



Railroad Commission of Texas

Rule 3.66 Weather Emergency Preparedness Standards

Office of General Counsel





- Required by Senate Bill 3
- Senate Bill 3 required the RRC to adopt rules no later than 6 months following the production of the Texas Electricity Supply Chain Security and Mapping Committee map
- The map was adopted early; therefore Rule 3.66 was adopted early



- Electricity Supply Chain Map was adopted on April 29, 2022
 - RRC had until October 29, 2022, to adopt weatherization rule
- Proposed on June 28, 2022
- Adopted on August 30, 2022
- Effective on September 19, 2022
- Facilities subject to the rule must implement rule requirements no later than December 1, 2022

(a) Applicability (1 of 3)



- Rule 3.66 applies to individual facilities
 - Gas Supply Chain Facilities; and
 - Gas Pipeline Facilities
- An operator under the RRC's jurisdiction may have only a portion of its total facilities subject to Rule 3.66



Gas Supply Chain Facility

1. Included on the Electricity Supply Chain Map; and
2. Designated as critical in Rule 3.65 (relating to *Critical Designation of Natural Gas Infrastructure*)

(a) Applicability (3 of 3)



Gas Pipeline Facility

1. Directly serves a natural gas electric generation facility operating solely to provide power to the electric grid for the Electric Reliability Council of Texas (ERCOT) power region or for the ERCOT power region and an adjacent power region; and
2. Included on the Electricity Supply Chain Map

(c) Preparedness Standards (1 of 13)



- By December 1 of each year, an operator of a facility must implement weather emergency preparation measures intended to:
 1. Ensure sustained operations during a weather emergency; and
 2. Correct weather-related forced stoppages that prevented sustained operation due to previous weather emergencies

(c) Preparedness Standards (2 of 13)



- By December 1 of each year, an operator of a facility must implement weather emergency preparation measures intended to:
 1. Ensure **sustained operations** during a weather emergency; and
 2. Correct weather-related forced stoppages that prevented sustained operation due to previous weather emergencies

(c) Preparedness Standards (3 of 13)



- Sustained Operations
 - Safe operation of a gas pipeline facility or a gas supply chain facility such that the facility does not experience a major weather-related forced stoppage or weather-related forced stoppage in production, treating, processing, storage, or transportation of natural gas.

(c) Preparedness Standards (4 of 13)



- By December 1 of each year, an operator of a facility must implement weather emergency preparation measures intended to:
 1. Ensure sustained operations during a weather emergency; and
 2. Correct weather-related forced stoppages that prevented sustained operation due to previous weather emergencies

(c) Preparedness Standards (5 of 13)



- Weather Emergency
 - Weather conditions such as freezing temperatures, freezing precipitation, or extreme heat in the facility's county or counties that result in an energy emergency as defined by §3.65
 - A weather emergency does not include weather conditions that cannot be reasonably mitigated such as tornadoes, floods, or hurricanes

(c) Preparedness Standards (6 of 13)



- Weather Emergency
 - Energy Emergency is defined in Rule 3.65 as a firm load shed event
 - Rule 3.65 is currently proposed for amendments, including amendments proposed to broaden the definition of “Energy Emergency”
 - Comments due October 7, 2022

(c) Preparedness Standards (7 of 13)



- By December 1 of each year, an operator of a facility must implement weather emergency preparation measures intended to:
 1. Ensure sustained operations during a weather emergency; and
 2. Correct weather-related forced stoppages that prevented sustained operation due to previous weather emergencies



- Weather Related Forced Stoppage
 - An unanticipated and/or unplanned outage in the production, treating, processing, storage, or transportation of natural gas that is caused by weather conditions such as freezing temperatures, freezing precipitation, or extreme heat and occurs during a weather emergency

(c) Preparedness Standards (9 of 13)



- Major Weather-Related Forced Stoppage
 - A weather-related forced stoppage that is the result of the deliberate disregard of this section or that results in:
 - A. a loss of production exceeding 5,000 Mcf of natural gas per day per oil lease;
 - B. a loss of production exceeding 5,000 Mcf of natural gas per day per gas well;
 - C. a loss of gas processing capacity exceeding 200 MMcf per day;
 - D. a loss of storage withdrawal capacity exceeding 200 MMcf per day; or
 - E. a loss of transportation capacity exceeding 200 MMcf per day

(c) Preparedness Standards (10 of 13)



- By December 1 of each year, an operator of a facility must implement **weather emergency preparation measures** intended to:
 1. Ensure sustained operations during a weather emergency; and
 2. Correct weather-related forced stoppages that prevented sustained operation due to previous weather emergencies

(c) Preparedness Standards (11 of 13)



- Preparation Measures
 - Training relevant personnel on weather emergency preparation and operation
 - Consideration of the risk to the health and safety of employees
 - Consideration of protection of the environment
 - Weatherization of the facility

(c) Preparedness Standards (12 of 13)



- Preparation Measures
 - **Weatherization** using methods a reasonably prudent operator would take given
 - the type of facility,
 - the age of the facility,
 - the facility's critical components,
 - the facility's location, and
 - weather data for the facility's county or counties such as data developed for the Commission by the state climatologist

(c) Preparedness Standards (13 of 13)



- **Weatherization**

- The iterative cycle of preparedness for sustained operation during weather emergencies that includes:

- (A) correcting critical component failures that occurred during previous weather emergencies;

- (B) installing equipment to mitigate weather-related operational risks; and

- (C) internal inspection, self-assessment, and implementation of processes to identify, test, and protect critical components.

(d) Weather Readiness Attestation



- By December 1 of each year, an operator shall submit the Weather Emergency Readiness Attestation.
- Attestation must:
 - Meet certification/signatory requirements
 - Include an attachment describing all activities engaged in by the operator to implement the requirements of subsection (c) of this section, including a description of the weatherization methods utilized by the operator to weatherize each type of facility

(e) Inspections (1 of 2)



- RRC will inspect facilities to ensure compliance with Rule 3.66
- Will prioritize inspections of oil leases and gas wells producing greater than 5,000 Mcf per day of natural gas and facilities storing, processing, or transporting greater than 200 MMcf per day of natural gas
- Further prioritization in descending order in accordance with a facility's production volume or storage, processing, or transportation capacity

(e) Inspections (2 of 2)



- Two types of inspections:
 - Inspections for preparedness based on Attestation
 - Weather Related-Forced Stoppages inspections

(f) Notifications (1 of 3)



- Operators of facilities subject to 3.66 must immediately notify the RRC through the Critical Infrastructure online portal of:
 1. Weather-related forced stoppages that are not resolved within 24 hours
 2. Forced stoppages due to loss of electric power that are not resolved within 24 hours

(f) Notifications (2 of 3)



- Must call the RRC's Critical Infrastructure telephone number within 1 hour of discovery:
 1. Major weather-related forced stoppages
 2. Major stoppages that are due to loss of electric power

(f) Notifications (3 of 3)



- Repeated or major weather-related forced stoppages may result in the requirement for an operator to contract with a “qualified person” to assess the operator’s weather emergency preparedness
- Operator required to submit the qualified person’s written assessment and a corrective action plan

(g) Enforcement (1 of 3)



- Per Senate Bill 3, enforcement mechanisms are different depending on the type of facility
- However, enforcement for all types of facilities will utilize the same penalty classification table

(g) Enforcement (2 of 3)



- Gas Supply Chain Facilities
 - RRC will pursue administrative violations of the rule for adjudication only
 - After an order finding a violation of Rule 3.66 has been entered by RRC, RRC will refer violation to the Office of the Attorney General
 - Office of Attorney General will file suit for collection of penalties utilizing Rule 3.66's penalty classification table

(g) Enforcement (3 of 3)



- Gas Pipeline Facilities
 - RRC has administrative penalty authority
 - RRC will adjudicate alleged violations
 - If violation order is issued, RRC will collect penalties utilizing Rule 3.66's penalty classification table



CID/CIX 24-hour Outage Report Module User Tutorial

Mysti Doshier

October 2022





Outages Dashboard

Reporting a Facility Outage

Overview



Effective December 1, 2022, critical infrastructure facilities are required to report weather-related and major weather-related forced stoppages to the RRC as per Senate Bill 3 (16 Texas Administrative Code §3.66) from the 87th Texas Legislative Regular Session.

