



PHMSA'S REGULATORY AGENDA AND ITS IMPLICATIONS FOR INDEPENDENT PRODUCERS

IPAA STRATEGIC PLANNING CONFERENCE ON LAND
ACCESS AND ENVIRONMENTAL ISSUES

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MAJOR FOCUS OF DISCUSSION

- **Misc. II Rule – Docket No. PHMSA-2013-0163 (Final Rule published January 13, 2017)**
- **Liquid Rule - Docket No. PHMSA-2010-0229 (pending publication in Federal Register, again)**
- **Gas Rule - Docket No. PHMSA-2011-0023 (currently scheduled for December, 2017)**

MISC. II RULE

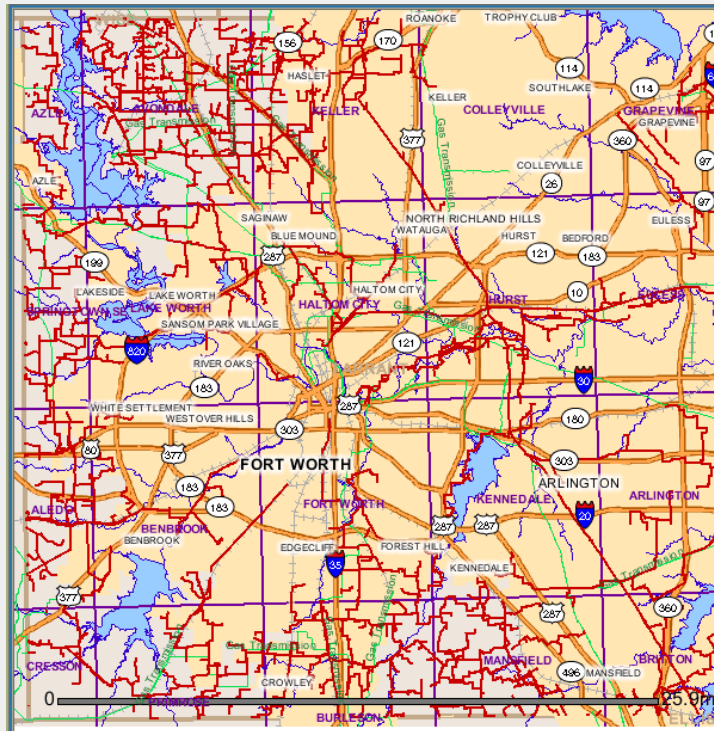
- Original contained provisions to modify Operator Qualification regulations
 - Extend to “new construction” activities
 - Remove OQ “Lite” for Type A gathering
 - Impose OQ on Type B gathering
- Provisions for testing pressure control devices on “farm taps”

SAFETY EVALUATION OF HL PIPELINES

- Timeline
 - ANPRM 8/2010
 - NPRM 10/2015
 - FR (sent to Register 1/12/17) - retracted

SAFETY EVALUATION OF HL PIPELINES

- “FR” released 1/12
 - Extended Reporting Requirements to gathering
 - Supposedly a reduced data set for annual
 - Retained SRC
 - Accident
 - No NPMS



SAFETY EVALUATION OF HL PIPELINES

- “FR” released 1/12
 - ILI requirements not extended to rural gathering
 - Requirement to install LDS not extended to rural gathering

SAFETY EVALUATION OF GAS PIPELINES

TRANSMISSION AND GATHERING

- Timeline
 - ANPRM 08/2011
 - NPRM 05/2016
- Enhancements to IM
- Gathering
- IVP (Mandates & NTSB)



SAFETY EVALUATION OF GAS PIPELINES

TRANSMISSION AND GATHERING

- Continuous need to communicate to PHMSA staff that when they write transmission, it includes Type “A” gathering
- Poor construct of language
 - Retroactivity
 - Applicability beyond Intent

SAFETY EVALUATION OF GAS PIPELINES

TRANSMISSION AND GATHERING

- Regulations EO
 - Move forward in the interest of “Public Safety”
 - Abridged version
 - Mandates & NTSB recommendations



QUESTIONS?

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