

April 26, 2021

Re: TC Energy - Rutledge Compressor Station  
Annual Leak Monitoring Survey Report

TC Energy's Columbia Pipeline Group operates the Rutledge Compressor Station in Fallston, Maryland. Per 26.11.41.03B(3)(a) the Rutledge Compressor Station conducted its initial leak detection monitoring survey on March 2, 2021. In accordance with COMAR 26.11.41.07, each leak monitoring survey is required to be posted on a publicly available website for a period of two years from the survey date. This posting fulfills TC Energy's obligation to meet that requirement.

**TC Energy - Rutledge Compressor Station**  
**Leak Detection and Repair Report April 2021**

### EMISSION DETAIL REPORT

<b>Company:</b> TC Energy USA	<b>Facility:</b> Rutledge	<b>Start Date:</b> 3/2/2021	<b>Technician:</b> Sebastian Smith	Leak	LDAR Leak Count: 13	Vents	Repaired: 0	REPAIR STATUS				
<b>District:</b> CPG North	<b>Location:</b> 39.561776 / -76.477239	<b>End Date:</b> 3/2/2021	<b>Technician:</b> Matthew Fuller		Non-LDAR Leak Count: 0	Mandatory Emission Tests	Leak Tests: 0	Repaired: 11	Delay of Repair: 2			Unsuccessful Attempt: 0
					Total Leak Count: 13		Vent Tests: 0 No Emission Tests: 0 Total Tests: 0					

**Assessment Comments:** MDE Survey at Rutledge on 03/02/2021. All Units are Dry Seal Centrifugal Compressors and were standby Pressurized. Station and Unit Blowdowns are combined. Station Blowdown Valves are Buried. Acoustic VPAC was used to identify leaking Unit Isolation Valves; all Unit Blowdowns were identified as leaking.

Emission ID #	Emission Type	Detection Date	Process Block	FEH1 Equipment Designation	Component	Sub Source	Operating Mode	Emission Description	LEL Tox / Safety Hazard	Emission Severity	Gas Type	Previous Leak (emission)	Rate (cm)	Detection Method	N/A	Repair Recommendation	Initial PPM Reading	LDAR Tag ID	Bubble Test	Repair Status	Repair Status Date	First Attempt Due Date	Final Attempt Due Date	DOR Start Date	DOR End Date	DOR Reason	DOR Approver Name	Final PPM Reading	Repair Method	
35611076	Leak	03/02/2021	Separator/Filter	Main suction scrubber	Connector - MDE	Threaded Connection	NA	Bottom Threading to Pressure Transmitter, Suction Line to Heat Scrubber.	No	LOW	Sweet Gas		0.02	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	Bubble Test	
35611077	Leak	03/02/2021	Separator/Filter	Main suction scrubber	Connector - MDE	Threaded Connection	NA	Top Threading to East Level Switch on Hydrocarbon Tank, Main Suction Scrubber.	No	LOW	Sweet Gas		0.03	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	Bubble Test	
35611078	Leak	03/02/2021	Compressor Cent. Dry Seal	North cooling gas scrubber, unit 1	Connector - MDE	Threaded Connection	Standby/Pressurized	South Threading to Union on Drain Line from North Cooling Gas Scrubber, Unit 1.	No	LOW	Sweet Gas		0.08	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	Bubble Test	
35611079	Leak	03/02/2021	Compressor Cent. Dry Seal	South cooling gas scrubber, unit 1	Connector - MDE	Flange Connection	Standby/Pressurized	South Flange, Valve 108, Bottom Horizontal 3" Valve to South Cooling Gas Scrubber, Unit 1.	No	LOW	Sweet Gas		0.08	Optical Gas Imaging/Optical Gas Imaging		Replace gasket/seal and tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	Bubble Test	
35611080	Leak	03/02/2021	Compressor Cent. Dry Seal	South cooling gas scrubber, unit 1	Connector - MDE	Flange Connection	Standby/Pressurized	West Threading to Differential Pressure Meter, South Cooling Gas Scrubber, Unit 1.	No	LOW	Sweet Gas		0.06	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Delay of Repair	04/01/2021	-	04/01/2021	04/01/2021	04/01/2022	Shutdown Required	Wayne Cook	-	-	
35611081	Leak	03/02/2021	Compressor Cent. Dry Seal	North cooling gas scrubber, unit 2	Valve - MDE	Grease Fitting	Standby/Pressurized	Grease Fitting, Unit 2 Cooling Gas Line Valve.	No	LOW	Sweet Gas		0.01	Optical Gas Imaging/Optical Gas Imaging		Tighten valve packing	-	-	No	Repaired	03/02/2021	-	04/01/2021	-	-	-	-	-	OGI	
35611082	Leak	03/02/2021	Compressor Cent. Dry Seal	Unit 2	Connector - MDE	Threaded Connection	Standby/Pressurized	Top Tapping Union on Unit side of Pressure Differential Line over Suction Loading Valve, Unit 2.	No	LOW	Sweet Gas		0.01	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/02/2021	-	04/01/2021	-	-	-	-	-	-	OGI
35611083	Leak	03/02/2021	Compressor Cent. Dry Seal	Unit 2	Connector - MDE	Threaded Connection	Standby/Pressurized	Tapping Union to Elbow North of Pressure Differential Meter over Suction Loading Valve, Unit 2.	No	LOW	Sweet Gas		0.01	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/02/2021	-	04/01/2021	-	-	-	-	-	-	OGI
35611084	Leak	03/02/2021	Compressor Cent. Dry Seal	Unit 2	Connector - MDE	Threaded Connection	Standby/Pressurized	Tapping Union to Elbow Below of Pressure Differential Meter over Suction Loading Valve, Unit 2.	No	LOW	Sweet Gas		0.01	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/02/2021	-	04/01/2021	-	-	-	-	-	-	OGI
35611085	Leak	03/02/2021	Compressor Cent. Dry Seal	Unit 3	Connector - MDE	Threaded Connection	Standby/Pressurized	Top Union, Filter Dump, Cooling Gas System, Unit 3.	No	LOW	Sweet Gas		0.03	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	-	Bubble Test
35611086	Leak	03/02/2021	Compressor Cent. Dry Seal	Unit 3	Valve - MDE	Valve Stem	Standby/Pressurized	Packing, Discharge Valve, Unit 3.	No	MEDIUM	Sweet Gas		0.12	Optical Gas Imaging/Optical Gas Imaging		Tighten valve packing	-	-	Yes	Delay of Repair	04/01/2021	-	04/01/2021	04/01/2021	04/01/2022	Shutdown Required	Wayne Cook	-	-	
35611087	Leak	03/02/2021	Separator/Filter	Main discharge scrubber	Connector - MDE	Threaded Connection	NA	Top Threading Connection to South Level Switch, Hydrocarbon Tank, Main Discharge Scrubber.	No	LOW	Sweet Gas		0.06	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	-	Bubble Test
35611088	Leak	03/02/2021	Separator/Filter	Unit 3	Connector - MDE	Threaded Connection	NA	Top Threading Connection to North Level Switch, Hydrocarbon Tank, Main Discharge Scrubber.	No	LOW	Sweet Gas		0.08	Optical Gas Imaging/Optical Gas Imaging		Tighten connection	-	-	Yes	Repaired	03/17/2021	-	04/01/2021	-	-	-	-	-	-	Bubble Test
TOTAL													0.61																	

