



Natural Gas STAR Methane Challenge Program Implementation Plan

Partner Name			Current as of (date)		
Partner Imp	ementation Manager				
Name:					
Title:					
Address:					
City/State/Zip:					
Telephone/Fax:		E-mail:			
			and to a collection of information		

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to average 37 hours for each response. 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.

Natural Gas STAR Methane Challenge Program Implementation Plan

Partner Methane Challenge Commitments¹

BMP Commitment Option

	Source	Start Date	Achievement Year		
Onshore Production					
	Pneumatic Controllers				
	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tan	ks			
	Gathering and Boosting				
	Pneumatic Controllers				
	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tan	ks			
	Reciprocating Compressors - Rod Packing Vent				
	Centrifugal Compressors - Venting				
Natural Gas (NG) Processing					
	Reciprocating Compressors - Rod Packing Vent				
	Centrifugal Compressors - Venting				
NG Transmission & Underground Storage					
	Reciprocating Compressors - Rod Packing Vent				
	Centrifugal Compressors - Venting				
	Transmission Pipeline Blowdowns between Compressor Stations				
	Pneumatic Controllers				
NG Distribution					
	Mains – Cast Iron and Unprotected Steel (Commitment Rate:)			
	Services – Cast Iron and Unprotected Steel				
	Distribution Pipeline Blowdowns (Commitment Rate:)				
	Excavation Damages				
			1		
Partner Methane Challenge Commitments					
ONE Future Emissions Intensity Commitment Option					
Segr	nent: Intens	ity Target:	Target Year:		

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).





Milestones/Timeframes for Meeting Commitments:

MidAmerican Energy Company's (MidAmerican) Damage Prevention Program is designed to measure and lessen damages to MidAmerican's gas pipelines and applies to all MidAmerican gas transmission and distribution facilities, regardless of whether the facility is underground or aboveground.

The six elements of MidAmerican's Damage Prevention Program are:

- 1) Damage Prevention
- 2) Performance
- 3) Stakeholder Communications
- 4) Management of Change
- 5) Program Quality Control
- 6) Forms and Records

Milestones and timelines:

- Complete evaluation metrics for EPA methane challenge and define how the metrics are gathered December 31, 2017
- Complete gathering of baseline metrics March 1, 2018
- Complete the evaluation and mitigation improvement review of the 2018 data May 1, 2018
- Evaluate initial program implementation October 1, 2018

Reporting:

MidAmerican currently reports greenhouse gas data as part of the GHGRP for Subpart NN and Subpart W sources. Separate reports under the GHGRP are files for MidAmerican system segments in Iowa, Illinois, South Dakota, and Nebraska, per EPA requirements. All of these segments make up the MidAmerican natural gas distribution system as a whole. MidAmerican will utilize the reporting methods specified by the EPA for the applicable industrial segment and source category covered by our Damage Prevention Program.

3





Emission Source	Elements to be Collected
	Total number of excavation damages
Excavation damages – natural gas	Total number of excavation damages per thousand
distribution network	locate calls
	Total number of excavation damages per class
	location (optional) ¹
	Total number of excavation damages by pipe
	material (steel, cast iron, copper, plastic etc.) and
	part of system involved (main, service, inside
	meter/regulator set, etc.)
	Total number of excavation damages which
	resulted in a release of natural gas
	Total number of excavation damages which
	resulted in the pipeline being shut down
	Total number of excavation damages on pipelines
	or facilities with supervisory control and data
	acquisition-based systems in place ²
	Total number of excavation damages by type that
	caused excavation damage incidents ³
	Total number of excavation damages where the
	operator was given prior notification of excavation activity
	Total number of excavation damages by apparent
	root cause
	Actions taken to minimize excavation
Voluntary action to reduce methane	damages/reduce methane emissions from
emissions during the reporting year	excavation damages
	Company-specific goal for reducing excavation
	damages and/or methane emissions from
	excavation damages (when available)
	Progress in meeting company-specific goal (when available)

NOTES:

¹ This information is not available, MidAmerican will not be reporting on this measure.

³MidAmerican is defining an incident reported here as being a DOT reportable incident to PHMSA and state authorities.

_

²This data will be reported as available. Not all areas within MidAmerican's service territory have this type of data system in place.

ⁱ Commitments should be listed per the Partner's most recent Partnership Agreement. 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).