

Measurement location	Operator	Contacted authority	Exchange with authority	Statements authority/ consequence
Compressor station Rückersdorf (Thüringen)	Gascade	State office for the environment, mining and nature conservation of Thuringia (Weimar branch office)	<p><b>14.07.</b> DUH letter of complaint to authority</p> <p><b>19.07.</b> reply, information that statement of the responsible immission control authority was requested &amp; announcement of technical supervisory evaluation</p> <p><b>02.08.</b> response with technical supervisory evaluation received</p>	<p><b>Statements</b> <u>According to the operator, there were no reportable incidents/failures on 03.04.<sup>1</sup> that led to gas leakage at the turbine.</u> The operator is a member of OGMP 2.0<sup>2</sup> - with the help of the experience gained through the membership, parts of the Rückersdorf compressor station were investigated in July 2021 - <u>leaking magnetic valves were found through which methane escaped and was visible on the blowout on the roof of the hall.</u> CATF/DUH findings are insofar correct.</p> <p><b>Consequence</b> <u>The operator has committed itself to replace the causally defective components as soon as possible in order to eliminate emissions. The district administration of Greiz will accompany the prompt implementation of the replacement of the valves and include their regular maintenance as well as methane control measurements in its regular monitoring program for the plant.</u> In order to prevent such incidents in the future, the operator has stated that <u>the valves in the maintenance plan will be checked more often from now on</u> - the blowouts on the roof will be checked 6 times a year.</p>
Compressor station Olbernhau (Saxony)	Gascade	Saxon State Office for Environment, Agriculture and Geology	<p><b>14.07.</b> DUH letter of complaint to authority</p> <p><b>10.08.</b> answer, delayed response</p>	<p><b>Statements</b> Responsible is the <b>Saxony State Directorate</b> - case has been transmitted to them for processing and clarification of further procedure. We will receive message after successful examination. Direct contact</p>

<sup>1</sup> Day of measurement

<sup>2</sup> Oil and Gas Methane Partnership – industry initiative to reduce methane emissions, <https://www.ogmpartnership.com/>

			<p>announced due to vacation and necessary clarification of jurisdiction. Case forwarded to responsible authority.</p> <p><b>13.10.</b> Request with authority. Answer: Draft response available &amp; currently being coordinated</p> <p><b>14.10.</b> Receipt of <b>response letter</b> from authority</p>	<p>is possible via head of department Achim Bobeth, Tel.: 0351 825 4400 achim.bobeth@lds.achsen.de.</p> <p><b>Response letter (14.10.)</b> The authority requested a statement from the operator Gascade due to the DUH letter. <u>According to the statement, the compressor station was running normally at the time of the recordings without any noticeable reportable incidents or malfunctions.</u> The leakages were not recognizable for operators at that time. <u>Gascade conducted an inspection of the plant in July, which revealed irregularities with "minor methane leaks at the pig trap (long-distance natural gas pipeline) and the blowout system."</u> These plant components were attributable to the emission sources identified by DUH, according to the document. <u>The blowout system is part of the "immission control permit" for which a limit value was set in the permit for, among other things, "organic substances" specified as "total carbon".</u> The pig trap, on the other hand, is part of the pipeline system &amp; thus not subject to the plant's immission control permit. According to the operator, safe operation was not impaired; the authority shares this opinion based on the current state of knowledge. <u>The disturbance of the "intended operation" was not a reportable event, since the "compressor station is not subject to the Major Accidents Ordinance (12th BImSchV<sup>3</sup>)".</u></p> <p><b>Consequence</b> <u>The defective components responsible for emissions have been identified &amp; will be repaired/replaced by the operator by the beginning of the 4th quarter of</u></p>
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<sup>3</sup> Federal Immission Control Act

				<p>2021. The State Directorate will then promptly make sure that all defects that led to methane leakage have been rectified via an on-site visit. <u>"Should the operator fail to comply with its voluntary commitment in due time, the Saxony State Directorate reserves the right to take administrative steps to enforce the elimination of defects."</u></p>
<p>Various measuring points in Lower Saxony</p>		<p>Lower Saxony Ministry for the Environment, Energy, Building and Climate Protection</p>	<p><b>16.07.</b> DUH letter of complaint to authority <b>11.08.</b> reply from responsible authority, letter was forwarded to them. <b>22.09.</b> reply letter of the ministry from responsible employee</p>	<p><b>Statements</b> The <b>Lower Saxony Ministry of Economics, Labor, Transport and Digitalization (MW), Department 31 - Raw Materials, Energy Issues of the Economy, Major Industrial Projects</b>, is responsible. The LBEG<sup>4</sup>, which is subordinate to the MW and the responsible licensing and supervisory authority for mining operations, has been asked to comment on our letter. As soon as this statement is available, we will receive further information from Department 31 (contact person: Behrens, <u>referat-31@mw.niedersachsen.de</u>)</p> <p>Responsible employee answered after coordination with LBEG (22.09.). It is pointed out that methane emissions from the oil and gas industry have been decreasing for years according to BVEG<sup>5</sup>. <u>According to LBEG, recordings made by CATF and forwarded to the ministry are "neither leakages nor fugitive emissions", as the emissions are "in all cases part of the approved working process".</u> In these processes, it is continued, <u>"methane is not separately recorded, so there are no limits either."</u> Flares, for example, generally have to</p>

