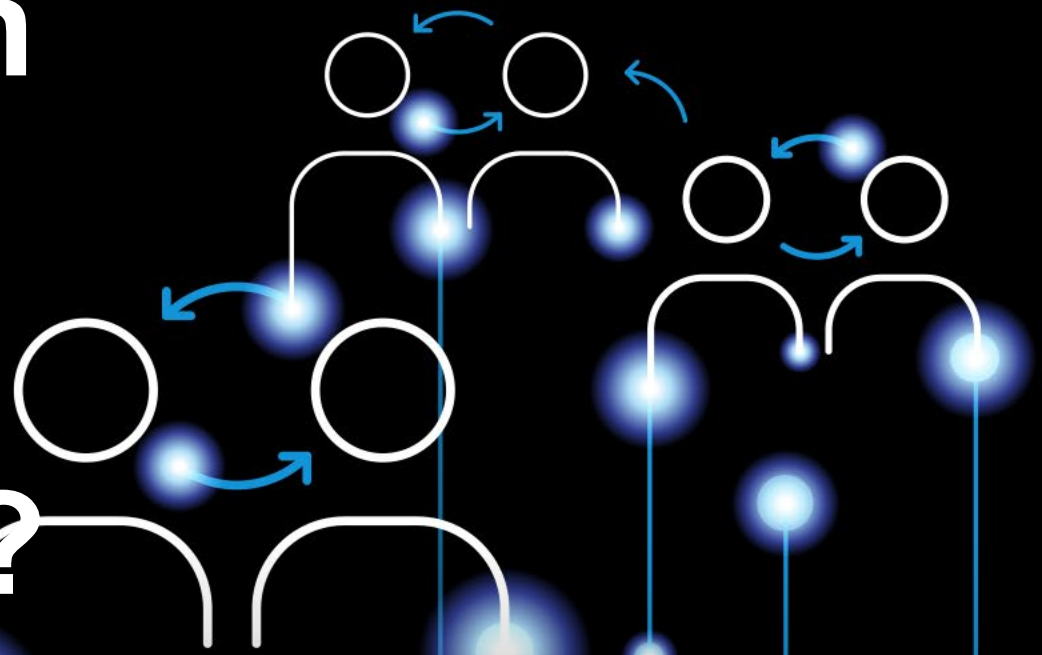
Does Class Location Not Determine Regulated Gas Gathering Anymore?



May 5, 2022

presented by

Tad Nowicki

Compliance Consultant

AGENDA

- Overview of new regulations
- Three main points:
  - Using GIS to define and document gathering (#1)
  - Class location = gathering type determination (#2)
  - Data completeness, conservative assumptions and an iterative process (#3)

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Think about your current pipeline GIS…

- Is everything is mapped?
- What is the state of critical attributes (Material, Diameter, Wall Thickness, Grade, MAOP)?

Now let's continue

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OVERVIEW OF RULE

WHAT DOES THIS RULE DO?

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Regulates **ALL** onshore gas gathering pipelines

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IT IS HUGE!

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PHMSA estimates:

400,000+ miles of new pipe

500 new operators

370 new Type C operators (~91,000 miles)

