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Pipeline and Hazardous Materials Safety Administration Advisory Bulletin 03-21/Methane Leaks: Mandate to Update Inspection/Maintenance Plans

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The Pipeline and Hazardous Materials Safety Administration (“PHMSA”) issued Advisory Bulletin 03-21 in a prepublication Federal Register Notice titled:

Pipeline Safety: Statutory Mandate to Update Inspection and Maintenance Plans to Address Eliminating Hazardous Leaks and Minimizing Releases of Natural Gas from Pipeline Facilities (“Bulletin”)

See Docket No. PHMSA-2021-0050.

PHMSA states that the purposes of the *Bulletin* include:

- Reminding pipeline and pipeline facility operators of the requirements found in the federal Protecting our Infrastructure of Pipelines and Enhancing Safety Act (“PIPES Act”) mandating minimization of methane emissions
- Noting PIPES Act requirement that pipeline operators update inspection/maintenance plans to address the elimination of hazardous leaks and minimize natural gas releases
- Ensuring that updated plans address replacement or remediation at facilities that have historically experienced leaks
- Identifying procedures to prevent and mitigate both vented (intentional) and fugitive (unintentional) pipeline emissions
- Addressing the replacement/remediation of pipelines made from cast iron, bare steel, certain vintage plastic, or other legacy materials that are stated to cause disproportionately involved methane leaks

PHMSA states that the *Bulletin* is applicable to:

- 2.8 million-mile pipeline network
- 17,000 underground natural gas wells
- 164 liquefied natural gas facilities

The focus on methane (which is the primary component of natural gas) is its potency as a greenhouse gas.

A copy of the Bulletin can be downloaded [here](#).