

SDG&E, June 15th, 2026

Rulemaking (R.) 15-01-008 to Adopt Rules and Procedures Governing Commission Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leaks Consistent with Senate Bill 1371, Leno.  
In Response to Data Request, R15-01-008 2026 June Report  
Appendix 5; Rev. 03/26/2026

Notes:  
Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value.  
At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange.

Distribution M&R Station Leaks and Emissions (Informational Purposes Only)

Number of Stations	Station Classification	Emission Factor (Mscf/yr)	Annual Emissions (Mscf)	Explanatory Notes / Comments
2	A1	40.6	81	2025 EOY Above Grade < 100 psi Actual Inlet Press
14	A2	896.5	12,551	2025 EOY Above Grade 100 - 300 psi Actual Inlet Press
31	A3	1,684.5	52,220	2025 EOY Above Grade > 300 psi Actual Inlet Press
9	B1	1.0	9	2025 EOY Below Grade < 100 psi Actual Inlet Press
77	B2	1.8	142	2025 EOY Below Grade 100 - 300 psi Actual Inlet Press
324	B3	12.2	3,945	2025 EOY Below Grade > 300 psi Actual Inlet Press
		Sum Total	68,947	

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Notes:  
Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value.  
At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange.  
After completing the tab on "Leak Based - Station Emissions" and "Station - Unknown Leaks" fill in the table for "Leak Based - Emissions Summary."

Distribution M&R Station Leaks:																	
ID	Geographic Location	M&R Station or Farm Tap Classification	Component Type	Incoming Pressure (psi)	Leak Grade	Upgraded Leak Grade or Downgraded Leak Grade	Leak Discovery Method	Discovery Date (MM/DD/YY)	Re-Grade Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Scheduled Repair Date (MM/DD/YY)	Reason for Not Scheduling a Repair	Number of Days Leaking	Number of Days to Repair	Emission Factor (Mscf/Day)	Annual Emissions (Mscf)	Explanatory Notes / Comments

Not Applicable

Sum Total Emissions from leaks carried over from before 2025 0 Provided as an example.

Sum Total Emissions from leaks discovered in 2025 0 Provided as an example.

Sum Total Emissions from O&M Leaks discovered in 2025 0 Provided as an example.

Grand Total of all 2025 emissions from leaks 0 Provided as an example.

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Notes:  
If highlighted cells are filled in, the other cells will auto-populate

Summary of Data by Distribution M&R Station Results for Annual System Leak Rate and Resulting Number of Unknown Leaks calculated for M&R Station

M&R Station Classification; Leak Grade or Bubble Size Category if available.	Total System M&R Station per survey Cycle	M&R Station on Annual Survey [MX,A]	M&R Station on Multi-Year Survey Cycles [MXTot]	Survey Interval (yrs) [I]	M&R Station Surveyed Annually from Multi-Year Survey Cycles [MX,I]	Total # of Leaks Detected from Survey [N <sub>XL</sub> ]	Annual Leak Rate [Leaks / Meter] $R_X = \frac{N_{XL}}{M_{XA} + (I \times M_{XI})}$	# of Unknown Leaks $N_{X,unk} = \bar{R}_X \times (M_X^{tot} - M_{XI}) \times \frac{I}{2}$	Total # of Leaks Detected from O&M*  [N <sub>X,O</sub> ]
Not Applicable				1			-	-	
				3			-	-	
				5			-	-	
				1			-	-	
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ID	Geographic Location	Damage Type	Pipe Material	Pipe Size (nominal)	Pipe Age (months)	Pressure (psi)	Leak Grade	Above Ground or Below Ground	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Number of Days Leaking	Emission Factor (Mscf/Day)	Annual Emissions (Mscf)	Explanatory Notes / Comments
Sum Total												0		

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At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange

Distribution M&R Station Blowdowns:				
ID	Geographic Location	Number of Blowdown Events	Annual Emissions (Mscf)	Explanatory Notes / Comments
N/A	SDG&E Territory	2,012	8.0	External District Reg. Inspection at Distribution M&R Stations - Estimated avg. gas vented = 4 scf/insp
N/A	SDG&E Territory	4	0.1	Filter Change out or Filter Inspection w/parts replacement at Distribution M&R Stations - Estimated avg. gas vented = 30 scf/ea
N/A	SDG&E Territory	473	8.5	M&R Station Inspection Blowdowns
N/A	SDG&E Territory	202	2.4	Reg. Change out & Internal Reg. Inspection at Distribution M&R Stations - Estimated avg. gas vented = 12 scf/ea
N/A	SDG&E Territory	42	0.5	Straight Install/Remove Reg Activity at Distribution M&R Stations - Estimated avg. gas vented = 12 scf/ea
		Sum Total	20	

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The data collected on this sheet is for informational purposes and may not be included in the emissions inventory for 2025. The worksheet is designed to track actual emissions for future reference and to determine if an actual leak based emission accounting is feasible for M&R stations.

Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value.

At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange

The emissions captured on this tab represent the emissions associated with the operational design and function of the component. Any intentional release of natural gas for safety or maintenance purposes should be included on the Blowdowns worksheet.

**Distribution M&R Station Component Vented Emissions:**

ID	Geographic Location	Station Classification	Device Type	Bleed Rate	Manufacturer	Number of Days Emitting	Engineering or Manufacturer's based Estimate of Emissions	Annual Emissions (Mscf)	Explanatory Notes / Comments
							Sum Total	0	

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The data collected on this sheet is for informational purposes and will not be included in the emissions inventory for 2024. The worksheet is designed to track actual leaks for future reference and to determine if an actual leak based emission accounting is feasible for M&R stations

If you record data using this table and you only leak survey part of your system, you must extrapolate emissions from leaks up to account for emissions from your entire system for the year

Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value

The emissions captured on this tab represent the emissions associated unintentional leaks that if repaired would not leaking. If the component is releasing gas or "bleeding" as a result of its design or function then it is not to be captured in this tab

**Distribution M&R Station Component Fugitive Leaks:**

ID	Geographic Location	Station Classification	Device Type	Bleed Rate	Manufacturer	Pressure (psi)	Discovery Date (MM/DD/YY)	Regal Date (MM/DD/YY)	Number of Days Leaking	Evolution Factor (Mtc/day)	Annual Emissions (Mtc)	Explanatory Notes / Comments
10002832224		92106 R1	CV	Greater than 60			12/9/2025	12/9/2025	343	0.071	24.35 MMR Leak	
100027213956		92124 R3	BY	Greater than 60	Rockwell (Std.)		3/12/2025	3/12/2025	71	0.023	1.63 MMR Leak	
100027226700		92084 R2	C	Greater than 60			2/4/2025	2/4/2025	35	0.071	2.49 MMR Leak	
100027229111		92084 R2	BY	Greater than 60	Rockwell (Std.)		2/4/2025	2/4/2025	35	0.023	0.81 MMR Leak	
100027291110		92084 R2	BY	Greater than 60	Rockwell (Std.)		2/4/2025	2/4/2025	35	0.071	0.81 MMR Leak	
100027089419		92085 A3	C	Greater than 60			1/6/2025	1/6/2025	6	0.071	0.43 MMR Leak	
100028420554		92083 R3	C	Greater than 60			12/26/2025	12/26/2025	360	0.071	25.56 MMR Leak	
100028402446		92107 R1	C	Greater than 60			12/19/2025	12/19/2025	333	0.071	25.56 MMR Leak	
100028330399		92040 R3	C	Greater than 60			12/8/2025	12/8/2025	342	0.071	24.28 MMR Leak	
100028312084		92040 R3	C	Greater than 60			12/8/2025	12/8/2025	342	0.032	10.94 MMR Leak	
100028024213		92044 R3	BY	Greater than 60	Fisher		11/20/2025	11/20/2025	324	0.071	7.45 MMR Leak	
100028038466		92064 R3	C	Greater than 60			11/20/2025	11/20/2025	324	0.071	23.00 MMR Leak	
100028048489		91901 R2	C	Greater than 60			11/12/2025	11/12/2025	316	0.071	22.44 MMR Leak	
100028063224		91901 R2	F	Greater than 60	Fisher		11/12/2025	11/12/2025	316	0.032	10.11 MMR Leak	
100028136184		92121 R3	C	Greater than 60			10/20/2025	10/20/2025	293	0.071	20.80 MMR Leak	
100028028140		91942 R3	C	Greater than 60			9/15/2025	9/15/2025	258	0.071	18.82 MMR Leak	
100027940404		92083 R3	C	Greater than 60			8/28/2025	8/28/2025	240	0.071	17.64 MMR Leak	
100027937113		92182 A2	C	Greater than 60			8/18/2025	8/18/2025	230	0.071	16.33 MMR Leak	
100027911960		92058 A1	C	Less than or equal to 60			8/6/2025	8/6/2025	218	0.071	15.48 MMR Leak	
100027912102		92064 R3	C	Greater than 60			8/5/2025	8/5/2025	217	0.071	15.41 MMR Leak	
100027866864		92121 R3	C	Greater than 60			7/30/2025	7/30/2025	211	0.071	14.98 MMR Leak	
100027691955		92071 R3	BY	Greater than 60	Rockwell (Std.)		7/30/2025	7/30/2025	211	0.023	4.85 MMR Leak	
1000275199454		92123 R1	BY	Less than or equal to 60	Rockwell (Std.)		5/7/2025	5/7/2025	127	0.023	2.92 MMR Leak	
100027596704		92121 R1	C	Less than or equal to 60			5/7/2025	5/7/2025	127	0.071	9.02 MMR Leak	
100027599453		92121 R1	C	Less than or equal to 60	Rockwell (Std.)		5/7/2025	5/7/2025	127	0.023	2.92 MMR Leak	
100027599379		92081 A2	O	Greater than 60			5/6/2025	5/6/2025	125	0.071	8.98 MMR Leak	
100027459566		91978 A3	BY	Greater than 60	Rockwell (Std.)		5/2/2025	5/2/2025	122	0.023	2.81 MMR Leak	
100027458309		91978 A3	C	Greater than 60			5/2/2025	5/2/2025	122	0.071	8.86 MMR Leak	
100027450409		92044 R3	O	Greater than 60			4/11/2025	4/11/2025	101	0.071	7.17 MMR Leak	
100027069666		92064 R3	BY	Greater than 60	Rockwell (Std.)		3/21/2025	3/21/2025	80	0.023	1.84 MMR Leak	
100027069670		92064 R3	C	Greater than 60	Rockwell (Std.)		3/21/2025	3/21/2025	80	0.023	1.84 MMR Leak	
100027299577		91941 R3	C	Greater than 60			3/21/2025	3/21/2025	80	0.071	5.88 MMR Leak	
100027071849		92064 R3	C	Greater than 60			3/21/2025	3/21/2025	80	0.071	5.88 MMR Leak	
100027400478		91941 R3	C	Greater than 60	Rockwell (Std.)		3/21/2025	3/21/2025	80	0.023	1.84 MMR Leak	
100027389958		92064 R3	C	Greater than 60			3/19/2025	3/19/2025	78	0.071	5.54 MMR Leak	
100027270654		92121 R3	C	Greater than 60			2/19/2025	2/19/2025	50	0.071	3.55 MMR Leak	
100027220857		92024 A2	C	Greater than 60			2/3/2025	2/3/2025	34	0.071	2.41 MMR Leak	
100027175123		92075 R3	C	Greater than 60			1/24/2025	1/24/2025	24	0.071	1.70 MMR Leak	
100027166831		92081 R3	C	Greater than 60			1/24/2025	1/24/2025	24	0.071	1.70 MMR Leak	
100027172544		92082 R3	F	Greater than 60	Fisher		1/24/2025	1/24/2025	24	0.032	0.77 MMR Leak	
100026897625		92083 R3	BY	Rockwell (Hypersafe)			1/10/2025	1/10/2025	10	0.023	0.23 MMR Leak	
Sum Total											0.73	



