Gas Gathering Pipelines

Docket No. PHMSA– 2011–0023

RIN: 2137-AF38

86 FR 63296, Nov. 15, 2021

(referred to as RIN-3)

US DOT PHMSA

Office of Pipeline Safety

Highlights of New Requirements

- Annual and incident reporting for all gas gathering lines, including previously unregulated lines
- Documentation of beginning and ending points of all gathering lines.
- Newly designated “Type C” and “Type R” gathering lines
  - **Type C** - Previously-unregulated gathering pipelines subject to safety standards in part 192 and reporting requirements in part 191
  - **Type R** - All other onshore gathering lines in Class 1 and 2 locations subject to reporting requirements in part 191.
- “Incidental Gathering” line exception limited to lines 10 miles or less from the furthermost downstream endpoint of gathering for newly constructed lines or otherwise changed after May 16, 2022.

Compliance Dates

- 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.**

Compliance Dates

§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** comply with the applicable requirements prior to the May 16, 2023, 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.

- (3) If, after April 14, 2006, an onshore gathering pipeline becomes a Type A or Type B, the operator must comply with §192.9(g):
  - Type B – 1 year
  - Type A - 2 years
- (4) If a Type C gathering pipeline existing on or before May 16, 2022, an operator must comply with the applicable requirements of this section, except for paragraph (h), on or before May 16, 2023; or An alternative deadline approved by PHMSA submitted per §192.18 90 days prior to the deadline and include:
  - Notification to PHMSA and *State* or local pipeline safety authorities,
  - 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.

Stakeholder Litigation – GPA/API

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 Numbers for Gathering

- All Type A, Type B and Type C

	INTERSTATE						INTRASTATE											
Calendar Year	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
2023	96.9	37.1	2,201.1	4,857.5	7,192.6	37	8,501.7	4,628.9	90,712.4	511.8	104,354.7	513	**8,598.6**	**4,666.0**	**92,913.5**	**5,369.3**	**111,547.4**	**539**
2022	87.7	39.9	2,016.8	4,989.4	7,133.9	40	8,129.2	4,620.0	91,982.1	516.9	105,248.3	504	**8,217.0**	**4,659.9**	**93,999.0**	**5,506.4**	**112,382.2**	**533**
2021	119.4	49.3	0.0	5,227.6	5,396.3	36	8,126.0	3,096.6	0.0	550.9	11,773.4	359	**8,245.4**	**3,145.9**	**0.0**	**5,778.4**	**17,169.7**	**384**
2020	131.0	73.1	0.0	5,394.6	5,598.7	38	8,279.3	3,127.8	0.0	556.0	11,963.1	370	**8,410.3**	**3,200.9**	**0.0**	**5,950.5**	**17,561.8**	**398**
2019	135.1	69.0	0.0	5,221.1	5,425.2	38	8,510.5	3,231.4	0.0	621.1	12,363.1	370	**8,645.5**	**3,300.5**	**0.0**	**5,842.3**	**17,788.2**	**399**
2018	149.1	61.7	0.0	5,589.2	5,800.0	35	8,296.8	3,206.7	0.0	612.6	12,116.1	363	**8,445.9**	**3,268.4**	**0.0**	**6,201.9**	**17,916.1**	**388**
2017	172.9	84.6	0.0	5,586.0	5,843.5	36	8,436.9	3,159.4	0.0	657.5	12,253.9	344	**8,609.9**	**3,244.1**	**0.0**	**6,243.5**	**18,097.4**	**372**
2016	182.4	69.2	0.0	5,662.5	5,914.0	40	8,073.1	3,192.9	0.0	683.0	11,949.0	346	**8,255.4**	**3,262.1**	**0.0**	**6,345.4**	**17,862.9**	**375**
2015	155.5	92.0	0.0	5,272.0	5,519.4	38	8,134.5	3,238.2	0.0	890.5	12,263.3	351	**8,290.0**	**3,330.2**	**0.0**	**6,162.5**	**17,782.7**	**377**
2014	200.0	74.0	0.0	5,090.6	5,364.6	39	7,645.1	3,522.1	0.0	998.1	12,165.3	343	**7,845.1**	**3,596.1**	**0.0**	**6,088.7**	**17,529.9**	**369**
2013	222.5	129.6	0.0	5,147.3	5,499.3	42	7,403.3	3,541.3	0.0	933.2	11,877.8	330	**7,625.7**	**3,670.8**	**0.0**	**6,080.5**	**17,377.1**	**360**
2012	180.5	88.7	0.0	4,899.3	5,168.5	38	6,772.0	3,544.4	0.0	1,047.3	11,363.6	320	**6,952.4**	**3,633.1**	**0.0**	**5,946.7**	**16,532.2**	**346**
2011	329.2	285.1	0.0	5,180.7	5,795.0	36	7,441.3	4,847.6	0.0	1,193.1	13,482.0	313	**7,770.6**	**5,132.7**	**0.0**	**6,373.8**	**19,277.0**	**338**
2010	703.3	303.4	0.0	5,512.1	6,518.8	35	6,778.3	5,070.0	0.0	1,182.3	13,030.6	301	**7,481.6**	**5,373.4**	**0.0**	**6,694.4**	**19,549.4**	**323**

https://portal.phmsa.dot.gov/analytics/saw.dll?Portalpages&PortalPath=%2Fshared%2FPDM%20Public%20Website%2F_portal%2FPublic%20Reports&Page=Infrastructure

PHMSA Numbers for Gathering

- Interstate Type A, Type B and Type C

	INTERSTATE					
Calendar Year	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
2023	96.9	37.1	2,201.1	4,857.5	7,192.6	37
2022	87.7	39.9	2,016.8	4,989.4	7,133.9	40
2021	119.4	49.3	0.0	5,227.6	5,396.3	36
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2016	182.4	69.2	0.0	5,662.5	5,914.0	40
2015	155.5	92.0	0.0	5,272.0	5,519.4	38
2014	200.0	74.0	0.0	5,090.6	5,364.6	39
2013	222.5	129.6	0.0	5,147.3	5,499.3	42
2012	180.5	88.7	0.0	4,899.3	5,168.5	38
2011	329.2	285.1	0.0	5,180.7	5,795.0	36
2010	703.3	303.4	0.0	5,512.1	6,518.8	35

PHMSA Numbers for Gathering

- Intrastate Type A, Type B and Type C

	INTRASTATE					
Calendar Year	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
2023	8,501.7	4,628.9	90,712.4	511.8	104,354.7	513
2022	8,129.2	4,620.0	91,982.1	516.9	105,248.3	504
2021	8,126.0	3,096.6	0.0	550.9	11,773.4	359
2020	8,279.3	3,127.8	0.0	556.0	11,963.1	370
2019	8,510.5	3,231.4	0.0	621.1	12,363.1	370
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2016	8,073.1	3,192.9	0.0	683.0	11,949.0	346
2015	8,134.5	3,238.2	0.0	890.5	12,263.3	351
2014	7,645.1	3,522.1	0.0	998.1	12,165.3	343
2013	7,403.3	3,541.3	0.0	933.2	11,877.8	330
2012	6,772.0	3,544.4	0.0	1,047.3	11,363.6	320
2011	7,441.3	4,847.6	0.0	1,193.1	13,482.0	313
2010	6,778.3	5,070.0	0.0	1,182.3	13,030.6	301

PHMSA Numbers for Gathering

- All Type A, Type B and Type C

Calendar Year	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
2023	8,598.6	4,666.0	92,913.5	5,369.3	111,547.4	539
2022	8,217.0	4,659.9	93,999.0	5,506.4	112,382.2	533
2021	8,245.4	3,145.9	0.0	5,778.4	17,169.7	384
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2016	8,255.4	3,262.1	0.0	6,345.4	17,862.9	375
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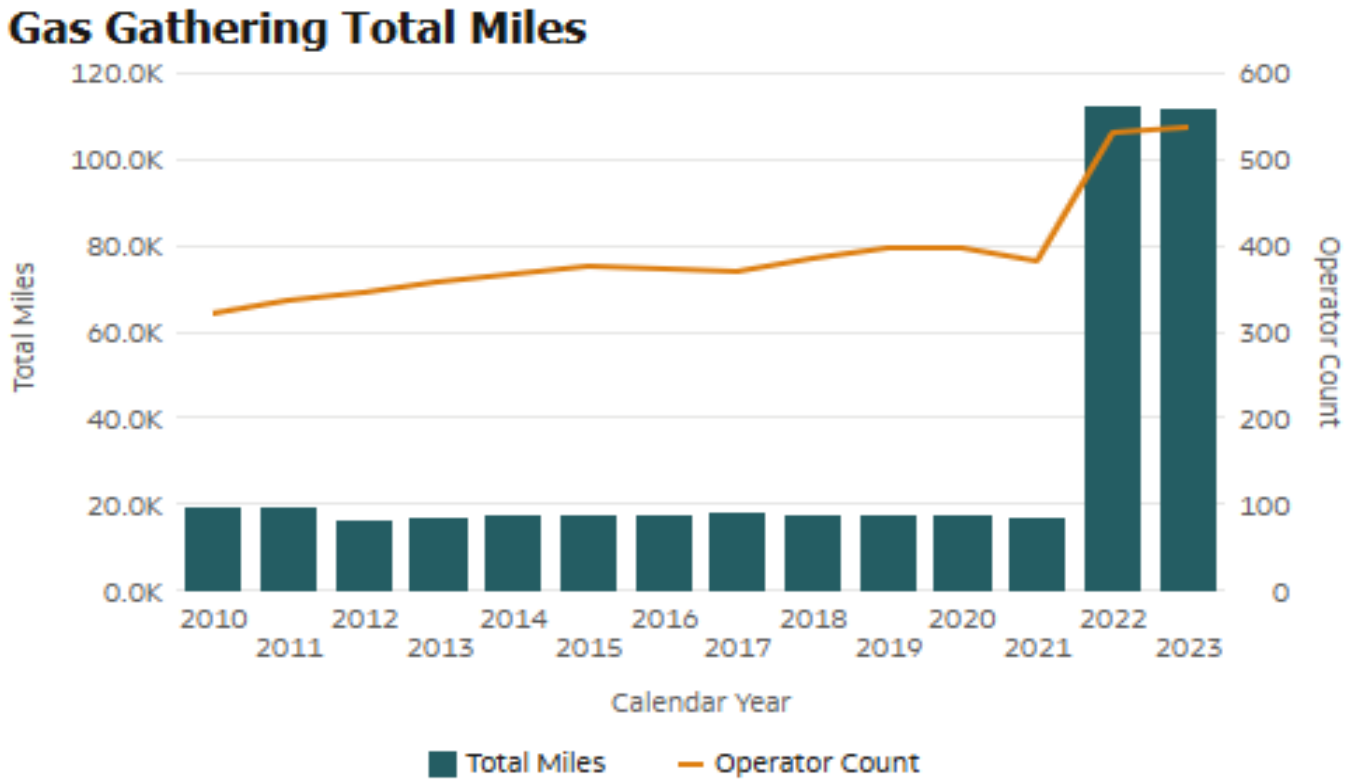
2014	7,845.1	3,596.1	0.0	6,088.7	17,529.9	369
2013	7,625.7	3,670.8	0.0	6,080.5	17,377.1	360
2012	6,952.4	3,633.1	0.0	5,946.7	16,532.2	346
2011	7,770.6	5,132.7	0.0	6,373.8	19,277.0	338
2010	7,481.6	5,373.4	0.0	6,694.4	19,549.4	323

