

COMMITTEE REPORT

HEALTH, SAFETY & ENVIRONMENT COMMITTEE

Jeff Atwood, Diamondback Energy,
and Greg Schrab, SM Energy

The PBPA's Health Safety and Environment (HSE) Committee met in person and virtually on March 22, 2022. The meeting began with introductions of the new co-chairs, Jeff Atwood/Diamondback for health and safety, and Greg Schrab/SM for environmental, with plans for bimonthly meetings for the remainder of 2022, with the next meeting in May.

Jeff opened with a Safety Moment on ladder safety, and then lead an open discussion on various health and safety topics of interest including:

- COVID (including OSHA proposed permanent standard)
- Proposed OSHA heat stress standard
- Incident severity, (SIF'S)
- Short-service employees
- Lone workers
- Employee's recognizing risk

On environmental, Greg provided an update on the proposed EPA methane rule and then lead an open discussion on various environmental topics of interest. PBPA submitted comments on the proposed methane rule to EPA on January 31, 2022, which included:

- Statutory prerequisites for a methane-specific endangerment and significant contribution finding
- Existing source guidelines, including for LDAR
- Standards on associated gas flaring and venting (eliminate venting, and minimize flaring by requiring gas capture and sale when a sales line is available)
- LDAR, including survey frequency and the Appendix K protocol for conduct of OGI surveys, and alternative methods to OGI
- Gas pneumatic controllers and pumps (zero emission standard for new and existing devices)
- Storage tanks, including regulating on a battery not per tank basis with no specific mention of an off-ramp for low-emitting batteries, and more stringent requirements around exemptions using enforceable permits
- Reciprocating compressors at central production facilities (annual rod packing replacement based on leak testing)
- Liquids unloading (either zero emissions, or best management practices)

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A supplemental proposal, with proposed regulatory text and potentially additional regulated source activities is expected by this summer, and a final rule by the end of this year, with additional time then for States to develop plans to implement the existing source guidelines.

Other environmental topics of interest discussed include EPA revisiting TCEQ's SIP around SSM and Affirmative Defense, TCEQ's recently revised hazardous and universal waste rules, EPA's proposed revision to the definition of WOTUS, USFWS's pending proposal under the MBTA for incidental take permitting of migratory birds, PHMSA's recently revised gas gathering pipeline rule, and the WV vs. EPA GHG case regarding the authority of EPA to regulate CO2 emissions from power plants that could have a broader effect on how EPA can regulate GHGs for existing sources such as with the proposed methane rule.

Special guest Erin Van Evera-Welch/Director Midland College PPDC, then presented on Basin United Safety Orientations and the Permian Basin Environmental Regulatory Seminar on May 19, 2022.

Stephen Robertson then discussed the preparation and pending launch of this year's annual HSE benchmarking survey, which was subsequently distributed to members on April 4 and is due on April 22.