<sup>4</sup> State Office for mining, energy and geology, <https://www.lbeg.niedersachsen.de/startseite/>

<sup>5</sup> Federal association of natural gas, crude oil and geoenergy e.V., <https://www.bveg.de/>

				<p>burn a high percentage of the substances supplied, which results in a limit value. As long as these values for the emissions are complied with or the release into the atmosphere, including methane, is part of this approved work process, there is no administrative offense.</p> <p>However, the statement continues, LBEG is planning a program from 2022 to 2029 for representative monitoring of emissions generated at natural gas and oil production sites, including the location and capture of methane. In addition, the industry has also launched a nationwide survey program in 2020 to further improve the detection of immissions at residential sites located a short distance from natural gas production facilities.</p>
Mallnow compressor station (Brandenburg)	Gascade	Brandenburg State Office for the Environment (LfU)	<p><b>08.06.</b> DUH letter of complaint to authority</p> <p><b>15.06.</b> Response from LfU, sending of approval notices for the plant, office is currently in contact with Gascade regarding the leak.</p> <p><b>18.06.</b> DUH response to LfU: Inquiry regarding the question of whether Gascade informed the authority about the leak. No direct answer received to this.</p>	<p><b>Classification</b> Through the reporting of DIE ZEIT it was possible to find out that the LfU Brandenburg did not know about this leak, but was only made aware of it through the inquiry of DUH and the reporting of DIE ZEIT.</p> <p><b>Statements</b> According to Gascade, the leak does not represent a malfunction, as the escaping quantity is far below the EU limit value. <u>According to LfU, there are no explicit reporting requirements for operators of gas compressor stations</u> (<b>Note by DUH:</b> in the opinion of DUH, the permit documents clearly state an obligation to report so-called "damage to the environment". However, due to the current practice, leaks like the one in Mallnow are not reported, or not even discovered. The consequence is that they cannot end up in the national inventory either).</p>

				<p>The last control inspection by the LfU took place in November 2020 (<b>note by DUH:</b> also in November, a leak at the compressor station was measured for the first time by DUH and CATF). No leak was found during the inspection. <u>According to LfU, no obligation of the authority to search for leaks results from the applicable immission control regulations and laws.</u> The regular inspections include, among other things, the inspection of the plant regarding its technically approved condition and the evaluation of reports.</p> <p><b>Consequences</b></p> <p>According to reports, the gas supply in Mallnow was stopped from 5<sup>th</sup> to 9<sup>th</sup> of July in order to carry out necessary repairs. This should have eliminated the leak, which had been present since at least November 2020. The gas leak was said to be due, among other things, to a <u>defect in a main fitting</u>, and localization and repair were complex. <u>The leakage was estimated at approximately 10 m<sup>3</sup> of natural gas per hour.</u> Repair of the defect and testing by Gascade and by external service provider. In view of the prolonged leak, <u>the testing cycles were adjusted</u> - previously, testing was only carried out 1 once a year.</p>
Compressor station Waidhaus (Bavaria)	Open Grid Europe GmbH / Megal <sup>6</sup>	Bavarian State Office for the Environment (LfU)	<p><b>14.07.</b> DUH letter of complaint to authority</p> <p><b>16.07.</b> Response from LfU: Name of responsible authorities. Authorities were asked to reply to us in each case</p>	<p><b>Statements</b></p> <p>The <b>district office of “Neustadt an der Waldnaab”</b> is responsible for compressor stations in Waidhaus. According to the mail of 23.07., the authority is in the process of initiating further investigations and measures regarding the described facts in consultation with the LfU Bavaria - we will be</p>

<sup>6</sup> Note DUH: Megal is a joint venture of Open Grid Europe GmbH and GRTgaz Deutschland GmbH - several stations are located at the same site in Waidhaus

