



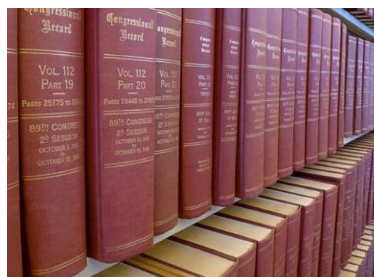
GAS GATHERING PIPELINES

Existing and New Rules

GAS GATHERING PIPELINES

History and Definitions

HISTORY OF REGULATIONS FOR GAS GATHERING LINES



1970 Final Rule: Part 192 Definition of gathering line.

Exception for rural gas gathering.

TO AMEND THE NATURAL GAS PIPELINE SAFETY ACT OF 1968 AND THE HAZARDOUS LIQUID PIPELINE SAFETY ACT OF 1979 TO IMPROVE NATURAL GAS AND HAZARDOUS LIQUID PIPELINE SAFETY, IN RESPONSE TO THE NATURAL GAS PIPELINE ACCIDENT IN EDISON, NEW JERSEY.

1968

Natural Gas Pipeline Safety Act of 1968: Exclusion for rural gas gathering.

1970



1974-1978

Rulemaking efforts to revise gathering lines definitions withdrawn.

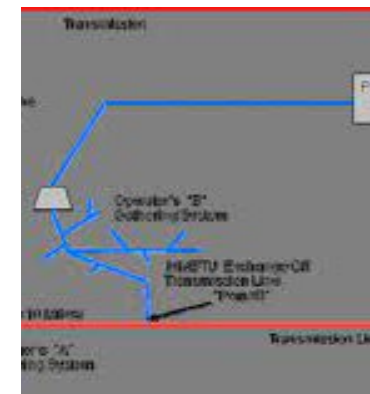
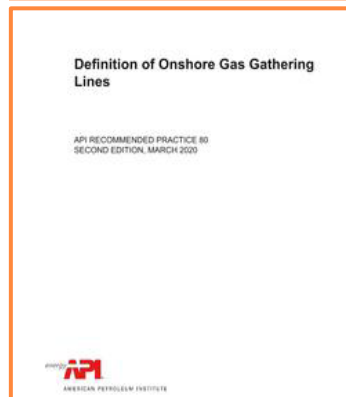


API RP 80: Defines Onshore Gas Gathering in Part 192.

Furthermost & function concept.

5 potential endpoints.

2000



2002

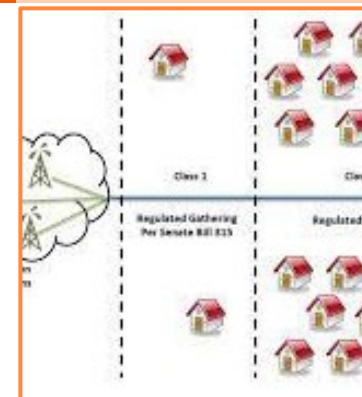
Pipeline Safety Act of 2002: Define gathering lines based on function and operational characteristics – Regulated gathering lines.

Final Rule adopted API RP 80.

Type A & Type B gathering lines.

Exemptions for Class 1 gathering lines.

2006



2021

Final Rule: Amendments 191-30 and 192-129 (RIN 3).

Where we are now, Type C and Type R gathering lines.

Reporting requirements.



KEY DEFINITIONS - §192.3

Gathering line: a pipeline transporting gas from production to transmission, gathering or distribution.

Pipeline: 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.

KEY DEFINITIONS – API RP 80

Production Operation: piping and equipment used for production and preparation for transportation or delivery -

- a) extraction and recovery, lifting, stabilization, treatment, separation, production processing, storage, and measurement of hydrocarbon gas and/or liquids; and
- b) associated production compression, gas lift, gas injection, or fuel gas supply.

Piping: includes individual well flowlines, equipment piping, transfer lines between production operation equipment elements and sites, and tie-in lines to connect to gathering, transmission, or distribution lines.

APPLICABILITY TO PART 191

§191.1 Scope

- (a) ...This part applies to offshore gathering lines (except as provided in paragraph (b) of this section) and to onshore gathering lines, including Type R gathering lines as determined in §192.8 of this chapter.
- (c) Sections §191.22(b) and (c) and §191.23 do not apply to the onshore gathering of gas –
 - (1) Through a pipeline that operates at less than 0 psig (0 kPa);
 - (2) Through a pipeline that is not a regulated onshore gathering pipeline; or
 - (3) Within inlets of the Gulf of Mexico, except for the requirements in §192.612 of this chapter.

APPLICABILITY TO PART 192

§192.1 What is the scope of this part?

(b) This part does not apply to –

(4) Onshore gathering of gas –

- (i) Through a pipeline that operates at less than 0 psig (0 kPa);
- (ii) Through a pipeline that is not a regulated onshore gathering line (as determined in §192.8); and
- (iii) Within inlets of the Gulf of Mexico, except for the requirements in §192.612.

INCORPORATED BY REFERENCE (IBR)

§192.7 What documents are incorporated by reference partly or wholly in this part?

(4) API Recommended Practice 80 (API RP 80) "Guidelines for the Definition of Onshore Gas Gathering Lines" (1st edition, April 2000).

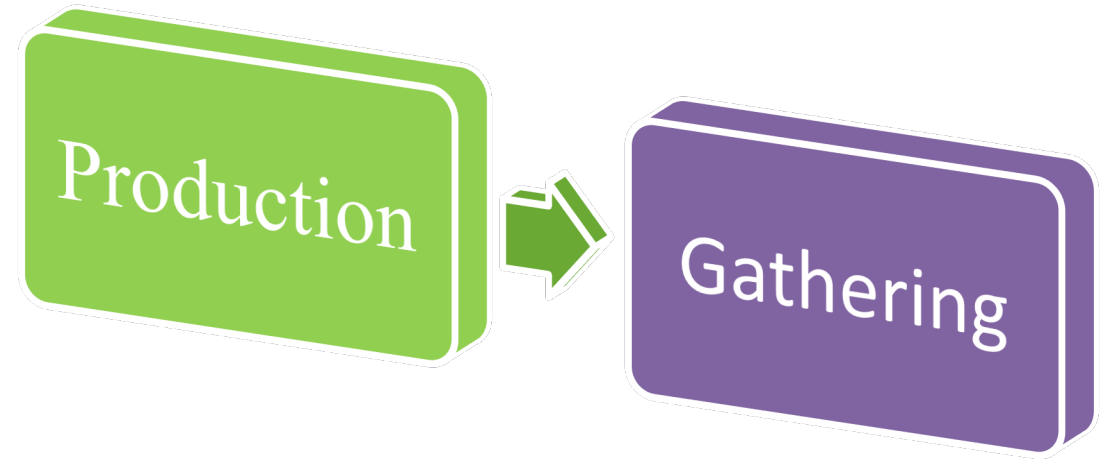
However, there are some limitations to the RP as defined in §192.8.

§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 §192.7), to determine if an onshore pipeline (or part of a connected series of pipelines) is an onshore gathering line. The determination is subject to the limitations listed below. After making this determination, an operator must determine if the onshore gathering line is a regulated onshore gathering line under paragraph (b) of this section.

PRODUCTION OR GATHERING?

Using API RP 80 determine if the line in question is Production or Gathering.



- Note both functions can have the same equipment. Do not rely strictly on dehydrators or separators and the use of meters to determine function.
- Gathering begins at the furthestmost downstream point of PRODUCTION operations and utilizes API RP 80 and §192.8 to determine gatherings endpoints.

GATHERING PIPELINES

WHAT ARE THE GATHERING TYPES?

Regulated Gathering:

- Type A, Type B, Type C (§192.8).

Reporting regulated Gathering (§191.3):

- Type R.

Some key factors for regulated gathering pipelines:

- Class location.
- Material and diameter.
- "Function and Furthestmost downstream."
- Pressure test if conducted 5 years before being regulated or:
 - Highest operating pressure if unknown.

GATHERING LINES ENDPOINTS

Furthermost downstream point of production operation as described in API RP 80 **BUT** with the limitations found in §§192.8(a)(2) through 192.8(a)(5):

- Processing plant.
- Treatment facility.
- Point of commingle.
- Compressor station.
- Incidental gathering.



GATHERING LINES PRIOR TO AMENDMENTS 191-30 & 192-129 (RIN 3)

Gathering line transports gas from production to transmission or distribution main.

Start and end points defined in API RP 80 IBR.

Regulated Onshore Gas Gathering included:

- Type A: High Pressure in Class 2 – 4 areas.
- Type B: Low Pressure in Class 2 – 4 areas.
- Class 1 gathering was exempt from Parts 191 & 192.

GATHERING LINES AFTER AMENDMENTS 191-30 & 192-129 (RIN 3)

Gathering line transports gas from production to transmission or distribution main.

Start and end points defined in API RP 80 IBR.

Regulated Onshore Gas Gathering includes:

- Type A: High Pressure in Class 2 – 4 areas.
- Type B: Low Pressure in Class 2 – 4 areas.
- Type C: High Pressure $\geq 8"$ & $\geq 20\%$ SMYS in a Class 1 area.

Incidental Gathering limited to 10 miles after 05/16/2022.

Reporting-Regulated Gathering:

- Type R: All other onshore gathering lines in Class 1 & 2 areas.

GATHERING LINES AFTER AMENDMENTS 191-30 & 192-129 (RIN 3) – COMPLIANCE DEADLINES

- Part 191: Incidents/notifications after May 16, 2022.
- Construction notifications after May 16, 2022.
- November 16, 2022: Identification of all gathering lines – Records.
- March 15 of each year: Annual reports due for gathering, including Type C & Type R.
- Part 192: after May 16, 2023, unless limited enforcement discretion applies for Type C gathering, then May 17, 2024.
- Farm taps on Type C gathering newly regulated must meet §192.740 or be in DIMP within 1 year after May 16, 2023.

GATHERING LINES AFTER AMENDMENTS 191-30 & 192-129 (RIN 3) – COMPLIANCE DEADLINES

Change in Class location or MAOP causes change in gathering classification:

- Becomes a Type A: 1 year to comply with this section §192.9(g)(3).
- Becomes a Type B: 2 years to comply with this section §192.9(g)(3).
- Becomes a Type C: 1 year to comply with this section §192.9(g)(5).
- Becomes a Type R: No longer subject to part 192, reporting only §192.8(c)(3).

CLASSIFICATIONS OF GATHERING

TYPE A GATHERING (§192.8)

- Metallic, MAOP with hoop stress $\geq 20\%$ SMYS.
- Non-metallic with MAOP > 125 psig (862 kPa).
- If stress level is unknown, determine according to subpart C of this part.
- Class 2, 3, or 4 locations.

TYPE B GATHERING (§192.8)

- Metallic with MAOP $< 20\%$ SMYS (low stress).
- If stress level is unknown, determine according to subpart C of this part.
- Non-metallic with MAOP ≤ 125 psig (862 kPa).
- Class 2: determined by one (1) of three (3) methods.
- Class 3 or 4.

TYPE C GATHERING (§192.8)

Pipelines $\geq 8.625''$ and any of the following in a Class 1 area:

- Metallic & MAOP of $\geq 20\%$ SMYS.
- Metallic & Unknown SMSY & MAOP > 125 psig (862 kPa).
- Non-Metallic & MAOP > 125 psig (862 kPa).

TYPE R GATHERING (§192.8)

Class 1 and some Class 2 locations that are:

- $< 8''$ in diameter, no pressure limitation.
- $\geq 8''$ pipeline $< 20\%$ SMYS or < 125 psig unknown data for MAOP.
- Pipe previously classified as Type B but removed via clustering methods described in §192.8(c)(2).
- This pipe is not subject to Part 192 requirements, only Part 191 reporting requirements.

END OF GATHERING

END OF GATHERING

To determine the end point of gathering, you have to use a combination of API RP 80 with the limitations in §192.8(a)(2).

The end of gathering is established by the **furthermost endpoint**.

API RP 80 – GATHERING LINE

§2.2(a)(1)(A):

The inlet of the furthestmost downstream natural gas processing plant, other than a natural gas processing plant located on a transmission line,

GATHERING PIPELINES

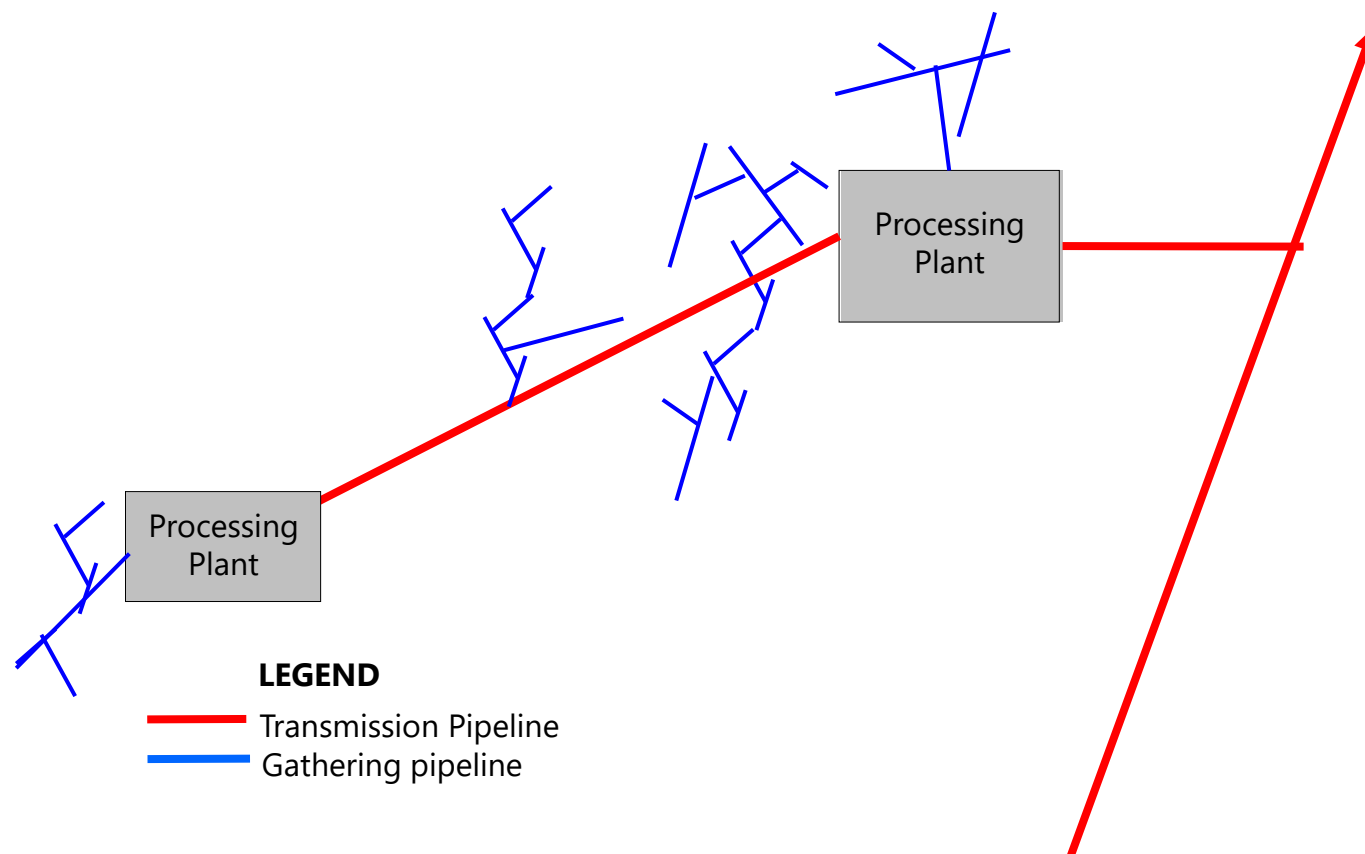
§192.8(a): Operator must use RP 80 to determine if a pipeline is gathering line.