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Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (If not self-explanatory)
<b>Population - Station Emissions</b>	
Number of Stations	
Station Classification	A1 = above grade, pressure <100 psi A2 = above grade, pressure =100-300 psi A3 = above grade, pressure >300 psi B1 = below grade, pressure <100 psi B2 = below grade, pressure =100-300 psi B3 = below grade, pressure >300 psi
Emission Factor (Mscf/yr)	
Annual Emissions (Mscf)	
Explanatory Notes / Comments	
<b>Leak Based - Station Emissions</b>	
ID	
Geographic Location	GIS, zip code, or equivalent
M&R Station or Farm Tap Classification	A1 = above grade, pressure <100 psi A2 = above grade, pressure = 100 - 300 psi A3 = above grade, pressure >300 psi B1 = below grade, pressure <100 psi B2 = below grade, pressure = 100 - 300 psi B3 = below grade, pressure > 300 psi F1 = farm tap, pressure <100 psi F2 = farm tap, pressure = 100 - 300 psi F3 = farm tap, pressure >300 psi
Component Type	C = copper CI = cast iron P = plastics (Acetyl, ABS, PE, PVC, etc.) PB = cathodically protected steel, bare PC = cathodically protected steel, coated UB = unprotected steel, bare UC = unprotected steel, coated
Incoming Pressure (psi)	
Leak Grade	
Upgraded Leak Grade or Downgraded Leak Grade	
Leak Discovery Method	
Discovery Date (MM/DD/YY)	
Re-Grade Date (MM/DD/YY)	
Repair Date (MM/DD/YY)	
Scheduled Repair Date (MM/DD/YY)	

