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


• 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
  o Extend to “new construction” activities
  o Remove OQ “Lite” for Type A gathering
  o Impose OQ on Type B gathering

• Provisions for testing pressure control devices on “farm taps”
SAFETY EVALUATION OF HL PIPELINES

• Timeline
  o ANPRM 8/2010
  o NPRM 10/2015
  o 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
  o ANPRM 08/2011
  o 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
  o Retroactivity
  o Applicability beyond Intent
SAFETY EVALUATION OF GAS PIPELINES
TRANSMISSION AND GATHERING

• Regulations EO
  o Move forward in the interest of “Public Safety”
  o Abridged version
  o Mandates & NTSB recommendations
QUESTIONS?

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