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.

API RP 80/PART 192 COMBINED – PROCESSING PLANT

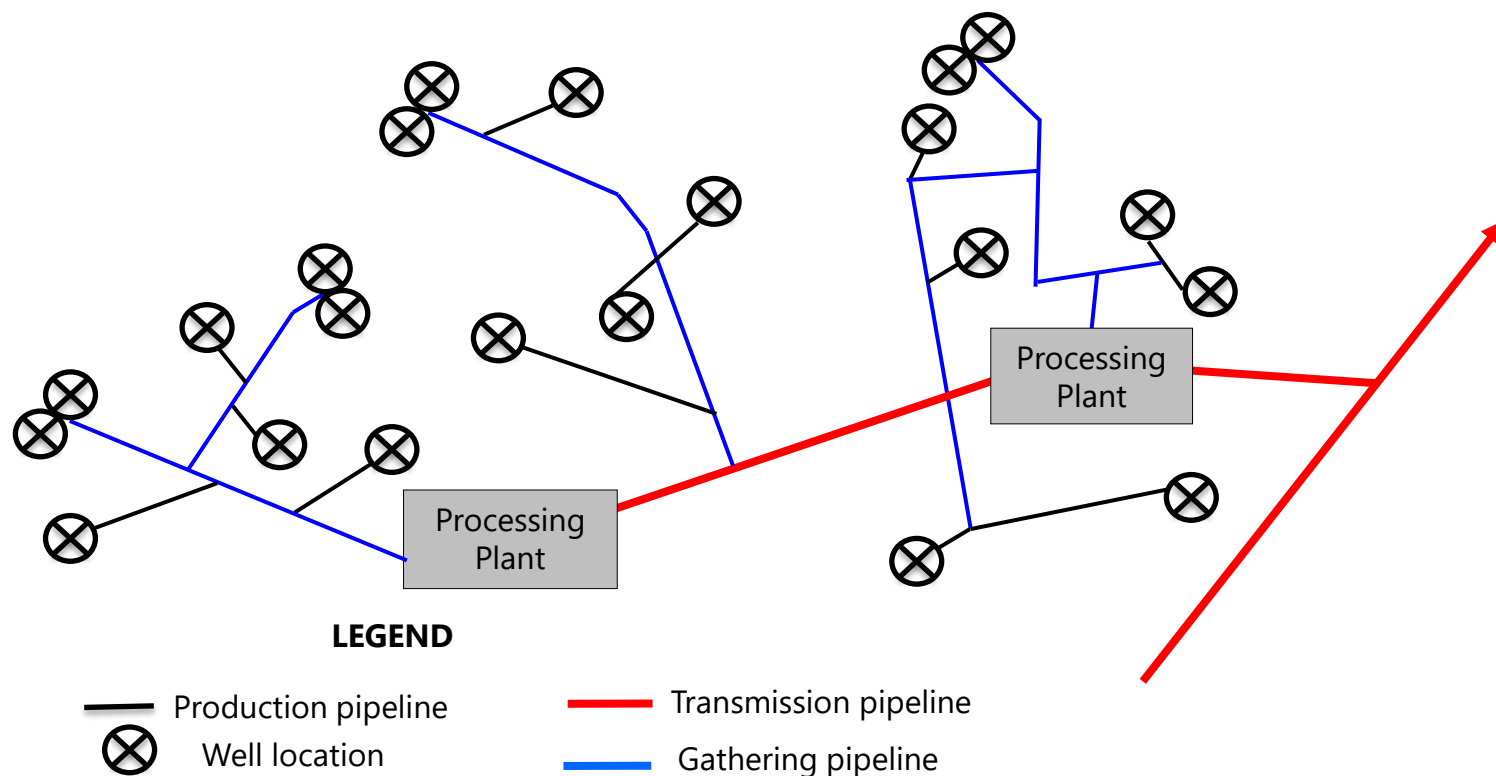
(A) the inlet of the ~~furthermost~~ **first** downstream natural gas processing plant, other than a natural gas processing plant located on a transmission line,

§192.8(a)(2) LIMITATION ON GATHERING LINE



§192.8(a)(2) LIMITATION ON GATHERING LINE – UPDATED

The line connecting two plants is transmission unless the operator can demonstrate by sound engineering principles the gathering extends a further downstream plant.



END OF GATHERING – GAS TREATMENT

§192.8(a):

Regulation is silent on a limitation, but from the preamble of the final rule – this endpoint refers to a “gas treating plant” in the RP as **a significant stand-alone facilities** (e.g., a sulfur recovery or large dehydration facility) or similar facility and is not intended to be a simple piece of equipment like a separator or dehydrator.

API RP 80 – GAS TREATMENT

§2.2.1.2.2 Gas Treatment

Gas treatment often occurs in conjunction with gas processing or compression and in such cases is considered to be part of those operations. In some cases, however, gas treatment operations involve significant stand-alone facilities (e.g., a sulfur recovery or large dehydration facility).

TREATMENT – SULPHUR RECOVERY UNIT



API RP 80 & §192.8 – GATHERING ENDPOINT

Gas processing is not regulated under the federal gas pipeline safety standards. Gas gathering ends at the INLET to a gas processing plant unless approved by the Administrator per §192.8(a)(2).

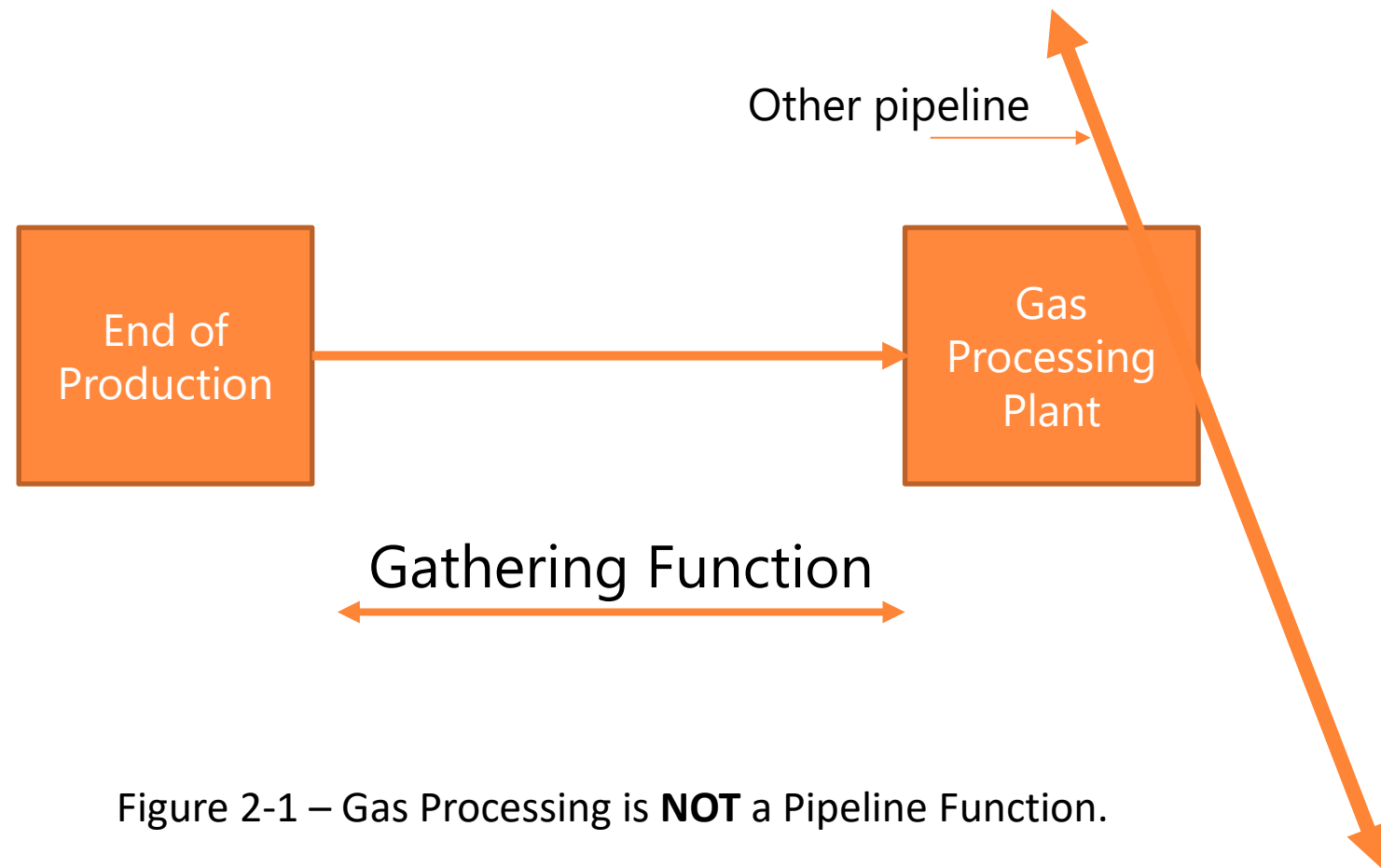


Figure 2-1 – Gas Processing is **NOT** a Pipeline Function.

API RP 80 – COMMINGLING

§2.2(a)(1):

(C) the furthestmost downstream point where gas produced in the same production field or separate production fields is commingled,

END OF GATHERING – COMMINGLING

But...

§192.8(a)(3) states the point of commingling on the line can't be more than 50 miles.

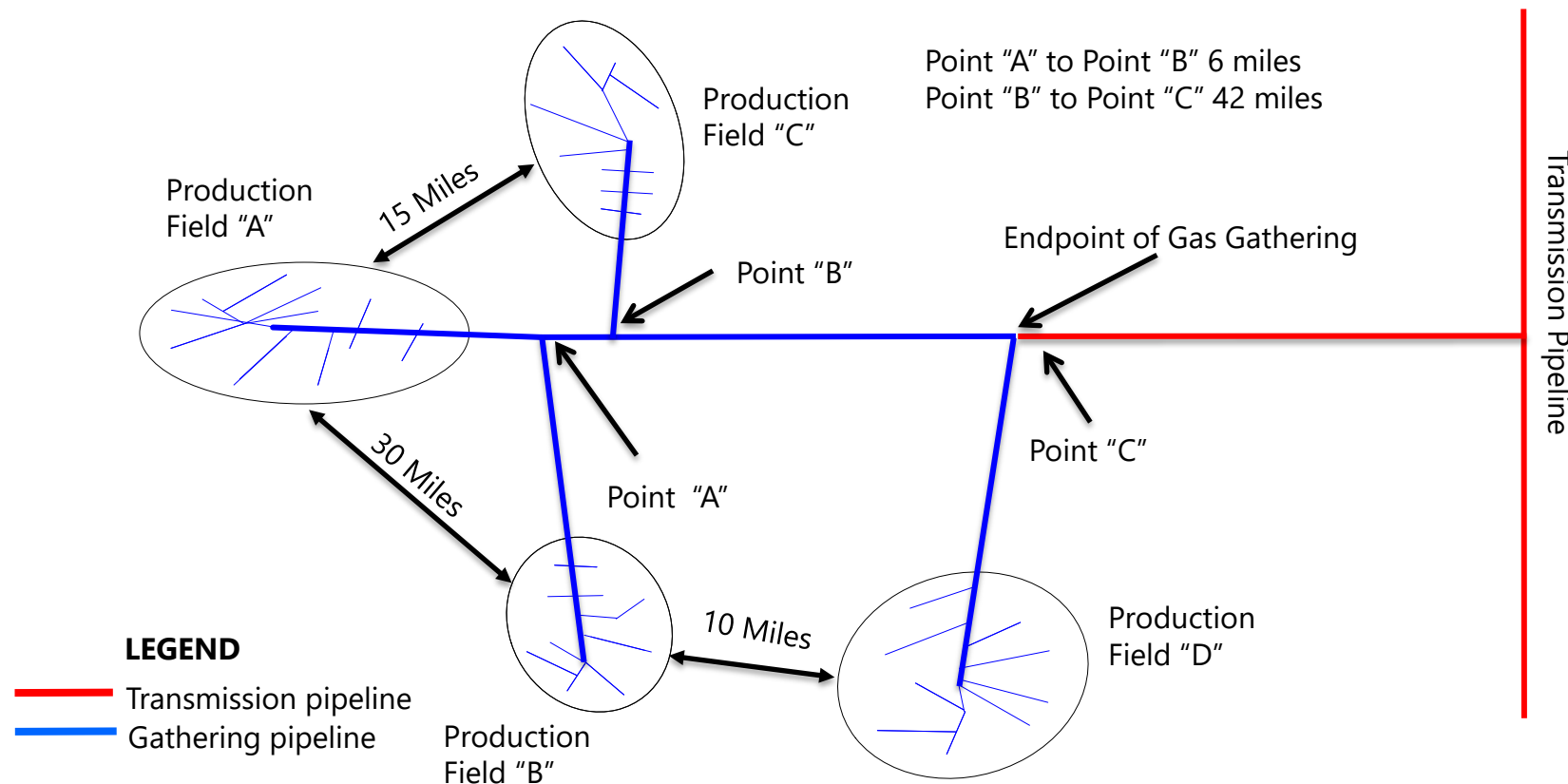
API RP 80/PART 192 COMBINED – COMMINGLING

§2.2(a)(1):

(C) the furthestmost downstream point where gas produced in the same production field or separate production fields is commingled, **but the fields may not be more than 50 miles from each other**