			<p><b>23.07.</b> response from competent authority, please be patient</p> <p><b>13.10.</b> Inquiry DUH to authority</p> <p><b>14.10.</b> Response Authority - Response to inquiry is currently being coordinated and will arrive by 20.10.</p> <p><b>20.10.</b> Reception of final response from the authority</p>	<p>informed about the results without further inquiry, until then please be patient.</p> <p><b>Consequence</b> According to the authority's reply of 20.10., the operator (OGE/Megal), in consultation with the authority, initiated the following measure in response to the measurement:</p> <ol style="list-style-type: none"> <li>1. Inspection at Megal compressor station revealed leaks, affected parts were partially repaired. In addition, "tight-sealing plug-in washers" were installed to prevent future leaks at this location. Some leaks can only be repaired when the entire compressor station is shut down - this is expected to happen before the end of October 2021. After that, a new inspection will be carried out using the company's own infrared camera.</li> <li>2. No gas emissions could be detected at the OGE compressor station site via infrared camera at the time of the inspection.</li> <li>3. <u>OGE and MEGAL have taken the incidents as an opportunity to intensify leakage checks in the future.</u> Up to now, inspections were carried out once a year using an infrared camera; from now on, quarterly inspections will be carried out. The inspection by infrared camera will be recorded in the course of the maintenance and repair documentation.</li> </ol>
Compressor station Rothenstadt (Bavaria)	Open Grid Europe GmbH / Megal <sup>7</sup>	Bavarian State Office for the Environment (LfU)	<p><b>14.07.</b> DUH letter of complaint to authority</p>	<p><b>Statements</b> The <b>city of Weiden</b> respectively <b>city's environmental department</b> is responsible for the Rothenstadt</p>

			<p><b>16.07.</b> Response from LfU: Name of responsible authorities. Authorities were asked to reply to us in each case</p> <p><b>20.07.</b> Answer from the responsible environmental office of the city of Weiden</p> <p><b>16.08.</b> E-mail from DUH to responsible employee, reference to link to video recording in letter of complaint.</p> <p><b>14.10.</b> Inquiry by mail, as not reached by phone &amp; subsequent call back made &amp; information given by phone.</p> <p><b>25.10.</b> Further mail from the city: announcement of a detailed statement</p> <p><b>29.10.</b> Detailed statement received</p>	<p>compressor station. According to the letter of 16.07., the facts of the case are being "examined in detail by the supervisory authorities". The environmental engineer of the city has checked the site for a first overview on 19.07. Please provide further material, if available. All necessary steps including if necessary criminal and regulatory, will be initiated. LfU and government of the Upper Palatinate both receive a copy of the letter.</p> <p>E-mail sent by DUH with link to video recording in addition to letter of complaint on 16.08.</p> <p>After written inquiry 14.10., a call from the responsible office was received: Information given that <u>no immission control problems could be found on site by the environmental engineer</u>. The operator had also informed them that the <u>plant had not been in operation on the day</u> of the investigation by the CATF (<b>note by DUH:</b> Even without the plant being in operation, natural gas can escape from the pipeline system trough it. Date, time and localization data of the recording are automatically reproduced on the display of the FLIR camera used). The plant is subject to the Industrial Emissions Directive. More detailed information is not possible, among other reasons, because the authority is legally limited in disclosing the communication between itself and the operator. <b>Supplementary statements from detailed statement (29.10.)</b></p> <p>Video call with LfU, operator Megal and city of Weiden took place on 25.10., site inspection already on 19.07. (5 days after complaint letter of DUH). Visual material submitted by DUH <u>has "actually shown</u></p>
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a gas leakage, which was immediately repaired after detection by OGE".

The operator OGE informed the city of Weiden in a detailed statement on 28.10. "essentially" as follows:

- Documented emissions were checked with infrared camera, gas emission was detected at one blowout train, which was due to internal leakage at one of the 18 safety valve groups. This natural gas emission was immediately shut off.

**Consequence**

- OGE used the incident as an opportunity to intensify leak testing of station blowouts  
 → From now on, quarterly checks will be carried out at the Rothenstadt site. Checking takes place by means of infrared camera
- Note that inspection of the compressor station is carried out in accordance with legal requirements, permit notices & technical regulations. At the Rothenstadt site, several emission reduction measures were also carried out as part of the new construction in 2017/2018, including the installation of 2 flare systems for the combustion of methane gases & double shut-off valves.

City of Weiden: From the point of view of the city as a licensing and monitoring authority, there is "agreement" with the measures already implemented and those proposed for the future. Diffuse gas leakages detected during self-monitoring are reported to the authority "without delay" and recorded in the

				annual emission report according to BImSchG <sup>8</sup> , which is submitted to the city on a regular basis. <u>"The issue and monitoring of gas leaks will also be increasingly addressed in the future as part of the official environmental inspections."</u>
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<sup>8</sup> Federal Immission Control Act