PHMSA Numbers for Gathering

- All Type A, Type B and Type C



PHMSA Numbers for Gathering

All Type R

			INTERSTATE		INTRASTATE		Type R Miles	Operator Count
Calendar Year	Type R Miles	Operator Count	Type R Miles	Operator Count	Type R Miles	Operator Count		
2023		1	4,158	21	262,457	585	**266,615**	**599**
2022			4,026	24	244,895	515	**248,921**	**530**

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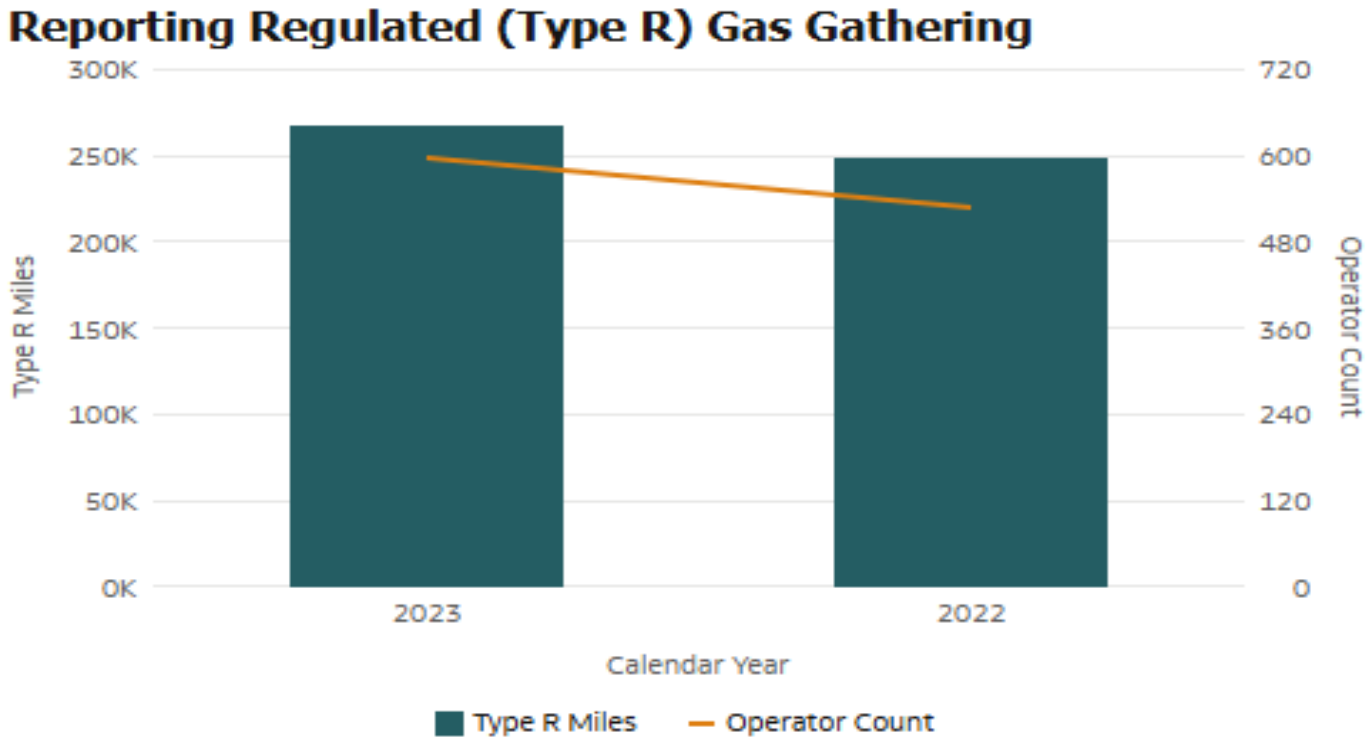
PHMSA Numbers for Gathering

All Type R



Mileage of Gas Gathering Reported Data from 2023 Annual Reports.

State Name	Type A (miles)	Type B (miles)	Type C (miles)	Offshore (miles)	Type R miles (miles)	Total Miles
Texas	4,696	1,182	39,283	372	96,101	~141,634
Oklahoma	267	712	16,581	0	56,000	~73,560
New Mexico	241	96	7,482	0	21,809	~29,628
Wyoming	30	0.1	5,255	0	8,593	~13,878
North Dakota	12	19	2,467	0	9,486	~11,984
Colorado	543	82	4,161	0	7,088	~11,874
Kansas	18	18	1,514	0	11,801	~11,801
Louisiana	509	26	5,278	279	4,511	~10,603
Pennsylvania	570	291	3,786	0	4,663	~9,320
West Virginia	211	198	2,498	0	3,508	~6,037
Ohio	422	1,740	1,939	0	1,817	~5,918
Arkansas	116	28	780	0	4,233	~5,157
Total ALL	~7,519	~4,392	~91,024	~651	~229,610	~333,196

Gathering lines – RP 80 Limitations

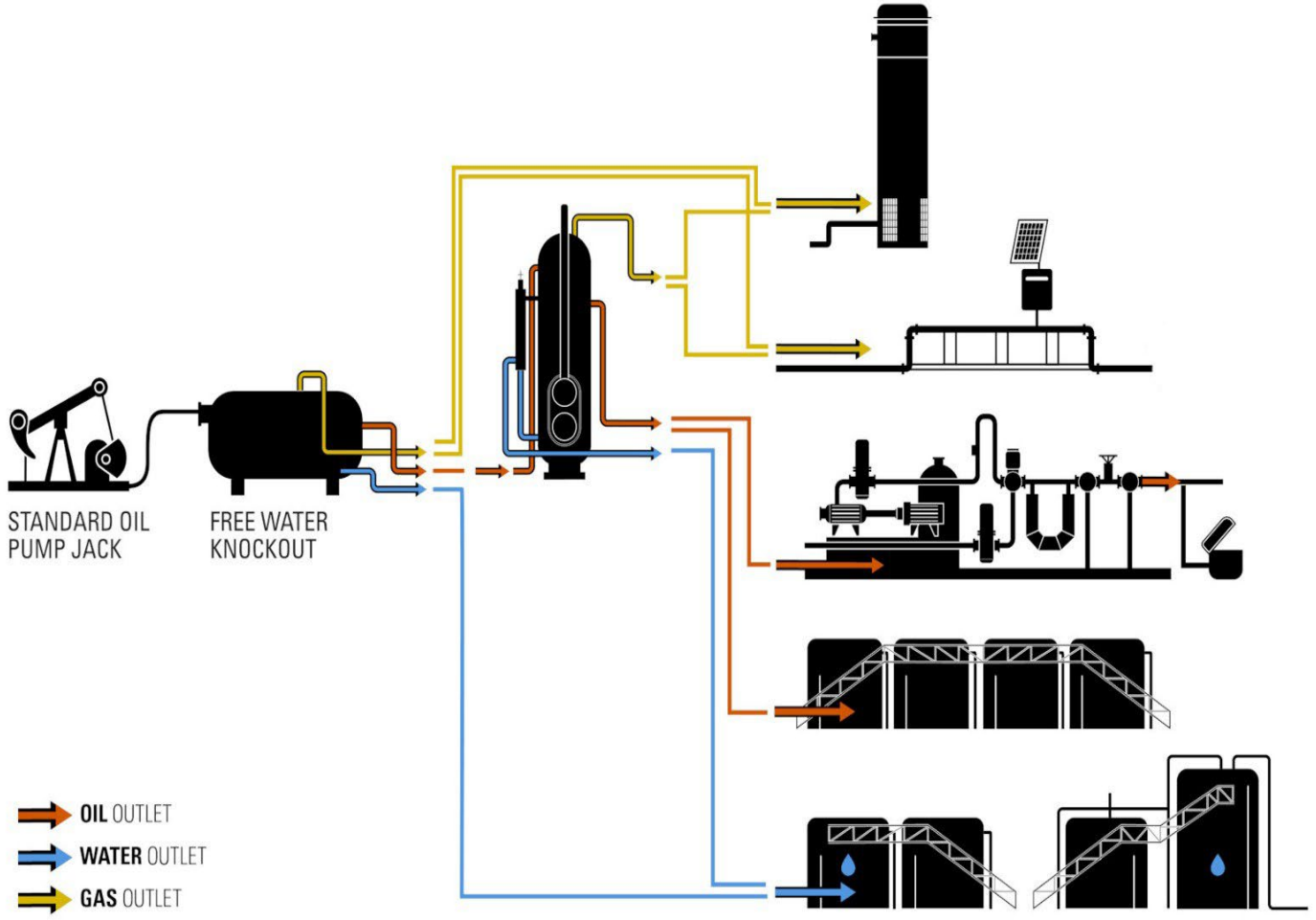
The end of production is the beginning of gathering