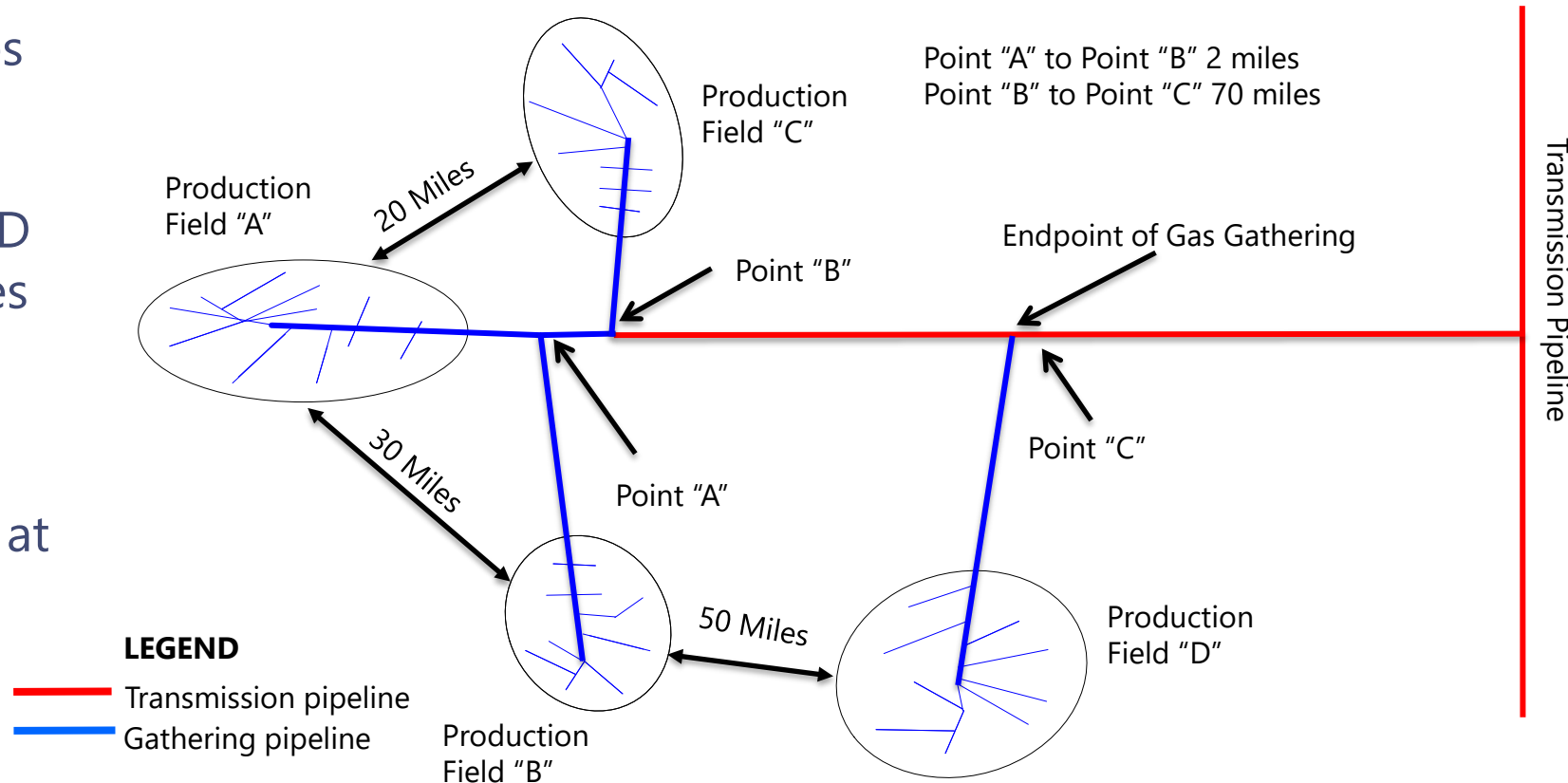
LAST POINT OF COMMINGLING – 2006 FAQ DRAWING

This is the utilization of the furthestmost downstream commingle point and meets the qualifier of within 50 miles of the four gathering fields.



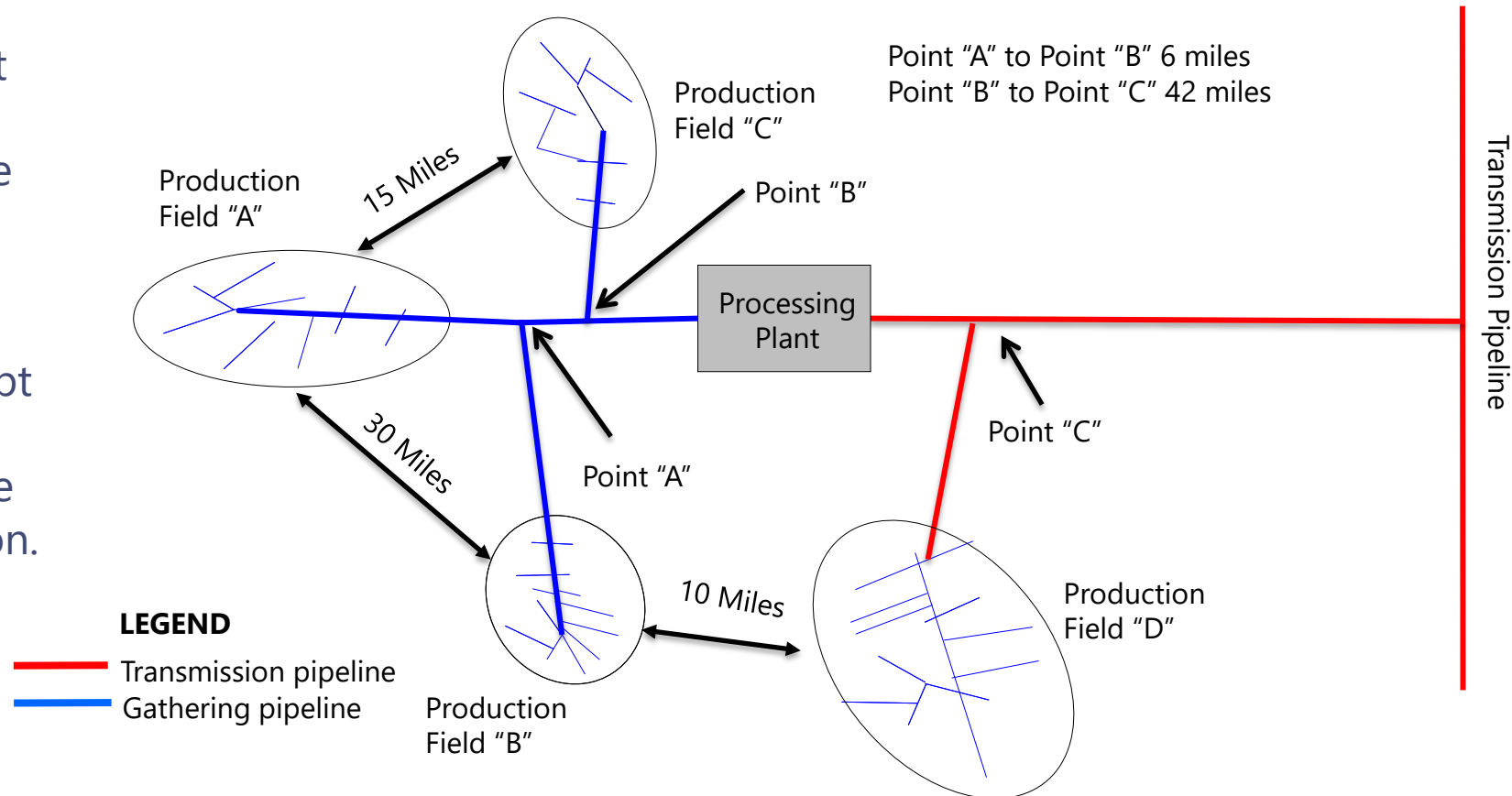
LAST POINT OF COMMINGLING – 2006 FAQ DRAWING

This example demonstrates the fields are within the guidelines of 50 miles, but gas from production field D enters the pipeline 70 miles downstream from where production field C enters the line at point B, thus making Transmission start at point B.



LAST POINT OF COMMINGLING – 2006 FAQ DRAWING

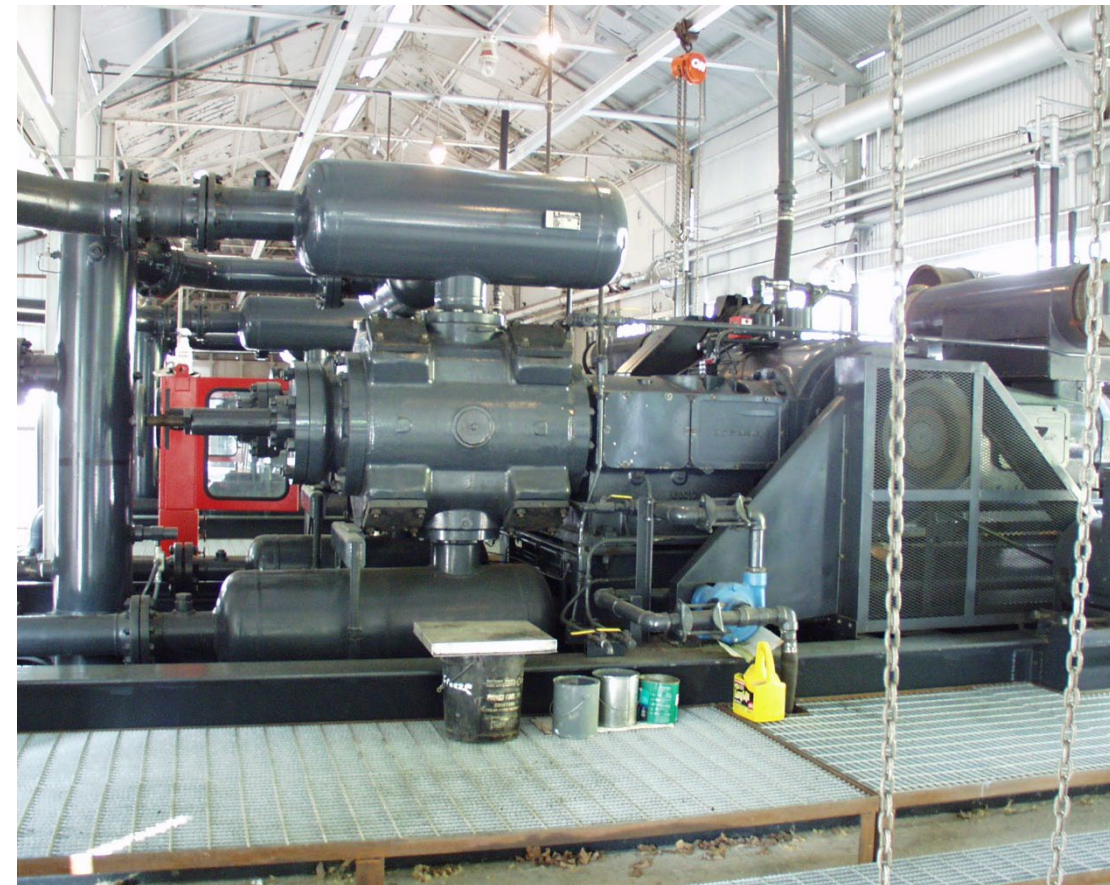
In this example - even though there is a gas processing plant between the points at which Field C and Field D commingle their gas with the rest of the production - the "furthestmost downstream" does not apply because of §192.8(a)(2) concept applies, and the endpoint of gathering is the same as in the initial example for this question.



LAST POINT OF COMPRESSION

§192.8(a) Operator must use API RP 80 to determine if a pipeline is gathering line:

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



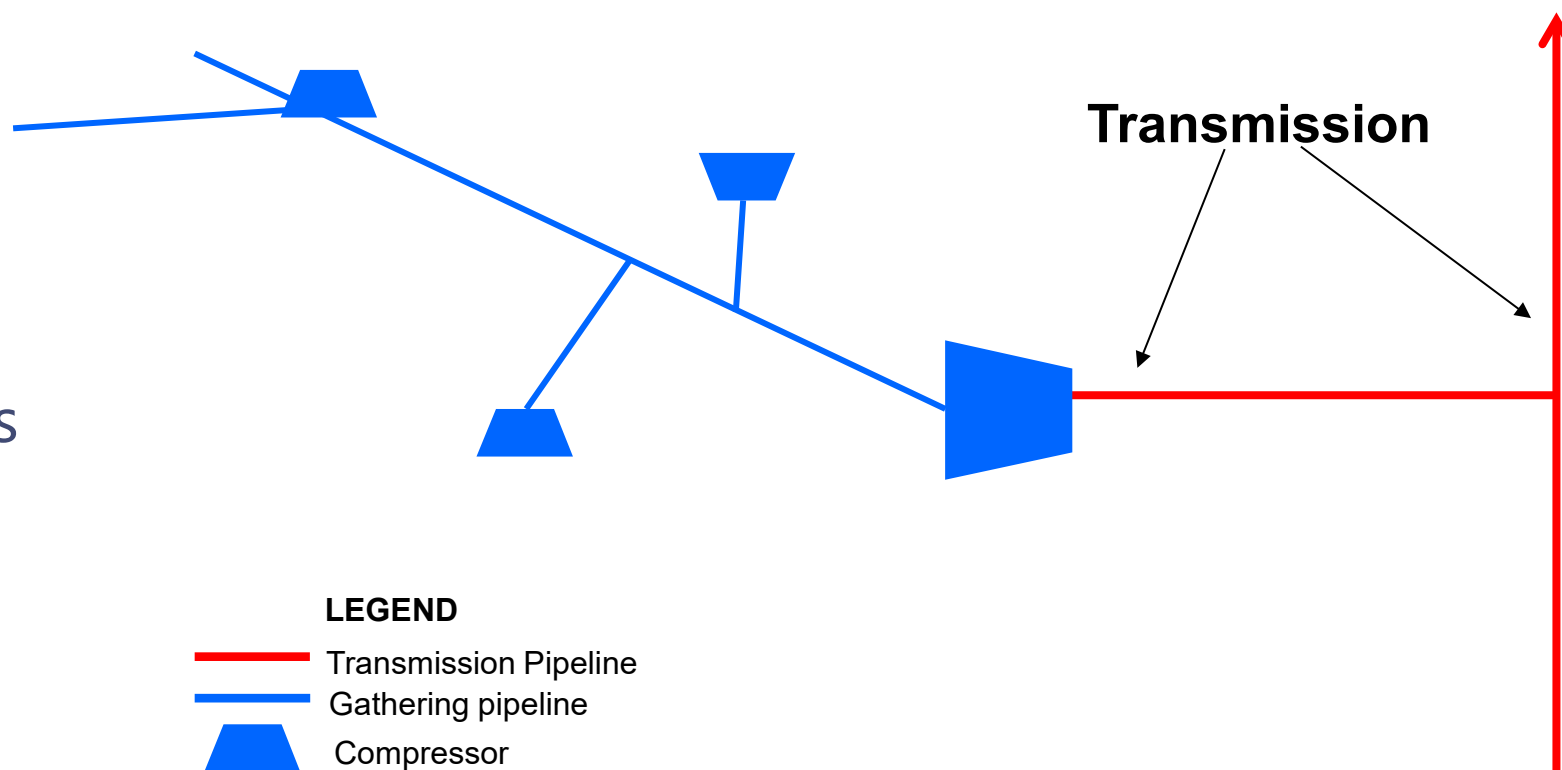
API RP 80/PART 192 COMBINED - COMPRESSOR

§2.2(a)(1):

(D) the outlet of the furthestmost downstream compressor station used to lower gathering line operating pressure to facilitate deliveries into the pipeline from production operations or to increase gathering line pressure for delivery to another pipeline, or