130 new Type R operators

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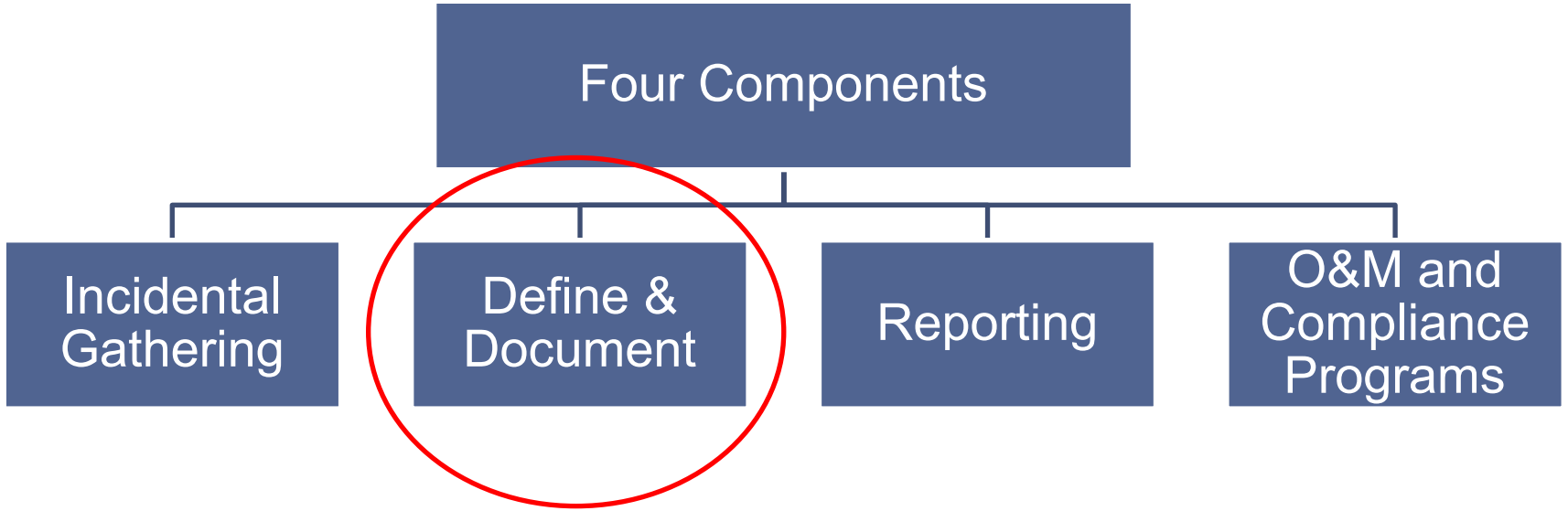
REQUIREMENTS

REQUIREMENTS

Mandates two things:

1. Reporting for all gathering lines
2. Minimum safety requirements for large diameter, high-pressure pipelines



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DEFINE AND DOCUMENT

DEFINE AND DOCUMENT

192.8 (b) – “Each operator must determine and maintain for the life of the pipeline, records documenting the methodology by which it calculated the beginning and end points of each onshore gathering pipeline it operates, as … [Type A, B, C and R]…”

Includes three things:

- Define what a gathering line is (Standard)
- Document beginning and end of each gathering line (GIS)
- Determine and document the applicable gathering type (GIS attributes)

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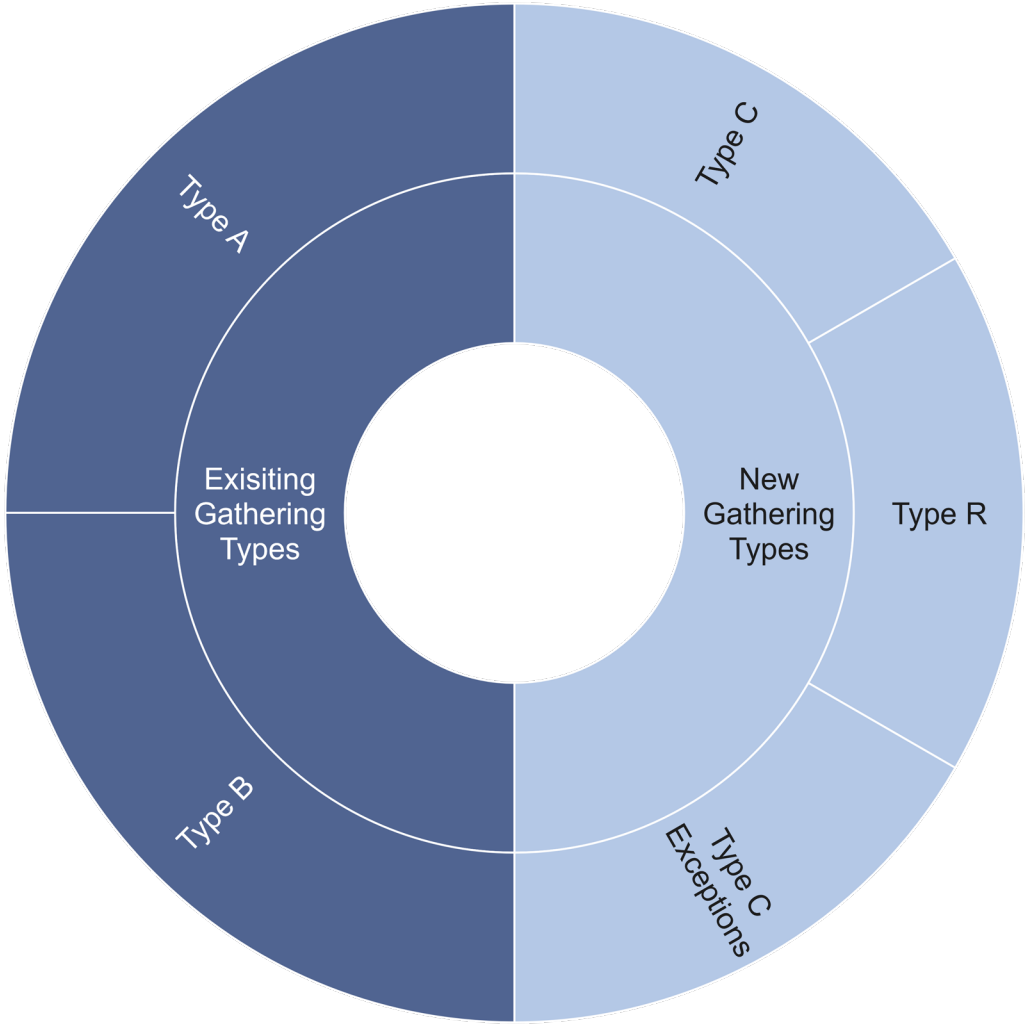
DETERMINE GATHERING TYPE

