Gas Gathering Pipelines

Docket No. PHMSA-2011-0023 RIN: 2137-AF38 86 FR 63296, Nov. 15, 2021 (referred to as RIN-3)

US DOT PHMSA
Office of Pipeline Safety





Highlights of New Requirements

- Annual and incident reporting for all gas gathering lines, including previously unregulated lines
- Documentation of beginning and ending points of all gathering lines.
- Newly designated "Type C" and "Type R" gathering lines
 - **Type C** Previously-unregulated gathering pipelines subject to safety standards in part 192 and reporting requirements in part 191
 - **Type R** All other onshore gathering lines in Class 1 and 2 locations subject to reporting requirements in part 191.
- "Incidental Gathering" line exception limited to lines 10 miles or less from the furthermost downstream endpoint of gathering for newly constructed lines or otherwise changed after May 16, 2022.



PHMSA Numbers for Gathering

All Type A, Type B and Type C

		INTERSTATE				INTRASTATE				Time A Time	Tuna D	an D. Turne C	Offelsone		Oneveter				
Calendar Year	$\triangle \Psi$	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
	2022	89.22	39.85	2,016.84	4,989.41	7,135.32	4:	8,094.44	4,630.30	91,704.20	516.94	104,945.87	497	8,183.65	4,670.15	93,721.03	5,506.35	112,081.19	527
	2021	119.42	49.30	0.00	5,227.56	5,396.27	36	8,125.95	3,069.10	0.00	550.87	11,745.91	357	8,245.37	3,118.39	0.00	5,778.42	17,142.19	382
	2020	131.01	73.08	0.00	5,394.58	5,598.67	38	8,279.30	3,100.34	0.00	555.95	11,935.59	368	8,410.31	3,173.42	0.00	5,950.53	17,534.26	396
	2019	135.06	69.01	0.00	5,221.11	5,425.17	38	8,510.48	3,210.49	0.00	621.14	12,342.12	369	8,645.54	3,279.50	0.00	5,842.25	17,767.29	398
	2018	149.05	61.72	0.00	5,589.21	5,799.98	35	8,296.81	3,206.68	0.00	612.64	12,116.13	363	8,445.86	3,268.40	0.00	6,201.86	17,916.11	388
	2017	172.93	84.62	0.00	5,585.99	5,843.54	36	8,436.95	3,159.45	0.00	657.49	12,253.88	344	8,609.88	3,244.06	0.00	6,243.48	18,097.42	372
	2016	182.37	69.16	0.00	5,662.46	5,913.99	40	8,073.05	3,192.95	0.00	682.96	11,948.96	346	8,255.43	3,262.10	0.00	6,345.41	17,862.94	375
	2015	155.45	92.00	0.00	5,271.97	5,519.43	38	8,134.51	3,238.22	0.00	890.54	12,263.26	351	8,289.96	3,330.22	0.00	6,162.51	17,782.69	377
	2014	200.27	73.97	0.00	5,090.61	5,364.85	39	7,645.09	3,522.12	0.00	998.10	12,165.30	343	7,845.35	3,596.09	0.00	6,088.71	17,530.16	369
	2013	222.48	129.57	0.00	5,147.25	5,499.30	42	7,403.25	3,541.28	0.00	933.22	11,877.75	330	7,625.74	3,670.85	0.00	6,080.47	17,377.05	360
	2012	180.46	88.73	0.00	4,899.33	5,168.52	38	6,771.96	3,544.37	0.00	1,047.32	11,363.65	320	6,952.42	3,633.10	0.00	5,946.65	16,532.17	346
	2011	329.22	285.06	0.00	5,180.75	5,795.03	36	7,441.34	4,847.61	0.00	1,193.07	13,482.02	313	7,770.56	5,132.67	0.00	6,373.82	19,277.05	338
	2010	703.33	303.36	0.00	5,512.07	6,518.76	35	6,879.27	5,070.04	0.00	1,182.29	13,131.59	302	7,582.60	5,373.40	0.00	6,694.36	19,650.35	324

All Type R



2023 Annual Report Data - https://www.phmsa.dot.gov/technical-resources/pipeline/gas-gathering/gas-gathering-performance-metrics



Mileage of Gas Gathering Reported Data from 2023 Annual Reports.