#### LEL, H2S, Safety Hazard

The following risk matrix is used to risk rank any possible leak/A vent safety hazards. The LEL/Safety Hazard Checklist must be checked if a leak (or group of leaks) poses any significant hazard. Examples of this may be:

- Personal detector reads any LEL reading
- Personal detector reads any H2S or any CO2 leak
- Personal detector alarms for non-toxic hazard (low PPM etc.)
- Emission is found near any possible ignition source (i.e. burner, electrical conduit, exposed wire, etc.)
- Emission area is so high that it covers a head
- Emission source location may cause inhalation hazard to facility personnel or public

The severity is primarily based on the LEL reading or ppm for any toxic gases (see fifth column under "Consequences"). The total leak rate is also taken into account on the severity.

Severity	Consequences				Probability				
	People	Assets	Environment	Reputation	LEL/Toxic Gas Level	A	B	C	D
	Low	Slight	Moderate	Major	Low	Slight	Moderate	High	
0	No injury or health effect	No Damage	No effect (<0.01 cfm)	No impact	0% LEL and 0ppm Toxics within 0.5 m of source				
1	Slight inhalation/odor risk	Slight wear	Slight effect (0.01 – 0.05 cfm)	Slight impact	0% LEL and 0ppm Toxics within 0.5 m of source				
3	Minor freespillover injury risk or exposure risk	Minor Damage	Minor effect (0.05 – 1.0 cfm)	Minor impact	1-5% LEL and below alarm level Toxics within 0.5 m of source				
4	Moderate freespillover injury risk or exposure risk	Moderate Damage	Moderate Effect (1.0 – 10 cfm)	Moderate impact (regulator involvement)	Cause of LEL of 1-5% and alarm level Toxics in building				
5	Extreme freespillover or toxic exposure fatality risk	Major Damage	Major Effect (>10.0 cfm)	Major impact (regulator enforcement)	Cause of LEL 10% and over and above alarm level Toxics in building				
					<b>LOW RISK</b>	The risk is not serious. It does not require immediate action, but should be periodically revisited to ensure that risks remains acceptably low			
					<b>MODERATE RISK</b>	The risk is moderate. It requires further review of controlled responses to determine the potential for escalation and to ensure risk is within acceptable limits.			
					<b>HIGH RISK</b>	The risk is high. It requires immediate action and prompt review of control and mitigation measures.			