Must determine gathering type for **every** gathering line



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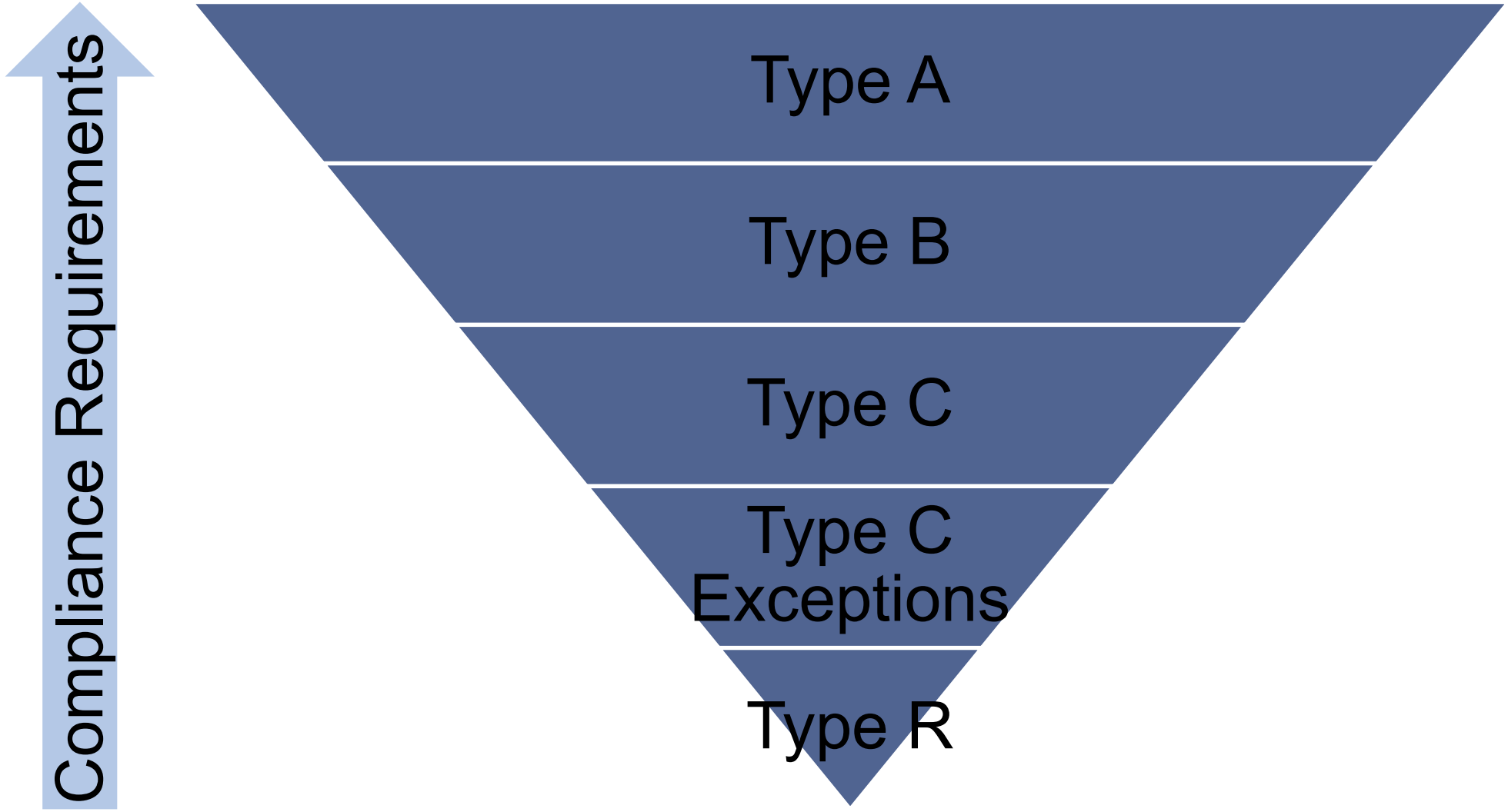
SIZE OF REQUIREMENTS