State Name	Type A (miles)	Type B (miles)	Type C (miles)	Offshore (miles)	Type R miles (miles)	Total Miles
Texas	4,696	1,182	39,283	372	96,101	~141,634
Oklahoma	267	712	16,581	0	56,000	~73,560
New Mexico	241	96	7,482	0	21,809	~29,628
Wyoming	30	0.1	5,255	0	8,593	~13,878
North Dakota	12	19	2,467	0	9,486	~11,984
Colorado	543	82	4,161	0	7,088	~11,874
Kansas	18	18	1,514	0	11,801	~11,801
Louisiana	509	26	5,278	279	4,511	~10,603
Pennsylvania	570	291	3,786	0	4,663	~9,320
West Virginia	211	198	2,498	0	3,508	~6,037
Ohio	422	1,740	1,939	0	1,817	~5,918
Arkansas	116	28	780	0	4,233	~5,157
Total ALL	~7,519	~4,392	~91,024	~651	~229,610	~333,196





Corrections to Final Rule

Technical Correction issued May 4, 2022, provided for response to Petition and corrections 87 FR 26296

- Petition Response
- Changes to SRCR reporting requirements,
- Determination of Type C (MAOP alternative), and
- Issued an Enforcement Discretion on Incidental Gathering

Technical Correction issued June 13, 2022, to correct an inadvertent error that removed offshore gathering from reporting 87 FR 35675

- §191.15 "Each operator of a transmission, offshore gathering, or a regulated onshore gathering pipeline system ..."
- §191.17 "Each operator of a transmission, offshore gathering, or regulated onshore gathering pipeline system ..."



Compliance Dates

- Final Rule Effective Date: May 16, 2022.
- Reporting
 - Incident Reports: Report events occurring after May 16,
 2022.
 - Annual Reports: 2022 reports due March 15, 2023.
- Identify all gathering lines: November 16, 2022.
- §192.9 compliance: **May 16, 2023.**
- §192.9 compliance for lines that become Type C **after** May 16, 2022: **1 year from date they become Type C lines.**
- MAOP lookback: 5-year period ending May 16, 2023.
- Federal enforcement discretion
 - Incidental gathering lines: constructed after May 16, 2022.
 - Part 192 requirements for pipelines ≤12.75": May 17, 2024.







Compliance Dates

§192.9(g) Compliance deadlines. An operator of a regulated onshore gathering line must comply with the following deadlines, as applicable.

(1) An operator of a new, replaced, relocated, or otherwise changed line **must** be in compliance with the applicable requirements of this section by the date the line goes into service, unless an exception in §192.13 applies.

This means there may be lines that **must** be in compliance with the applicable requirements prior to the May 16, 2023 date due to the construction activity occurring after May 16, 2022.



COMPLIANCE DEADLINES

§192.9(g) Compliance deadlines. An operator of a regulated onshore gathering line must comply with the following deadlines, as applicable.

- (3) If, after April 14, 2006, a change in class location or increase in dwelling density causes an onshore gathering pipeline to become a Type A or Type B regulated onshore gathering line, the operator has 1 year for Type B lines and 2 years for Type A lines after the pipeline becomes a regulated onshore gathering pipeline to comply with this section.
- (4) If a Type C gathering pipeline existing on or before May 16, 2022, was not previously subject to this part, an operator must comply with the applicable requirements of this section, except for paragraph (h) of this section, on or before:
- (i) May 16, 2023; or
- (ii) An alternative deadline approved by PHMSA. The operator must notify PHMSA and *State* or local pipeline safety authorities, as applicable, no later than 90 days in advance of the deadline in paragraph (b)(1) of this section. The notification must be made in accordance with §192.18 and must include a description of the affected facilities and operating environment, the proposed alternative deadline for each affected requirement, the justification for each alternative compliance deadline, and actions the operator will take to ensure the safety of affected facilities.





Stakeholder Litigation – GPA/API

NOTABLE COURT DECISION

<u>GPA Midstream & American Petroleum Institute v. U.S. DOT PHMSA</u> – Petitioned Valve rule's applicability to Gathering lines.

