

Response to Comments UT NTL 2007-1

The Utah State Office received one comment on draft NTL 2007-1.

Comment 1.

- The comment objected to requirement 15(a) which requires differential and static pressure transducers to operate in the outer 2/3 of their calibrated spans for the majority of the flowing period, if the meter measures more than 100 Mcf/day on a monthly basis. The commenter stated that transducers have become increasingly accurate and cited an example where a differential pressure transducer with an 800" span can operate at 20" of differential pressure, while still providing an overall measurement uncertainty of $\pm 1\%$.

It is important to note that requirement 15 has two parts; part (a) which is summarized above, and part (b) which requires an overall measurement uncertainty of $\pm 3\%$. Requirement 15 states that the least restrictive of either part (a) or part (b) will be enforced. For the vast majority of Electronic Flow Computers (EFCs), part (b) will be the least restrictive and, therefore, is the requirement that will be enforced. Many of the newer and more accurate flow computers can operate below 5% of their calibrated span and still meet the $\pm 3\%$ overall measurement uncertainty requirement. If BLM determined that the flow computer given in the example used by the commenter could meet or exceed a $\pm 3\%$ overall measurement uncertainty, then it would be in compliance with requirement 15.

Requirement 15(a) was included to ensure that in no circumstance would EFCs be held to a higher standard than chart recorders. No changes to the draft NTL were made as a result of this comment.