The notification is only required if the weather-related forced stoppage occurs during a weather emergency.

Weather-related forced stoppage

- An unanticipated and/or unplanned outage in the production, treating, processing, storage, or transportation of natural gas that is caused by weather conditions such as freezing temperatures, freezing precipitation, or extreme heat and occurs during a weather emergency.





Major weather-related forced stoppage

- A weather related-forced stoppage during a weather emergency that is the result of the deliberate disregard of this section or that results in:
 - A loss of production exceeding 5,000 Mcf of natural gas per day per oil lease;
 - A loss of production exceeding 5,000 Mcf of natural gas per day per gas well;
 - A loss of gas processing capacity exceeding 200 MMcf per day;
 - A loss of storage withdrawal capacity exceeding 200 MMcf per day; or
 - A loss of transportation capacity exceeding 200 MMcf per day.

Weather emergency

- Weather conditions such as freezing temperatures, freezing precipitation, or extreme heat in the facility's county or counties that result in an energy emergency as defined by §3.65 of this title. A weather emergency does not include weather conditions that cannot be reasonably mitigated, such as tornadoes, floods or hurricanes.



When to Take Action



Weather-related forced stoppage

- Notify the RRC using the Critical Infrastructure Division's notification online portal (RRC Online CID system account) if the stoppage is not resolved within 24 hours of discovery.

Major weather-related forced stoppage

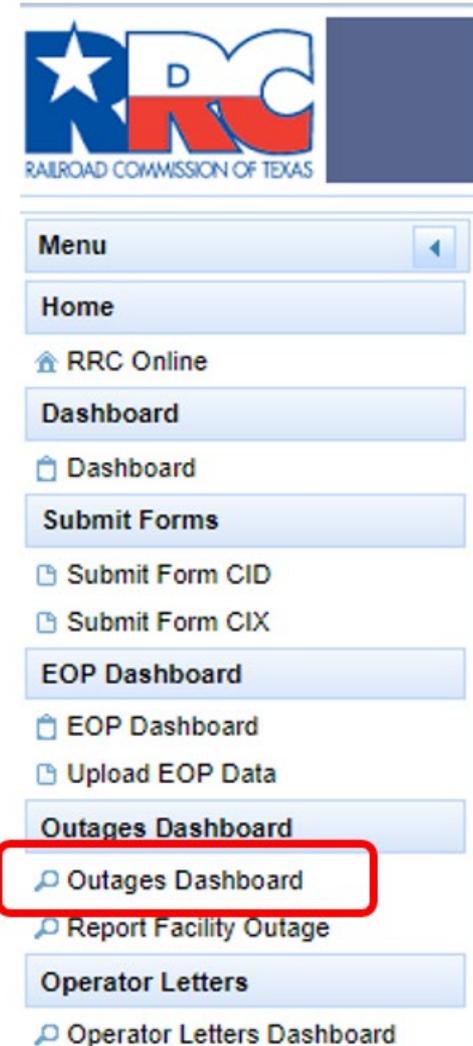
- Call the Critical Infrastructure Division's 24-hour emergency line to notify the RRC of the stoppage **within one hour** of discovery of the stoppage.
- Then, submit online in the Critical Infrastructure Division's notification portal. (RRC Online CID system account)

Important: You must return to complete the report once the outage has been resolved.

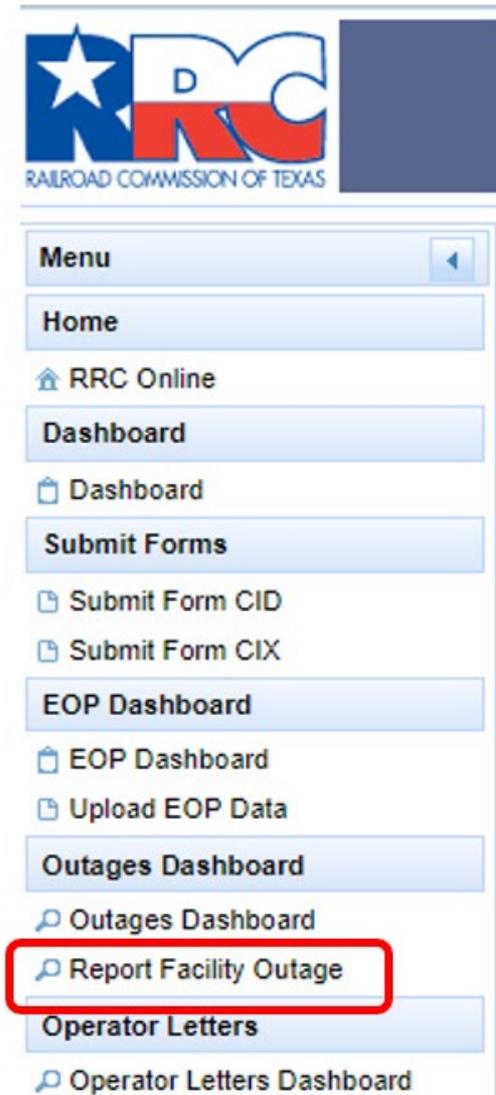
Outages Dashboard in the RRC Online System



- Log in to your RRC Online System account.
- User must have a SAD (Security Administrator Designation form)
- Click, “Critical Infrastructure Designation (CID/CIX).”
- Click, “Outages Dashboard” from the left-hand menu.
- The Outages Dashboard allows you to view, sort or edit outages you have reported. If you have not experienced/reported any outages, the Outage Dashboard will display, “No results found for search



Reporting an Outage (1 of 2)



- To report an outage, click, “Report Facility Outage” on the left-hand menu.
- This will take you to the “Report Outages Dashboard” where all your CID facilities are listed.

Reporting an Outage (2 of 2)



- Click the “Actions” button to the left of the Facility Id for which you need to report the outage/stoppage.
- Click, “Create Outage Report.”
- **Note:** If you have multiple facilities that have experienced an outage/stoppage that requires you notify the RRC, you must submit separate outage reports for each facility.

The screenshot displays a web application interface with a table. The table has columns for 'Facility Id' and 'Facility Name'. Below the table, there is an 'Actions' column with three buttons, each labeled 'Actions'. The middle 'Actions' button is highlighted with a red box. A callout box shows the 'Actions' dropdown menu, which includes options: 'View', 'Create Outage Report' (highlighted with a red box), and 'Facility Outages'.

Outage Information Page (1 of 6)



- Select your outage/stoppage reason from the drop-down menu.
- Indicate whether there is a third-party issue involved in the outage/stoppage.
- If so, provide a brief description.

Outage Information

You may leave the Resolution Date/Time empty if your outage is still in progress. You must

Reason for Outage/Stoppage

Select Outage/Stoppage Reason

- Select Outage/Stoppage Reason
- Weather related forced stoppage
- Forced stoppage caused by a loss of electricity
- Both of the Above - Weather and loss of Electricity

Date Discovered:

Third Party Issue

No

No

Yes

Description of the third-party issue if applicable:

Outage Information Page (2 of 6)



- Provide the date and time the outage/stoppage was discovered.