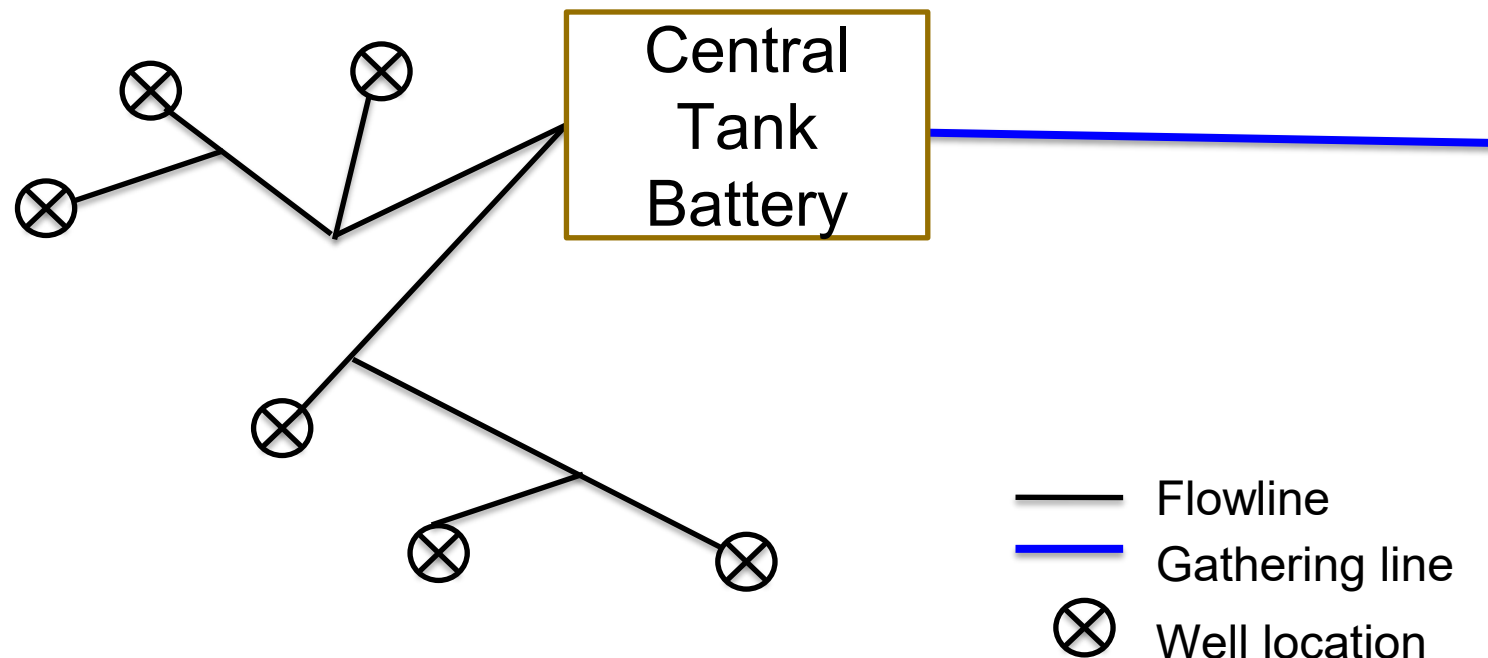
LAST POINT OF COMPRESSION

The end of the gathering line here ends at the outlet, flange or valve at the outlet of the compressor station, may be inside or outside of a fence or property line, thus the beginning of a transmission line.



REVISED 2007 FAQ DRAWING 16B

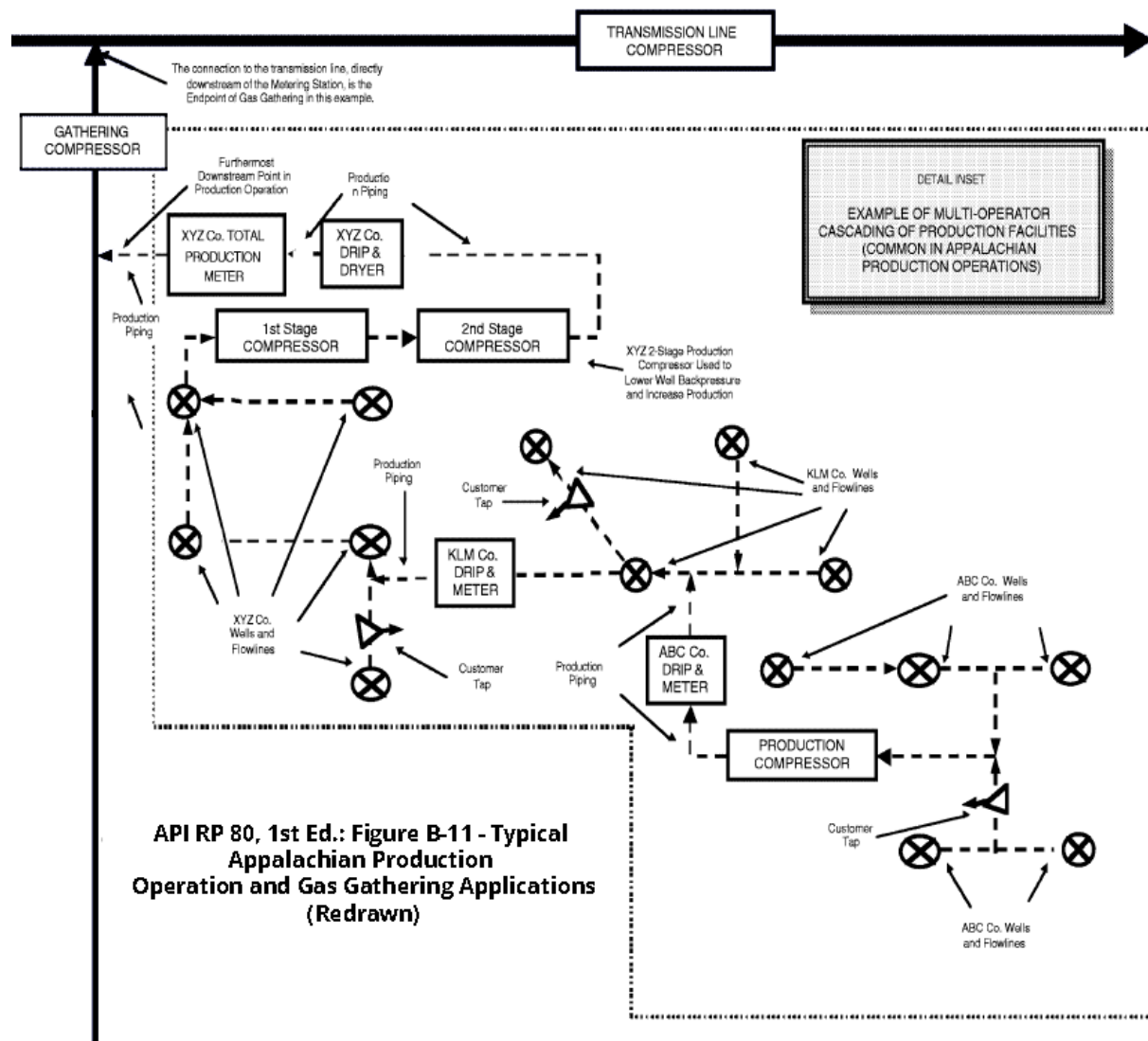
Wells all flow to central tank battery (no treatment of well stream on location). Tank battery has separation, heat treaters and stock tanks.





GAS GATHERING PIPELINES

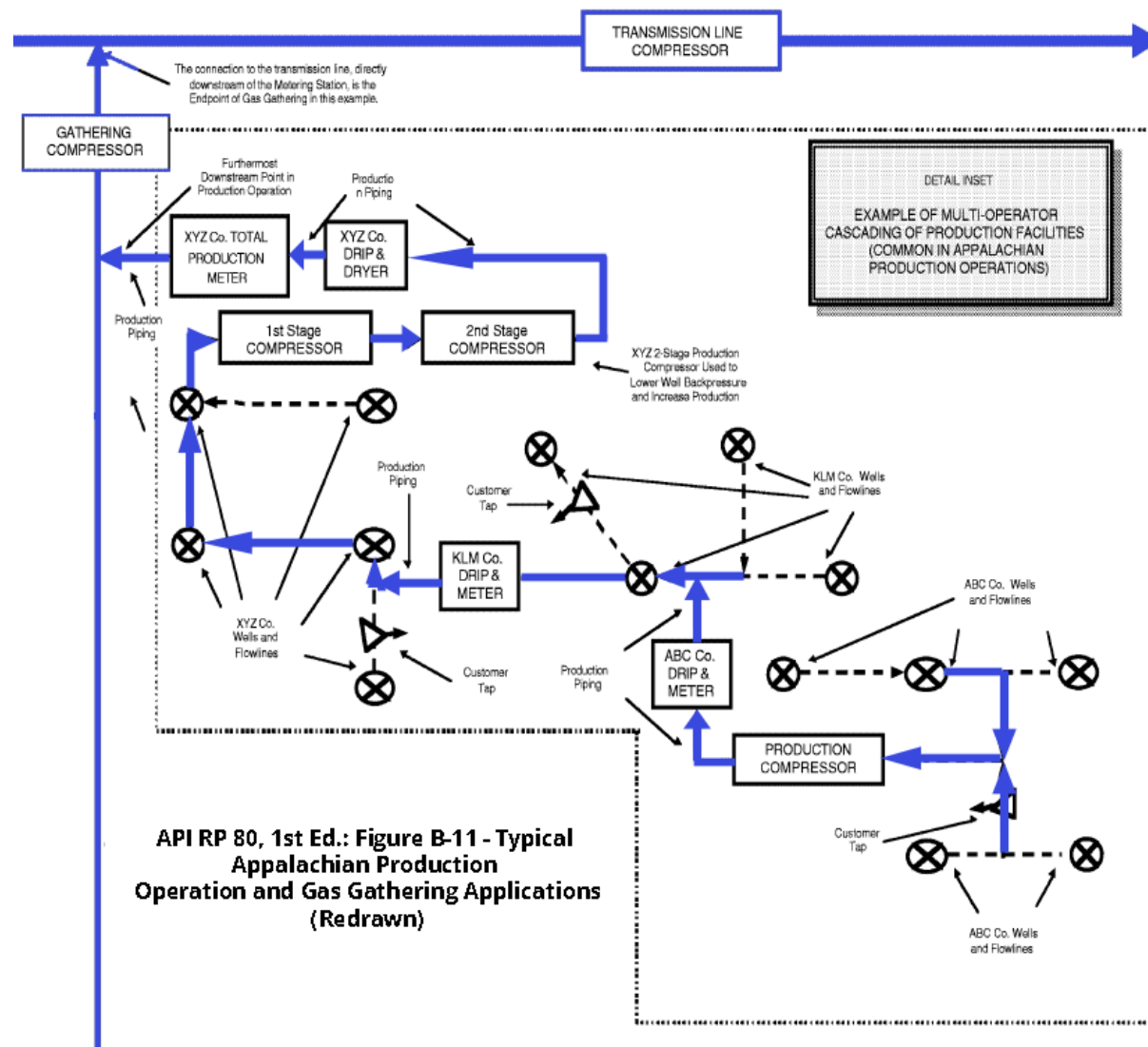
End of Gathering





GAS GATHERING PIPELINES

End of Gathering



Gathering

GATHERING PIPELINES

§192.8(a): Operator must use RP 80 to determine if a pipeline is gathering line

—

(5) For new, replaced, relocated, or otherwise changed gas gathering pipelines installed after May 16, 2022, incidental gathering limited to 10 miles.

Incidental gathering is the additional downstream gathering pipeline sometimes needed to connect the outlet of an identified gathering endpoint with a transmission line, distribution line, or other pipeline facility.

GATHERING PIPELINES

Otherwise changed is a substantial physical alteration of a pipeline facility as opposed to a repair or restoration (preamble to Amend. 192-102). The original alignment or functionality of the pipeline facility is modified by the alteration.

Examples of a substantial physical alteration could include:

- Addition of a pig launcher or receiver to a pipeline.
- Addition of a mainline block valve.
- Relocation of a pipeline.
- Connection of a lateral.

GATHERING LINES AFTER AMENDMENTS 191-30 & 192-129 (RIN 3)

10-Mile Incidental Gathering Limitation after May 16, 2022:

The definition, therefore, includes recognition that gathering may continue downstream of:

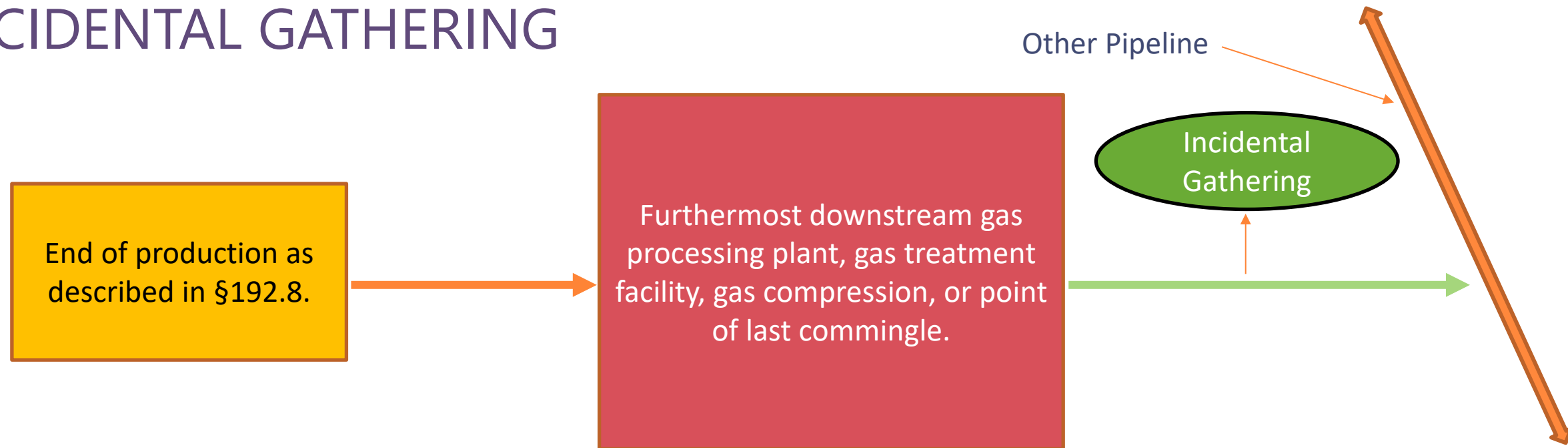
- Processing.
- Treatment.
- Commingle.
- Compression.

GATHERING PIPELINES

Noteworthy for Incidental Gathering:

- Operators may have lines existing prior to the May 16, 2022, date longer than 10 miles.
- Operators may lose the incidental gathering status on existing lines over 10 miles when construction activities or other changes they make to their systems after May 16, 2022.
- Operators are changing the classification of transmission lines to incidental gathering.