Decision May 16, 2023 – Vacate rule in its entirety as it applies to gathering pipeline facilities!! <u>2020-01459.pdf</u> (govinfo.gov)

Amendment 192.130 (valve rule) Affected the following 192 code sections:

- §192.3: Definitions entirely replaced, notification of potential rupture, rupture mitigation valve.
- §192.179(e), (f), (g) and (h): Transmission line valves.
- §192.610: Change in class location: Change in valve spacing.
- §192.615(a)(2), (a)(6), (a)(8), (a)(11), (a)(12) and (c): Emergency plans.
- §192.617: Investigation of failures and incidents.
- §192.634: Transmission lines: Onshore valve shut-off for rupture mitigation.
- §192.635: Notification of potential rupture.
- §192.636: Transmission lines: Response to rupture; capabilities of RMV or alternative equivalent tech.
- §192.745: Valve maintenance: Transmission lines.
- §192.935: What additional preventative and mitigative measures must an operator take?



A Gathering line in a Class 2, 3, or 4 Location and Any of the following:

- Metallic & MAOP produces Hoop Stress of ≥20% SMYS.
- Unknown stress.
- Non-Metallic & MAOP is >125 psig.



§192.9(c) states Type A gathering lines **MUST** comply with the with the requirements of this part applicable to transmission lines with specific exceptions.

Exceptions to compliance include:

- MAOP reconfirmation
- Pigging requirements
- Subpart O
- New Valve rule regulations

- Management of Change
- MCA
- Select corrosion requirements

§192.615 – must follow language as effective October 4, 2022.





TYPE B GAS GATHERING

A Gathering line in a Class 2, 3, or 4 Location and Any of the following:

- Metallic & MAOP produces Hoop Stress <20% of SMYS.
- Non-Metallic & MAOP is <125 psig.



§192.9(d) Type B regulated onshore gathering line must comply with the following requirements:

- 1) If new, replaced, relocated, or otherwise changed, must meet design, installation, construction, initial inspection, and initial testing requirements applicable to transmission lines.
- 2) If the pipeline is metallic, control corrosion per subpart I.
- 3) If the pipeline contains plastic pipe or components, the operator must comply with all applicable requirements of this part for plastic pipe components.
- 4) Damage prevention program under §192.614.
- 5) Public education program under §192.616.
- 6) Establish the MAOP of the line under §192.619(a), (b), and (c).
- 7) Install and maintain line markers per §192.707.
- 8) Conduct leakage surveys in accordance with §192.706 using leak detection equipment and promptly repair hazardous leaks per §192.703(c).



TYPE C GAS GATHERING & Requirements

A Gathering line in a Class 1 location with outside diameter ≥8.625" and any of the following:

- Metallic and MAOP produces a hoop stress of ≥20% SMYS.
- Metallic and unknown stress level, MAOP >125 psig.
- Non-metallic and MAOP >125 psig.

Calculate MAOP consistent with §192.619(a) or (c)(1) or use highest operating pressure during preceding 5 operating years.





Type C gathering ≥ 8.625" must follow "all" reporting requirements of Part 191.

§191.5 Immediate Notice of Certain Incidents:

- Initial incident notification
- 48-hour update

§191.7 Report Submission through portal unless alternative method approved.

§191.15(a)(2) Incident report: 30 days after incident.

§191.17(a)(2) Annual report: No later than March 15 PHMSA F 7100.2-1.

§191.22 National Registry of Operators:

- Obtain OPID.
- Report certain changes as required by §191.22(c).
- §191.23 Reporting safety-related conditions: SRC reports not required for lines ≤12.75" or exempted out by §192.9(f)(1).
- §191.29 National Pipeline Mapping System: All Gas Gathering Pipelines exempt.





CRITERIA	TYPE C REQUIREMENTS (CUMULATIVE)					
Diameter ≥8.625 inches.	 Damage prevention §192.614. Emergency plans §192.615. New/Replaced – Design, installation, construction, inspection, and testing requirements (allowance for composite pipe). 					
Diameter ≥8.625 inches through 12.75 inches with a PIR/Class exception.	 The above and: Public awareness §192.616. Line markers §192.707. Corrosion control (subpart I). Leakage surveys §192.706. 					
Diameter >12.75 inches through 16 inches with a PIR/Class exception, or diameter >16 inches.	 All the above and: Plastic pipe requirements. Establish maximum allowable operating pressure MAOP §192.619. 					







