

#### 2018 KOGA ANNUAL MEETING

PANEL DISCUSSION: GATHERING LINES

#### Gathering Lines-Topics

- Definition of Gathering
- Gathering Rule History
- How are Gathering Lines Determined
- Code Requirements
- Compliance Deadlines
- Pending Regulatory Changes
- KOGA Tech. & Reg. Committee Actions



### Gathering Line Definition (DOT)

**§192.3-** "a pipeline that transports gas from a current production facility to a transmission line or main."

"Main" has a specific definition and refers to distribution mains.

§192.9- "regulated onshore gathering line" means:

(1) Each onshore gathering line (or segment of onshore gathering line) with a feature described in the second column that lies in an area described in the third column; and

(2) As applicable, additional lengths of line described in the fourth column to provide a safety buffer:

### Gathering Rule History

#### **Initial Gathering Rule**

Any lines that pass through a city, town (incorporated or unincorporated), or any defined municipality or subdivision were regulated.

- Assumed that town limits constituted populated areas.
- Operators were forced to spend money on pipelines in extremely remote areas such as newly annexed farm land.

### Gathering Rule History

#### **Current Gathering Rule**

Based on a pipeline's primary function and population around the line or segment of line.

- Utilizes API RP 80 a practical guide for determining the application of the definition of gas gathering in the federal Gas Pipeline Safety Standards.
- House/structure counts are required to determine class locations and ultimately regulated lines or line segments.
- Defines code requirements for each line classification.

# §192.8 How are onshore gathering lines and regulated onshore gathering lines determined?

(a) An operator must use API RP 80 (incorporated by reference, *see* §<u>192.7</u>), to determine if an onshore <u>pipeline</u> (or part of a connected series of pipelines) is an onshore gathering line.

<u>Pipeline</u> - All parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.

#### API RP 80 (Highlights)

- Defines gathering lines, production operations and supplemental terms which aid in the explanation of the uses of certain equipment and processes in production operations and in transportation operations. (natural gas processing plant, gathering line gas treatment processing facility, production facility, etc.)
- Provides graphical representations "decision trees" to assist users to understand the application of the recommended practice.
- Utilizes both narrative and schematic descriptions of typical gas gathering systems and production operations.
- Assists in clarification of the intent of definitions via real-life scenarios where the recommended practice is implemented.



### §192.8

(1) The beginning of gathering, under section 2.2(a)(1) of API RP 80, may not extend beyond the furthermost downstream point in a production operation as defined in section 2.3 of API RP 80.

(2) The endpoint of gathering, under section 2.2(a)(1)(a) of API RP 80, may not extend beyond the first downstream natural gas processing plant, unless the operator can demonstrate, using sound engineering principles, that gathering extends to a further downstream plant.

(3) If the endpoint of gathering, under section 2.2(a)(1)(c) of API RP 80, is determined by the commingling of gas from separate production fields, the fields may not be more than 50 miles from each other, unless the Administrator finds a longer separation distance is justified in a particular case (*see* 49 CFR §190.9).

(4) The endpoint of gathering, under section 2.2(a)(1)(d) of API RP 80, may not extend beyond the furthermost downstream compressor used to increase gathering line pressure for delivery to another pipeline.

## §192.8

(b) For purposes of §<u>192.9</u>, "regulated onshore gathering line" means:

(1) Each onshore gathering line (or segment of onshore gathering line) with a feature described in the second column that lies in an area described in the third column; and

(2) As applicable, additional lengths of line described in the fourth column to provide a safety buffer:

Туре	Feature	Area	Safety buffer
A	-Metallic and the <i>MAOP</i> produces a <i>hoop stress</i> of 20 percent or more of <i>SMYS</i> . If the stress level is unknown, an operator must determine the stress level according to the applicable provisions in subpart C of this part. -Non-metallic and the MAOP is more than 125 psig (862 kPa).	Class 2, 3, or 4 location (see § <u>192.5</u> ).	None.
В	-Metallic and the MAOP produces a hoop stress of less than 20 percent of SMYS. If the stress level is unknown, an operator must determine the stress level according to the applicable provisions in subpart C of this part. -Non-metallic and the MAOP is 125 psig (862 kPa) or less.	<ul> <li>Area 1. Class 3 or 4 location.</li> <li>Area 2. An area within a Class 2</li> <li>location the operator determines</li> <li>by using any of the following three</li> <li>methods: <ul> <li>(a) A Class 2 location.</li> <li>(b) An area extending 150 feet</li> <li>(45.7 m) on each side of the centerline of any continuous 1 mile (1.6 km) of pipeline and including more than 10 but fewer than 46 dwellings.</li> <li>(c) An area extending 150 feet</li> <li>(45.7 m) on each side of the centerline of any continuous 1 mile (1.6 km) of pipeline and including more than 10 but fewer than 46 dwellings.</li> </ul> </li> </ul>	If the gathering line is in Area 2(b) or 2 (c), the additional lengths of line extend upstream and downstream from the area to a point where the line is at least 150 feet (45.7 m) from the nearest dwelling in the area. However, if a cluster of dwellings in Area 2 (b) or 2(c) qualifies a line as Type B, the Type B classification ends 150 feet (45.7 m) from the nearest dwelling in the cluster.