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 (50 miles)
- Compressor station (Cannot extend beyond furthest most downstream)
- Incidental gathering (10 miles)

End of production

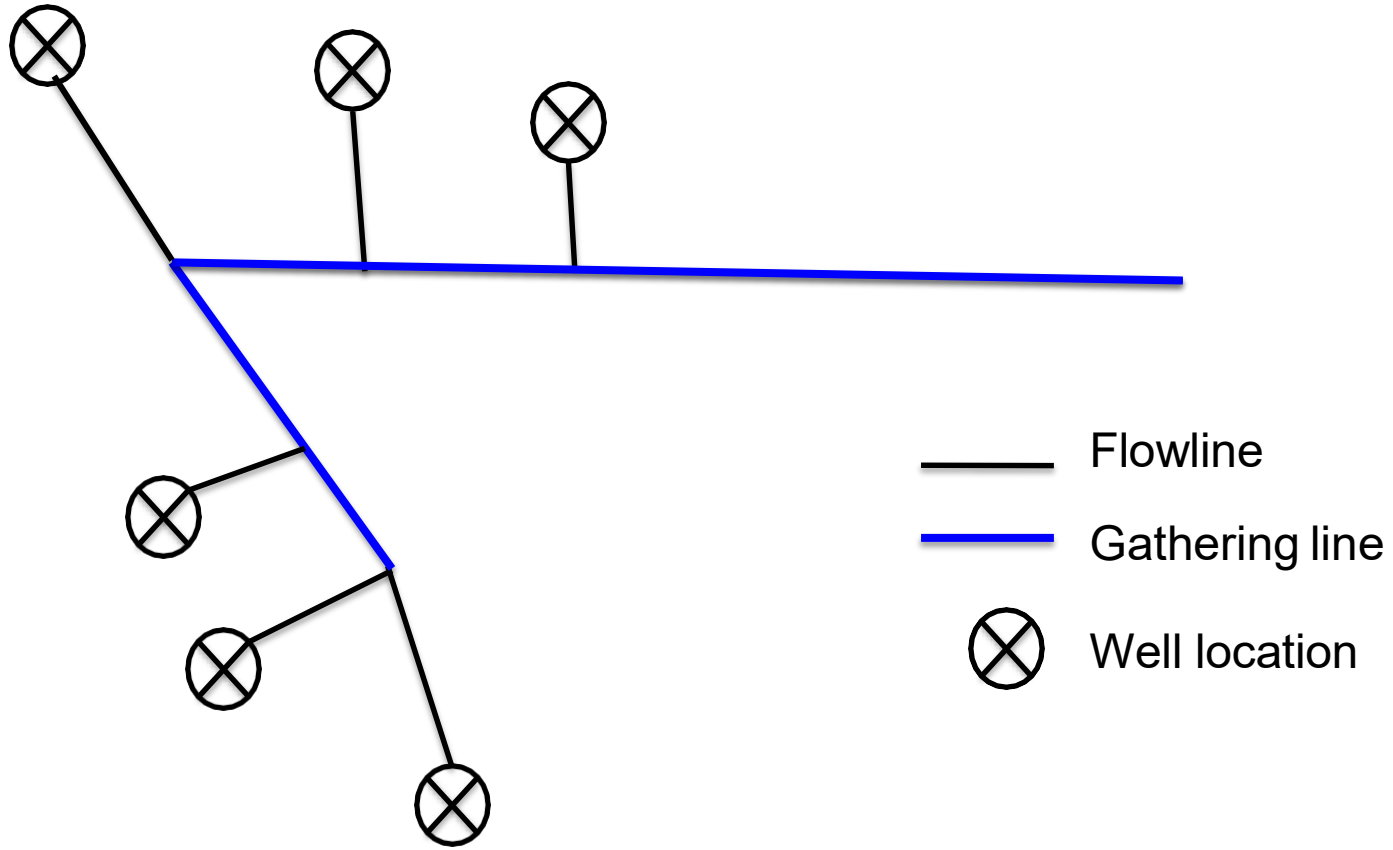
The end of production operations and the beginning of gathering operations at the point where gas transitions to single phase flow regardless of whether the gas meets the gas quality requirements of the transmission line.



2007 FAQ Drawing 16B

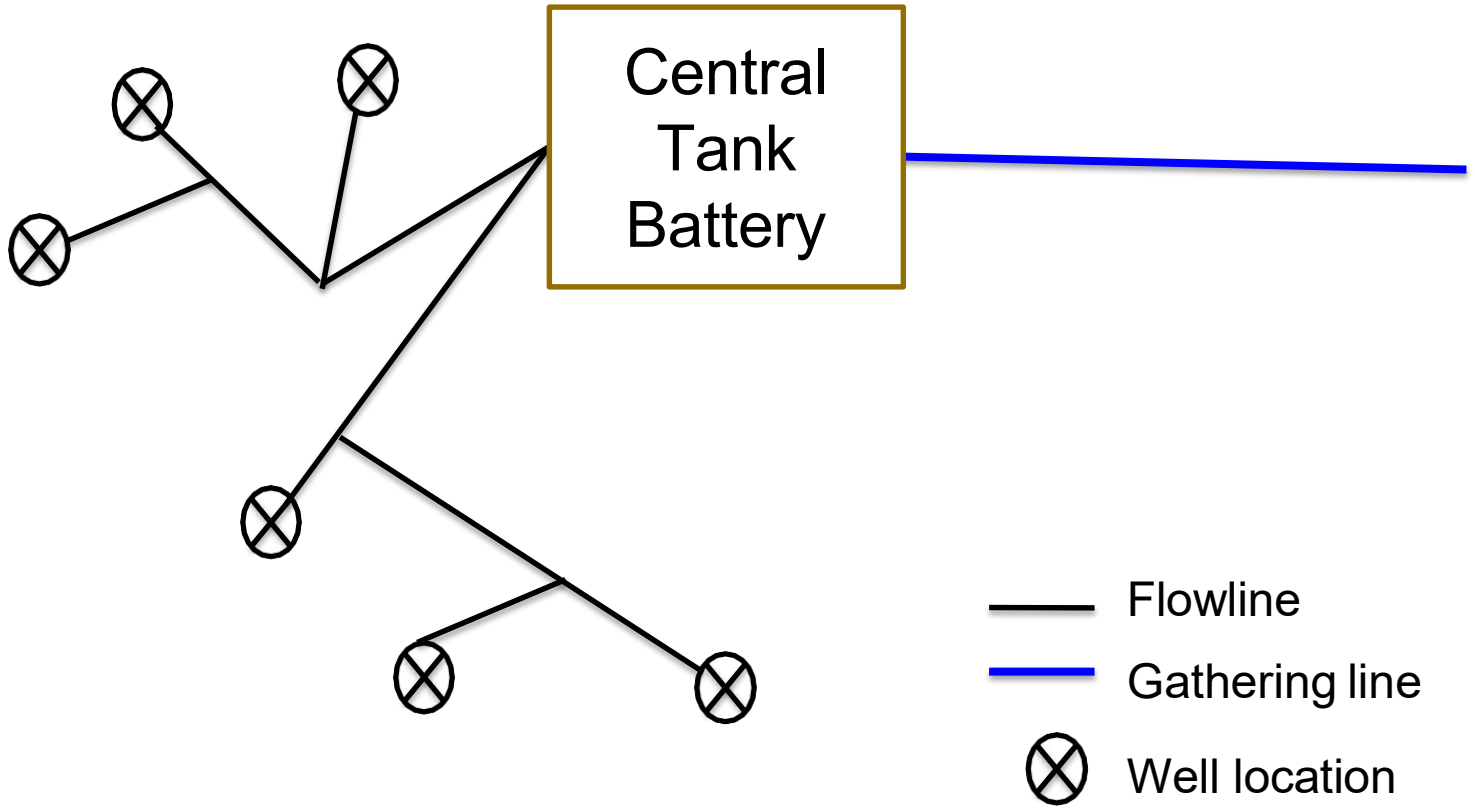
Wells pads have separation, heater treaters and stock tanks. Flowlines transporting gas only.