Date Discovered:	<input type="text"/>	Time Discovered (24h):	<input type="text"/>	Was this a major weather related forced stoppage?	No <input type="text"/>
Anticipated Recovery Time? (Hours)	<input type="text"/>	Resolution Date?	<input type="text"/>	Resolution Time (24h)?	<input type="text"/>

- Indicate whether this is a major weather-related forced stoppage.
- If yes, also indicated whether you have contacted the 24-hour emergency line.

Was this a major weather related forced stoppage?	Yes <input type="text"/>	Major Weather Event stoppage, have you contacted the 24 hour hotline?	Yes <input type="text"/>
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Outage Information Page (3 of 6)



- Indicate whether natural gas has been affected and specify the volume of natural gas that has been lost.

Major Weather Event stoppage, have you contacted the 24 hour hotline?

No

Natural Gas Affected?

No

Natural Gas Volume Lost:

Natural Gas Volume Type:

Select Nat Gas Volume Type

Select Nat Gas Volume Type

MCF

MMCF

Outage Information Page (4 of 6)



- Provide the following:
 - Anticipated Recovery Time
 - Resolution Date
 - Resolution time

Date Discovered:

Time Discovered (24h):

Was this a major weather related forced stoppage?

Anticipated Recovery Time? (Hours)

Resolution Date?

Resolution Time (24h)?

Outage Information Page (5 of 6)



- Select the facility type and provide a brief description of the cause of the stoppage/outage.
- Use the text box to provide a description of your recovery plan.
- Note: The “Latitude” and “Longitude” fields will automatically populate the facility’s coordinates and cannot be edited.

Facility Type Latitude Longitude

Brief description of cause of Shutdown/Outage:

2500 characters remaining.

Recovery plan/plan to be back online:

Outage Information Page (6 of 6)



- Upload any supporting documents you would like to submit with your outage report.
- Click “Save and Exit.”
- Note: The “Inspection # generated” field is for RRC internal use.

Inspection # generated:

Important: you must return to complete the report once the outage has been resolved.



Attestation Upload

Mysti Doshier

October 2022



Critical Infrastructure Attestation Upload

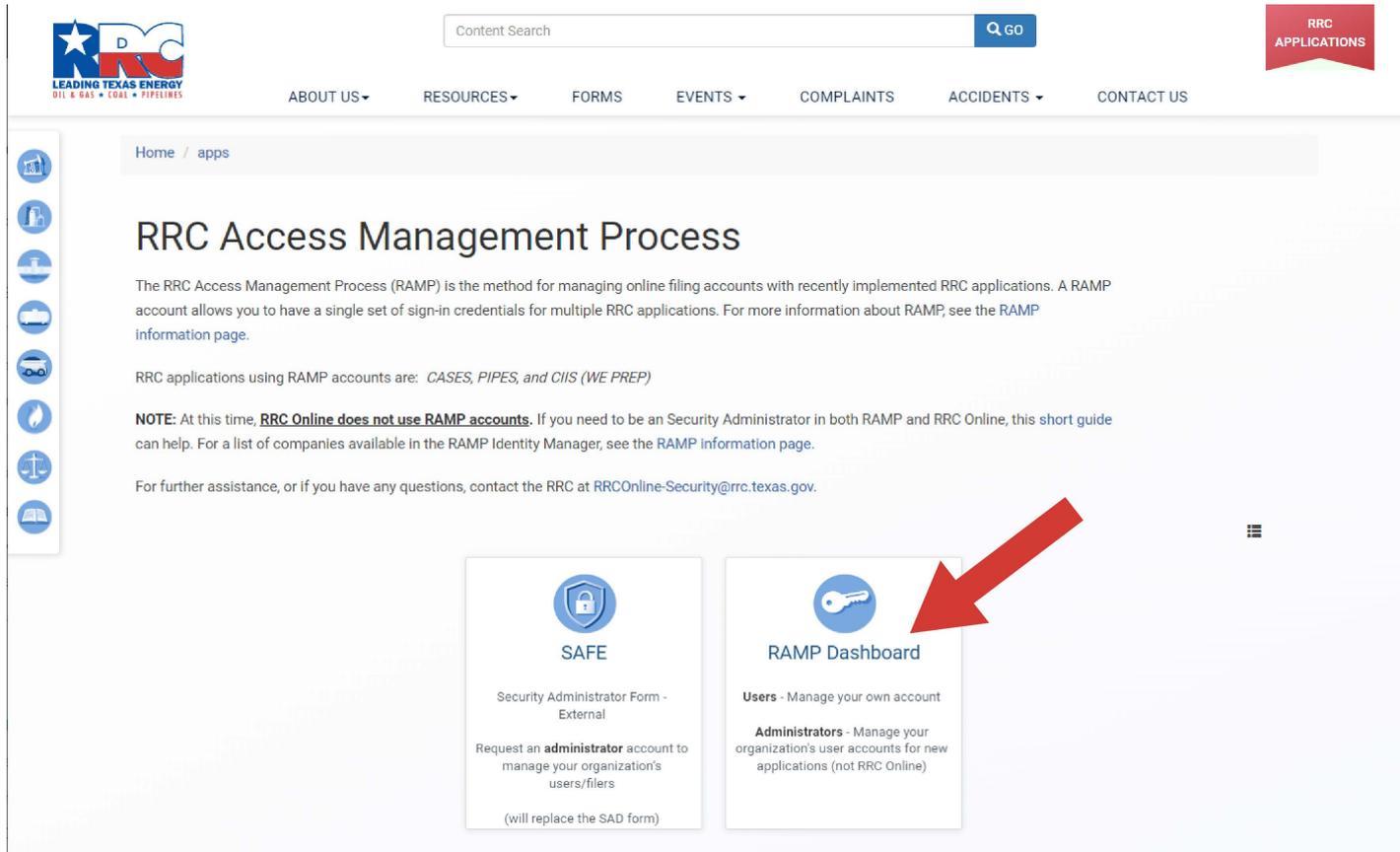


- The portal for attestation submissions will open on November 1, 2022. Once this becomes available, operators will have to request access to the WE PREP application through the RRC Access Management Process (RAMP) via the Security Administrator Form.
- RAMP Information: <https://www.rrc.texas.gov/forms/ramp-information/>
- Security Administrator Form Link: <https://myaccess.texas.gov/rrc/#/safe>
- RAMP Dashboard Link: <https://www.rrc.texas.gov/apps/rrc-ramp/>
- Once the access request is processed, operators will be able to access the WE PREP application through the RAMP Dashboard.
- After logging in, the operator will select “Upload Attestation” located under the WE PREP application. This will be the only option under the WE PREP application at that time.

Critical Infrastructure Attestation Upload (2 of 9)



- To upload an attestation form, first go to the following website:
- RAMP Dashboard Link: <https://www.rrc.texas.gov/apps/rrc-ramp/>
 - Select Ramp Dashboard

A screenshot of the RRC Access Management Process page. The page features a navigation bar with a search box, a "RRR APPLICATIONS" button, and a menu with items like "ABOUT US", "RESOURCES", "FORMS", "EVENTS", "COMPLAINTS", "ACCIDENTS", and "CONTACT US". The main content area is titled "RRC Access Management Process" and includes introductory text, a list of RRC applications using RAMP accounts, a note about RRC Online not using RAMP accounts, and contact information. At the bottom, there are two cards: "SAFE" (Security Administrator Form - External) and "RAMP Dashboard" (Users - Manage your own account, Administrators - Manage your organization's user accounts). A red arrow points to the "RAMP Dashboard" card.

