



# Flaring Minimization Policy

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## 1 Overview

### 1.1 Scope

This Policy applies to all portable and fixed location flares owned and operated by Crestwood Equity Partners, LP (Crestwood). Causes and options available to mitigate flaring due to upsets, unplanned events or unanticipated equipment failure, are unique. As a result, standards or procedures to minimize specific events during abnormal operations cannot reasonably be predefined. This Policy describes in general terms the nature and priority of actions to minimize flaring in the event of planned maintenance, an unplanned event, process upset, or equipment failure.

### 1.2 Purpose

Flares are designed, installed, and permitted for specific gas qualities and flow rates; as a result, flares should only be utilized for their intended design and installation purpose. Gas qualities and rates of gas flow should never be routed or rerouted to a flare that was not designed, installed, or intended to flare such gas qualities or rates of flow.

Flaring is also required for employee safety, to meet air pollution control requirements, as well as to ensure correct product specifications when transport equipment change of service occurs; therefore, in specific instances, flaring is critical to Crestwood's operations.

Reducing flaring to ensure emission reductions and sustainability goals is the intent of this Policy. Required emission reductions are not limited to volatile organic compound (VOC) emissions but include emissions of greenhouse gases. Flaring beyond events required for employee safety, product specification in transportation equipment, and air emission reductions, must be evaluated on a case-by-case basis to determine compliance with this Policy, and must be approved by Environmental Services prior to the event unless there is an imminent need to flare in order to protect the safety of equipment or personnel.

Flares are an essential component of safety, providing a means to ensure the safe and efficient combustion of gases that would otherwise be released to the atmosphere.

### 1.3 Governance

#### 1.3.1 Applicability

This Policy applies to all Crestwood companies, subsidiaries, divisions, personnel, and temporary staff who are in a position to operate flares at any site. Deviations of this Policy shall be reported verbally as soon as practicable and reasonable, and

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followed-up with a written notification within three (3) business days. All deviations shall be reported to Environmental Services.

Prior to March 31st of each calendar year, a group comprised of Crestwood Operations, Commercial, Environmental Services, Legal, and ESG shall review any flaring contrary to this Policy, and prepare an annual report summarizing such activity during the preceding calendar year. The Annual Report shall review the reasons/rationale for such flaring and suggest remedies to eliminate similar instances in subsequent years.

### **1.3.2 Document Owner**

This Policy is owned by Environmental Services. Any changes to the Policy must be reviewed in accordance with the Management of Change process. Exceptions to this Policy must be requested from the document owner. The document owner will review the request and determine whether to grant an exception. The exception must be noted in the document for which the exception was granted. Non-conformance with this Policy must be reported to the document owner.

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## 2 Training and Implementation

Crestwood Employees will be made aware of this Policy as applicable through company communications and training.

Training on this Policy will be initiated and provided by Environmental Services and the Corporate Health and Safety training team.

### 2.1 Training Objectives

Training requirements associated with this Policy shall include:

- Purpose of flaring
- Flaring types and permissibility
  - Required flaring
  - Authorized flaring
  - Unauthorized flaring
- Visible emission observations
- Sustainability strategy

### 2.2 Training Frequency


Training will be administered through new hire, face to face, and online methods of training. This training shall be repeated whenever inadequacies are identified in an affected employee's knowledge and as required by the Corporate Training Matrix.

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### 3 Authorized and Unauthorized Flaring

#### 3.1 Authorized Flaring

	<p><b>ATTENTION:</b> The following flaring activities and process streams are allowed by this Policy:</p> <ul style="list-style-type: none"> <li>• Plant personnel shall route pilot gas needed to ensure the flare remains lit</li> <li>• Plant personnel shall route waste gas from process equipment (e.g. tanks, dehydrators, etc.) as required by the air permit to reduce emissions to the environment</li> <li>• Plant personnel shall route truck/rail connect and disconnect emissions to flare when feasible</li> <li>• WHEN the net heating value of the waste gas is below the federal requirements, plant personnel shall route natural gas, when available, to the flare in order to increase the net heating value above the minimum value contained in federal regulations [40 CFR §60.18(c)(3)(ii)] <ul style="list-style-type: none"> <li>○ 300 Btu/scf for steam-assisted or air-assisted flares</li> <li>○ 200 Btu/scf for non-assisted flares</li> </ul> </li> <li>• IF compressor blowdown emissions are controlled by the flare THEN plant personnel shall control blowdown emissions using the flare to reduce greenhouse gas emissions</li> <li>• IF compressor rod packing emissions are controlled by the flare THEN plant personnel shall control compressor rod packing emissions using the flare to reduce greenhouse gas emissions</li> <li>• IF unplanned events, process upsets, or equipment and instrument failures exist THEN plant personnel shall route gas to the flare to the extent possible to reduce emissions of VOCs and greenhouse gases</li> <li>• IF sections of pipeline or transportation vessels (truck/rail) need to be blown down THEN personnel should utilize a portable flare (if feasible) to reduce greenhouse gas emissions</li> <li>• IF personnel or equipment safety are at risk THEN personnel shall route gas to the flare as necessary in order to return to a safe condition</li> <li>• Maintenance flare</li> </ul>
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### 3.2 Unauthorized Flaring

	<p><b>ATTENTION:</b> Flaring under the following scenarios is not allowed by this Policy:</p> <ul style="list-style-type: none"><li>• IF commercial opportunities exist that would financially benefit Crestwood to flare more gas (e.g. negative gas pricing) THEN flaring more gas is not allowed</li><li>• IF zero emission control devices like vapor recover units (VRU) are available, onsite and operable THEN plant personnel shall not flare gas that can be controlled by zero emission control devices</li></ul>
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