Some wells don't require separation and produce in a single phase



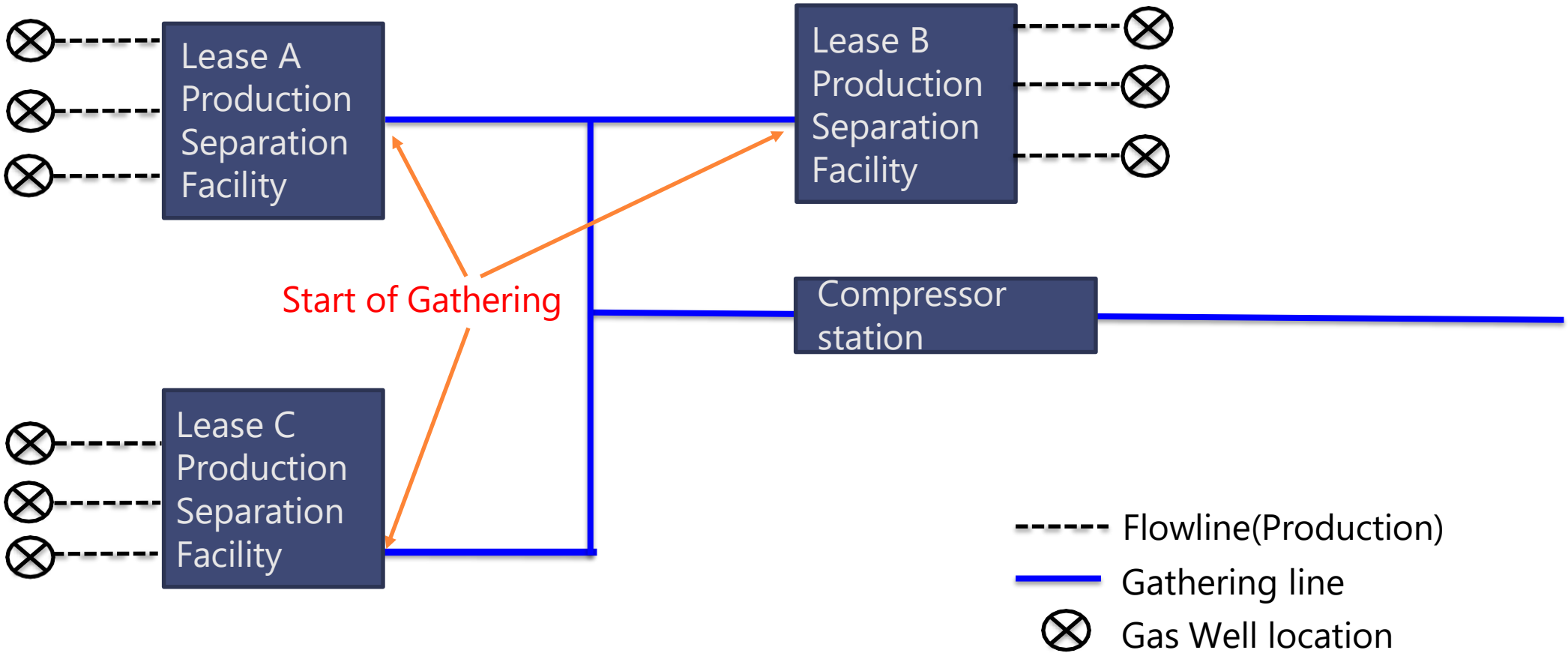
2007 FAQ Drawing 16B

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



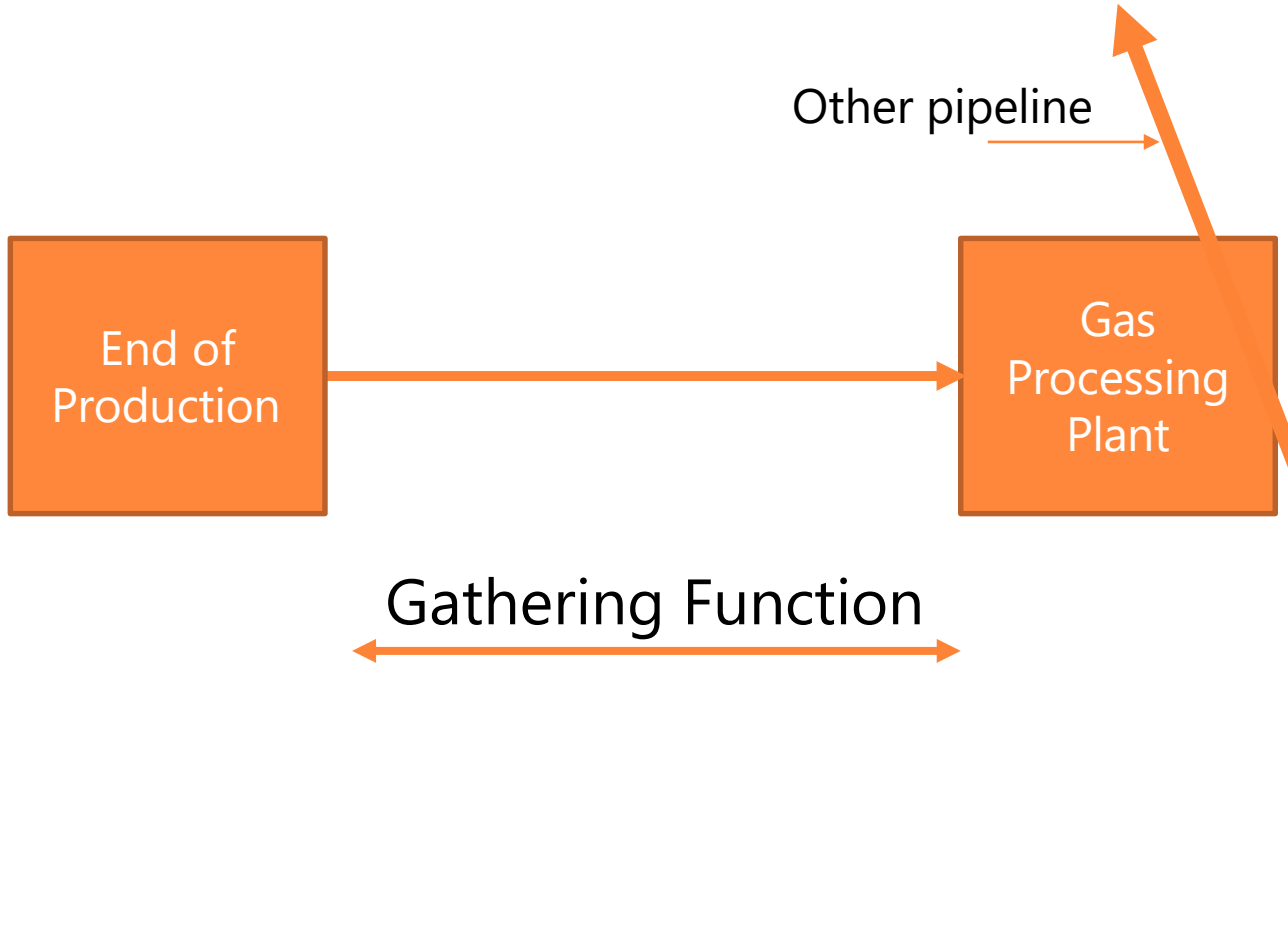
API RP 80

Top left side of API RP 80 Figure B-1



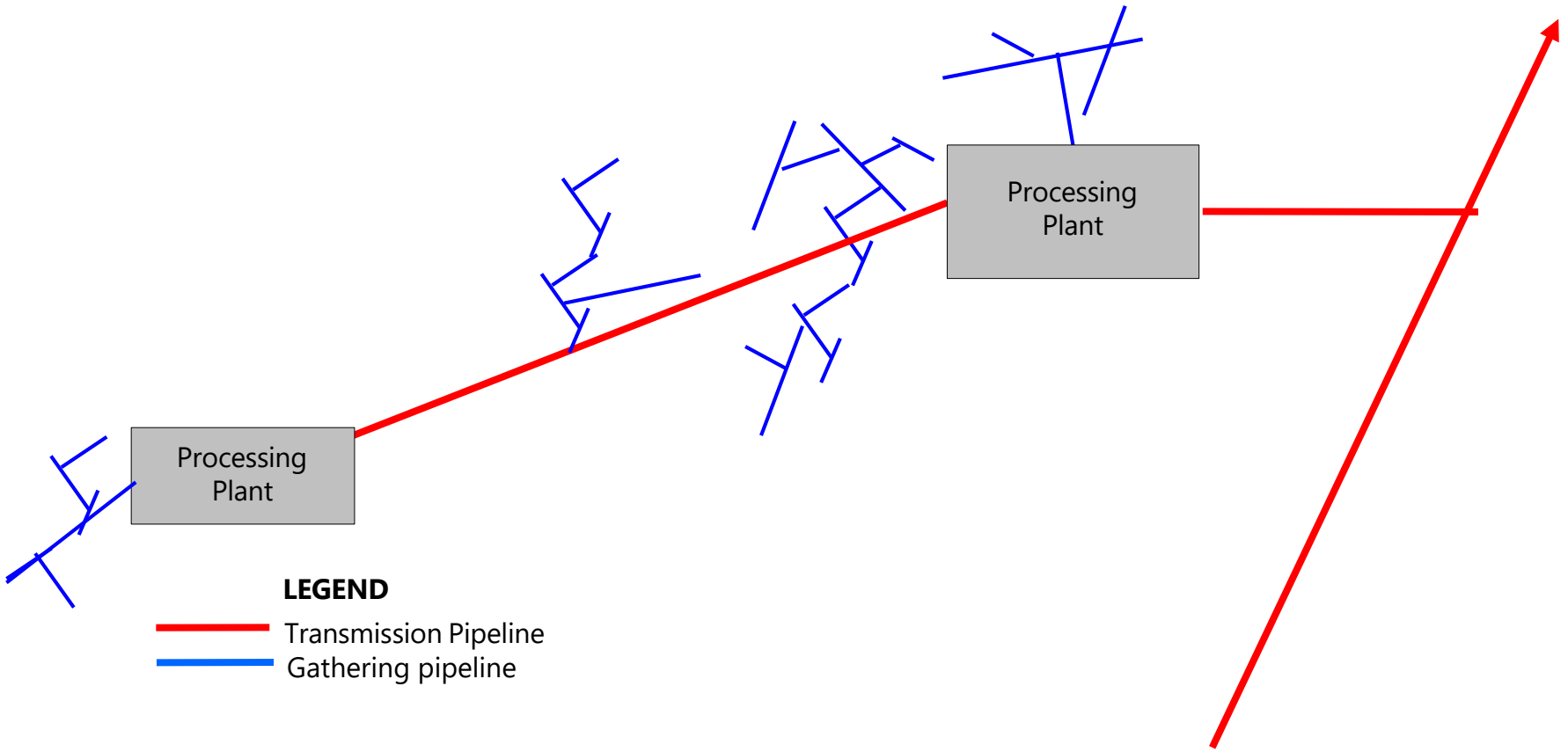
API RP 80 & §192.8 – GATHERING ENDPOINT

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).