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WHAT'S CHANGED WITH CLASS LOCATION?

NO LONGER KING

~~Class Location~~

#2

Gathering Type Determination

Pressure Calculations

Class Location

Type C Analysis

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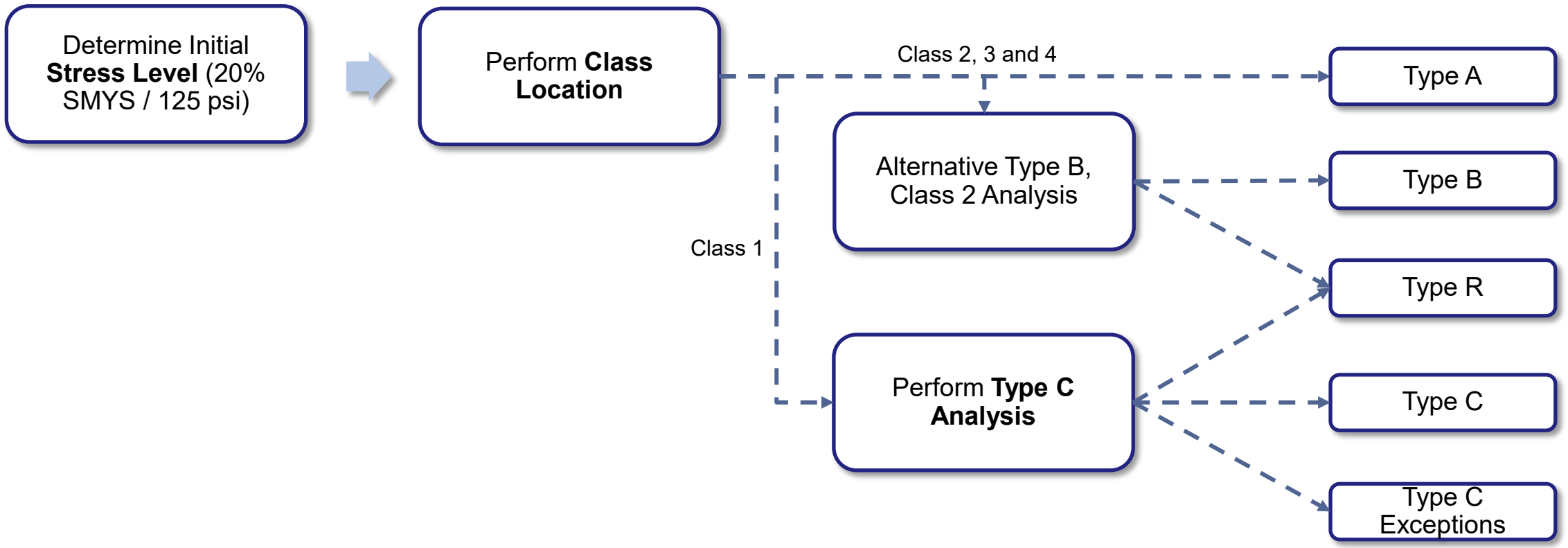
GATHERING TYPE DETERMINATION