Summary of Type C Requirements

Additional Criteria Method 1 or Method 2	≥8.625" to 12.75"	>12.75" to 16"	>16"
NO building intended for human occupancy or other impacted site. See §192.9(f)(3).	Reporting and OPID §191 Design, Construction, Initial inspection and Testing for new lines §192 Subparts B – G and J Damage Prevention §192.614 Emergency Plans §192.615	Reporting and OPID §191 Design, Construction, Initial inspection and Testing for new lines §192 Subparts B – G and J Damage Prevention §192.614 Emergency Plans §192.615	Reporting and OPID §191 Design, Construction, Initial inspection and Testing for new lines §192 Subparts B – G and J Damage Prevention §192.614 Emergency Plans §192.615
Building intended for human occupancy or other impacted site. See §192.9(f)(3)	Reporting and OPID §191 Design, Construction, Initial inspection and Testing for new lines §192 Subparts B – G and J Damage Prevention §192.614 Emergency Plans §192.615 + Corrosion Control §192 Subpart I + Line Markers §192.707 + Public Awareness §192.616 + Leakage Survey and Leak Repair §§192.706 and 192.703(c)	Reporting and OPID §191 Design, Construction, Initial inspection and Testing for new lines §192 Subparts B – G and J Damage Prevention §192.614 Emergency Plans §192.615 + Corrosion Control §192 Subpart I + Line Markers §192.707 + Public Awareness §192.616 + Leakage Survey and Leak Repair §§192.706 and 192.703(c) + Plastic Pipe and Components §192 Subpart B, C, D + MAOP §192.619	Corrosion Control §192 Subpart I Line Markers §192.707 Public Awareness §192.616 Leakage Survey and Leak Repair §§192.706 and 192.703(c) Plastic Pipe and Components §192 Subpart B, C, D MAOP §192.619





What does "building intended for human occupancy or other impacted site" mean?

- Any building that may be occupied by humans, including homes, office buildings factories, outside recreation areas, plant facilities, etc.;
- A small, well-defined outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period (the days and weeks need not be consecutive); or
- Any portion of the paved surface, including shoulders, of a designated interstate, other freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes.

It is not the same as an "identified site" under IM in 192.903





§192.9(f) Exceptions:

- (1) Compliance with paragraphs (e)(1)(ii) Corrosion, (v) Public awareness, (vi) Line markers, and (vii) Leakage surveys and leak repairs, and (e)(2)(i) and (ii) of this section is not required for pipeline segments that are 16 inches or less in outside diameter if one of the following criteria are met:
 - (i) Method 1.
 - (ii) Method 2.
- (2) Paragraph (e)(1)(i) (the design, installation, construction, initial inspection and initial testing requirements) of this section is not applicable to pipeline segments 40 feet or shorter in length that are replaced, relocated, or changed on a pipeline existing on or before May 16, 2022.





TYPE C GATHERING – EXEMPTION CRITERIA, METHOD 1

The segment is not located within a potential impact circle containing a building intended for human occupancy or other impacted site. The potential impact circle must be calculated as specified in §192.903, except that a factor of 0.73 must be used instead of 0.69. The MAOP used in this calculation must be determined and documented in accordance with paragraph (e)(2)(ii) of this section.

