GATHERING LINES and API RP 80

Pennsylvania Public Utility Gas Safety Conference

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49 CFR § 192.8

• How are onshore gathering lines and regulated onshore gathering lines determined?
  • An operator must use API RP 80
    – Incorporated by reference, see 49 CFR § 192.7
  • 49 CFR § 192.8(b) describes what regulated onshore gathering means
    – Type A or B gathering
Type A & B Gathering

• Type A Gathering (Class 2, 3 or 4)
  – Metallic and the MAOP is 20% or more of SMYS
  – Non-metallic and MAOP is more than 125 psig

• Type B Gathering (Class 2, 3 or 4)
  – Class 2 is 10 to 45 dwellings 150 feet from pipe along sliding mile or 5 or more dwellings 150 feet from pipe in a continuous 1000 feet
  – Metallic and the MAOP is less than 20% SMYS
  – Non Metallic and MAOP is 125 psig or less
49 CFR § 192 Requirements Type A Gathering

- Type A Gathering must comply with all applicable parts of 49 CFR § 192 except:
  - 49 CFR § 192.150 Passage of internal inspection devices.
  - Subpart O
  - Demonstrate compliance by describing the process to comply with subpart N (OQ) in a Class 2 location
49 CFR § 192 Requirements Type B Gathering

• Type B Gathering
  – If a line is new, replaced, relocated, or otherwise changed the design and construction must comply with 49 CFR § 192
  – Only 5 other code requirements may apply:
    – Subpart I, damage prevention, MAOP, line markers and public awareness
Compliance Deadlines

Regulated onshore Gathering line existing on April 14, 2006 and not previously subject to 49 CFR § 192, then an operator has until the following dates for compliance as per Docket No. PHMSA-1998-4868; Amendment 192-102:

- April 15, 2009 – Subpart I (Corrosion)
- October 15, 2007 – Damage Prevention
- October 15, 2007 – Establish MAOP
- April 15, 2008 – Install & maintain line markers
- April 15, 2008 – Establish a Public education program
Compliance Implementation

• Change in Class Location after April 14, 2006
  – Type B Gathering has 1 year to comply with the appropriate sections of 49 CFR § 192.
  – Type A Gathering has 2 years to comply with the appropriate sections of 49 CFR § 192.
Definitions

- **Gathering line** means a pipeline that transports gas from a current production facility to a transmission line or main.

- **Transmission line** means a pipeline other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not downstream from a distribution center; (2) operates at a hoop stress of 20% or more of SMYS; or (3) transports gas within a storage field.
• Under definition of an onshore gathering line
  – Appendix A – Onshore gas gathering decision trees
  – Two alternative guidelines to help determine gathering
  – Appendix B – Applications
  – Detailed figures showing gas gathering scenarios and the decision trees that leads an operator to determine the limits of gas gathering
API RP 80 2.2 (a)(1)(E)

- Under definition of an onshore gathering line
  - 2.2 (a)(1)(E) the connection to another pipeline downstream of: (i) the furthermost downstream endpoint identified in (A), (B), (C) or (D)
  - PHMSA considers the fifth possible endpoint (E) to be a “drafting error” that does not reflect PHMSA’s intent as stated in Interpretation 192.8
Prudent operators can classify pipelines connecting gas gathering systems to an existing transmission line as a transmission line if the line meet the requirements of 2.2 (a)(1)(A), (B), (C) and (D).

Regardless of class location the full length of the transmission line is jurisdictional to the PUC.
PUC Enforcement

• Operators can classify pipelines connecting gas gathering systems to an existing transmission line as gathering as per API RP 80 2.2 (a)(1)(E)

• Only the “incidental” gathering lines that fall in Class 2,3 or 4 areas would be jurisdictional to the PUC
During the development of API RP 80 physical parameters were considered and rejected as a means of determining a gas gathering pipeline definition. Factors such as pipeline length, size and operating pressure were determined to not be a reliable means of capturing pipeline function.
In Closing

• Remember, call before you dig!