LEADING TEXAS ENERGY
OIL & GAS • COAL • PIPELINES

Content Search

RRR APPLICATIONS

ABOUT US ▾ RESOURCES ▾ FORMS EVENTS ▾ COMPLAINTS ACCIDENTS ▾ CONTACT US

Home / apps

RRC Access Management Process

The RRC Access Management Process (RAMP) is the method for managing online filing accounts with recently implemented RRC applications. A RAMP account allows you to have a single set of sign-in credentials for multiple RRC applications. For more information about RAMP, see the [RAMP information page](#).

RRC applications using RAMP accounts are: *CASES, PIPES, and CIIS (WE PREP)*

NOTE: At this time, **RRC Online does not use RAMP accounts**. If you need to be an Security Administrator in both RAMP and RRC Online, this short guide can help. For a list of companies available in the RAMP Identity Manager, see the [RAMP information page](#).

For further assistance, or if you have any questions, contact the RRC at RROnline-Security@rrc.texas.gov.



SAFE

Security Administrator Form - External

Request an **administrator** account to manage your organization's users/filers

(will replace the SAD form)



RAMP Dashboard

Users - Manage your own account

Administrators - Manage your organization's user accounts for new applications (not RRC Online)

Critical Infrastructure Attestation Upload (3 of 9)



- When you register with RRC you will get a User Name and Password, use this User Name and Password as your login credentials to sign in



RRC SIGN IN

SIGN IN

[Forgot Password](#)

RRC SIGN IN

The RRC Sign In allows authorized users to electronically file permit applications, forms and documents with and submit fees, penalties and other payments to the Railroad Commission of Texas (RRC).

ACCEPTABLE USE POLICY

Unauthorized access to this computer system is prohibited. Evidence of criminal liability will be provided to law enforcement agencies. This system is subject to monitoring and stored data may be accessed and recorded. Anyone using this system consents to monitoring and should have no expectation of privacy except as otherwise provided by applicable privacy laws. Use of this system indicates your acknowledgement of and consent to comply with the agency's [security policies](#).

ACCESSIBILITY

The RRC is committed to making its website and applications accessible to all users. For more information on accessibility, reference the agency's [Accessibility Policy](#).

Critical Infrastructure Attestation Upload (4 of 9)



- Your name will appear at the top of the page to let you know that you are logged in as an authenticated user
- Click “Upload Attestation”

A screenshot of the Railroad Commission of Texas website. The top navigation bar includes links for Home, Cases, Complaints, Incidents, Inspections, Payments, Visit RRC, and Pipeline Integrity Filing. A search bar is present, and a red box highlights the "Online Portal Test" dropdown menu. Below the navigation is a banner image with the RRC logo and the text "LEADING TEXAS ENERGY OIL & GAS * COAL * PIPELINES". The main content area features three columns of service tiles: WE PREP (Weather Emergency Preparation Readiness Evaluation Portal), CASES (Case Administration Service Electronic System), and PIPES (Pipeline Inspection, Permitting, & Evaluation System). The "Upload Attestation" button under WE PREP is highlighted with a red box. Below the tiles, there is a paragraph of text: "This application allows you to electronically search RRC dockets and cases, review and submit filings for CASES, find inspections with PIPES, and pay administrative penalties. For instructions on how to use RRC CASES, click here."

Critical Infrastructure Attestation Upload (5 of 9)



- You will be taken to your Organization Page
- Click the “Upload Attestation” button at the top

The screenshot shows the user interface of the Railroad Commission of Texas portal. At the top, there is a navigation bar with links for Home, Cases, Complaints, Incidents, Inspections, Payments, Visit RRC, and Pipeline Integrity Filing. A search bar is located to the right of the navigation bar. Below the navigation bar, the user is logged in as "Account DUMMY ADMIN OWNED ACCOUNT". A red box highlights the "Upload Attestation" button, which is located next to "Upload a PS-48" and "Fill Out PS-48 Online" buttons. Below the buttons, there is a table with the following information:

Account Record Type	Phone	Mailing Address	Business Area	P5 Number
Organization		123 South Street Houston, TX 77059 USA		999999

Below the table, there are two tabs: "DETAILS" and "RELATED". The "DETAILS" tab is selected. Under the "DETAILS" tab, there is a section for "Organization Information" with the following fields:

Account Name	DUMMY ADMIN OWNED ACCOUNT	Status	
24 Hour Phone		Account Record Type	Organization
Organization ID		Mailing Address	123 South Street Houston, TX 77059 USA
Region List		County	
T4 Permit List	24574674	District	
P5 Number	999999	Region ID	

A map is displayed below the mailing address, showing the location of the organization. The map includes a red pin and the text "Map data ©2022".

Chatter isn't enabled or the user doesn't have Chatter access.

Critical Infrastructure Attestation Upload (6 of 9)



Upload Attestation

- Fill out the “Covered Year” field
- Fill out any other information that is not already populated on the upload screen
- Click “Next”

The screenshot shows a web form titled "Upload Attestation". It is divided into two main sections: "Attestation Details" and "Attestation Signatory information".

Attestation Details:

- A checkbox labeled "This attestation Confidential" is present.
- A red box highlights the "Covered Year" field, which contains the value "2022".
- An "Attachment Note" field contains the text "Please see our uploaded attestation form."

Attestation Signatory information:

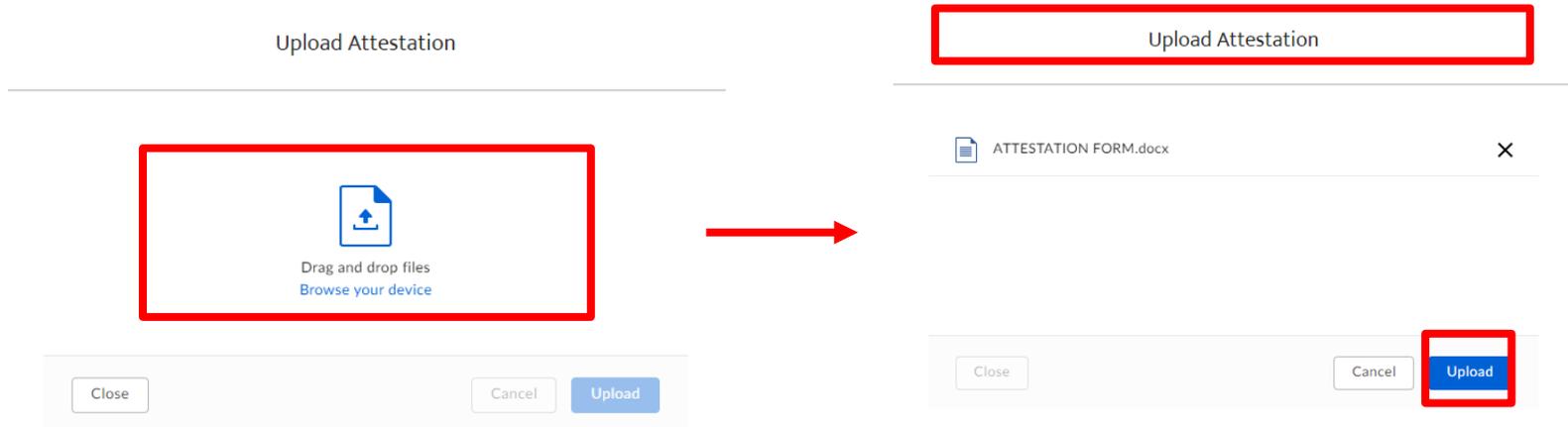
- Name:** First Name: "Online Portal", Last Name: "Test".
- Title:** "President".
- Address:** Street: "123 South Street".
- City:** "Houston".
- State/Province:** "Texas".

A red box highlights the "Next" button at the bottom right of the form.