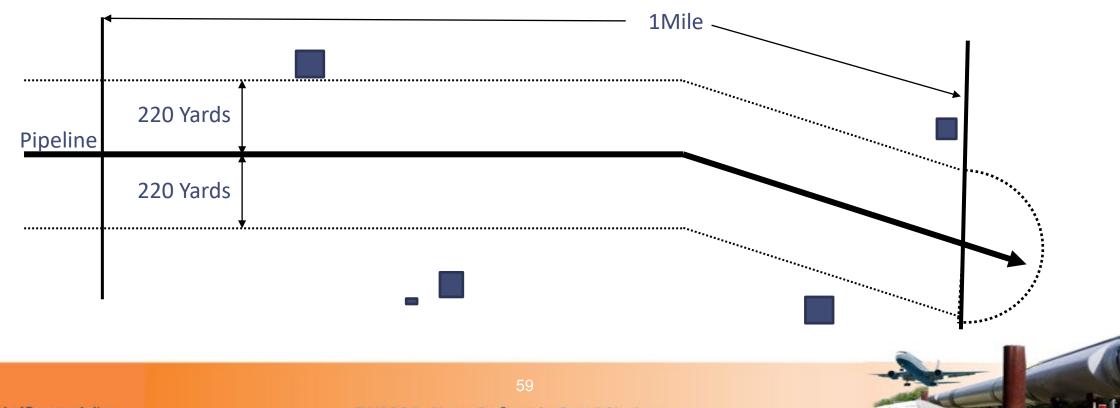
$$PIR = 0.73 * \sqrt{MAOP * d^2}$$

Note: §192.9(e)(2)(ii) requires the establishment of MAOP of the pipeline under §192.619(a) or (c) and maintain records used to establish the MAOP for the life of the pipeline.

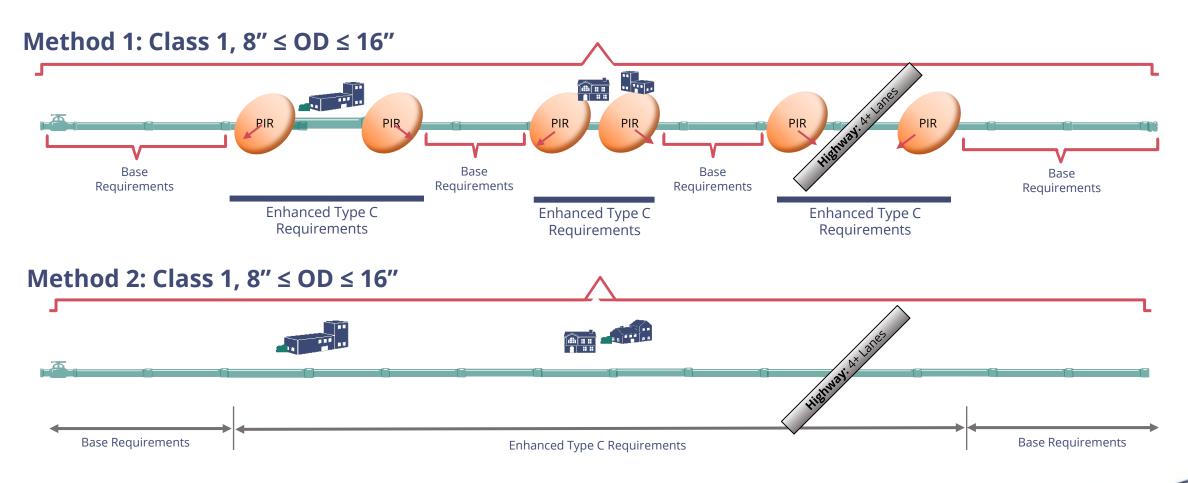
Safety Administration

TYPE C GATHERING – METHOD 2 MAOP REQUIREMENTS

Method 2: The segment is not located within a class location unit (see §192.5) containing a building intended for human occupancy or other impacted site.



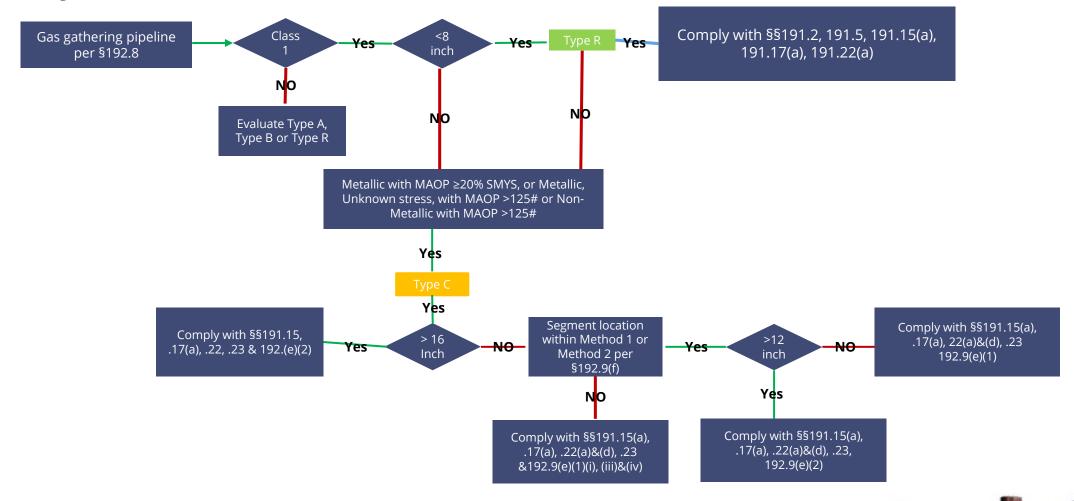
TYPE C GATHERING – METHOD 1 & 2 COMPARISON





