

| Company Information   |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
|---|--|---------------|--|-------------------|--|-----------|--|----------|--|------------------------|--|------------|--|------|--|--------|--|
| <p style="font-size: 1.2em; font-weight: bold; margin: 0;">Implementation<br/>Plan</p>  <p style="font-size: 1.2em; font-weight: bold; margin: 0;">Distribution<br/>Sector</p>   | <p style="text-align: center; color: #ccc; font-style: italic;">Partner Address Label Here</p> <p style="text-align: center; font-style: italic; margin-top: 20px;">If the information provided above is incorrect,<br/>please make corrections below.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Company Name:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">Gas Star Contact:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">Position:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">Address:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">City, State, Zip Code:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">Telephone:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">Fax:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="padding: 5px;">Email:</td> <td style="border-bottom: 1px solid black;"></td> </tr> </table> | Company Name: |  | Gas Star Contact: |  | Position: |  | Address: |  | City, State, Zip Code: |  | Telephone: |  | Fax: |  | Email: |  |
| Company Name:   |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Gas Star Contact:   |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Position:   |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Address:  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| City, State, Zip Code:  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Telephone:  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Fax:  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Email:  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| Implementation Plan Elements  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| <p><b>ELEMENT 1 Best Management Practices (BMPs)</b><br/>The following BMPs have been identified as significant opportunities to cost effectively reduce methane emissions from the distribution sector. They were selected based on their applicability to the industry, economic feasibility, and cost-effectiveness. There are two core BMPs for the distribution sector:</p> <p style="margin-left: 20px;"><b>BMP 1</b> Directed inspection and maintenance at gate stations and surface facilities<br/><b>BMP 2</b> Identify and rehabilitate leaky distribution pipe</p> <p>For detailed information on these BMPs, please refer to the <i>Lessons Learned</i> publications on the Natural Gas STAR website: <a href="https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions">https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions</a>.</p> |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| <p><b>ELEMENT 2 Additional Activities</b><br/>Current partners have reported many processes and technologies that are considered additional Best Management Practices by the program. New partners are encouraged to evaluate and report current and new practices or technologies that cost effectively reduce methane emissions.</p>  |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |
| <p><b>ELEMENT 3 Inventory Past Reductions</b><br/>Partners are encouraged to report past methane emission reductions back to 1990. Accounting for these historical reductions will create a permanent record of your company's methane emission reduction efforts. In addition, reviewing past activities will help guide companies' participation in Natural Gas STAR by creating a base of understanding of current activities to facilitate planning of future activities.</p>   |  |               |  |                   |  |           |  |          |  |                        |  |            |  |      |  |        |  |

The Implementation Plan is designed to be a dynamic tool for Natural Gas STAR Partners to plan their program activities. As company priorities and plans shift over time, the Implementation Plan may be revised or updated by submitting a new form to the program. The Partner should only share non-Confidential Business Information (CBI) to fulfill Gas STAR Program requirements.

## ELEMENT 1 Best Management Practices

### BMP 1 Directed Inspection and Maintenance (DI&M) at Gate Stations and Surface Facilities

A DI&M program is a system for performing routine leak detection and repair where leak measurement data from previous inspections are used to guide subsequent inspections and direct maintenance to those leaks that are cost effective to repair.

Estimated Reduction  
Potential  
1,190 Mcf per station

Will you be implementing this BMP?     Yes     No  
 If no, why?  
 Not cost effective  
 May consider at a later date  
 Other \_\_\_\_\_ please describe:

If yes, at what scale will you be implementing this BMP?  
 Company Wide  
 Pilot Project  
 Other \_\_\_\_\_

Please describe:

#### Activity Summary

Number of gate stations and surface facilities? \_\_\_\_\_

Number of gate stations and surface facilities at which DI&M will take place? \_\_\_\_\_

#### Inspection Schedule

Facilities will be inspected:     quarterly     annually     biannually     other \_\_\_\_\_

Please list the number of gate stations and surface facilities that will implement BMP 1 in upcoming years.