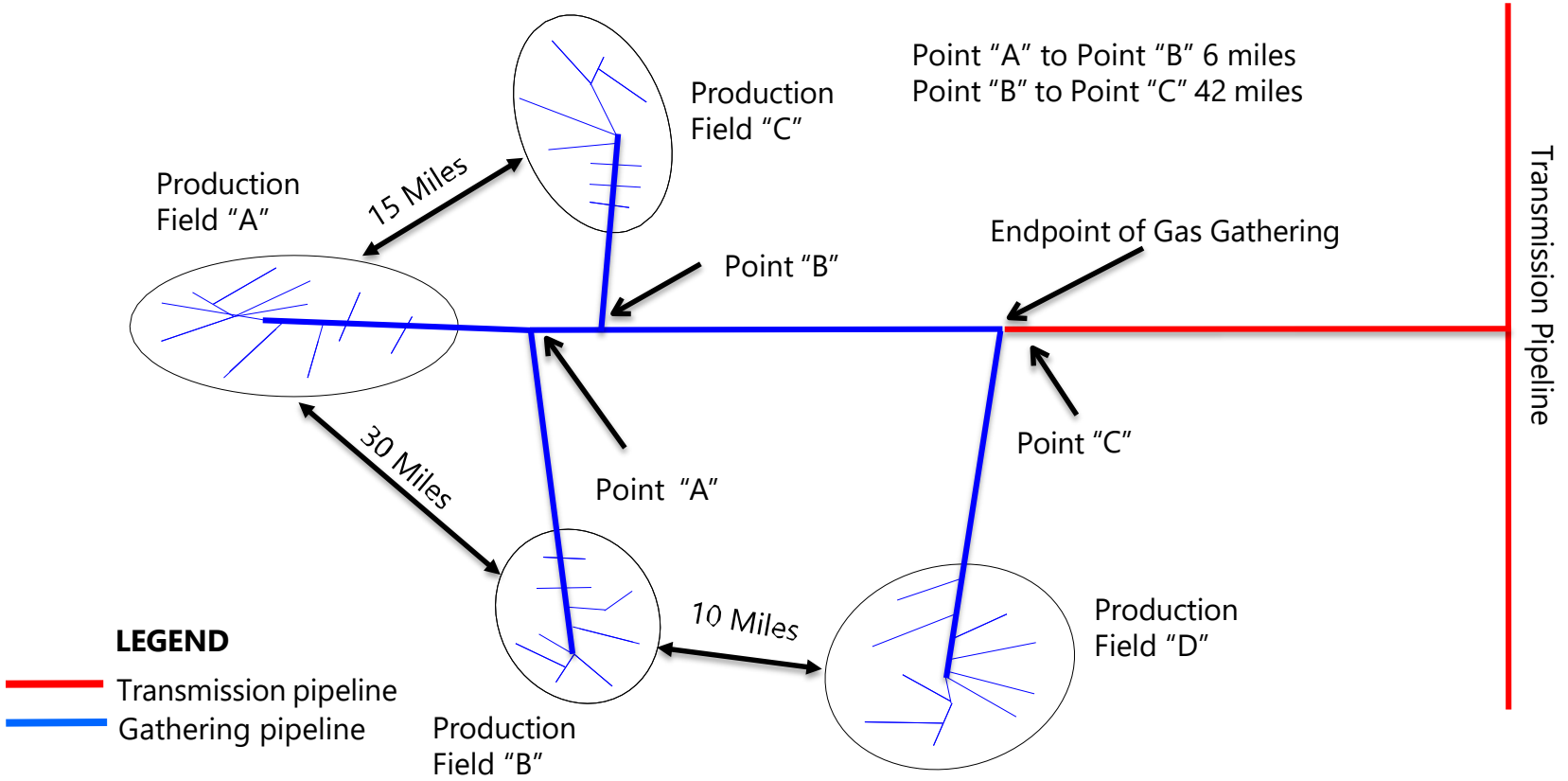
§192.8(a)(2) LIMITATION ON GATHERING LINE