SAFETY OF GAS GATHERING LINES

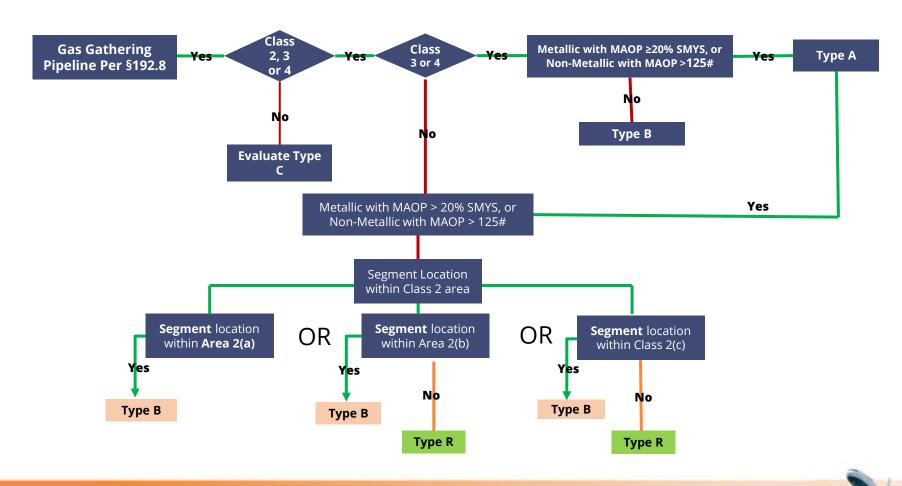
Regulatory Flow Chart for Class 1 Locations





SAFETY OF GAS GATHERING LINES

Regulatory Flow Chart for Class 2, 3, & 4 Locations





TYPE C GATHERING - ADDITIONAL GUIDANCE

Type C lines must have:

- Corrosion control no written procedures, but required to maintain records as required by §192.491.
- Written damage prevention program state one call guidelines may also apply.
- Written public awareness program.
- Written emergency plan (pre-valve rule).
- If >12 ", establish MAOP §192.619 (a) or (c) can use highest pressure prior to date became regulated.
- Fix hazardous leaks when found.



COMPRESSOR STATION ON GATHERING Class 1 area

§192.8(b): Each operator must determine and maintain for the life of the pipeline records documenting the methodology by which it calculated the beginning and end points of each onshore gathering pipeline it operates, as described in the second column of table 1 to paragraph (c)(2) of this section. Table 1 refers to the outside diameter ≥8.625 and any of the following, metallic and > 20% SMYS, unknown level of SMYS and MAOP is >125 psig, therefore the pipe within the compressor stations must be considered when determining the type of gathering the compressors are and what codes they must follow.

Inlet size and % SMYS of the pipe on/in compressor stations determine the gathering type §192.8(b) in Class 1 areas:

Type R gathering line Type R Compressor — 10" Discharge Header / Type C Type C gathering line Type R Compressor — 10" Discharge Header / Type C

Note: This is for the Compressor skids, after skid mounted scrubber, through the outlet, or point downstream where piping or SMYS meet the requirements for different classification.

