

Weekly		Monthly		Combined
Form #	Survey Item	Form #	Survey Item	Enterprise Responses
EIA-800, Weekly Refinery Report	<ul style="list-style-type: none">Change survey instructions to require reporting production of propane and propylene fractionated from still gas whether fractionation takes place at the refinery or at a facility downstream of the refinery. This change is needed to more completely account for the quantity of propane and propylene supplied, particularly as petrochemical feedstock. The current practice of reporting still gas shipped from refineries as still gas (not reported weekly on Form EIA–800) when the still gas will ultimately be fractionated into product components overstates supply of still gas (implying use as plant fuel) and understates supply of propane and propylene.	EIA-810, Monthly Refinery Report		<ul style="list-style-type: none">No comments
			<ul style="list-style-type: none">Change survey instructions to require reporting production of natural gas liquids (ethane, propane, normal butane, and isobutane) and refinery olefins (ethylene, propylene, normal butylene, isobutylene) on a product basis when the products are fractionated from still gas whether fractionation takes place at the refinery or at a facility downstream of the refinery. This change is needed to more completely account for quantities supplied of natural gas liquids and refinery olefins on a product basis, particularly for use as petrochemical feedstock. The current practice of reporting still gas shipped from refineries as still gas when the still gas will ultimately be fractionated into product components overstates supply of still gas (implying use as plant fuel) and understates supply of natural gas liquids and refinery olefin products.	<ul style="list-style-type: none">No comment
	<ul style="list-style-type: none">Change the “Who Must Submit” part of survey instructions to include reporting by non-refinery operators of distillation, reforming, cracking, coking, hydrotreating, and similar processes. This change is needed in order for EIA to capture complete data on operations of process units commonly associated with oil refineries but operated at non-refinery facilities such as natural gas liquids fractionation plants.		<ul style="list-style-type: none">Change the “Who Must Submit” part of survey instructions to include reporting by non-refinery operators of distillation, reforming, cracking, coking, hydrotreating, and similar processes. This change is needed in order for EIA to capture complete data on operations of process units commonly associated with oil refineries but operated at non-refinery facilities such as natural gas liquids fractionation plants.	<ul style="list-style-type: none">No comment

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	<ul style="list-style-type: none">Discontinue collecting propane production, propane stocks, and total natural gas liquids (NGL) stocks at NGL fractionators. NGL fractionators that hold stocks will report on the new Form EIA–806 Weekly Natural Gas Liquids Report. Rename Form EIA–800 from <i>Weekly Refinery and Fractionator Report</i> to <i>Weekly Refinery Report</i>.			<ul style="list-style-type: none">The weekly reporting of propane productions and total natural gas NGLs and stocks at NGL fractionators was proposed in 2019. See the EIA-806 for the company’s view for weekly reporting production and stocks of NGLs from operators of natural gas plants.
			<ul style="list-style-type: none">Change the label for product code 207 from the current “Other renewable fuels and intermediate products” to “Other Biofuels and Biointermediates” not elsewhere specified or indicated. This change is to make the Form EIA–810 product label consistent with terminology used in EIA, other government agencies, and the biofuel industry.	<ul style="list-style-type: none">No comment
EIA-805, Weekly Bulk Terminal Report		EIA-815, Monthly Bulk Terminal Report	<ul style="list-style-type: none">Change the label for product code 207 from the current “Other renewable fuels and intermediate products” to “Other Biofuels and Biointermediates” not elsewhere specified or indicated. This change is to make the Form EIA–815 product label consistent with terminology used in EIA, other government agencies, and the biofuel industry.	<ul style="list-style-type: none">No comment
	<ul style="list-style-type: none">Add a product line for bulk terminal operators to report stocks of propane that meet at least the minimum specifications to be classified as consumer-grade propane (product code 626). The added product detail for consumer-grade propane will add transparency to propane supplies by showing separate stock levels of consumer-grade propane readily available for consumption and propane held as a component of product mixes where the propane requires processing through a fractionator or other unit before being consumed as propane. At present, EIA stock levels for propane do not differentiate between consumer-grade and higher grades of propane that are ready for use and propane contained as a component of a product mix.		<ul style="list-style-type: none">Add a product line for bulk terminal operators to report stocks of propane that meet at least the minimum specifications to be classified as consumer-grade propane (product code 626). The added product detail for consumer-grade propane will add transparency to propane supplies by showing separate stock levels of consumer-grade propane readily available for consumption and propane held as a component of product mixes where the propane requires processing through a fractionator or other unit before being consumed as propane. At present, EIA stock levels for propane do not differentiate between consumer-grade and higher grades of propane that are ready for use and propane contained as a component of a product mix.	<ul style="list-style-type: none">We believe reporting propane separately from propane contained in a mix would be a valuable metric on a monthly basis only.A weekly report would be highly volatile due to our approximately 1.3 million barrels per day of fractionation capacity and approximately 6 million barrels per day of capacity industry-wide. Weekly reporting would provide little value due to the significant variations in the data based on fractionation operations (i.e., run-time and down-time) from week to week.Reporting accurate weekly data of propane separately from propane stored as a mix would be unduly burdensome, time consuming, and costly. A monthly report of the requested data should provide sufficient and far more reliable information.We understand that consumer grade and export grade propane are to be reported together. Despite the request to report the combined volume, we recommend not making a distinction between commercial grade propane and export grade propane because export grade propane meets consumer grade propane specifications and there is more than sufficient capacity to convert consumer grade propane to export grade propane. Enterprise views the two grades as fungible.

