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GHG Submittals 2013 and beyond

- Document decisions
- Review and revise monitoring plan
- Review records that should be maintained for 3 yrs
- BMM continues only for unique/unusual circumstances
- Consistency with other reporting obligations

Sources



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<http://www.epa.gov/ghgreporting/>

<http://www.epa.gov/ghgreporting/documents/pdf/2012/training/Subpart-W-Overview.pdf>

<http://www.ccdsupport.com/confluence/display/help/Preview+of+e-GGRT+Components+and+Specifications+for+Reporting+Year+2012>

<http://www.epa.gov/ghgreporting/documents/pdf/2012/training/Subpart-W-update.pdf>

<http://www.ccdsupport.com/confluence/display/help/XML+Reporting+Schema+Preview>

Contact Info



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