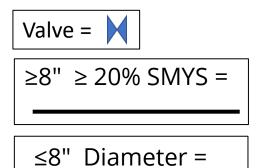


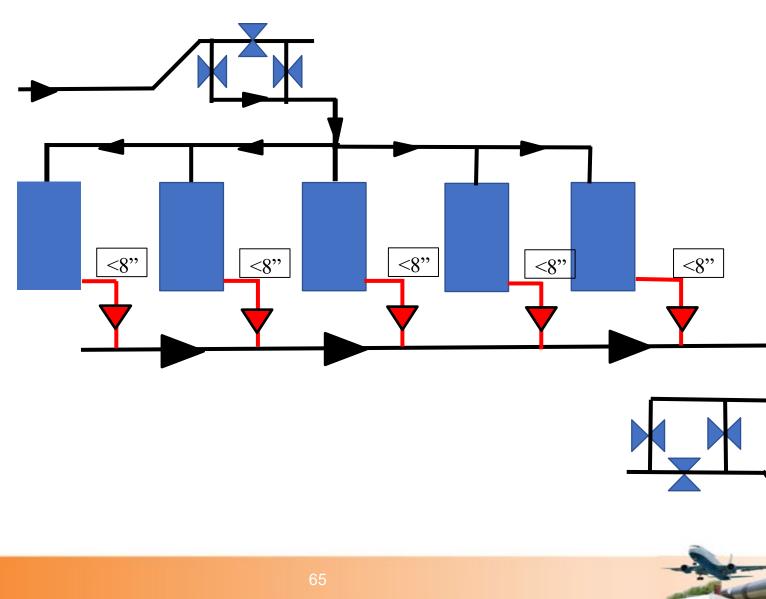




COMPRESSOR STATION ON GATHERING Class 1 area

EXAMPLE

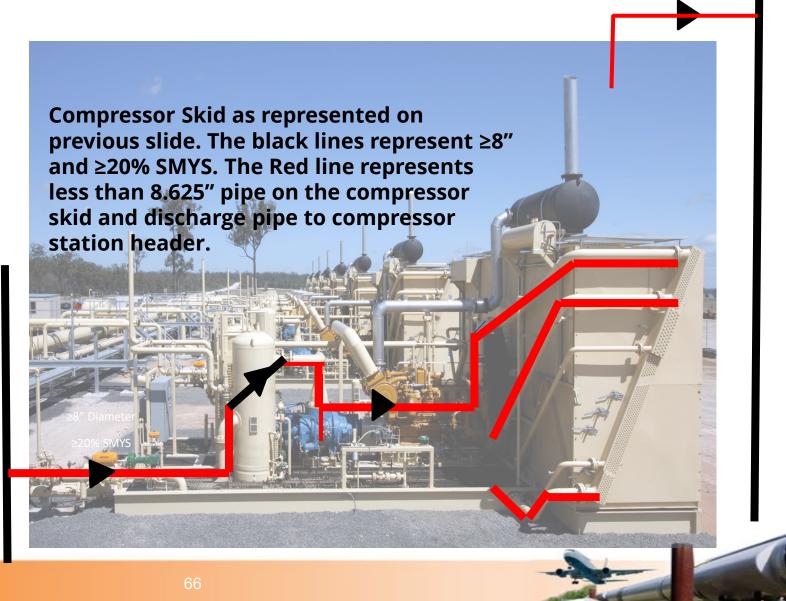






COMPRESSOR STATION ON GATHERING Class 1 area

All piping after the inlet scrubber is <8" through discharge piping at the header tie-in.



TYPE R GAS GATHERING

"All other onshore gathering lines"

- Class 1:
 - < 8" diameter, NO pressure limitations.
 - ≥ 8" With a MAOP <125 psig, or hoop stress < 20% SMYS.
 - Not required to calculate MAOP, can use highest operating pressure.
- Class 2:
 - Location outside of Type B Area 2 (b) or (c) limits.
- Gathering on a vacuum





Type R gathering must:

§191.5 Immediate Notice of Certain Incidents:

- Initial Incidents notification.
- 48-hour update.

§191.7 Report Submission through portal unless alternative method approved.

§191.15(a)(2) Incident report: 30 days after incident.

§191.17(a)(2) Annual report: No later than March 15 PHMSA F 7100.2-3.

§191.22 National Registry of Operators:

- Obtain OPID.
- Exempt from §191.22(b) and (c).

§191.23 Reporting safety-related conditions: Exempted in §191.1(c) and §191.23(b)(1).

§191.29 National Pipeline Mapping System: Exempt – All Gas Gathering Pipelines §191.29(c)





Frequently Asked Questions

General Topics

- What is a gathering line?
- Who regulates gathering pipelines?
- o Are all gas gathering lines regulated?

https://www.phmsa.dot.gov/faqs/gathering-pipelines-faqs

Gathering Pipelines FAQs

On November 11, 2021, the Pipeline and Hazardous Materials Safety Administration issued a second major rulemaking on the safety of gas gathering pipelines (86 FR 63266). In association with this rulemaking, PHMSA has developed new guidance covering the requirements for the new classifications of onshore gathering lines introduced by the final rule: Type C regulated gathering lines and Type R gathering lines subject to reporting only.