INCIDENTAL GATHERING



API RP 80: Figure 2-6 Incidental Gathering Downstream of an Identified Endpoint

Note: Gathering does not extend past the first processing plant unless sound engineering is approved §192.8(a)(2) and may not extend more than 10 miles after 05-16-2022 meeting requirements in §192.8(a)(5). Previous pipelines deemed incidental prior to 5-16-2022 may continue to operate under this status, but if there is modification, the pipeline may lose status if over 10 miles.

COMPRESSION IN GATHERING PIPELINES

COMPRESSOR STATION ON GATHERING

§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 \longrightarrow Type R Compressor \longrightarrow 10" Discharge Header / Type C
Type C gathering line \longrightarrow Type R Compressor \longrightarrow 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.



GAS GATHERING PIPELINES

Compression

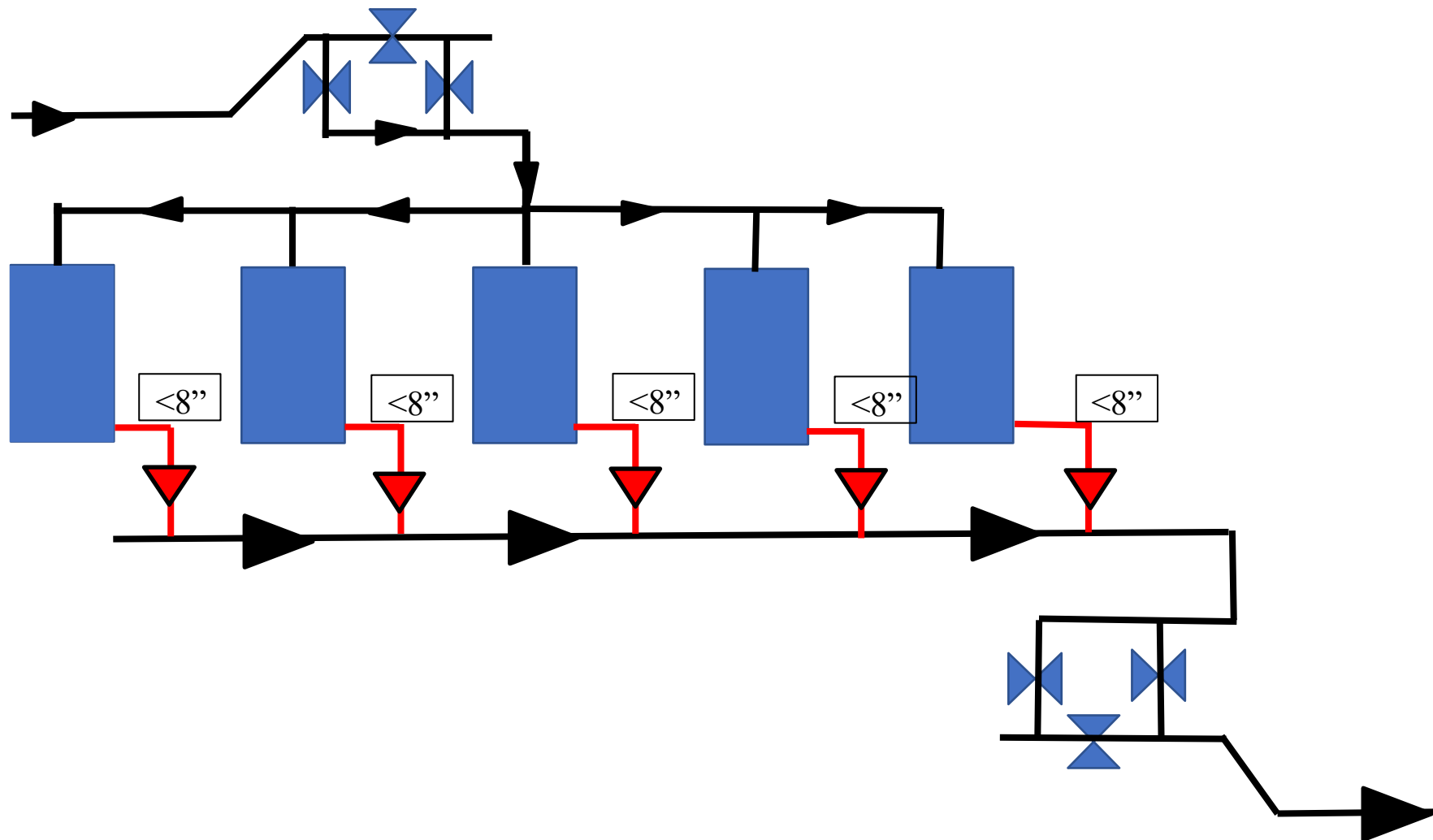
EXAMPLE

Valve =



$\geq 8"$ $\geq 20\%$ SMYS =

$\leq 8"$ Diameter =

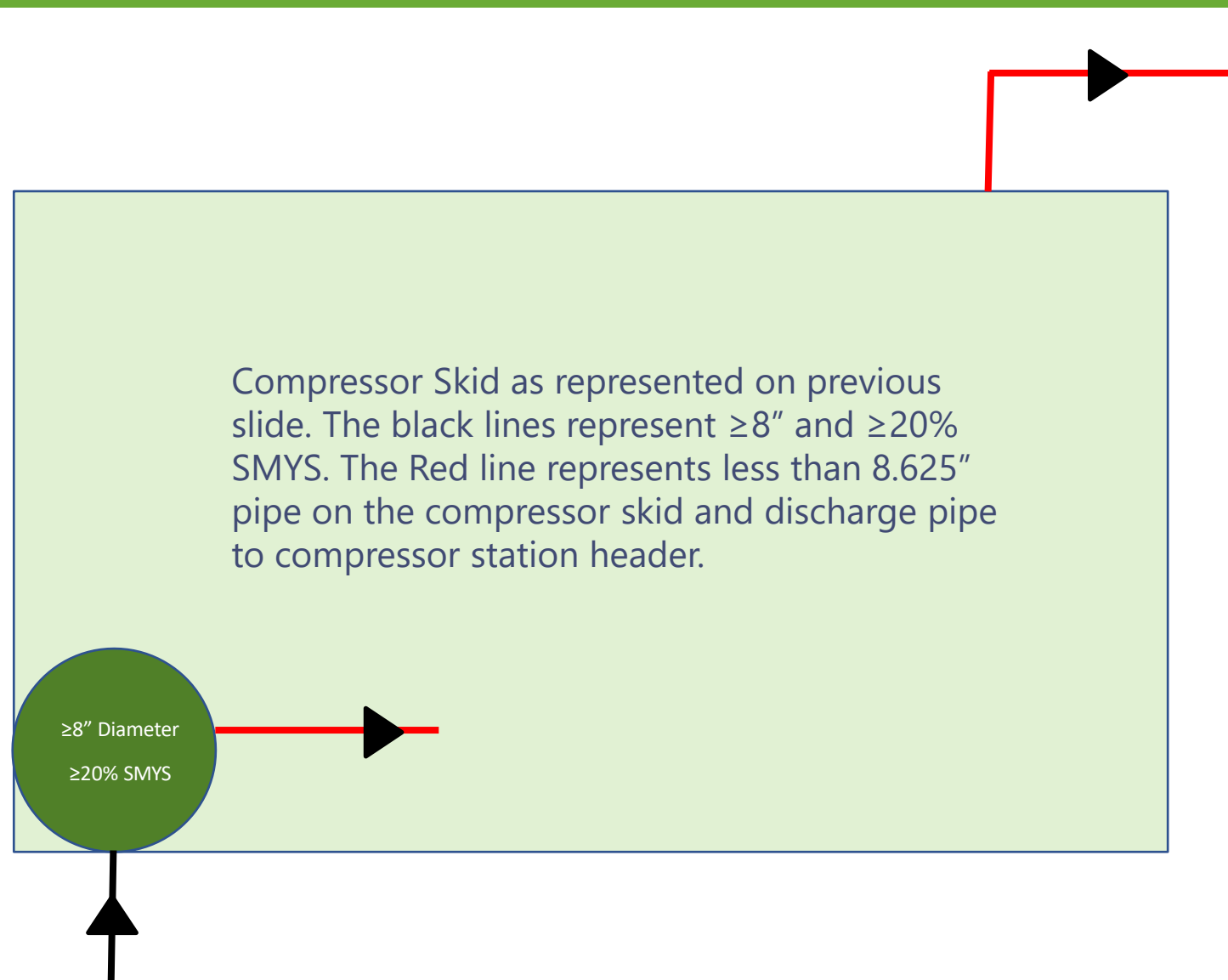




GAS GATHERING PIPELINES

Compression

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



CLASS LOCATION

CLASS LOCATIONS

BIHO= Building Intended for Human Occupancy

Class 1	Class 2	Class 3	Class 4
≤ 10 BIHO	$>10 < 46$ BIHO	<ul style="list-style-type: none">• ≥ 46 BIHO• Within 100 yards<ul style="list-style-type: none">• Well-defined area• 20 people• 5 days a week• For 10 weeks in 12-month period	Area with 4 or more stories prevalent

REGULATORY REQUIREMENTS

TYPE A GATHERING

TYPE A GATHERING

Any of the following AND in a Class 2, 3, or 4 Location:

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

TYPE A GAS GATHERING REQUIREMENTS

§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
- Valve rule regulations
- Management of Change
- MCA
- Select corrosion requirements

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

TYPE B GATHERING

TYPE B GATHERING

Any of the following **AND** in a Class 2, 3, or 4 Location:

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

TYPE B GATHERING – CLASS 2

Area 1 is the Class 3 and 4 locations.

Area 2 is an area within a Class 2 location, operator may choose any of the following methods to classify the Type B gathering lines:

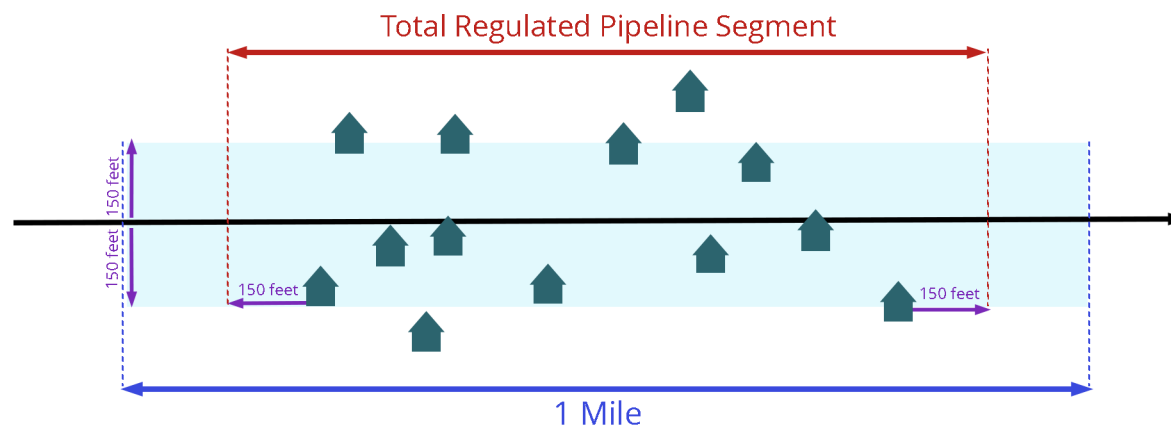
- A Class 2 location.
- Area extending 150 feet on each side the centerline, continuous 1 mile of pipeline and more than 10 but less than 46 dwellings.
- Area extending 150 feet on each side of the centerline, continuous 1000 feet of pipeline and more than 5 dwellings.

EXPLAIN THE SAFETY BUFFER FOR AREA 2(B)

This example illustrates the use of a sliding mile looking for the highest concentrations of dwelling units. This is a typical class location survey with the exception of using 150 feet instead of 660 feet either side of the centerline of the pipe.

Area 2(b) Application

Frequently Asked Questions (FAQs) - Revised 7/11/2007
Figure 14-1 (Redrawn)

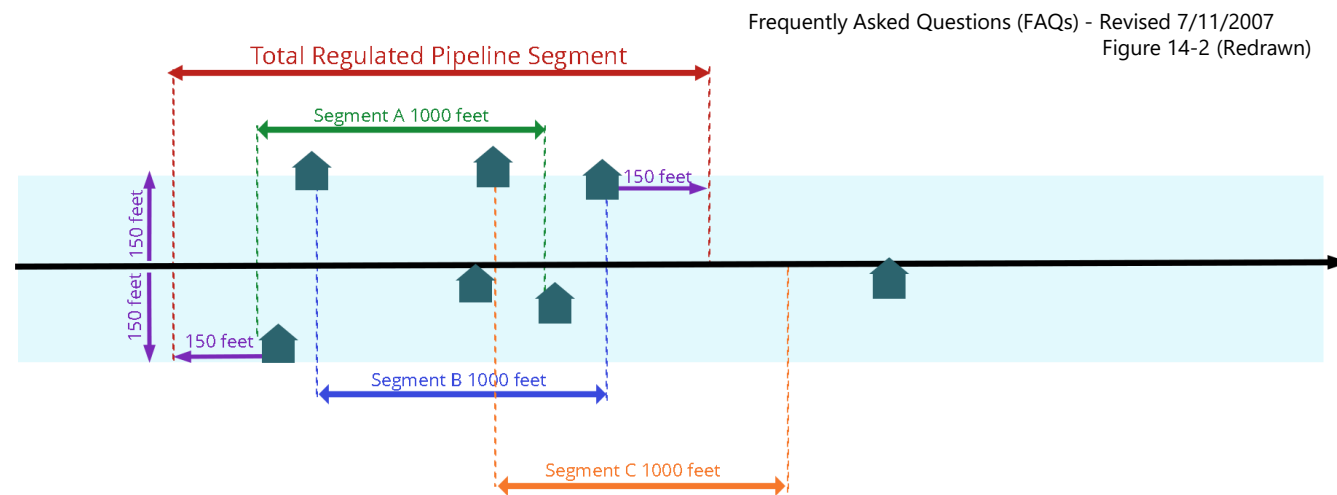


For a Class 2 area (buildings intended for human occupancy are less than 46, but greater than 10) the operator can use 150 feet to survey for the highest concentrations of buildings. If an operator uses this method, the area to be regulated can then be further reduced by clustering or adding a buffer zone of 150 feet on the upstream side of the dwelling units and the same on the downstream side. This distance establishes the length of pipeline that is regulated.

EXPLAIN THE SAFETY BUFFER FOR AREA 2(C)

Segment A contains 5 houses within the 1000-foot segment.

Area 2(c) Application



After sliding the 1000-foot corridor to the next dwelling unit, it is determined that Segment B also contains 5 houses within the required 1000 feet. Sliding the 1000-foot corridor to the next dwelling unit, two houses drop out of the corridor and there are not enough houses in Segment C to make it regulated. Therefore, the regulated segment begins 150 feet upstream of the first house used in Segment A and continues to 150 feet past the downstream side of Segment B or 150 feet past the sixth house in the illustration above.

