

July 31, 2018

Comments on NCWM S&T Items Block 1
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1. Changing all the references to master meters, transfer standards, reference vehicles, etc., are not editorial changes. There are many of these master meters and transfer standards currently recognized in H44 that will not meet the one-third requirement of the Fundamental Considerations. Consequently, many of these transfer standards will be prohibited from use if these changes are made.
2. How long must field standards remain accurate, repeatable and stable, to qualify as field standards? Over which ranges of environmental and operational parameters must metering systems proposed as field standards meet the one-third requirement? Which tests must be conducted and data submitted to demonstrate the metering systems meet the one-third requirement for field standards? **Answers to these questions are critical before any action on these proposals can be considered.**
3. The proposals in S&T items Blocks 1 and 2 conflict with each other. No action should be taken on either of these items until all of the issues related for field standards and transfer standards are resolved.
4. The proposed definition for field standard allows for accepting proposed field standards based on “other suitable and designated standards.” How will industry and regulators know if the “other suitable and designated standards” have tested the meters to the one-third requirement of the Fundamental Considerations? How will anyone know which tests have been conducted to determine the performance characteristics of the metering systems? How will anyone know the ranges of environmental and operational characteristics over which the meters have been tested?