This new guidance and the prior guidance covering requirements for offshore, Type A, and Type B gathering lines are linked below.

- Onshore Gas Gathering FAQs for Type A and B Pipelines
- Onshore Gas Gathering FAQs for Type C and R

Frequently Asked Questions

- Frequently Asked Questions Posted May 8, 2023
- Major Topics
 - o General
 - Regulatory requirements
 - Design Requirements
 - O&M Manuals
 - o Recordkeeping
 - Required Tasks
 - Compressor Stations
 - Operator Qualification
- Posted on the Pipeline Technical Resources Gas Gathering website

https://www.phmsa.dot.gov/technical-resources/pipeline/gas-gathering/gas-gathering-regulatory-overview





Frequently Asked Questions

• O&M Manual Requirements Topics

- o Am I required to have an O&M manual under § 192.605 for my Type B and C gathering line?
 - No, there is no explicit regulatory requirement for operators of Type B or C gathering lines to have § 192.605-compliant O&M manuals. Nevertheless, operators of all regulated gas gathering lines, including Types B and C gathering lines, are required to follow their state requirements.

Note: the LDAR NPRM have proposed the requirement to "Prepare, update, and follow a manual of written procedures for conducting operations, maintenance, and emergency response in accordance with § 192.605", as applicable in 192.9.



ADDITIONAL QUESTIONS





Safety Administration

Documentation of Gathering Classification

Does § 192.8(b) require that documentation includes the determination of "production" versus gathering? Does this need to be written documentation?

• Yes. An operator of a gathering pipeline must have written documentation of its analysis of the start and end points of gathering per Section 192.8(b), and the application of API RP 80 necessarily includes a determination of the endpoint of production operations.





Type C Instrumented Leakage Surveys

Do I need to use a gas detector device for Type C leakage surveys?

- § 192.9(e)(1)(vii) requires the use of an instrument to conduct the leakage surveys on Type C gathering lines.
 - § 192.9 What requirements apply to gathering pipelines?
 - (e) Type C lines. The requirements for Type C gathering lines are as follows.
 - (1) An operator of a Type C onshore gathering line with an outside diameter greater than or equal to 8.625 inches must comply with the following requirements: ...
 - (vii) Conduct leakage surveys in accordance with the requirements for transmission lines in § 192.706 using leak-detection equipment, and promptly repair hazardous leaks in accordance with § 192.703(c).



OTHER THINGS TO CONSIDER - DISTRIBUTION OFF GATHERING

Operators with new type C gathering with Farm Taps should have looked at putting these in a Distribution Integrity Management Program or meeting the requirements of 192.740.

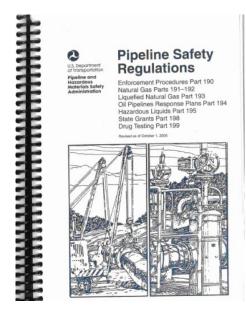
The previous language in §192.740 exempted these lines as they were not previously considered Regulated gathering, but with Amendments 191-30 and 192-129 (RIN 3). These lines are now considered Regulated Gathering.

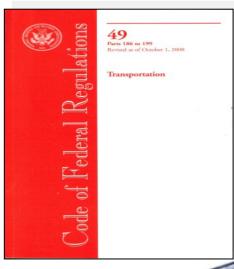




Additional Resources and Tools

- PHMSA Homepage, Office of Pipeline Safety
 - www.phmsa.dot.gov
- Standards & Rulemaking
 - http://www.phmsa.dot.gov/pipeline/regs
- PHMSA Technical Resources
 - https://www.phmsa.dot.gov/technicalresources/pipeline/pipeline-technical-resources-overview
 - GPAC Meeting slides for reference at "Public Meetings" tab (https://primis.phmsa.dot.gov/meetings/)
- PHMSA's Stakeholder Communications Site
 - http://primis.phmsa.dot.gov/comm
- For Federal Regulations (Official Version)
 - www.ecfr.gov







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Safety of Gas Gathering Lines

Thank You for what you do for Pipeline Safety!