May not extend beyond the first processing plant



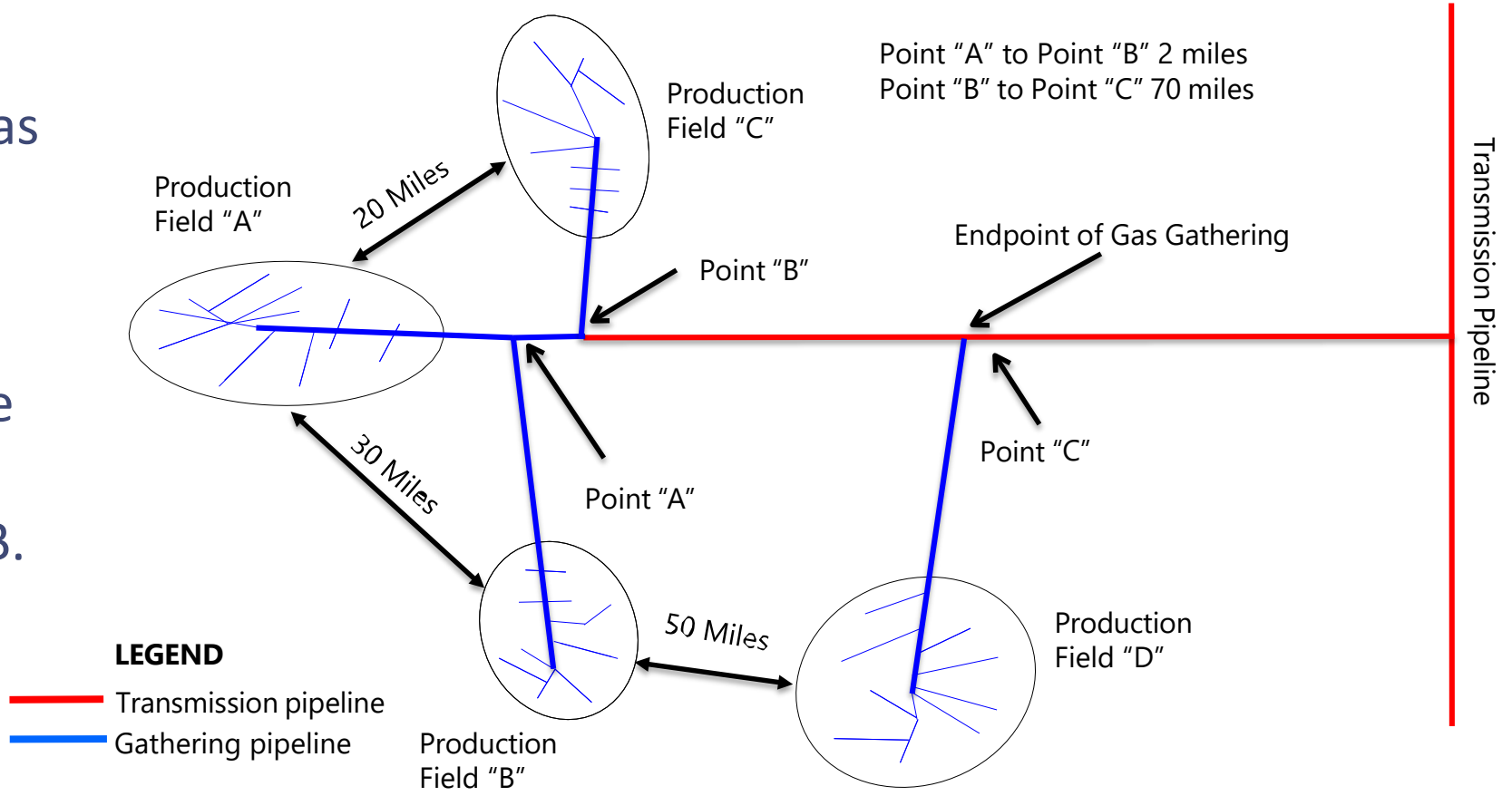
Last point of commingling – 2006 FAQ

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



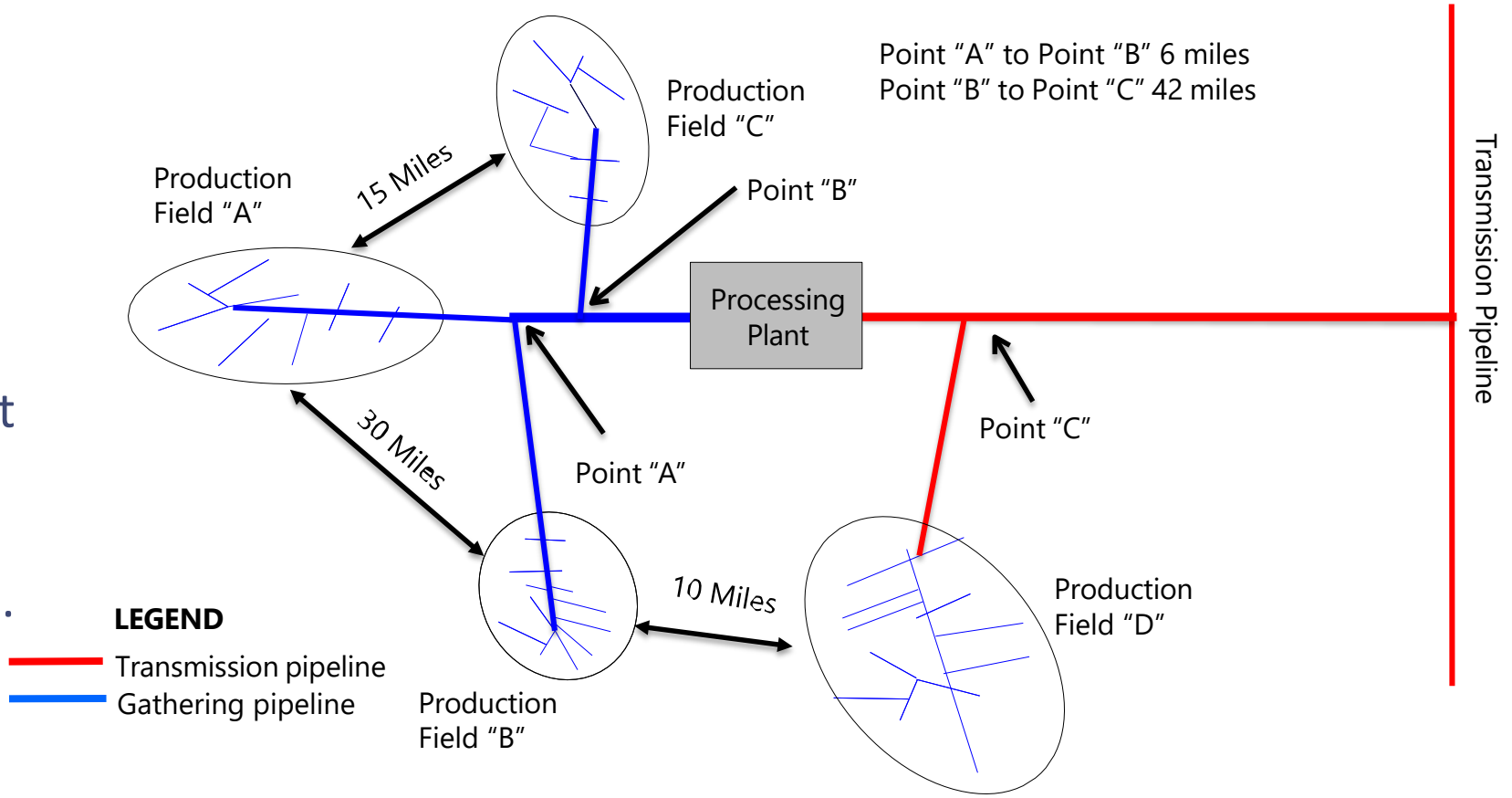
Last point of commingling – 2006 FAQ

This example demonstrates the fields are not within the guidelines of 50 miles, but gas from production field D enters the pipeline 70 miles downstream form where production field C enters the line at point B, thus making Transmission start at point B.



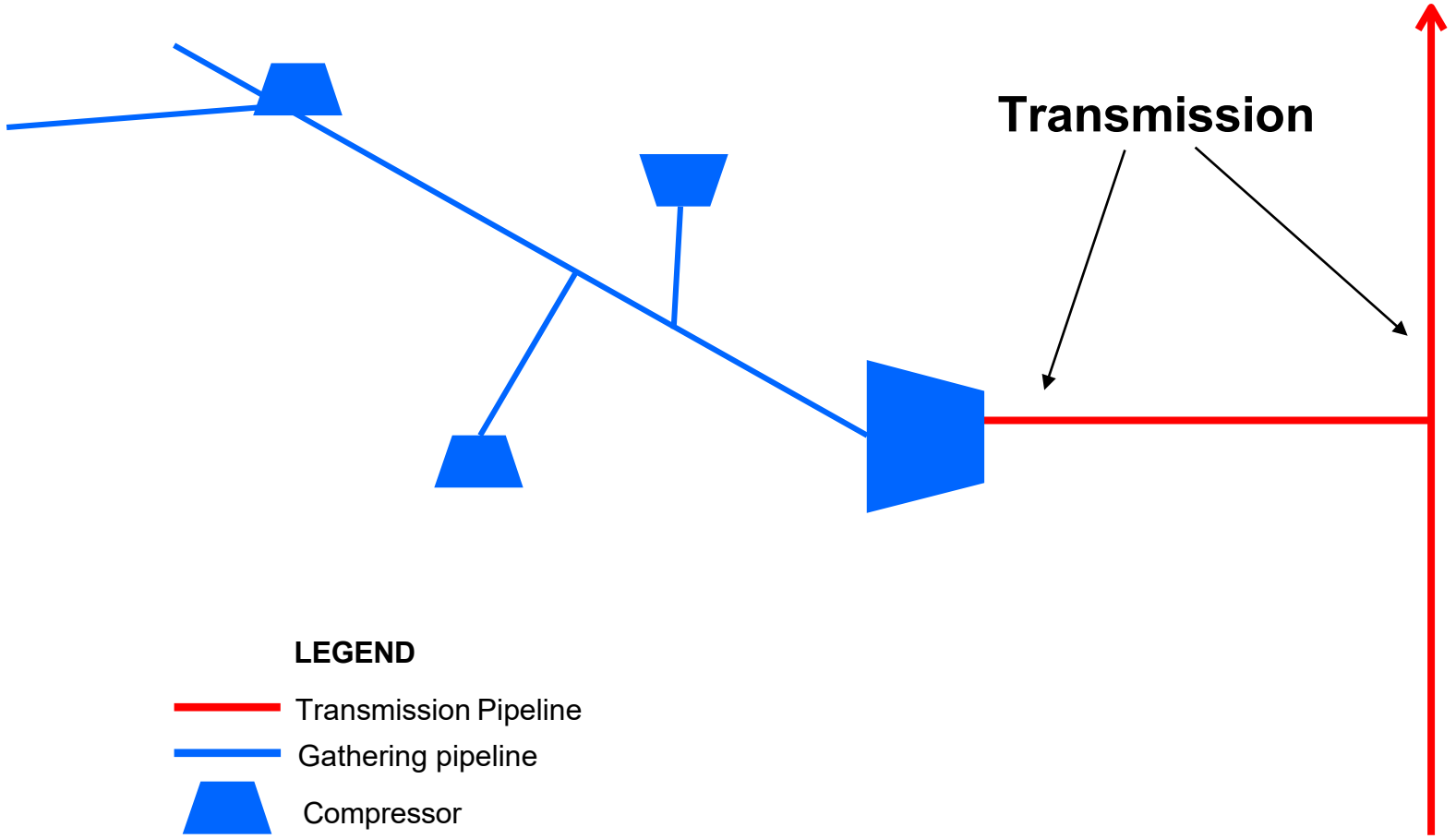
Last point of commingling – Processing Plant

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 "furthermost 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.



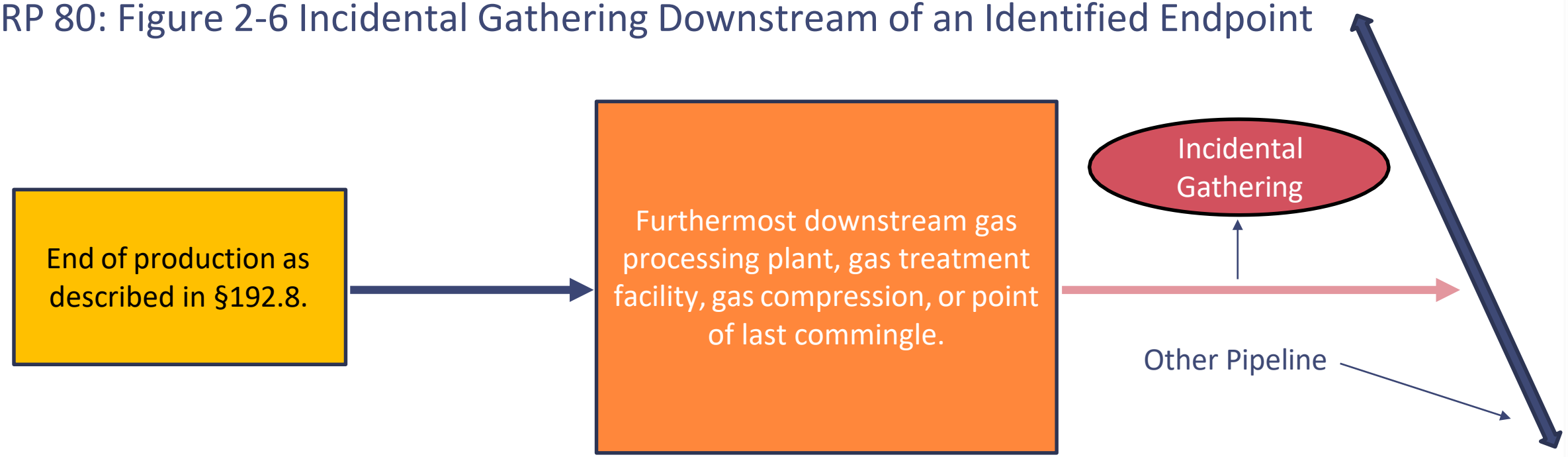
Last point of compression

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.



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.

TYPE A GAS GATHERING REQUIREMENTS

A Gathering line in a Class 2, 3, or 4 Location and Any of the following:

- Metallic & MAOP produces Hoop Stress of ≥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 requirements of this part applicable to transmission lines with specific exceptions.

Exceptions to compliance include:

- MAOP reconfirmation
- Pigging requirements
- Subpart O (IM)
- New Valve rule regulations
- Management of Change
- MCA
- Certain parts of Subpart I (corrosion)

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

TYPE B GAS GATHERING

A Gathering line in a Class 2, 3, or 4 Location and Any of the following:

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

TYPE B GAS GATHERING REQUIREMENTS

§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 (Subpart B – G).
2) If the pipeline is metallic, certain parts of subpart I (corrosion).
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 §192.614.
5) Public education §192.616.
6) Establish the MAOP §192.619(a), (b), and (c).
7) Install and maintain line markers §192.707.
8) Conduct leakage surveys §192.706 using leak detection equipment and promptly repair hazardous leaks §192.703(c).

TYPE C GAS GATHERING & Requirements

A Gathering line in a Class 1 location with outside diameter ≥8.625" and any of the following:

- Metallic and MAOP produces a hoop stress of ≥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 GAS GATHERING REQUIREMENTS

Type C gathering ≥ 8.625" must follow "all" reporting requirements of Part 191.

§191.5 Immediate Notice of Certain Incidents: Immediate and 48 hour

§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.

§191.22 National Registry of Operators: Obtain OPID and Report certain changes per §191.22(c).

§191.23 Reporting safety-related conditions: SRC reports not required for lines ≤12.75" or exempted out by §192.9(f)(1).

