



# **GAS GATHERING LINES**

Presented to  
**OHIO GAS ASSOCIATION**  
**2012 Technical Seminar Seminar**

**March 29, 2012**  
**Marriott Columbus Northwest Hotel**  
5605 Blazer Parkway  
Dublin, Ohio 43017

by  
**Paul E. Oleksa**  
**Oleksa and Associates, Inc.**



# DISCLAIMER

- 1) There are significant differences in opinion regarding Gathering Line issues.
- 2) Information in this presentation represents the personal opinions of Paul E Oleksa at this point of time. These opinions may change over time.
- 3) I believe that the regulations must be enforced as they are written, not the way someone may have intended them to be written or the way someone would like them to be written.



# DISCLAIMER

- 4) Federal or state enforcement personnel may not agree with the opinions expressed in this presentation.
- 5) Attendees are urged to research the facts regarding this issue and arrive at their own conclusions.



What Are Gathering Lines?  
What does it mean to you?





With All This We Have –

- **Confusion**
- **Contradictions**
- **OPPORTUNITY!!!**



# What are we Going to Cover?

- Review of Part 192 Regulations
- Review of API RP 80
- Review of PHMSA FAQs
- Comment on GPTC Guidance
- Point out some Differences of Opinion
- What YOU can do to affect NEW REGULATIONS



# First – Some History

***1968***

Congress authorized DOT to develop, prescribe, and enforce safety standards for the transportation of gas by pipeline.

This authorization did NOT include Gathering Lines in rural areas.



# History – continued

**1970**

DOT promulgated the first federal pipeline safety standards.

CFR Part 192.

The regulations did NOT cover Gathering Lines in rural areas.

“Gathering Line” was defined.



# Definition – GATHERING LINE

## §192.3

A pipeline that transports gas from a current production facility to a transmission line or main.



**NOTE – No precise definition regarding where a gathering line begins or ends.**



# History – continued

**1974**

Notice of Proposed Rulemaking  
(NPRM) to change the definition.

An attempt to define the beginning  
and end.



# History – continued

**1992**

- Pipeline Safety Act (PSA) of 1992.
- Authorized DOT to regulate “Regulated Gathering Lines.”
- This could include gathering lines in rural areas.



# History – continued

*1996*

- Accountable Pipeline Safety and Partnership Act of 1996.
- Clarified that DOT had authority to obtain information from owners and operators of gathering lines.



# History – continued

*August 25, 2011*

- Advance Notice of Proposed Rulemaking (ANPRM).
- Section O, Modifying the Regulation of Gas Gathering Lines (page 53,100).
- Opens up many questions relating to regulation of Gathering Lines.



# Current Regulations

## 192.1(b)(4) – SCOPE

- Regulations do not include gathering lines that operate at a vacuum.
- Regulations apply only to “regulated onshore gathering lines.”

## 192.3 – DEFINITIONS

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



# Current Regulations

## 192.8(a)

- Use API RP 80 to determine if a pipeline is an onshore gathering line.
- If it is, then use 192.8(b) to determine if the line is a “regulated onshore gathering line.”

## 192.8(a)(1)

Provides limitations on the beginning and end of a regulated onshore gathering line.



# Current Regulations

## 192.8(b)

### Type A

- Only applies to lines in Class 2, 3, or 4 locations.
- Metallic plus hoop stress of 20% or more of SMYS.
  - If stress level is **unknown**, use Subpart C ( §192.107).
  - However, if yield strength is determined as a result of hardness testing according to the Gas Pipeline Safety Research Committee (GPSRC) of ASME, the stress level is **NOT unknown**.
- Non-metallic and MAOP is more that 125 psig.



# Current Regulations

**192.8(b)**

**Type B**

**Only applies to lines**

- **in Class 3 or 4 locations,**
- **In certain areas within Class 2 locations,**  
**or**
- **In a “safety buffer” area.**



# Current Regulations

## 192.8(b)

### Type B

- **Metallic plus hoop stress less than 20% SMYS.**
  - If stress level is **unknown**, use Subpart C ( §192.107).
  - However, if yield strength is determined as a result of hardness testing according to the Gas Pipeline Safety Research Committee (GPSRC) of ASME, the stress level is **NOT unknown**.
- **Non-metallic and MAOP is 125 psig or less.**



# Current Regulations

## Gathering lines that are NOT regulated

- **Gathering lines in a Class 1 location**
- **Any Type B gathering line in a Class 2 location that is:**
  - **Outside of those certain areas, and**
  - **Not in a safety buffer.**



## What Does it Mean to You?

**Type A** Regulated Onshore Gathering Line  
Same Rules as Transmission Line, Except:

- 1) Need Not be Constructed to Accommodate Smart Pigs.
- 2) Need Not Have Integrity Management (IM) Program.
- 3) Reduced Operator Qualification (OQ) Requirements for Class 2 Locations.