TYPE B GATHERING REQUIREMENTS §192.9(d)

§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 B GATHERING – ADDITIONAL GUIDANCE

- 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.
- Establish MAOP – §192.619 (a) or (c) – can use highest pressure prior to date became regulated.
- Fix hazardous leaks when found.

TYPE B GATHERING – NOT REQUIRED

Type B pipelines are **NOT** required to:

- Have O&M manual as per §192.605.
- Have emergency plan as per §192.615.
- Have OQ or CRM plan.
- Have an integrity management plan.
- Keep records as required by §192.709.

TYPE C GATHERING

TYPE C GATHERING – DEFINED IN §192.8(c)(2)

- Class 1 location with outside diameter $\geq 8.625''$ and the following:
 - Metallic and MAOP produces a hoop stress of $\geq 20\%$ 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

Type C gathering $\geq 8.625"$ 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.

TYPE C GATHERING

Type C gathering $\geq 8.625"$ must follow “all” reporting requirements of Part 191.

§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 $\leq 12.75"$ or exempted out by §192.9(f)(1).

§191.29 National Pipeline Mapping System: All Gas Gathering Pipelines exempt.

TYPE C GATHERING – OVERVIEW OF REQUIREMENTS

CRITERIA	TYPE C REQUIREMENTS (CUMULATIVE)
Diameter ≥ 8.625 inches.	<ul style="list-style-type: none">• 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: <ul style="list-style-type: none">• 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: <ul style="list-style-type: none">• Plastic pipe requirements.• Establish maximum allowable operating pressure MAOP §192.619.

TYPE C GATHERING – OVERVIEW OF REQUIREMENTS §192.9(e)

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

TYPE C GATHERING – EXEMPTION CRITERIA

§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)-(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

§192.9(f) Exceptions: Continued

- (3) Building intended for human occupancy or impacted site means:
- (i) Building occupied by humans, including homes, office buildings, factories, outside recreation areas, plant facilities, etc.;
 - (ii) Small, well-defined outside area occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period; or
 - (iii) 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.

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.

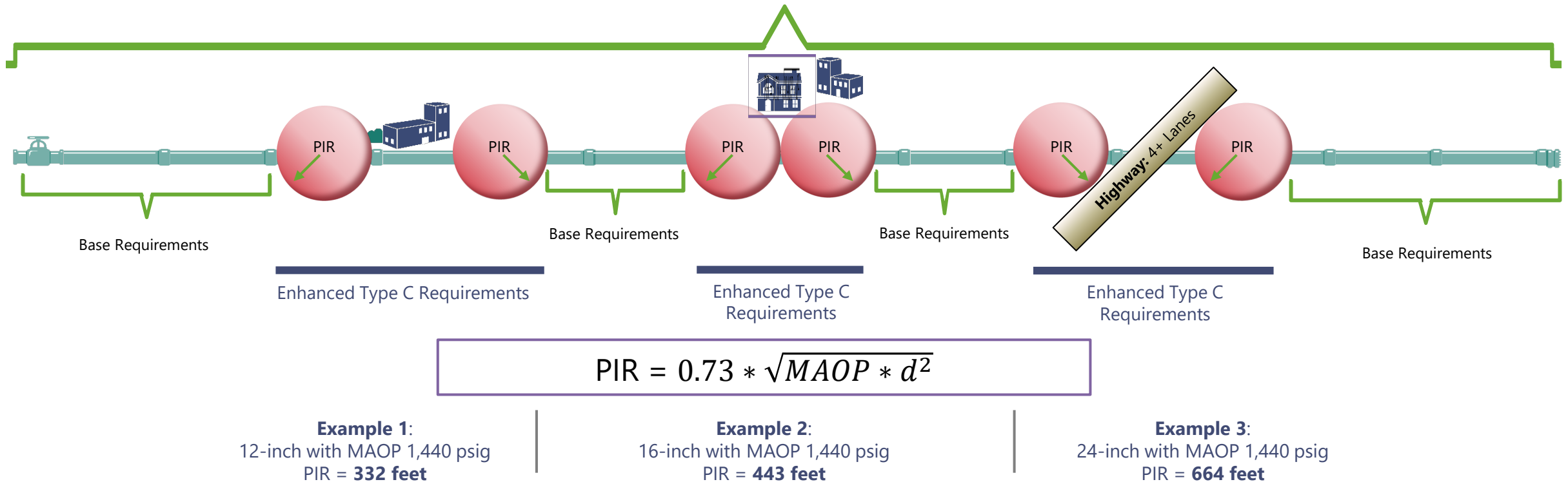
TYPE C GATHERING POTENTIAL IMPACT CIRCLES (PIC) FACTORS

Why are there different factors for natural gas in part 192?

- For Gas Gathering, the use of a Factor = 0.73 is explicitly stated in §192.9(f)(1)(i). This factor is required because of the “rich gas” nature of gas gathering pipelines where the gas may have a higher energy content than “dry” transmission gas.
- §192.903 refers to Section 3.2 of ASME B31.8S for factors for other gases, including production gas.

TYPE C GATHERING – METHOD 1

Class 1, $8'' \leq OD \leq 16''$



TYPE C GATHERING – EXEMPTION CRITERIA

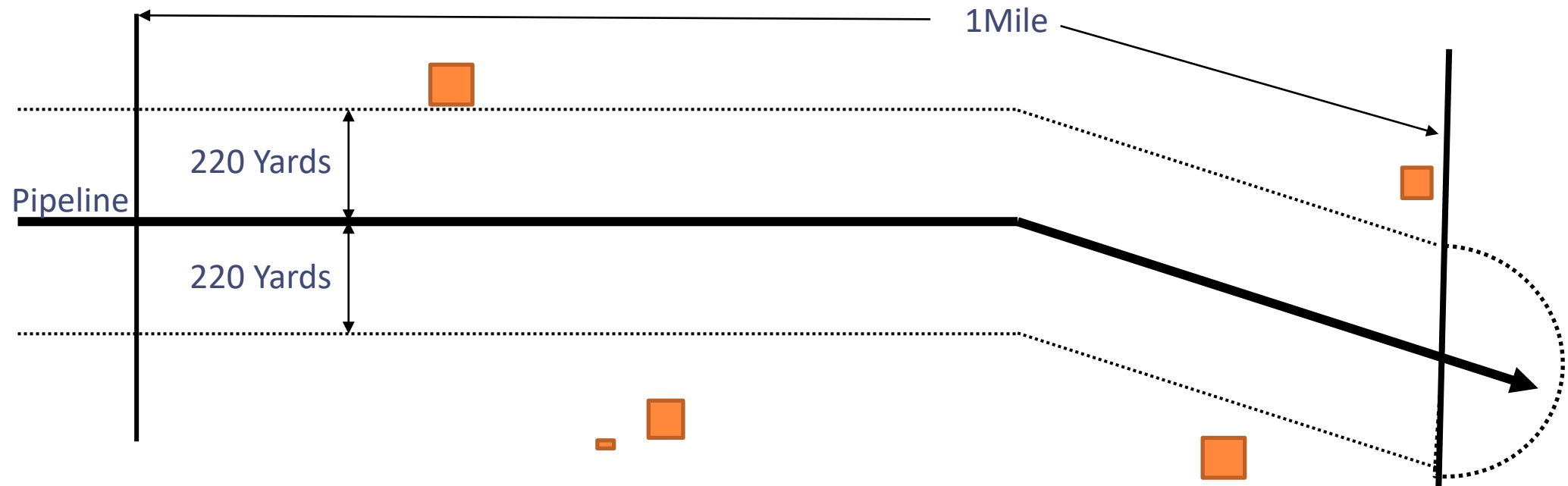
§192.9(f) Exceptions:

(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:

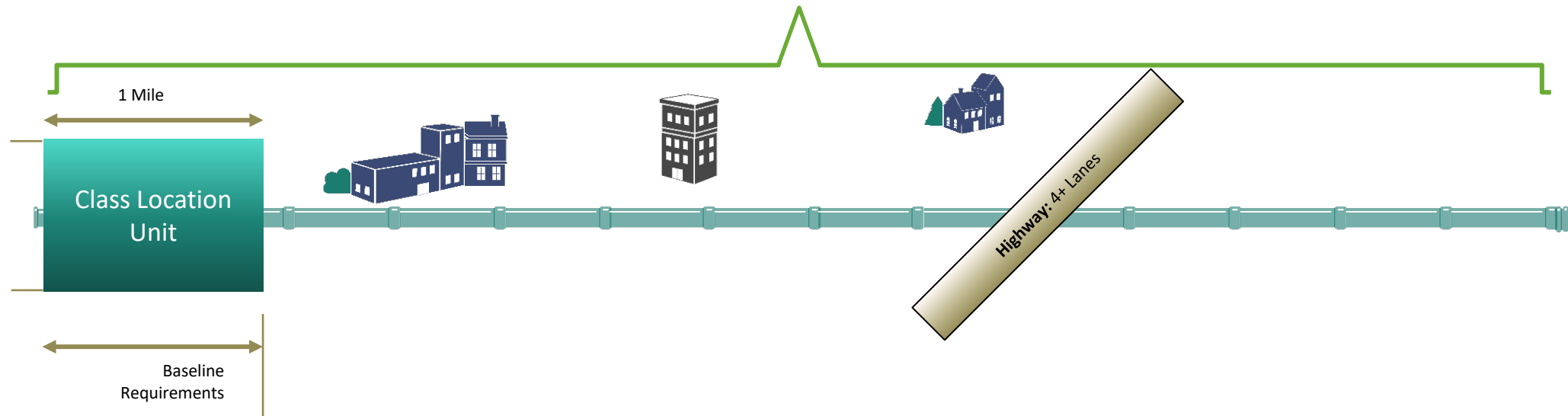
- (i) Method 1.
- (ii) Method 2.