Critical Infrastructure Attestation Upload (7 of 9)



- Click “Browse your device” to select your attestation form or drag and drop your file into the upload area
- Click “Upload”



Critical Infrastructure Attestation Upload (8 of 9)



- You have now successfully uploaded your Attestation Form for the year!

A screenshot of a web application interface. At the top, it says "Account DUMMY ADMIN OWNED ACCOUNT". There are three buttons: "Upload Attestation", "Upload a PS-48", and "Fill Out PS-48 Online". Below this is a table with account details: Account Record Type (Organization), Phone, Mailing Address (123 South Street, Houston, TX 77059, USA), Business Area, and PS Number (999999). A "DETAILS" tab is active, showing "Organization Information" with fields for Account Name, 24 Hour Phone, and Organization ID. A "Finish" button is visible in the bottom right of the dialog. A map is partially visible in the background, showing a location in Houston, TX. A message at the top right says "Chatter isn't enabled or the user doesn't have Chatter access."

Critical Infrastructure Attestation Upload (9 of 9)



- To view your uploaded form, click the “Related” tab and select the record you uploaded in the Files & Correspondence related list

Account: DUMMY ADMIN OWNED ACCOUNT

Upload Attestation | Upload a PS-48 | Fill Out PS-48 Online

Account Record Type: Organization | Phone: | Mailing Address: 123 South Street, Houston, TX 77059, USA | Business Area: | PS Number: 999999

DETAILS: **RELATED**

Complaints (0)

Incidents (0)

Inspection Packages (0)

Files & Correspondence (6+)

File and Correspondence ID	Business Area or Division	Document Type	File Name
FILECORR-245377	Pipeline Safety	PS-48 Form	
FILECORR-245534	Pipeline Safety	PS-48 Form	
FILECORR-245535	Pipeline Safety	PS-48 Form	
FILECORR-245543	Critical Infrastructure	Attestation	
FILECORR-245545	Critical Infrastructure	Attestation	
FILECORR-245546	Critical Infrastructure	Attestation	

Accounts > DUMMY ADMIN OWNED ACCOUNT
Files & Correspondence

14 Items • Updated a few seconds ago

File and Correspon...	Business Area or Divis...	Document T...	File Name	Party Su...	Delivery ...	Confiden...	Created Date
6 FILECORR-245546	Critical Infrastructure	Attestation				<input type="checkbox"/>	10/17/2022 4:27 PM
7 FILECORR-245551	Critical Infrastructure	Attestation				<input checked="" type="checkbox"/>	10/18/2022 11:48 AM
8 FILECORR-245555	Critical Infrastructure	Attestation				<input type="checkbox"/>	10/18/2022 11:54 AM
9 FILECORR-245561	Critical Infrastructure	Attestation	we-prep-logo-1080.jpg			<input type="checkbox"/>	10/18/2022 1:08 PM
10 FILECORR-245563	Critical Infrastructure	Attestation	TXRRRC - CIS - 3.66 Violation Letter Template v4.docx			<input type="checkbox"/>	10/18/2022 1:09 PM
11 FILECORR-245564	Pipeline Safety	PS-48 Form				<input type="checkbox"/>	10/18/2022 1:10 PM
12 FILECORR-245566	Critical Infrastructure	Attestation				<input type="checkbox"/>	10/18/2022 1:13 PM
13 FILECORR-245567	Critical Infrastructure	Attestation				<input type="checkbox"/>	10/18/2022 1:16 PM
14 FILECORR-245568	Critical Infrastructure	Attestation	we-prep-logo-1080.jpg			<input type="checkbox"/>	10/18/2022 1:16 PM



Inspection Process – CID Regional Directors

**Gilbert Herrera, Andrea Meyer,
Jarrod Eberly, Jim Collins**

October 2022



Inspection Process Agenda



- Introductions
- What's happening now?
 - i. Site Verifications
- What will be the inspection process?
 - i. Who is going to be inspected?
 - ii. Causes for inspection
 - iii. Weather emergency and notification
 - iv. Readiness Attestation
 - v. Common methods