## Type A or B Regulated Onshore Gathering Line

- 1) Subject to Inspection and Enforcement.
- 2) Reporting
  - Annual Reports
  - Incident Reports
  - Safety-Related Condition Reports
- 3) Manuals, Procedures, Programs
  - Comprehensive Construction Specifications or Standards
  - Written Damage Prevention Program
  - Written Public Awareness (Education) Program
- 4) Cathodic Protection Program
- 5) Determine Class Locations
- 6) Determine MAOPs (Pressure Tests, Strength)
- 7) Install & Maintain Line Markers
- 8) Record Keeping



# What Does it Mean to You?

## **Type B** Regulated Onshore Gathering Line

- 1) Design, Installation, Construction, Inspection, and Testing as Transmission Line (Not Retroactive).
- 2) If metallic, Corrosion Control.
- 3) Damage Prevention Program.
- 4) Public Education Program.
- 5) Establish MAOP (Testing, Strength)
- 6) Line Markers.



# What Does it Mean to You?

## ***Additional*** Requirements for **Type A** **Regulated Onshore Gathering Lines**

- 1) Operations & Maintenance Procedures.
- 2) Emergency Plan.
- 3) Full Written OQ program for Class 3 or 4 locations.



## Simplified RP 80 Definition of GATHERING LINE

- 1) Transports gas to furthestmost downstream point of:
  - Furthestmost downstream processing plant,
  - Outlet of furthestmost downstream treatment,
  - Furthestmost downstream point of commingling,
  - Outlet of furthestmost downstream compressor,
  - **OR (Very Important Word)**
  - Connection to another pipeline downstream of above (Incidental Gathering).
- 2) Transports gas for fuel, gas lift, or gas injection gas for production or gathering.



## FAQ 5

- 1) Because of RP 80 2.2(a)(1)(D), gathering ends at the outlet of the compressor station.
- 2) However, because of 2.2(a)(1)(E), gathering ends at the connection to the transmission line.



## FAQ 6

- 1) Where does a compressor station end?
- 2) The regulations don't say, so the operator has the responsibility to determine this based on good engineering and operational judgment.



## FAQ 7

- 1) Point of last commingling.
- 2) FAQ states that point on the pipeline in which the gas is commingled must be within 50 miles.
- 3) There is **NOTHING** in regulations to support this statement.



## FAQ 15

- 1) Can different methods of determining regulated pipeline segment be used on the same pipeline?
- 2) FAQ states that a consistent method should be used for each individual pipeline. There is **NOTHING** in regulations to support this statement.



## FAQ 16b

- 1) FAQ states that the beginning of gathering is intended to be where gas transitions to single phase flow (no liquids).
- 2) There is **NOTHING** in regulations to support this statement.



## GPTC Guide

- 1) The Guide for Gas Transmission & Distribution Piping Systems, published by the Gas Piping Technology Committee is a TREMENDOUS aid in determining how to comply with the regulations.
- 2) Use of this resource is highly encouraged.



## OPPORTUNITY FOR YOU

- 1) Advanced Notice of Proposed Rulemaking (ANPRM).
- 2) Federal Register August 25, 2011, page 53,086 (See Section O, page 53100).
- 3) Notice of Proposed Rulemaking (NPRM) to be published ... (we don't know when) ...
- 4) Make your thoughts heard!!!



# Final Rule

**It's Coming !**



# THANK YOU

Paul E. Oleksa

Phone: 330-659-0387

E-mail: [poleksa@oleksa.com](mailto:poleksa@oleksa.com)

Oleksa and Associates, Inc.

<http://www.oleksa.com>

For Ohio Gas Association Technical Seminar  
March 29, 2012