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

TYPE C GAS GATHERING REQUIREMENTS

CRITERIA	TYPE C REQUIREMENTS (CUMULATIVE)
Diameter ≥8.625 inches.	• Damage prevention §192.614. • Emergency plans §192.615. • New/Replaced – Subparts B through G - 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: • 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: • Plastic pipe requirements. • Establish maximum allowable operating pressure MAOP §192.619.

Summary of Type C Requirements

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 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
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	

What does “building intended for human occupancy or other impacted site” mean?

- Any building that may be occupied by humans
- A small, well-defined outside area 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

TYPE C GAS GATHERING REQUIREMENTS

§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 (PIR).

(ii) Method 2 (class location unit).

(2) Paragraph (e)(1)(i) *(the 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, METHOD 1

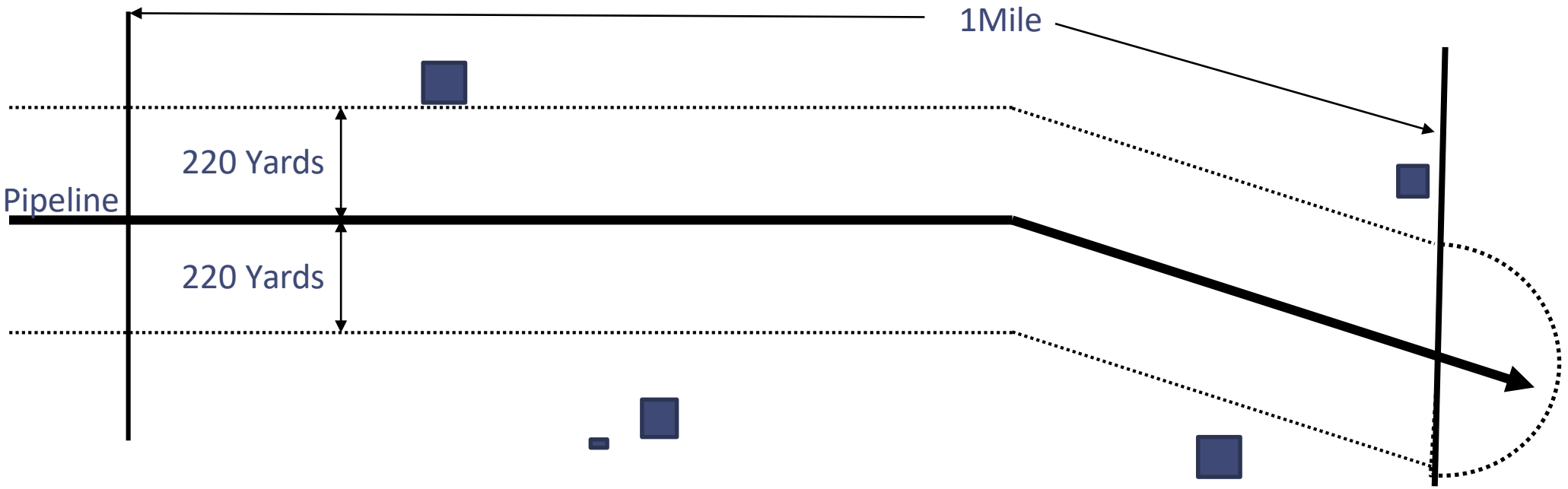
The segment is not located within a potential impact circle containing a building intended for human occupancy or other impacted site. The potential impact circle must be calculated as specified in §192.903, except that a factor of 0.73 must be used instead of 0.69. The MAOP used in this calculation must be determined and documented in accordance with paragraph (e)(2)(ii) of this section.

$$PIR = 0.73 * \sqrt{MMMMMMMM * dd^2}$$

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.

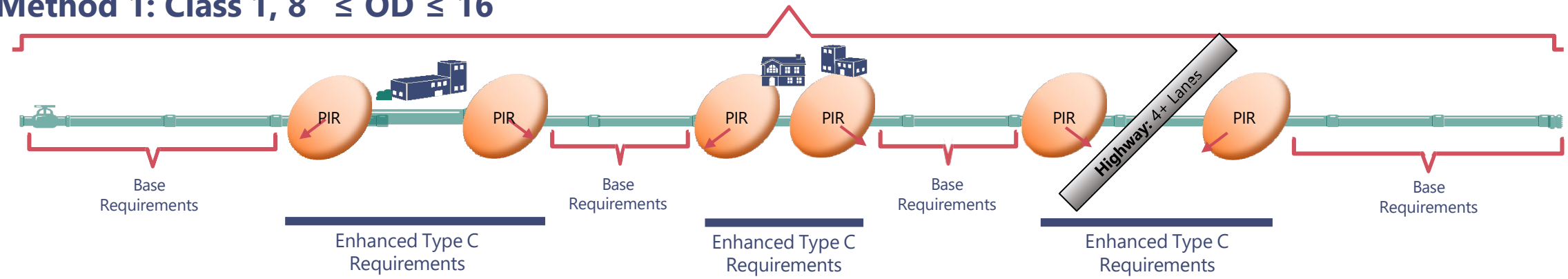
TYPE C GATHERING – METHOD 2 MAOP REQUIREMENTS

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

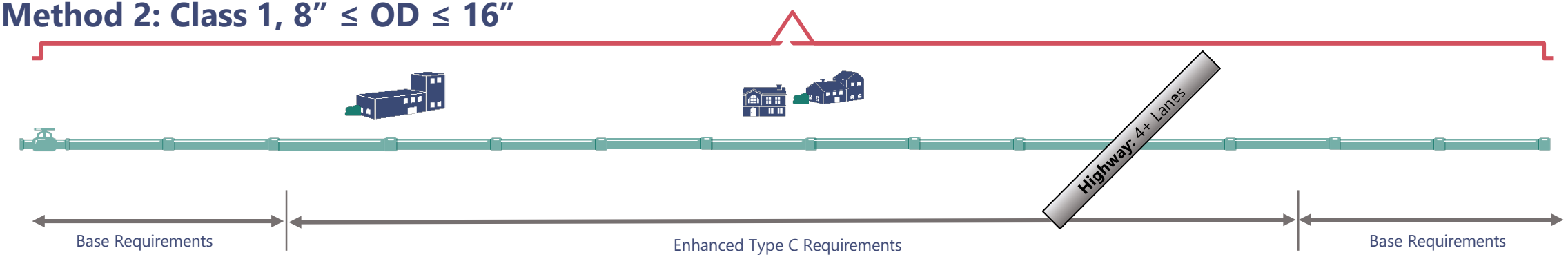


TYPE C GATHERING – METHOD 1 & 2 COMPARISON

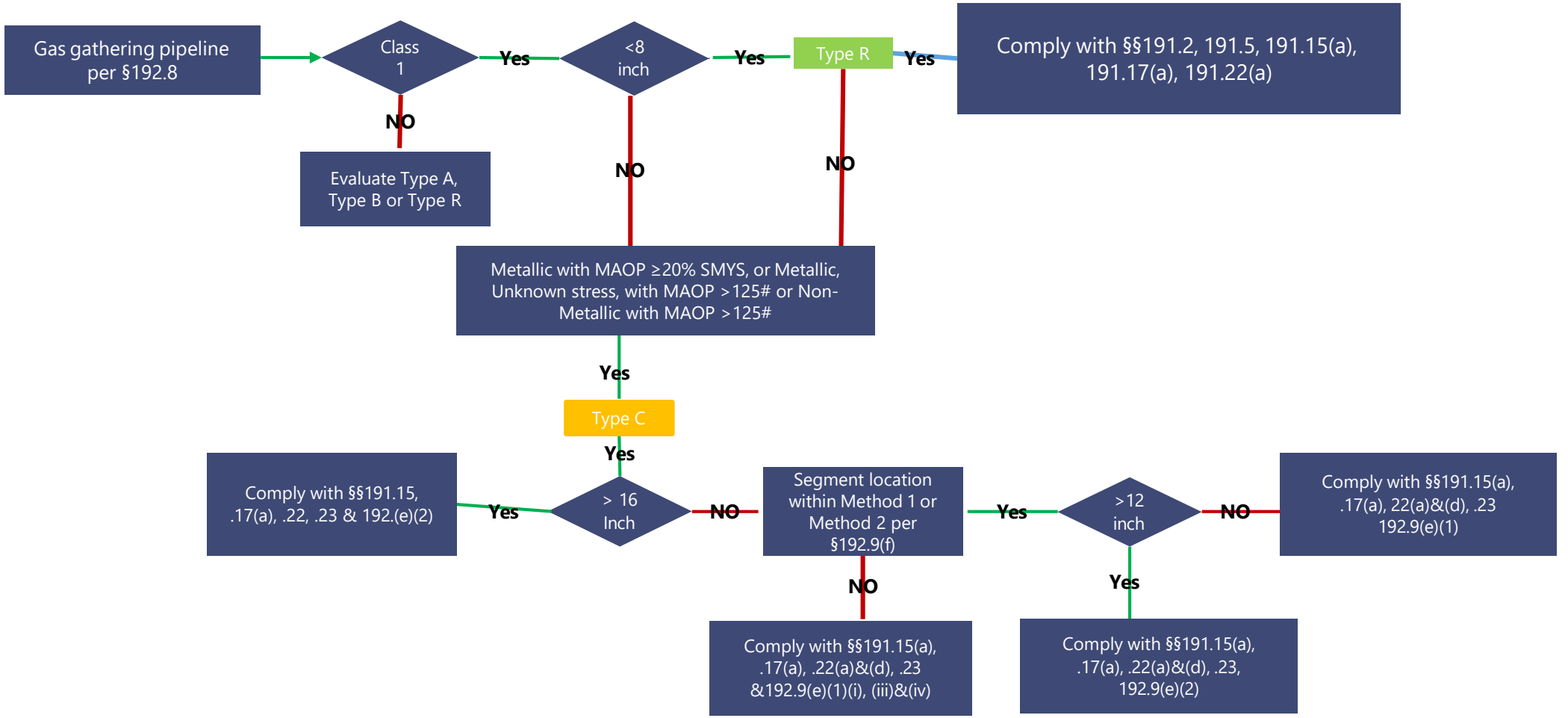
Method 1: Class 1, 8" ≤ OD ≤ 16"