Introductions



Jared Ware
Director

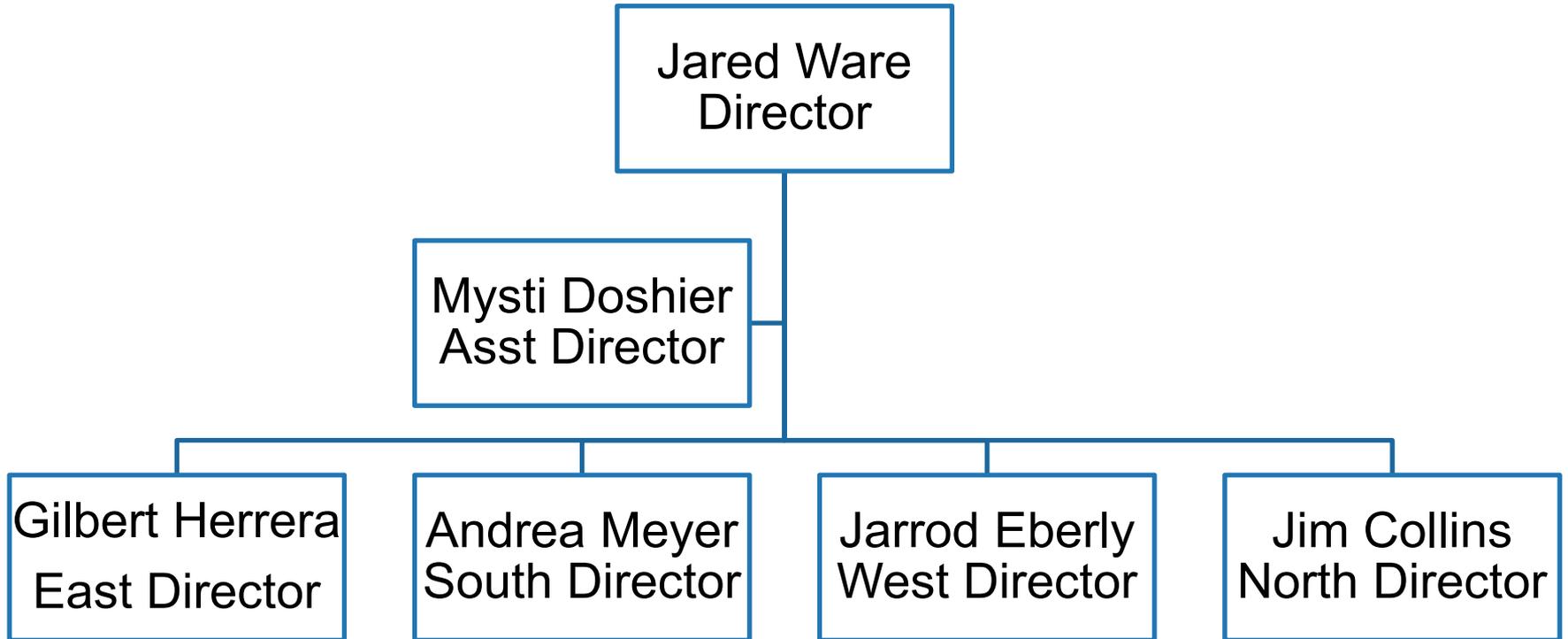
Mysti Doshier
Asst Director

Gilbert Herrera
East Director

Andrea Meyer
South Director

Jarrold Eberly
West Director

Jim Collins
North Director



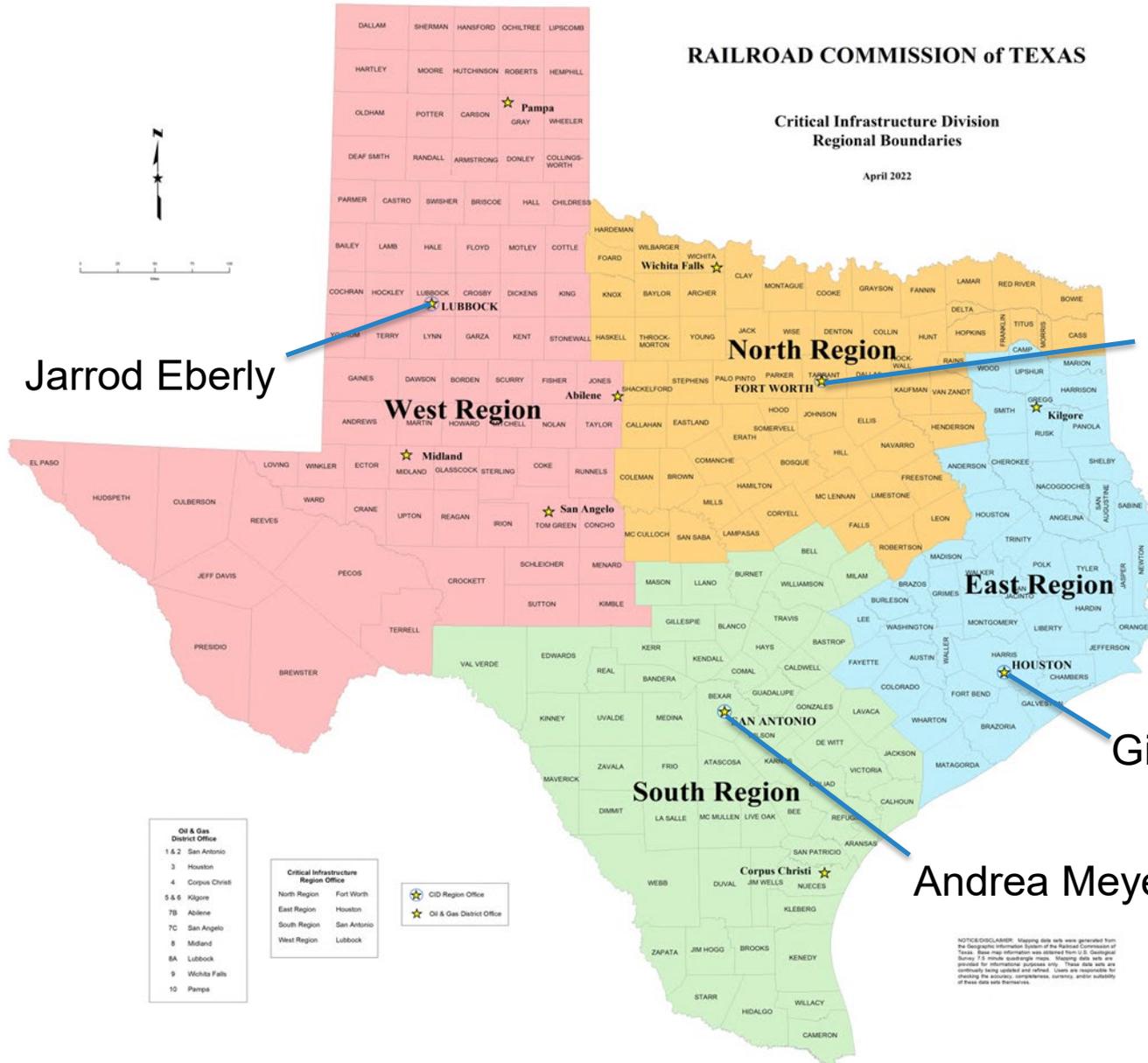
CID – Regional Map



RAILROAD COMMISSION of TEXAS

Critical Infrastructure Division Regional Boundaries

April 2022



Jarrold Eberly

Jim Collins

Gilbert Herrera

Andrea Meyer

- Oil & Gas District Office**
- 1 & 2 San Antonio
 - 3 Houston
 - 4 Corpus Christi
 - 5 & 6 Kilgore
 - 7B Abilene
 - 7C San Angelo
 - 8 Midland
 - 8A Lubbock
 - 9 Wichita Falls
 - 10 Pampa

- Critical Infrastructure Region Office**
- North Region Fort Worth
 - East Region Houston
 - South Region San Antonio
 - West Region Lubbock

- CID Region Office
- Oil & Gas District Office

NOTICE/DISCLAIMER: Mapping data sets were generated from the Geographic Information System of the Railroad Commission of Texas. These maps are informational and do not constitute an official survey. 30 minute quadrangle maps. Mapping data sets are provided for informational purposes only. These data sets are continuously being updated and refined. Users are responsible for checking the accuracy, completeness, currency, and/or suitability of these data sets themselves.



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WHAT'S HAPPENING NOW?

Site Verifications (1 of 3)



Compressor Stations



Confirm facility and operator information



Confirm GPS

Gas Processing Facilities



Confirm facility and operator information



Confirm GPS

This may lead to other facilities being verified

Site Verifications (2 of 3)



- We are contacting operators to schedule meetings at the location.
- This helps us verify the location GPS that was provided and the facility name
- We are making sure that the information that we have is accurate to make it easier for the operators and our inspectors

Site Verifications (3 of 3)



- Site verification visits are NOT an inspection
- No photos will be taken inside facilities
- All midstream facility visits **must** be coordinated with operators and our inspectors need to be accompanied by operator personnel
- For upstream facilities, it is **preferred but not required** that inspectors be accompanied by lease personnel.
- Appropriate time will be given to operators to respond and schedule these visits



**What will be the inspection
process?**

3.66 Applicability



Facilities required to comply with 3.66

Gas supply chain facility

Designated critical by 3.65

On the electricity supply chain map

Gas pipeline facility

Directly serves a natural gas electric generation facility

- Facility provides power to the electric grid

On the electricity supply chain map

An inspection will originate from one of two places.

- A regular inspection conducted in accordance with the Commission's inspection schedule
 - Any facility required to comply with 3.66
- An inspection scheduled in response to a weather-related stoppage notification
 - Any facility required to comply with 3.66

Inspection Schedule



Before
Dec 1

- Scheduled Visits
- Site Verifications

After
Dec 1

- Readiness Attestation
- Inspect facilities who submit attestation

During
weather
emergency

- Notification of forced weather-related stoppage
- Inspection from notification



Attestation – December 1 each year

- Confirmation that **weather emergency** preparation measures were implemented
 - Training on weather emergency preparation and operations
 - Consideration of the risk and protection to HSE
 - Weatherization of facilities
 - Critical components are listed and weatherization protection for the components is described
 - Describe corrective actions taken to mitigate known weather-related forced stoppages
 - Due to previous weather emergencies

Weather Emergency Readiness (2 of 2)



Attestation will also confirm the following

- Confirmation that information and statements are true, correct, and complete
- Confirmation of responsibility and authorization

Attestation (1 of 2)



Preparation
measures of
critical
facility
components



Corrective
measures
taken to
mitigate
previous
stoppages



Weather
Emergency
Readiness
Attestation



RRC inspectors will use this information when inspecting facilities subject to §3.66

Inspector should be able to identify which weatherization methods apply to which facility

