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Energy/Natural Gas Pipeline: Pipeline and Hazardous Materials Safety Administration Proposes Regulations Updating Safety Requirements

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The United States Department of Transportation's Pipeline and Hazardous Materials Safety Administration ("PHMSA") has issued a Notice of Proposed Rulemaking ("Proposed Rule") to update safety requirements for onshore gas transmission and gathering pipelines.

PHMSA states that the Proposed Rule includes changes to the integrity management ("IM") requirements and to address issues related to non-IM requirements.

Specific IM requirements that the Proposed Rule would change include:

- Revision of IM repair criteria for pipeline segments located in high consequence areas (HCAs)
- Adding specificity to performance-based requirements related to the nature and application of risk models
- Improving requirements for collecting, validating and integrating pipeline data
- Strengthening requirements for applying knowledge gained through the IM Program
- Strengthening requirements on the selection and use of direct assessment methods
- Enhancing requirements for internal corrosion and external corrosion management programs
- Enhancing requirements for management of change

As to non-IM requirements, the Proposed Rule includes:

- A new "moderate consequence areas" definition
- Strengthen requirements for corrosion control of steel pipelines, which include:
 - External protective coating surveys after backfill
 - Interference surveys
 - Internal corrosion monitoring mitigation requirements
 - Additional requirement for the management of change
 - Mandatory integrity assessments
- Establishing repair criteria for pipeline segments not located in HCAs
- Requirements for verification of maximum allowable operating pressure
- Verification of pipeline material for certain onshore, steel, gas transmission pipelines

The Proposed Rule also would monitor regulation of onshore gas gathering lines, which include but are not limited to repealing the exemption for gas gathering line reporting requirements and repeal of the use of American Petroleum Institute's Recommended Practice 80.

Additional topics addressed include:

- Requiring inspections by onshore pipeline operators of areas affected by an extreme weather event such as a hurricane or flood, an earthquake, a natural disaster, or other similar event
- Allowing extension of the 7-year reassessment interval upon written notice
- Addition of a requirement to report each exceedance of the MAOP greater than the margin (billed-up) allowed for operation of pressure-limiting or control devices
- Addition of requirements to ensure consideration of seismicity of the area and identifying and evaluating all potential threats
- Adding safety regulations for in-line inspection, scraper, and spear facilities
- Incorporation of consensus standards in the regulations for assessing the physical condition of in-service pipelines using in-line inspection, internal corrosion direct assessment, and stress corrosion cracking direct assessment

A link to the Proposed Rule can be found here

http://www.phmsa.dot.gov/pv_obj_cache/pv_obj_id_729B0F8B414AEFAAEAE24281719AB912D8362900/filename/NPRM_Safety_of_Gas_Trans_and_Gathering_Pipelines_3_15_16_final.pdf