

COMMITTEE REPORTS

HEALTH, SAFETY & ENVIRONMENT COMMITTEE

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

The following were the major activities taken by the HSE Committee this quarter:

1) In person meeting

HSE Benchmarking Survey Best Practices Meeting: The HSE Committee met on November 10. The meeting time was extended (11:00-2:00) and comprised our best practice sharing coming out of our annual HSE Benchmarking Survey. Following a welcome and introductions by Stephen Robertson, Jeff Atwood presented the safety moment. The practice discussions followed; each topic involved an initial presentation, followed by group discussion:

- **Occupational Health & Safety:** Adam Berig, Ovintiv
- **Spills:** Greg Schrab, SM Energy
- **Emissions:** Shyla Harris, Pioneer Natural Resources
- **Freshwater Intensity:** Eileen McGrath-Connor, Chevron

2) How to Calculate Total Recordable Incident Rate (TRIR) – Discussion by PBPA Members

- Definitions and an example to demonstrate the differences.
- For the Overall TRIR, PBPA Operators = run the OSHA calculation as if PBPA was 1 big company made up of all the members by adding up all the PBPA OSHA counts * 200,000 hours / total sum of all PBPA member hours
- For the Average TRIR, PBPA Operators = taking the TRIR for each company and averaging those results across all members
- As an example, if we only had 2 companies participating with the following data you can see how the results would be different:
- Company A = 20 events; 5,000,000 hours; $TRIR = (20*200,000)/(4,000,000) = 1.00$
- Company B = 10 events; 1,000,000 hours; $TRIR = (10*200,000)/(1,000,000) = 2.00$

1. Overall TRIR = $(20+10)*200,000/(4,000,000 + 1,000,000) = 1.2$

2. Average TRIR = $(1.0 + 2.0)/2 = 1.5$

3) H2S and Respiratory protection – Discussion by PBPA Members

- What exposure level(s) are companies following--OSHA 10 ppm TWA for construction, OSHA 20 ppm ceiling for general industry?

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HEALTH, SAFETY & ENVIRONMENT COMMITTEE CONTINUED

4) Comments on EPA Greenhouse Gas Reporting Program Rule Proposed Revisions:

PPBA submitted its comment letter to EPA on October 5. The letter included comments on the overlap with other related federal actions involving methane and GHGs (Inflation Reduction Act methane fee, EPA OOOOb/c, and SEC climate disclosure), Subpart A (responsibility for reporting), Subpart C (data quality, recordkeeping, reporting), and Subpart W (pneumatic devices, liquids unloading, atmospheric storage tanks, associated gas venting and flaring, equipment leaks surveys and population counts, other large release events, combustion, streamlining and improving implementation, and Subpart VV and CCUS).

5) EPA OOOOb/c Workgroup Meeting: A workgroup within the HSE Committee met on December 1 to discuss the review and commenting process for EPA's proposed rule changes for OOOOa/b/c. The supplementary proposal was pre-published on November 11, with the comment period closing on February 13, 2023. Discussions included a brief review of the some of the most impactful parts of the rule, including on the positive side the removal of Appendix K LDAR requirements, but several sources with more onerous proposed requirements compared to the November 2021 proposal (including super emitter event third-party reporting, associated gas flaring, flare monitoring requirements, storage tanks, and LDAR). As the workgroup moves forward, recurring meetings will be scheduled, draft comments formulated around the various sources in the rule, and the need for outside legal support in drafting the comment letter evaluated.