Reason for Not Scheduling a Repair	
Number of Days Leaking	
Number of Days to Repair	
Emission Factor (Mscf/Day)	
Annual Emissions (Mscf)	
Explanatory Notes / Comments	
Leak Based - Unknown Leaks	
M&R Station Classification; Leak Grade or Bubble Size Category if available.	Utilities should add rows according to their bubble size categories and nomenclature, and should include a no-bubble category. For example, include a row for each: Foam/ Indeterminate; Bubbles; Soap Blown Off; and No Bubbles.
Total System M&R Station per survey Cycle	
M&R Station on Annual Survey [MX,A]	
M&R Station on Multi-Year Survey Cycles [MXTot]	
Survey Interval (yrs) [I]	
M&R Station Surveyed Annually from Multi-Year Survey Cycles [MX,I]	
Total # of Leaks Detected from Survey [N <sub>x,L</sub> ]	
Annual Leak Rate [Leaks / Meter]	$R_x = \frac{N_{x,L}}{M_{x,A} + (I \times M_{x,I})}$
# of Unknown Leaks	$N_{x,unk} = \overline{R}_x \times (M_x^{Tot} - M_{x,I}) \times \frac{I}{2}$ <p>If the operator changed the leak survey cycle during the report year that requires more detailed calculations based on the approved calculation methodology to determine the number of unknown leaks an additional worksheet may be added to show the calculations.</p>
Total # of Leaks Detected from O&M*  [N <sub>x,O</sub> ]	
Leak Based - Emissions Summary	
Grade if Applicable	
Count of Leaks Carried over from Prior Year	Based on a leak start date prior to the first day of the year of interest.
Count of Leaks Discovered in the Year of Interest	The total number of leaks by grade or category discovered in the year of interest.
Count of Leaks Repaired in the Year of Interest	If a leak is downgraded to not leaking, do not count it.
Average Days to Repair Leaks	The average days to repair leaks should be baase on the formula: (Repair Date/Time minus Discovery Date/Time) plus (one day, unless using a discrete time stamp for leak repairs), then take the sum and divide by number of leaks repaired by grade to get the average days to repair.

<b>Count of Estimated Unsurveyed Leaks in the Year of Interest</b>	For leaks identified in Unsurveyed areas extrapolate the proportion of leak counts by grade that were found in the respective areas based on the year or periods used to estimate the unsurveyed leak count.  If the unsurveyed leak count was based on the current year leak count by grade detected then use the current proportion of graded leak count applied to the unsurveyed leaks.
<b>Count of Remaining Leaks at final day of the Year of Interest (12/31/22)</b>	This count is only of the actual leaks detected in the operator's system that have not been repaired as of 12/31 of the year of interest.
<b>Emissions from Leaks Carried over from Prior Year.</b>	Based on a leak start date prior to the first day of the year of interest.  This includes leaks discovered through O&M and survey activities.
<b>Emissions from Leaks Discovered in the Year of Interest.</b>	The total number of leaks by grade or category discovered in the year of interest.  This includes leaks discovered through O&M and survey activities.
<b>Emissions from Estimated Unsurveyed Leaks in the Year of Interest</b>	The emissions by grade would be on the same basis that used to extrapolate the count of leaks in the unsurveyed areas. For example: For leaks identified in Unsurveyed areas extrapolate the proportion of leak emissions by grade that were found in the respective areas based on the year or periods used to estimate the unsurveyed leak count.  If the unsurveyed leak count was based on the current year leaks detected then use the current proportion of graded leaks applied to the unsurveyed leak emissions.
<b>Total Emissions in the Year of Interest [Mscf of Natural Gas]</b>	
<b>All Damages</b>	
<b>ID</b>	
<b>Geographic Location</b>	GIS, zip code, or equivalent
<b>Damage Type</b>	E = excavation damage N = natural force damage O = other outside force damage
<b>Pipe Material</b>	PB = cathodically protected steel, bare PC = cathodically protected steel, coated UB = unprotected steel, bare UC = unptotected steel, coated
<b>Pipe Size (nominal)</b>	
<b>Pipe Age (months)</b>	
<b>Pressure (psi)</b>	MOP = maximum operating pressure over the past year
<b>Leak Grade</b>	1 = grade 1 2 = grade 2 2+ = grade 2+ 3 = grade 3 N = non-graded or ungraded
<b>Above Ground or Below Ground</b>	AH = above ground, hazardous AN = above ground, non-hazardous B = below ground