#### §192.9 What requirements apply to gathering lines?

An operator of a gathering line must follow the safety requirements of this part as prescribed by this section for each line type.

- Type A- Metallic and the MAOP of 20 percent or more of SMYS or Non-metallic and the MAOP is more than 125 psig
- Type B- Metallic and the MAOP of 20 percent or less of SMYS or Non-metallic and the MAOP is less than 125 psig

Type A Requirements

An operator of a Type A regulated onshore gathering line must comply with the requirements of this part applicable to transmission lines.

Exceptions:

- §<u>192.150</u> (Passage of Internal Inspection Devices)

-Subpart O (Integrity Management)

\* Additionally, an operator of a Type A regulated onshore gathering line in a <u>Class 2 location</u> may demonstrate compliance with subpart N (Operator Qualification) by describing the processes it uses to determine the qualification of persons performing operations and maintenance tasks.

#### Type A Requirements (Overview)

- Subpart A General (Definitions, Class Locations, Incorporated Documents, Underground Storage, Conversion to Service, Rules of regulatory construction, Customer Notifications)
- Subpart B- Materials
- Subpart C- Pipe Design
- Subpart D- Design of Pipeline Components
- Subpart E- Welding of Steel Pipeline
- Subpart F- Joining of Materials Other Than Welding
- Subpart G- General Construction Requirements for Transmission Lines and Mains
- Subpart H- Customer Meters, Service Regulators, and Service Lines
- Subpart I- Requirements for Corrosion Control
- Subpart J- Testing Regiments
- Subpart K- Uprating
- Subpart L- Operations
- Subpart M- Maintenance
- Subpart N- Qualification of Pipeline Personnel\*

#### Type B Requirements

An operator of a Type B regulated onshore gathering line must comply with the following requirements:

- (1) If a line is new, replaced, relocated, or otherwise changed, the design, installation, construction, initial inspection, and initial testing must be in accordance with requirements of this part applicable to transmission lines;
  - Subpart B- Materials
  - Subpart C- Pipe Design
  - Subpart D- Design of Pipeline Components
  - Subpart E- Welding of Steel Pipeline
  - Subpart F- Joining of Materials Other Than Welding
  - Subpart G- General Construction Requirements for Transmission Lines and Mains
  - Subpart J- Testing Requirements

#### Type B Requirements

(2) If the pipeline is metallic, control corrosion according to requirements of subpart I of this part applicable to transmission lines;

(3) Carry out a damage prevention program under §192.614;

(4) Establish a public education program under §192.616;

(5) Establish the MAOP [The maximum allowable operating pressure. (Guide definition)] of the line under §<u>192.619</u>; and

(6) Install and maintain line markers according to the requirements for transmission lines in §192.707.

(7) Conduct leakage surveys in accordance with §<u>192.706</u> using leak detection equipment and promptly repair hazardous leaks that are discovered in accordance with §<u>192.703(c)</u>.

#### 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 §<u>192.13</u> applies.

(2) If a regulated onshore gathering line existing on April 14, 2006 was not previously subject to this part, an operator has until the date stated in the second column to comply with the applicable requirement for the line listed in the first column, unless the Administrator finds a later deadline is justified in a particular case:

Requirement	Compliance deadline
Control corrosion according to Subpart I requirements for transmission lines.	April 15, 2009.
Carry out a damage prevention program under §192.614.	October 15, 2007.
Establish MAOP under §192.619	October 15, 2007.
Install and maintain line markers under §192.707.	April 15, 2008.
Establish a public education program under §192.616.	April 15, 2008.
Other provisions of this part as required by paragraph (c) of this section for Type A lines.	April 15, 2009.

(3) If, after April 14, 2006, a change in class location or increase in dwelling density causes an onshore gathering line to be a regulated onshore gathering line, the operator has 1 year for Type B lines and 2 years for Type A lines after the line becomes a regulated onshore gathering line to comply with this section.

#### Federal Regulations (49CFR192)

Link to Code of Federal Regulations

#### KOGA Tech. and Reg. Committee

- Completed a detailed review of Federal Regulations and proposed changes.
- Coordinating with IPAA to address industry concerns with proposed changes to CFR's.
- Accompanied IPAA in a meeting with PHMSA to discuss concerns.

#### What's Next-

PHMSA amended the pipeline safety regulations to address requirements of the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 (2011 Act), and to update and clarify certain regulatory requirements.

#### Docket Number PHMSA-2011-0023

- Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines- (NPRM) Published on 04/18/2016
- The pending rule includes several changes to the Code of Federal Regulations regarding Gathering Lines, the final rule has yet to be published.

Link to Federal Register

#### Questions?

# Thank you for your continued membership in KOGA and for your attendance during this presentation.