Method 2: Class 1, 8" ≤ OD ≤ 16"

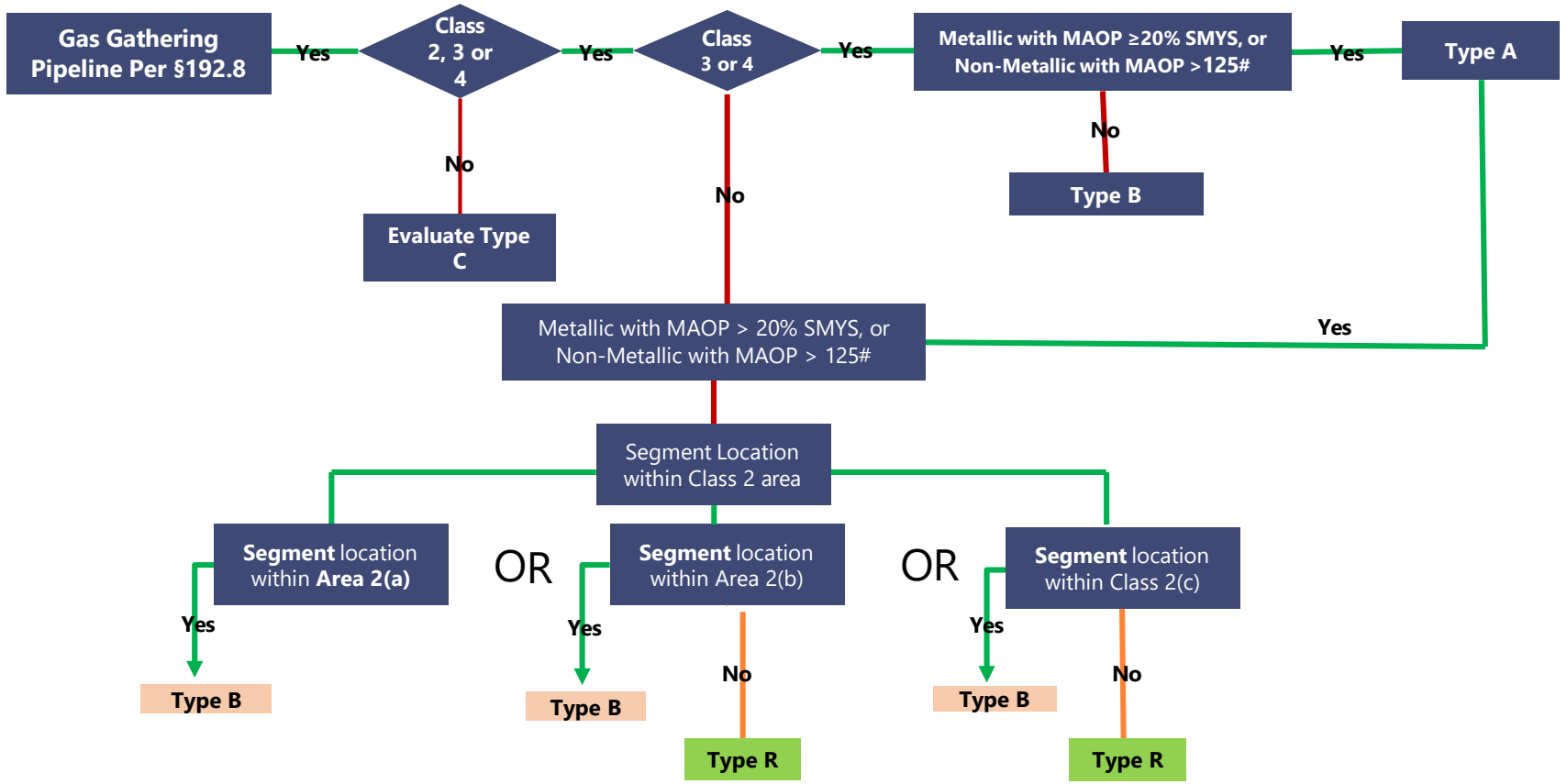


Regulatory Flow Chart for Class 1 Locations



SAFETY OF GAS GATHERING LINES

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



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 R GAS GATHERING

“All other onshore gathering lines”

- Class 1:
  - < 8” diameter, NO pressure limitations.
  - ≥ 8” With a MAOP <125 psig, or hoop stress < 20% SMYS.
    - Not required to calculate MAOP, can use highest operating pressure.
- Class 2:
  - Outside of Type B Area 2 (b) limits (150’, continuous mile, 10<dwellings<46)
  - Outside of Type B Area 2 (c) limits (150’, continuous 1000’, 5 or more dwellings)
- Gathering on a vacuum

TYPE R GAS GATHERING REQUIREMENTS

Type R gathering must:

§191.5 Immediate Notice of Certain Incidents: Initial and 48-hour update

§191.7 Report Submission through portal unless alternative method approved.

§191.15(a)(2) Incident report: 30 days after incident (7100.2-2).

§191.17(a)(2) Annual report: No later than March 15 PHMSA F 7100.2-3.

§191.22 National Registry of Operators:

- Obtain OPID.
- Exempt from §191.22(b) and (c), validation and notification respectively

§191.23 Reporting safety-related conditions: Exempted in §191.1(c) and §191.23(b)(1).

§191.29 National Pipeline Mapping System: Exempt – All Gas Gathering Pipelines §191.29(c)

Frequently Asked Questions

- **Frequently Asked Questions - Posted May 8, 2023**
- **Major Topics**
  - General
  - Regulatory requirements
  - Design Requirements
  - O&M Manuals
  - Recordkeeping
  - Required Tasks
  - Compressor Stations
  - Operator Qualification
- **Posted on the Pipeline Technical Resources Gas Gathering website**
  https://www.phmsa.dot.gov/technical-resources/pipeline/gas-gathering/gas-gathering-regulatory-overview

Frequently Asked Questions

phmsa.dot.gov – Gathering Pipelines FAQs page

- Onshore Gas Gathering FAQs for Type A and B Pipelines
- Onshore Gas Gathering FAQs for Type C and R

Frequently Asked Questions

- **O&M Manual Requirements Topics**
  - Am I required to have an O&M manual under § 192.605 for my Type B and C gathering line?
    - No, there is no explicit regulatory requirement for operators of Type B or C gathering lines to have § 192.605-compliant O&M manuals. Nevertheless, operators of all regulated gas gathering lines, including Types B and C gathering lines, are required to follow their state requirements.

ADDITIONAL QUESTIONS

Documentation of Gathering Classification

Does § 192.8(b) require that documentation includes the determination of "production" versus gathering? Does this need to be written documentation?

- Yes. An operator of a gathering pipeline must have written documentation of its analysis of the start and end points of gathering per Section 192.8(b), and the application of API RP 80 necessarily includes a determination of the endpoint of production operations.

Type C Instrumented Leakage Surveys

Do I need to use a gas detector device for Type C leakage surveys?

§ 192.9(e)(1)(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).

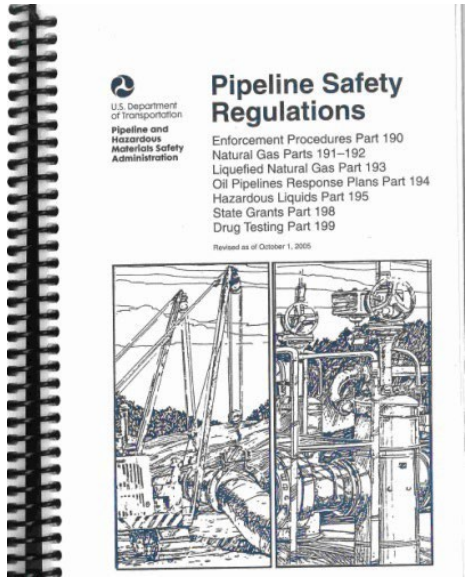
OTHER THINGS TO CONSIDER – DISTRIBUTION OFF GATHERING

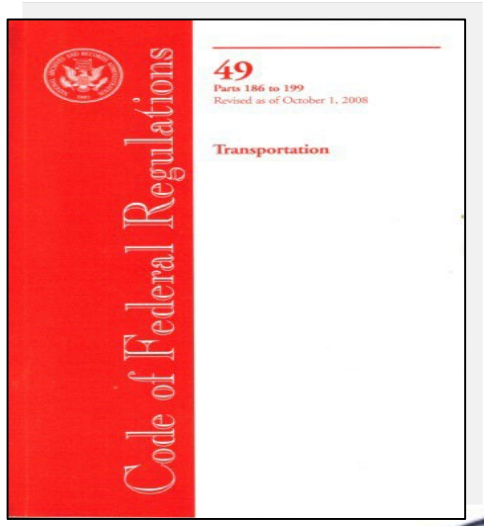
Operators with new type C gathering with Farm Taps should have looked at putting these in a Distribution Integrity Management Program or meeting the requirements of 192.740.

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.

Additional Resources and Tools

- **PHMSA Homepage, Office of Pipeline Safety**
  - www.phmsa.dot.gov
- **Standards & Rulemaking**
  - http://www.phmsa.dot.gov/pipeline/regs
- **PHMSA Technical Resources**
  - https://www.phmsa.dot.gov/technical-resources/pipeline/pipeline-technical-resources-overview
  - GPAC Meeting slides for reference at "Public Meetings" tab (https://primis.phmsa.dot.gov/meetings/)
- **PHMSA's Stakeholder Communications Site**
  - http://primis.phmsa.dot.gov/comm
- **For Federal Regulations (Official Version)**
  - www.ecfr.gov





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Thank You
for what you do for Pipeline Safety!