TYPE C GATHERING – METHOD 2 MAOP REQUIREMENTS

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

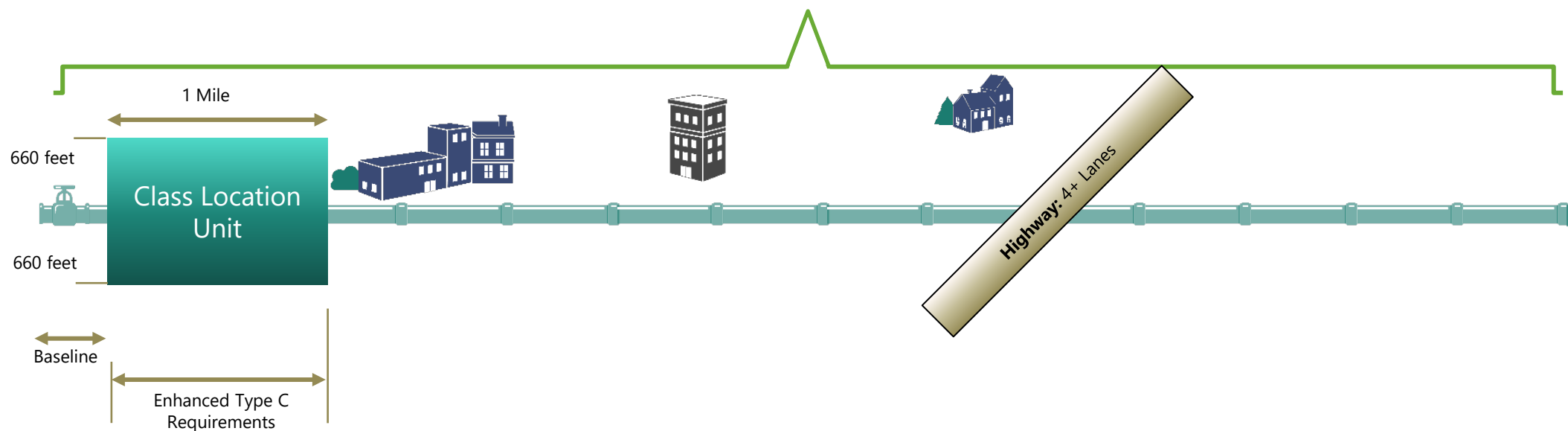


TYPE C GATHERING – METHOD 2, EXAMPLE 1



Application of Continuous Sliding Mile

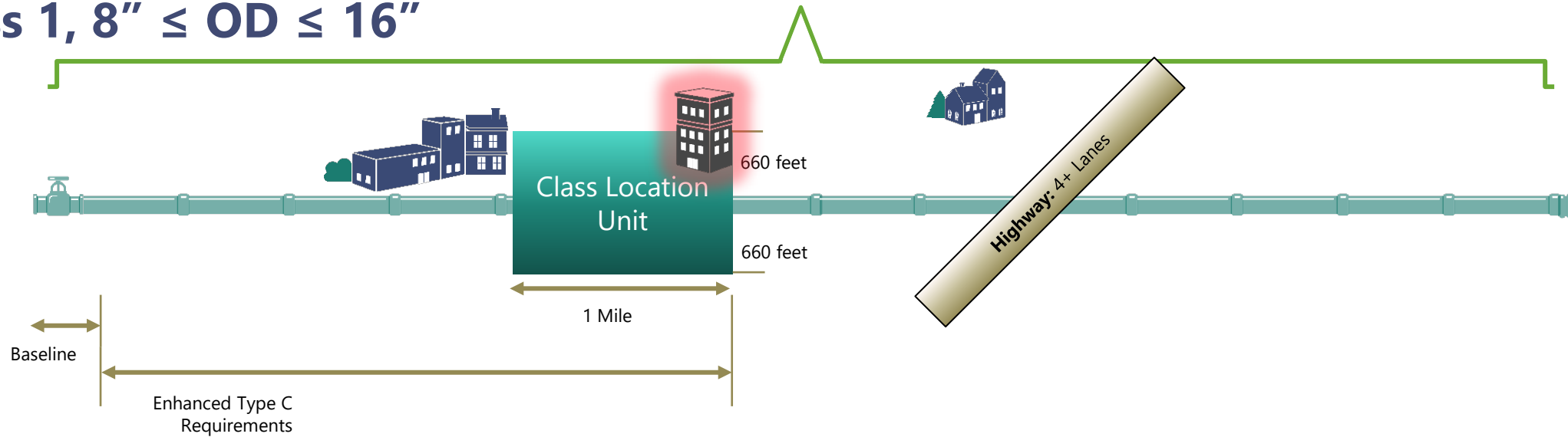
TYPE C GATHERING – METHOD 2, EXAMPLE 2



Application of Continuous Sliding Mile

TYPE C GATHERING – METHOD 2, EXAMPLE 3

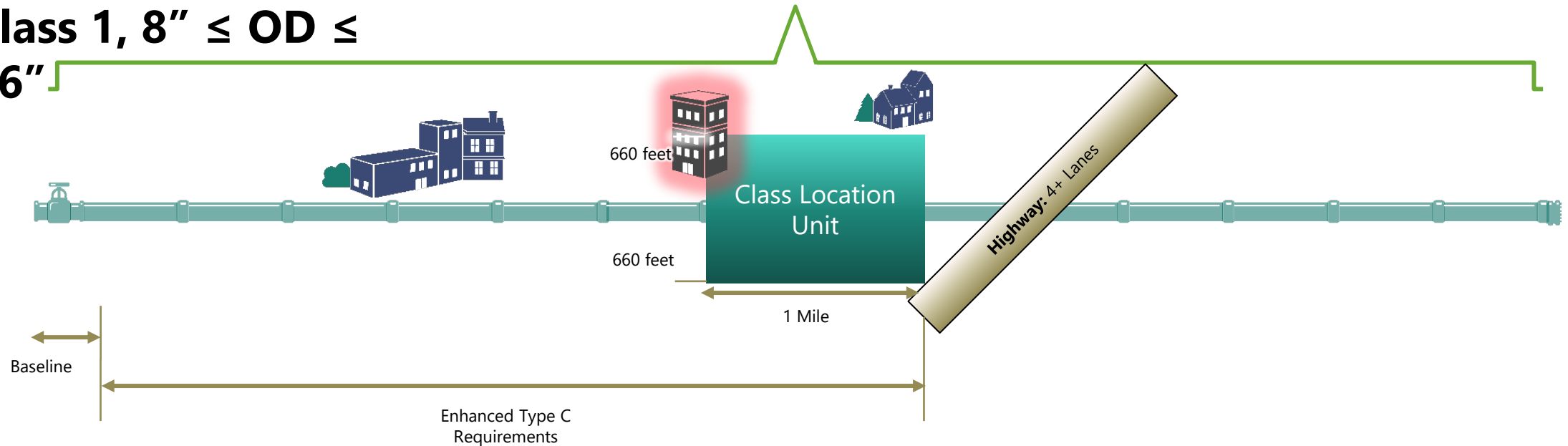
Class 1, $8'' \leq OD \leq 16''$



Application of Continuous Sliding Mile

TYPE C GATHERING – METHOD 2, EXAMPLE 4

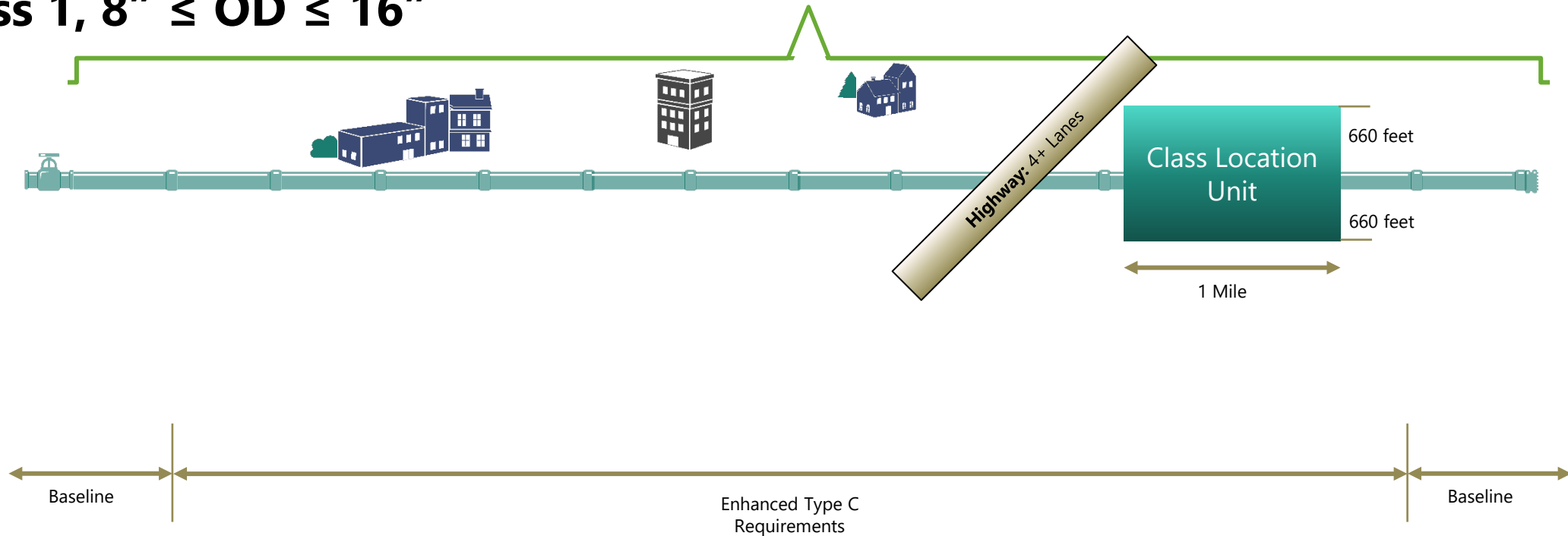
Class 1, $8'' \leq OD \leq 16''$



Application of Continuous Sliding Mile

TYPE C GATHERING – METHOD 2, EXAMPLE 5

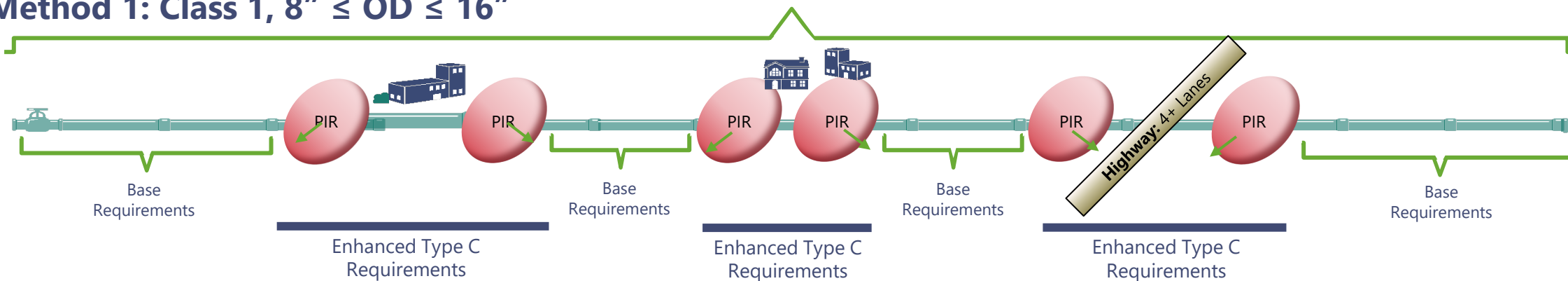
Class 1, $8'' \leq OD \leq 16''$



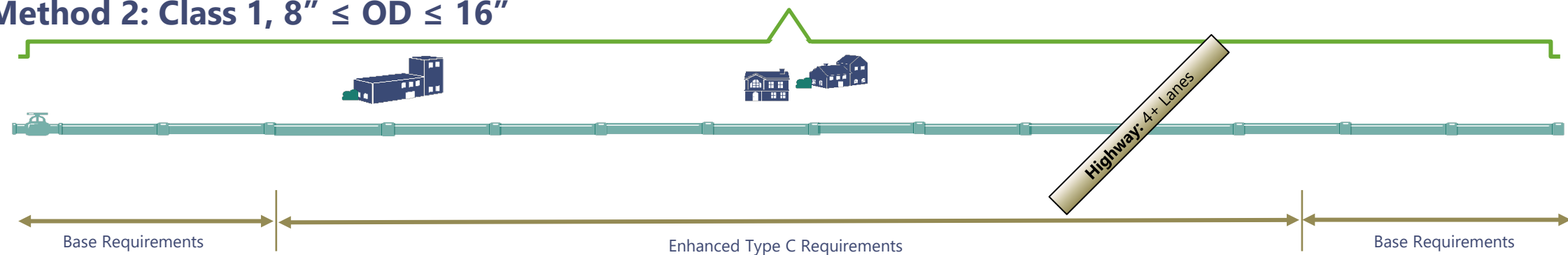
Application of Continuous Sliding Mile

TYPE C GATHERING – METHOD 1 & 2 COMPARISON

Method 1: Class 1, $8'' \leq OD \leq 16''$



Method 2: Class 1, $8'' \leq OD \leq 16''$



TYPE C GATHERING

All Type C gathering pipelines $\geq 8.625"$ must:

- Follow "all" reporting requirements of Part 191, has exemptions;
- After May 16, 2022, a new, replaced, relocated, or otherwise changed... be designed, installed, constructed, initial inspection, and tested in accordance with the requirements in subparts B through G and J of this part applicable to transmission lines;
- Carry out a Damage Prevention program under §192.614;
- Develop and implement procedures for emergency plans in accordance with §192.615.

TYPE C GATHERING

If the line is ≥ 8 " AND meets "criteria," the operator must also:

- *If the pipeline is metallic, control corrosion according to requirements of subpart I of this part applicable to transmission lines except for §192.493;*
- Develop and implement a written public awareness program in accordance with §192.616 [*API RP 1162 (1st edition, Dec. 2003)*];
- Install and maintain line markers according to the requirements for transmission lines in §192.707; and
- 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).

TYPE C GATHERING

If the line is > 12" AND meets "criteria," the operator must also:

- *If the pipeline contains plastic pipe*, comply with all applicable requirements of this part for plastic pipe or components. This does not include pipe and components made of composite materials that incorporate plastic in the design; and
- Establish the MAOP of the pipeline under §192.619(a) or (c) and maintain records used to establish the MAOP for the life of the pipeline.

TYPE C GATHERING

All Type C lines > 16" must:

- Follow all eight requirements outlined in §192.9(e).
- No exceptions for PIR or Class location.

TYPE C GATHERING – METHOD 1 MAOP REQUIREMENTS

§192.619(a): No *person* may operate a segment of *steel or plastic pipeline* at a *pressure* that exceeds a maximum allowable operating pressure (*MAOP*) determined under paragraph (c), (d), or (e) of this section, or the lowest of the following:

(3) The highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column. This pressure restriction applies unless the segment was tested according to the requirements in paragraph (a)(2) of this section after the applicable date in the third column or the segment was uprated according to the requirements in subpart K of this part:

PIPELINE SEGMENT	PRESSURE DATE	TEST DATE
(i) Onshore regulated gathering pipeline (Type A or Type B under §192.9(d)) that first became subject to this part (other than §192.612) after April 13, 2006	March 15, 2006, or date pipeline becomes subject to this part, whichever is later	5 years preceding applicable date in second column
(ii) Onshore regulated gathering pipeline (Type C under §192.9(d)) that first became subject to this part (other than §192.612) on or after May 16, 2022	May 16, 2023, or date pipeline becomes subject to this part, whichever is later	5 years preceding applicable date in second column
(iii) Onshore transmission pipeline that was a gathering pipeline not subject to this part before March 15, 2006	March 15, 2006, or date pipeline becomes subject to this part, whichever is later	5 years preceding applicable date in second column
(iv) Offshore gathering pipelines	July 1, 1976	July 1, 1971
(v) All other pipelines	July 1, 1970	July 1, 1965