<b>Discovery Date (MM/DD/YY)</b>	
<b>Repair Date (MM/DD/YY)</b>	
<b>Number of Days Leaking</b>	<p>If date and time stamp are reliable and used consistently by respondent, then emissions may be calculated based on actual time leaking. E.G. Repair time - damage event time = duration of event.</p> <p>If respondent has average or historical leak duration based on the nature and circumstances of damages, then these may be applied to like damage events. The emissions factors should be adequately supported and explained in the filing.</p> <p>If actual time stamps and historical averages are not available, then whole days should be used in the engineering calculation. The leak begins with the damage event date thru repair date or December 31st of subject year, whichever is later. E.G. Days Leaking = Repair date - date of damage + 1 day.</p>
<b>Emission Factor (Mscf/Day)</b>	
<b>Annual Emissions (Mscf)</b>	
<b>Explanatory Notes / Comments</b>	<p>Provide method of calculation and example of formula.</p> <p>Explain how any EF's used were derived.</p>
<b>Blowdowns</b>	
<b>ID</b>	
<b>Geographic Location</b>	GIS, zip code, or equivalent
<b>Number of Blowdown Events</b>	
<b>Annual Emissions (Mscf)</b>	
<b>Explanatory Notes / Comments</b>	
<b>Component Vented Emissions</b>	
<b>ID</b>	
<b>Geographic Location</b>	GIS, zip code, or equivalent
<b>Station Classification</b>	<p>A1 = above grade, pressure &lt;100 psi</p> <p>A2 = above grade, pressure =100-300 psi</p> <p>A3 = above grade, pressure &gt;300 psi</p> <p>B1 = below grade, pressure &lt;100 psi</p> <p>B2 = below grade, pressure =100-300 psi</p> <p>B3 = below grade, pressure &gt;300 psi</p>
<b>DeviceType</b>	<p>C = connector</p> <p>OE = open-ended line</p> <p>M = meter</p> <p>P = pneumatic device</p> <p>PR = pressure relief valve</p> <p>V = valve</p> <p>O = other devices</p>
<b>Bleed Rate</b>	<p>L = low bleed</p> <p>I = intermittent bleed</p> <p>H = high bleed</p> <p>NA = not applicable</p>
<b>Manufacturer</b>	
<b>NumberofDays Emitting</b>	Because the emissions are a factor of design or function, these emissions counted for the entire year.

<b>Engineering or Manufacturer's based Estimate of Emissions</b>	
<b>Annual Emissions(Mscf)</b>	<p>The emissions should be based on 365 days times the actual volume emitting if known, or the approved Emissions Factor.</p> <p>Note whether the emissions are based on actual volumetric measures in the next column.</p>
<b>Explanatory Notes / Comments</b>	
<b>Component Fugitive Leaks</b>	
<b>ID</b>	
<b>Geographic Location</b>	GIS, zip code, or equivalent
<b>Station Classification</b>	<p>A1 = above grade, pressure &lt;100 psi  A2 = above grade, pressure =100-300 psi  A3 = above grade, pressure &gt;300 psi  B1 = below grade, pressure &lt;100 psi  B2 = below grade, pressure =100-300 psi  B3 = below grade, pressure &gt;300 psi</p>
<b>DeviceType</b>	<p>C = connector  OE = open-ended line  M = meter  P = pneumatic device  PR = pressure relief valve  V = valve  O = other devices</p>
<b>Bleed Rate</b>	<p>L = low bleed  I = intermittent bleed  H = high bleed  NA = not applicable</p>
<b>Manufacturer</b>	
<b>Pressure(psi)</b>	MOP = maximum operating pressure over the past year
<b>Discovery Date(MM/DD/YY)</b>	<p>List the actual discovery date.</p> <p>If the leak was discovered in the year of interest, then we will assume the component was leaking from the beginning of the year for emissions reporting purposes.</p>
<b>Repair Date(MM/DD/YY)</b>	Date that the component repair stopped the leak. Any associated blowdowns as a result of the repair should be included in the blowdowns tab.
<b>NumberofDays Leaking</b>	<p>Assume Leaking from January 1 of subject year or prior survey date, whichever is later, thru the repair date (if repaired in year of interest) or December 31 of subject year, whichever is earlier.</p> <p>For O&amp;M discovered leaks, assume that the leak begins with the discovery date thru repair date or December 31st of subject year, whichever is earlier.</p>
<b>Emission Factor(Mscf/day)</b>	
<b>Annual Emissions(Mscf)</b>	
<b>Explanatory Notes / Comments</b>	