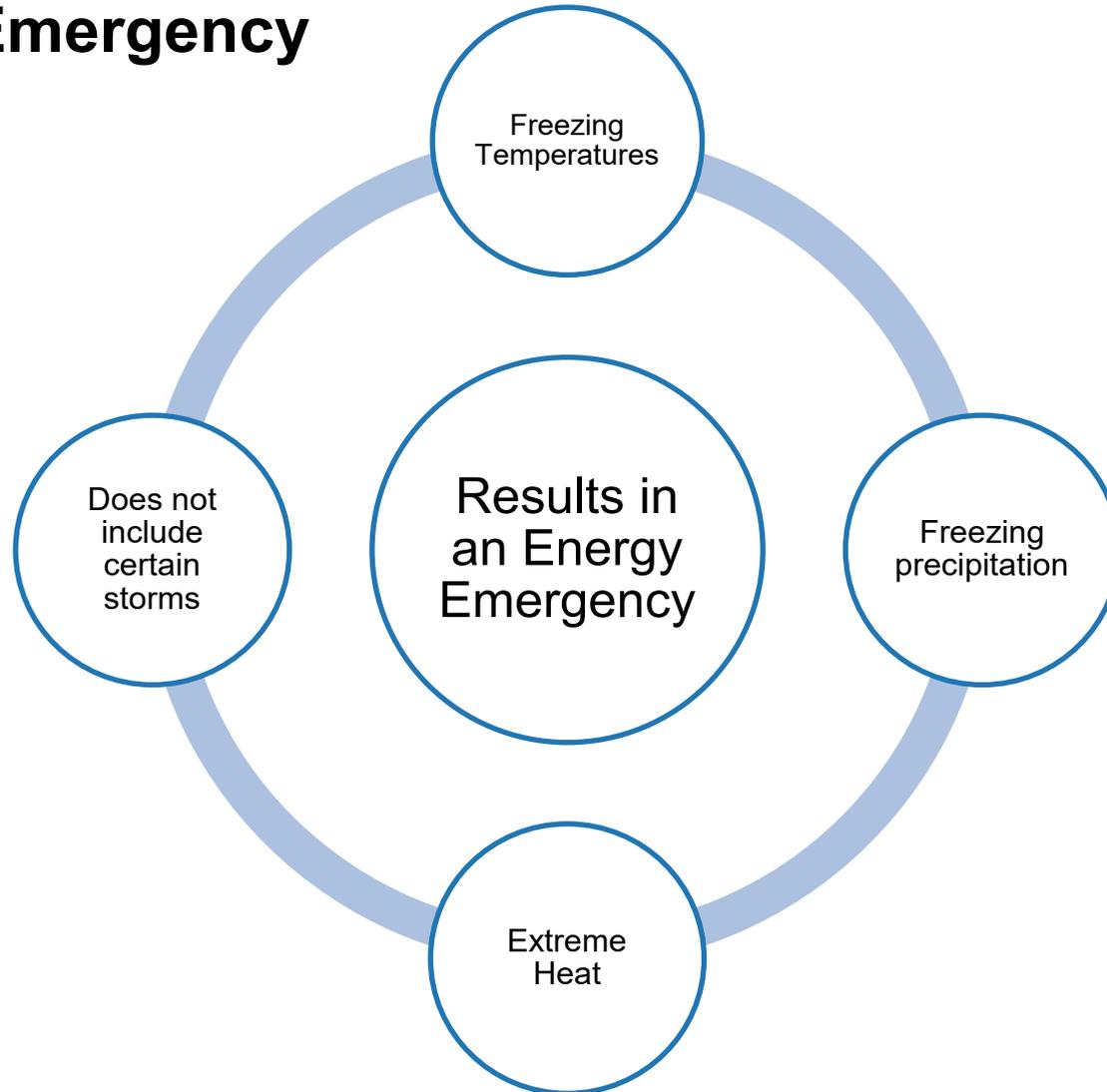
One attestation may be submitted per operator

- Facilities may be grouped together
 - Similar weatherization measures were implemented
- An operator may also list individual facilities
 - Specific weatherization techniques for a facility differ from general techniques of that type of facility for the operator

Weather Emergency



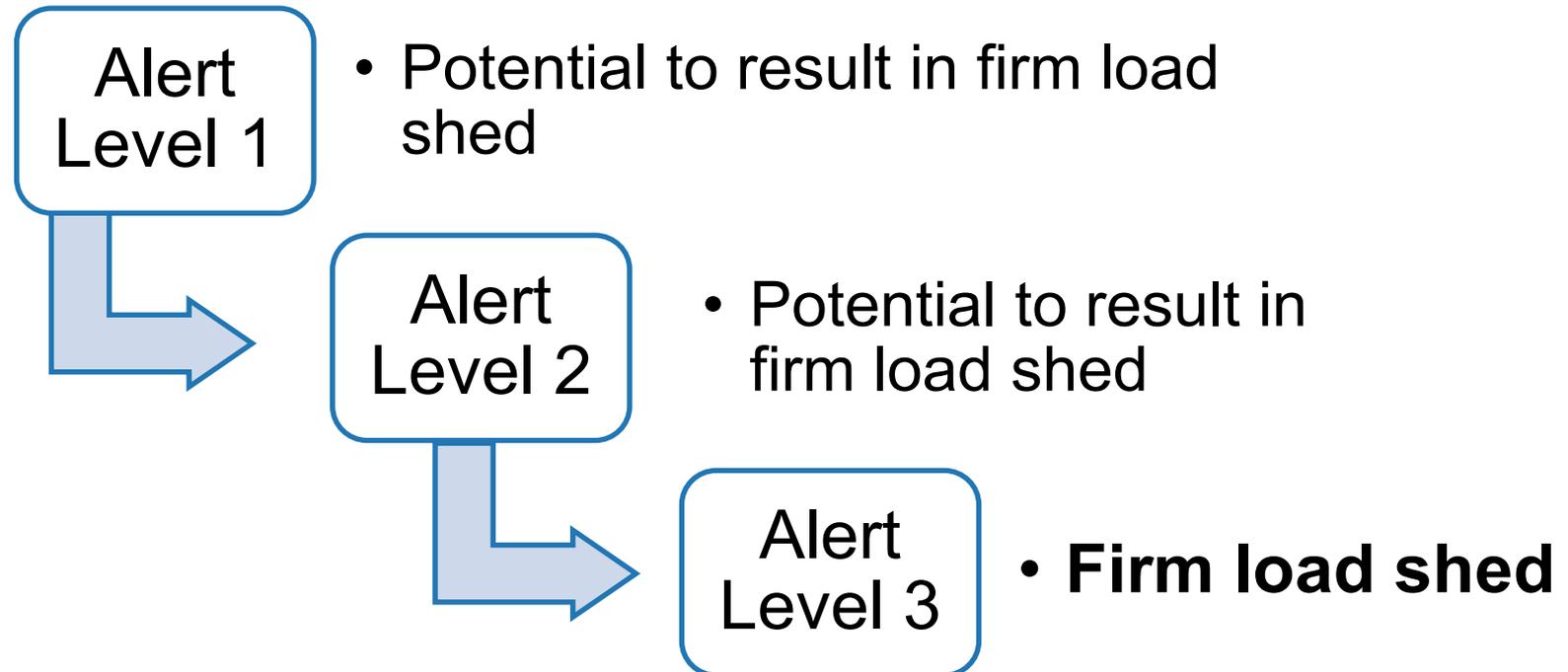
Weather Emergency – weather conditions that result in an **Energy Emergency**



Energy Emergency



Energy Emergency – ERCOT has issued an EEA 1 or higher





First concern in a weather emergency

- The safety of employees

Safe operation in “sustained operation”



By December 1st of each year, implement weather emergency preparation measures

- Ensure the sustained operation of a gas supply chain facility or a gas pipeline facility during a weather emergency
- Correct known weather-related forced stoppages that prevented sustained operation due to previous weather emergencies



Required weather emergency preparation measures:

- Consideration of the risk to the health and safety of employees and protection of the environment.
- Providing training on weather emergency preparations and operations to relevant operational personnel
- Weatherization of the facility



- **Weatherization includes:**
 - Correcting critical component failures
 - Installing equipment to mitigate weather-related operational risks
 - Implementation of processes to identify, test, and protect critical components.