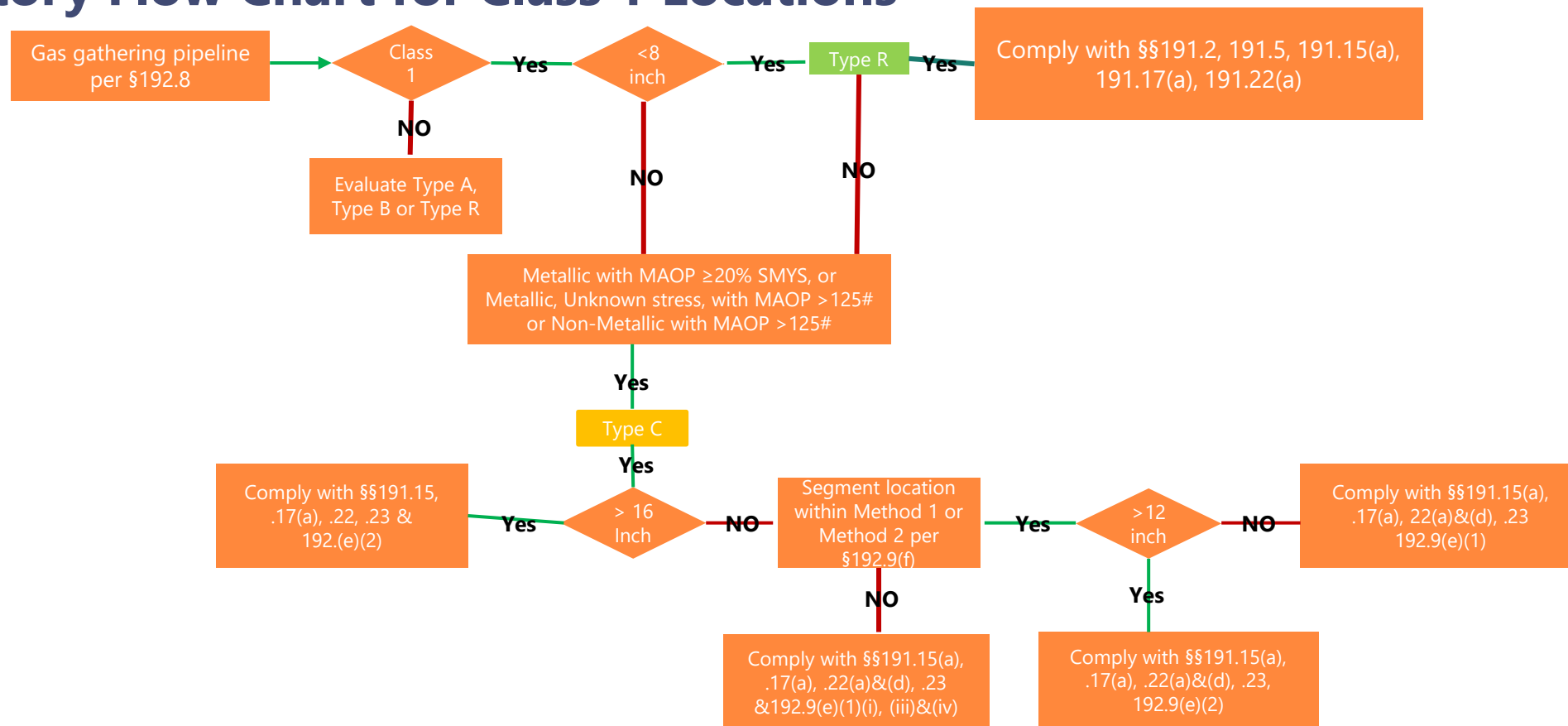
TYPE C GATHERING – METHOD 2

BUILDING INTENDED FOR HUMAN OCCUPANCY OR OTHER SITE

- 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.*

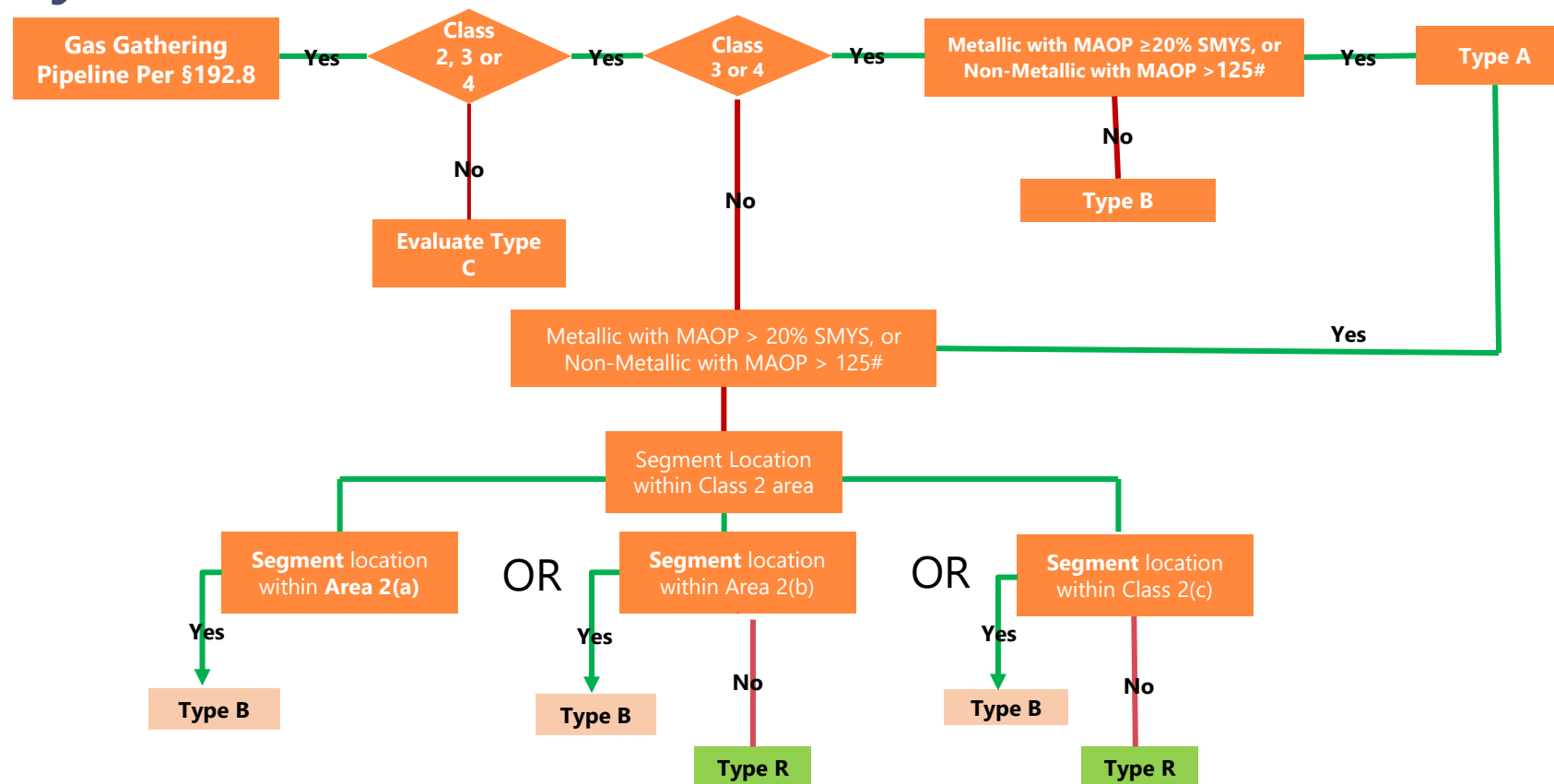
SAFETY OF GAS GATHERING LINES

Regulatory Flow Chart for Class 1 Locations



SAFETY OF GAS GATHERING LINES

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



SUMMARY OF TYPE C REQUIREMENTS

CRITERIA	TYPE C REQUIREMENTS (CUMULATIVE)
Diameter ≥ 8.625 inches.	<ul style="list-style-type: none">• 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: <ul style="list-style-type: none">• Public awareness §192.616• Line markers §102.707• 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: <ul style="list-style-type: none">• Plastic pipe requirements• Establish maximum allowable operating pressure MAOP §192.619



GAS GATHERING PIPELINES

PROVISION	SCOPE
Reporting (incident, annual) Part 191	All gathering
Design, Construction, initial Inspection and Testing*	All new and replaced Type C (diameter \geq 8.625")
Damage Prevention § 192.614	All Type C (diameter \geq 8.625")
Emergency Plans § 192.615	All Type C (diameter \geq 8.625")
Public Awareness § 192.616	Diameter 8.625" through 16" with a PIR exception All Type C with a diameter > 16"
Line Markers § 192.707	Diameter 8.625" through 16" with a PIR exception All Type C with a diameter > 16"
Corrosion Control Subpart I to part 192	Diameter 8.625" through 16" with a PIR exception All Type C with a diameter > 16"
Leakage Surveys and Repairs §§ 192.703, 192.706	Diameter 8.625" through 16" with a PIR exception All Type C with a diameter > 16"
Maximum Allowable Operating Pressure § 192.619	Diameter > 12.75" through 16" with a PIR exception All Type C with a diameter > 16"
Plastic Pipe Requirements	Diameter > 12.75" through 16" with a PIR exception All Type C with a diameter > 16"

SUMMARY OF TYPE C REQUIREMENTS §192.9(e)

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

SUMMARY OF TYPE C REQUIREMENTS

Since the Type C lines are by definition Class 1, are they required to perform an instrumented leakage survey? §192.706 only requires use of an instrument in Class 3 and 4 locations without odorized gas must use instruments.

§192.9(e)(1)(vii) requires the use of an instrument to conduct the leakage surveys.

§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).

SUMMARY OF TYPE C REQUIREMENTS

What is the time to remediate areas of low CP on type C pipeline? Does it start when the deficient area of CP was first discovered (i.e., before they were regulated) or is it May 16, 2023? Typically, an operator has until the next annual survey to fix the low CP area.

- Type C lines in operation after May 16, 2022, have to be in compliance at the time they begin operating.
- Operators of Type C previously in operation prior to May 16, 2022, have until May 16, 2023, to come into compliance with §192.9, including corrosion control requirements, if applicable. Accordingly, operators are not required to have in place corrosion control procedures or perform monitoring until May 16, 2023. After that, they have to promptly remediate under §192.465 but no later than the next annual survey interval.

TYPE C GATHERING – COMPOSITE PIPE

- Generally, 8" lines because largest size that is spoolable.
- Existing composite lines are grandfathered when they become regulated.
- §192.9(h) composite materials are not otherwise authorized unless requirements of this paragraph are met.
- Notification at least 90 days prior to installation.
- Submission of description meeting §§192.9(h)(2)(i – ix).
- §192.9(f)(2) – Requirements of Subparts B through G do not apply to segments that are ≤ 40 feet that are replaced, relocated or otherwise changed on pipelines in existence on or before May 16, 2022. Repairs and replacements do not require notification.

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.

TYPE C GATHERING – NOT REQUIRED

Type C lines are NOT required to have:

- O&M manual as per §192.605.
- OQ or CRM plan.
- An integrity management plan.
- Failure investigation procedures under §192.617.

COMPLIANCE DEADLINES

COMPLIANCE DEADLINES

- 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 $\leq 12.75"$: **May 17, 2024.**

COMPLIANCE DEADLINES

§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.

(2) If a Type A or Type B regulated onshore gathering pipeline 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 pipeline listed in the first column, unless the *Administrator* finds a later deadline is justified in a particular case:

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

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.

COMPLIANCE DEADLINES

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

(5) If, after May 16, 2022, a change in class location, an increase in dwelling density, or an increase in MAOP causes a pipeline to become a Type C gathering pipeline, or causes a Type C gathering pipeline to become subject to additional Type C requirements (see paragraph (f) of this section), the operator has 1 year after the pipeline becomes subject to the additional requirements to comply with this section.

This means operators are required to conduct Class Location studies to determine if any lines change classifications due to structures intended for human occupancy increasing or other listed changes occur requiring the line to be reclassified and meet new requirements for the new class location within the timeframe for the specific gathering type as previously discussed.

OTHER THINGS TO CONSIDER – DISTRIBUTION OFF GATHERING

NOTE: Look at the operators with new type C gathering with Farm Taps. These lines must meet the distribution regulations for pipelines including §192.740 or have their lines in a Distribution Integrity Management Plan.

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.

NOTABLE COURT DECISION

[GPA Midstream & American Petroleum Institute v. U.S. DOT PHMSA](#) – Petitioned Valve rule's applicability to Gathering lines.

Decision May 16, 2023 – Vacate rule in its entirety as it applies to gathering pipeline facilities!! [2020-01459.pdf \(govinfo.gov\)](#)

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?

PHMSA OF ENFORCEMENT DISCRETION NOTICE

PHMSA agrees to 1 year exercise of enforcement discretion for 8.625 to 12.750 lines for safety requirements. Compliance date of May 17, 2024.

Starting May 17, 2024, PHMSA will prioritize compliance with safety requirements.

PHMSA OF ENFORCEMENT DISCRETION APPLICABILITY

Regarding §191.22(c)(ii), what is the effective date for reporting construction of new Type C lines?

The stay applies to existing Type C only. New construction Type C is not impacted at all by the stay. The effective date for notifications for new construction (occurs on or after May 16, 2022) under §191.22(c)(ii) is May 16, 2022.

NOTIFICATIONS FOR COMPOSITE PIPELINES

What is the effective date for requiring notifications for use of composite pipe (which was May 16, 2022)?

The effective date in §192.18 and §192.9 for pipelines to be installed is on or after May 16, 2022. §192.9(h)(2) states “Operators must notify PHMSA in accordance with §192.18 at least 90 days prior to installing new or replacement pipe or components made of composite materials otherwise not authorized for use under this part in a Type C gathering pipeline.” The PHMSA Stay of Enforcement does not extend the May 16, 2022 date for §192.9(h)(2).

§192.18 has immediate effect as of May 16, 2022. If an operator wants to use composite pipe not otherwise allowable under 49 CFR Part 192, they must send a notification pursuant to §192.18, because 49 CFR Part 192 does not allow composite pipe without a notification to PHMSA.

NOTIFICATIONS FOR COMPOSITE PIPELINES

How do we address the repair of composite pipe?

The repairs should be conducted per the procedures originally approved in the notification made. In the case of repair, specifically addressing §192.9(h)(2)(vii).

§192.9(h) Composite materials.

(2) Operators must notify PHMSA in accordance with §192.18 at least 90 days prior to installing new or replacement pipe or components made of composite materials otherwise not authorized for use under this part in a Type C gathering pipeline. The notifications required by this section must include a detailed description of the pipeline facilities in which pipe or components made of composite materials would be used, including:

- (i) The beginning and end points (stationing by footage and mileage with latitude and longitude coordinates) of the pipeline segment containing composite pipeline material and the counties and States in which it is located;
- (ii) A general description of the right-of-way including high consequence areas, as defined in §192.905;
- (iii) Relevant pipeline design and construction information including the year of installation, the specific composite material, diameter, wall thickness, and any manufacturing and construction specifications for the pipeline;

NOTIFICATIONS FOR COMPOSITE PIPELINES

How do we address the repair of composite pipe?

The repairs should be conducted per the procedures originally approved in the notification made. In the case of repair, specifically addressing §192.9(h)(2)(vii).

§192.9(h) Composite materials.

(2) Operators must notify PHMSA in accordance with §192.18 at least 90 days prior to installing new or replacement pipe or components made of composite materials otherwise not authorized for use under this part in a Type C gathering pipeline. The notifications required by this section must include a detailed description of the pipeline facilities in which pipe or components made of composite materials would be used, including:

- (iv) Relevant operating information, including MAOP, leak and failure history, and the most recent pressure test (identification of the actual pipe tested, minimum and maximum test pressure, duration of test, any leaks and any test logs and charts) or assessment results;
- (v) An explanation of the circumstances that the operator believes make the use of composite pipeline material appropriate and how the design, construction, operations, and maintenance will mitigate safety and environmental risks;
- (vi) An explanation of procedures and tests that will be conducted periodically over the life of the composite pipeline material to document that its strength is being maintained;

NOTIFICATIONS FOR COMPOSITE PIPELINES

How do we address the repair of composite pipe?

The repairs should be conducted per the procedures originally approved in the notification made. In the case of repair, specifically addressing §192.9(h)(2)(vii).

§192.9(h) Composite materials.

(2) Operators must notify PHMSA in accordance with §192.18 at least 90 days prior to installing new or replacement pipe or components made of composite materials otherwise not authorized for use under this part in a Type C gathering pipeline. The notifications required by this section must include a detailed description of the pipeline facilities in which pipe or components made of composite materials would be used, including:

(vii) Operations and maintenance procedures that will be applied to the alternative materials. These include procedures that will be used to evaluate and remediate anomalies and how the operator will determine safe operating pressures for composite pipe when defects are found;

(viii) An explanation of how the use of composite pipeline material would be in the public interest; and

(ix) A certification signed by a vice president (or equivalent or higher officer) of the operator's company that operation of the applicant's pipeline using composite pipeline material would be consistent with pipeline safety.

NOTIFICATIONS FOR COMPOSITE PIPELINES

For pipe made with composite materials, is notification under §§192.9(h) and 192.18 required for replacement, relocation, or changes of 40 feet or less of composite pipe?

It depends on the installation date of the pipeline and the material used in the replacement. For all Type C gathering pipelines (including composite pipelines) installed prior to May 16, 2022, notification to PHMSA is not required for “pipeline segments 40 feet or less in length that are replaced, relocated, or changed,” per §192.9(f)(2). See 86 FR at 63289.

In addition, the final rule also allows the future use of composite pipe material on Type C gathering lines in certain circumstances, subject to PHMSA notification pursuant to §192.18 of the replacement, relocation, or other significant change to the pipe. See 86 FR at 63289. That notification is required regardless of pipe segment length. In other words, replacement or other significant change of a pipe segment on a Type C gathering line that was installed after May 16, 2022, using composite material requires a notification to PHMSA under §§192.9(h) and 192.18 regardless of the segment length. An operator may consider including in its initial §§192.9(h) and 192.18 notification its proposed procedures for future replacement or other significant change on all segments. If an operator discovers a condition that requires immediate replacement, operators should describe all urgent conditions in their §192.18 notification or conduct the repair using materials authorized under part 192, such as steel. Alternatively, they may describe those urgent conditions in their request for a state waiver per 49 U.S.C. 60118(e) or request an emergency special permit under §190.341.

Questions?

GAS GATHERING PIPELINES

Existing and New Rules

RESOURCES AVAILABLE FOR CLARIFICATIONS TO GATHERING

[eCFR](#)

[§192.8](#)

[§192.9](#)

[Amendment 191-30 & 192-129](#)

[ANSI GPTC Z380.1 Guide for Gas Transmission, Distribution, and Gathering Piping Systems](#)

[ANSI GPTC Z380.1 Appendix 22](#)

[API RP 80](#)

[Enforcement Discretion for Certain Type C Gathering Lines](#)

[Gathering line FAQ \(2006 FAQs-Type A & B, 2023 FAQs Type C and R\)](#)

[GPA Midstream & American Petroleum Institute v. U.S. DOT PHMSA](#)

[Integrity Management Performance](#)

[PHMSA Docket -2011-0023](#)

[Valve Rule](#)