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EIA-806, Weekly Natural Gas Liquids Report (NEW)	EIA proposes to add Form EIA–806 <i>Weekly Natural Gas Liquids Report</i> to the WPSRS. Form EIA–806 will be the weekly counterpart to Form EIA–816 <i>Monthly Natural Gas Liquids Report</i> . When implemented, EIA will use data from Form EIA–806 to report weekly total production of natural gas liquids (NGL), propane production from natural gas processing, and propane and NGL stocks held by operators of natural gas processing plants and NGL fractionators. Current EIA weekly reporting practice is to use Form EIA–800 to collect production of propane from natural gas processing equal to barrels of propane fractionated from mixed NGL by operators of NGL fractionators. Operators of NGL fractionators also report ending stocks of total NGL and propane on Form EIA–800. EIA intends to replace current reporting by NGL fractionators on NGL fractionators on Form EIA–800 with reports submitted by operators of natural gas processing plants that produce and/or hold stocks, and operators of NGL fractionation plants that hold stocks. With Form EIA–806, EIA proposes to collect the total quantity of natural gas liquids produced weekly by operators of natural gas processing plants. Weekly total NGL production is unavailable from current data collected on Form EIA–800. In addition, collecting weekly data from operators of natural gas processing plants allows EIA to improve consistency of weekly and monthly regional propane production by reporting weekly propane production in the region of the producing natural gas processing plant as is done in monthly data, rather than in the region where a fractionator operator separated propane from mixed NGL.	EIA-816, Monthly Natural Gas Liquids Report		Regarding the request to report NGL production from natural gas processing plants: <ul style="list-style-type: none">• We recommend not implementing due to the reduced accuracy of the data and the cost incurred to implement such reporting.• All natural gas processing plants are subject to a more rigorous month-end close process where measurement data is analyzed and corrected before being finalized. Weekly data will not be subject to the same scrutiny. Therefore, differences will exist between the aggregate of weekly data and final monthly data.• Explaining variances between weekly and monthly reported data will be a significant burden to measurement and reporting teams.

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	<ul style="list-style-type: none"> EIA proposes to collect total NGL stocks held by operators of natural gas processing plants and NGL fractionators. EIA will use plant-level NGL product composition data reported on Form EIA–816 to allocate total production and stocks reported weekly on Form EIA–806 to propane and other NGL products. EIA will allocate total NGL production and stocks reported weekly on Form EIA–806 to propane and other NGL current composition data, since this data is likely to be unavailable to plant operators in time to report weekly (<i>i.e.</i>, weekly reports due to EIA by 5:00 p.m. eastern time on Monday with data for the week ended at 7:00 a.m. eastern from the previous Friday). 			<p>Below is the company’s view for reporting weekly production and stocks.</p> <ul style="list-style-type: none"> If non-petroleum refining facilities are required to complete the report, a more detailed purpose and a broader definition of the types of facilities and commodities/products to be reported would be helpful to ensure accuracy and completeness. Our fractionators are pipeline connected to our storage terminals and have very limited on-site, dedicated storage for holding stocks (bullet tanks with 1,000 to 5,000 barrels capacity). The stocks used as mixed NGL feed (y-grade) or output from our fractionators (purity NGL products are already reported on EIA-805 and EIA-815. This differs from refineries which have large capacity tankage on-site to hold crude oil and refined products stocks. Because many of the ending stocks produced from non-petroleum refineries (such as NGLs from y-grade and olefins from NGLs) are held in terminals in a separate location from the facility, we believe that including such volumes in the weekly report could lead to double-counting.
		EIA-816, Monthly Natural Gas Liquids Report	Add a separate product line for operators of natural gas processing plants to report plant condensate (product code 210) as a product separate from natural gasoline (product code 220). Plant condensate and natural gasoline are separate products of natural gas processing plants with different uses, but the current Form EIA–816 combines the two products under the natural gasoline label. Natural gasoline is normally used either for blending into gasoline, as petrochemical feedstock, or exported. Plant condensate is usually either blended into crude oil or exported. Reporting plant condensate as a product separate from natural gasoline will provide greater transparency to supplies of both NGL and crude oil. This change will also make reporting on Form EIA–816 consistent, in terms of the products reported, with Form EIA–64A <i>Annual Report of the Origin of Natural Gas Liquids</i> .	<ul style="list-style-type: none"> No comment
N/A		EIA-817, Monthly Tanker and Barge Movement Report	<ul style="list-style-type: none"> Change the label for product code 207 from the current “Other renewable fuels and intermediate products” to “Other Biofuels and Biointermediates” not elsewhere specified or indicated. This change is to make the Form EIA–817 product label consistent with terminology used in EIA, other government agencies, and the biofuel industry. 	<ul style="list-style-type: none"> No comment
N/A		EIA-819 Monthly Report of Biofuels, Fuel Oxygenates, Isooctane and Isooctene	<ul style="list-style-type: none"> Change the label for product code 183 in part 8 of Form EIA–819 from the current “Other renewable fuels and intermediate products” to “Other Biofuels and Biointermediates” not elsewhere specified or indicated. This change is to make the Form EIA–819 product label consistent with terminology used in EIA, other government agencies, and the biofuel industry. 	<ul style="list-style-type: none"> No comment