Year \_\_\_\_\_      Number of gate stations and surface facilities \_\_\_\_\_

Year \_\_\_\_\_      Number of gate stations and surface facilities \_\_\_\_\_

Year \_\_\_\_\_      Number of gate stations and surface facilities \_\_\_\_\_

Year \_\_\_\_\_      Number of gate stations and surface facilities \_\_\_\_\_

#### Additional Information on Anticipated Plans and Projects

If additional space is needed, please continue on the back.

## BMP 2 Identify and Rehabilitate Leaky Distribution Pipe

|  |   |
|--|---|
| To reduce methane emissions, companies can use data from leak surveys and patrols, leak repair histories, corrosion monitoring records and other sources to identify and repair or replace the leakiest pipeline segments. | <b>Estimated Reduction Potential</b><br><br>29 Mcf/mile/year - Average Mains<br>0.3 Mcf/service/year - Average Services |
|--|---|

Will you be implementing this BMP?     Yes     No

If no, why?

Not cost effective

May consider at a later date

Other \_\_\_\_\_ please describe:

  

If yes, at what scale will you be implementing this BMP?

Company Wide

Pilot Project

Other \_\_\_\_\_

Please describe:

### Activity Summary

Total distribution pipeline mileage? \_\_\_\_\_

Total distribution pipeline mileage selected for this BMP? \_\_\_\_\_

### Replacement Schedule

Total distribution pipeline mileage to be rehabilitated by the end of:

Year 1: \_\_\_\_\_    Year 2: \_\_\_\_\_    Year 3: \_\_\_\_\_    Year 4: \_\_\_\_\_

### Additional Information on Anticipated Plans and Projects

If additional space is needed, please continue on the back.

## ELEMENT 2 Additional Activities

| Additional Activities   |                 |
|---|-----------------|
| <p>Your company may take advantage of additional technologies or practices to reduce methane emissions. The following is a list of some of the additional activities that have been reported by other Natural Gas STAR partners, which may be applicable to your operations (for more information on these activities, please view: <a href="https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions">https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions</a>):</p> |                 |
| <p> <input type="checkbox"/> Reduce/downgrade system pressure<br/> <input type="checkbox"/> Inject blowdown gas into low pressure system<br/> <input type="checkbox"/> DI&amp;M: survey and repair leaks<br/> <input type="checkbox"/> Use hot taps for in-service pipeline connections         </p>  |                 |
| Additional activities you will be implementing  | Please describe |
| <p>Activity _____<br/>           At what scale will this activity be implemented?<br/> <input type="checkbox"/> Company Wide<br/> <input type="checkbox"/> Pilot Project<br/> <input type="checkbox"/> Other _____</p>  |                 |
| <p>Activity _____<br/>           At what scale will this activity be implemented?<br/> <input type="checkbox"/> Company Wide<br/> <input type="checkbox"/> Pilot Project<br/> <input type="checkbox"/> Other _____</p>  |                 |
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| <p>Activity _____<br/>           At what scale will this activity be implemented?<br/> <input type="checkbox"/> Company Wide<br/> <input type="checkbox"/> Pilot Project<br/> <input type="checkbox"/> Other _____</p>  |                 |

## ELEMENT 3 Inventory Past Reductions

**An inventory of past reductions will help to create a permanent record of your past efforts.**

As a first step, many new partners find it useful to inventory and document past methane emission reduction efforts. The inventory process helps companies quantify the success of their past activities and target future methane emission reduction efforts. Historical methane emission reductions identified as part of the inventory process can be reported to the Natural Gas STAR Program.

Will you inventory past activities to include in your annual report?  Yes  No

If yes, please describe your company's plans for reviewing past methane emission reduction activities.

*The Natural Gas STAR Program thanks you for your time.*

*Please send completed forms to:*

**Regular Mail**

**Natural Gas STAR Program  
U.S. EPA (6207J)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460**

**Express/Overnight Mail**

**Natural Gas STAR Program  
1201 Constitution Ave NW  
Room Number 4353PP  
Washington, DC 20004**

*Questions? Please call Jerome Blackman at (202) 343-9630, or send an email to [GasSTAR@epa.gov](mailto:GasSTAR@epa.gov).*

The public reporting and recordkeeping burden for this collection of information is estimated to average 25 hours for each new response and 12 hours for subsequent responses. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