- **Weatherization of the facility shall be based on:**

- The type of facility
- Facility's critical components
- Facility's location
- Facility's age
- Weather data (facility's county or counties)



Some facility observations that inspectors may look for:

- Onsite fuel/spare parts
- Wind breaks or temporary enclosures
- Enclosing sensors
- Thermal insulation/heat tracing devices
- Monitoring devices for cold weather critical components

Weatherization Methods (2 of 2)



- Chemical injection systems (lower freeze point)
- Equipment to remove, store, or dispose of liquids susceptible to freezing
- Nitrogen in closed loop systems – instrument controls
- Availability and inventory of road/ground material
- Procurement of necessary third-party services
- Operating procedures during extreme weather conditions

Weatherization of Critical Components



A few common weatherization methods that we can visually see are:

- Methanol injection/drip
- Water removal – solid absorption
- Thermal insulation
- Wind breaks
- Heating devices
- Glycol unit
- Drip pots

Dead Legs (1 of 3)



Dead legs – sections of piping where fluid flow is stagnant

Permanent

- Part of original design
- Could be due to a modification

Operational

- On/Off
- Spare Pump, pass line, relief valve (in/out)
- Start Up/Shut Down operations

Temporary

- Equipment temporarily removed
- Deactivation
- Storing
- Preservation

Dead Legs (2 of 3)



1

- Identify dead legs
- Database of dead legs

2

- Prioritize dead legs
- Flush and test operation of dead legs

3

- Routine inspection (physical condition)
- Routine testing

Attestation

Is dead leg a critical component, if so, how is it weatherized

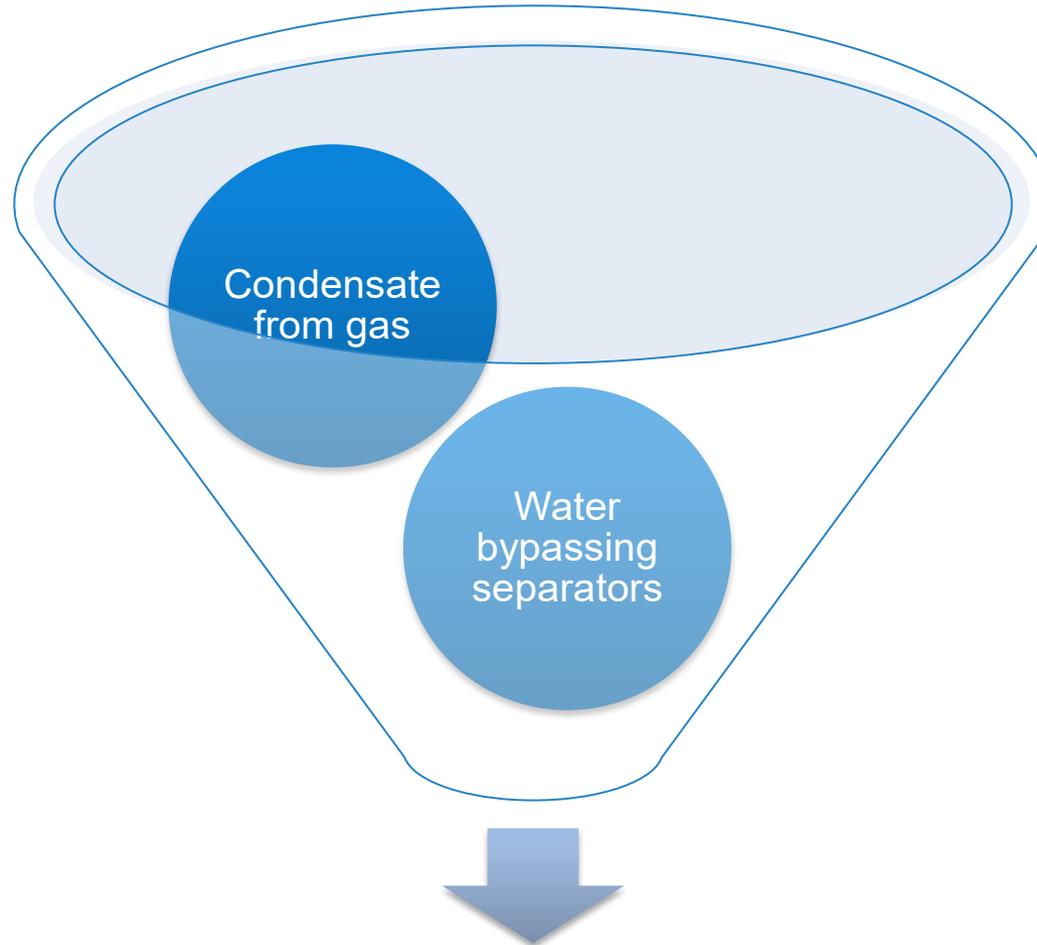
Corrective actions to mitigate previous failure

Forced Stoppage

Fix critical component

Add to attestation

Low Point Drains (1 of 2)



Capture and remove from pipe
Drains at a low point within the gas gathering system

Attestation

Is drain critical component, or weatherized method

Is this a way to implement a corrective action to mitigate a previous failure

Forced Stoppage

Did drain fail or is drain used to fix critical component

Add to attestation



Gas supply chain facility or gas pipeline facility

- If a **facility** experiences a weather-related forced stoppage in sustained operations during a weather emergency
 - Notify the Commission of the stoppage if the stoppage is not resolved within 24 hours of discovery
 - Only required if stoppage occurs during a weather emergency



A facility is a gas supply chain facility or a gas pipeline facility regulated under 3.66.

- Production
- Treating
- Processing
- Storage
- Transportation

Violation of 3.66 - Stoppage



Was the related forced stoppage due to the operator's failure to implement measures to prepare to operate in a weather emergency?

- **No** – weather-related forced stoppage was unrelated to the requirements of 3.66 – no violation will be issued
 - Inspection of facility
- **Yes** – measures to prepare to operate in a weather emergency as specified in 3.66 were not implemented – possible violation

We will not require a facility to operate. But require an operator to implement measures to prepare to operate in a weather emergency.



Major weather-related forced stoppage:

A weather-related forced stoppage during a weather emergency that is the **result of the deliberate disregard of this section or that results in:**

- (A) a loss of production exceeding 5,000 Mcf of natural gas per day per oil lease;
- (B) a loss of production exceeding 5,000 Mcf of natural gas per day per gas well;
- (C) a loss of gas processing capacity exceeding 200 MMcf per day;
- (D) a loss of storage withdrawal capacity exceeding 200 MMcf per day; or
- (E) a loss of transportation capacity exceeding 200 MMcf per day.



Repeated weather-related forced stoppage

- More than one weather-related forced stoppage violation within a 12-month period

Enforcement of Violations (1 of 2)



If there is a violation of 3.66 and the violation is not remedied with a reasonable amount of time

- The Commission is required to notify the Office of the Attorney General of Texas



Classification system for the range of penalties

- Factors include nature, circumstances, extent, and gravity of a prohibited act; the hazard or potential hazard created to the public's health, safety, or economic welfare; the history of previous violations; the amount necessary to deter future violations; and efforts to correct the violation.
- Factor value depends on the amount of natural gas impacted by the violation
 - Class A violation is the highest class of violations and is eligible for a penalty of \$5,000 to \$1,000,000.
 - Class B up to \$5,000, Class C up to \$4,000, Class D up to \$3,000
 - Points range for each class can be found in 3.66

Conclusions



Now to December 1 – Site verifications/Site observations

December 1 – Inspections related to operator attestations

Forced Stoppage – Inspect facility once RRC is notified of forced stoppage

- Weather-related forced stoppage
- Major weather-related forced stoppage
- Repeated weather-related forced stoppage