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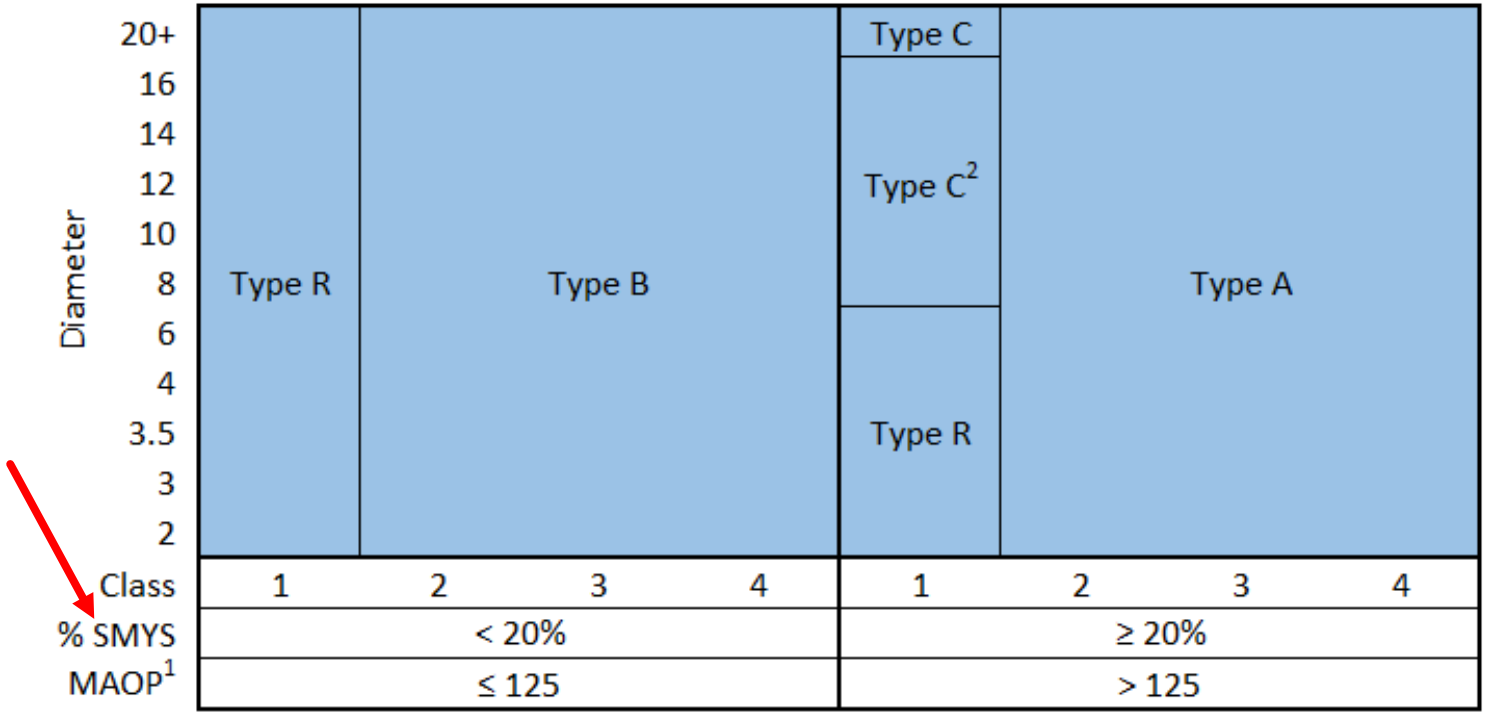
CONSERVATIVE ASSUMPTIONS & ITERATIVE PROCESS

DATA FOR GATHERING TYPE DETERMINATION



Diameter								
20+	Type R	Type B			Type C	Type A		
16								
14								
12					Type C[2]			
10								
8								
6					Type R			
4								
3.5								
3								
2								
Class	1	2	3	4	1	2	3	4
% SMYS	< 20%				≥ 20%			
MAOP[1]	≤ 125				> 125			

[1] If non-steel or unknown

[2] Type C, exceptions could apply

Pipeline data required:

- Material
- Diameter
- Wall Thickness
- Grade
- MAOP

#3

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USING AN ITERATIVE PROCESS

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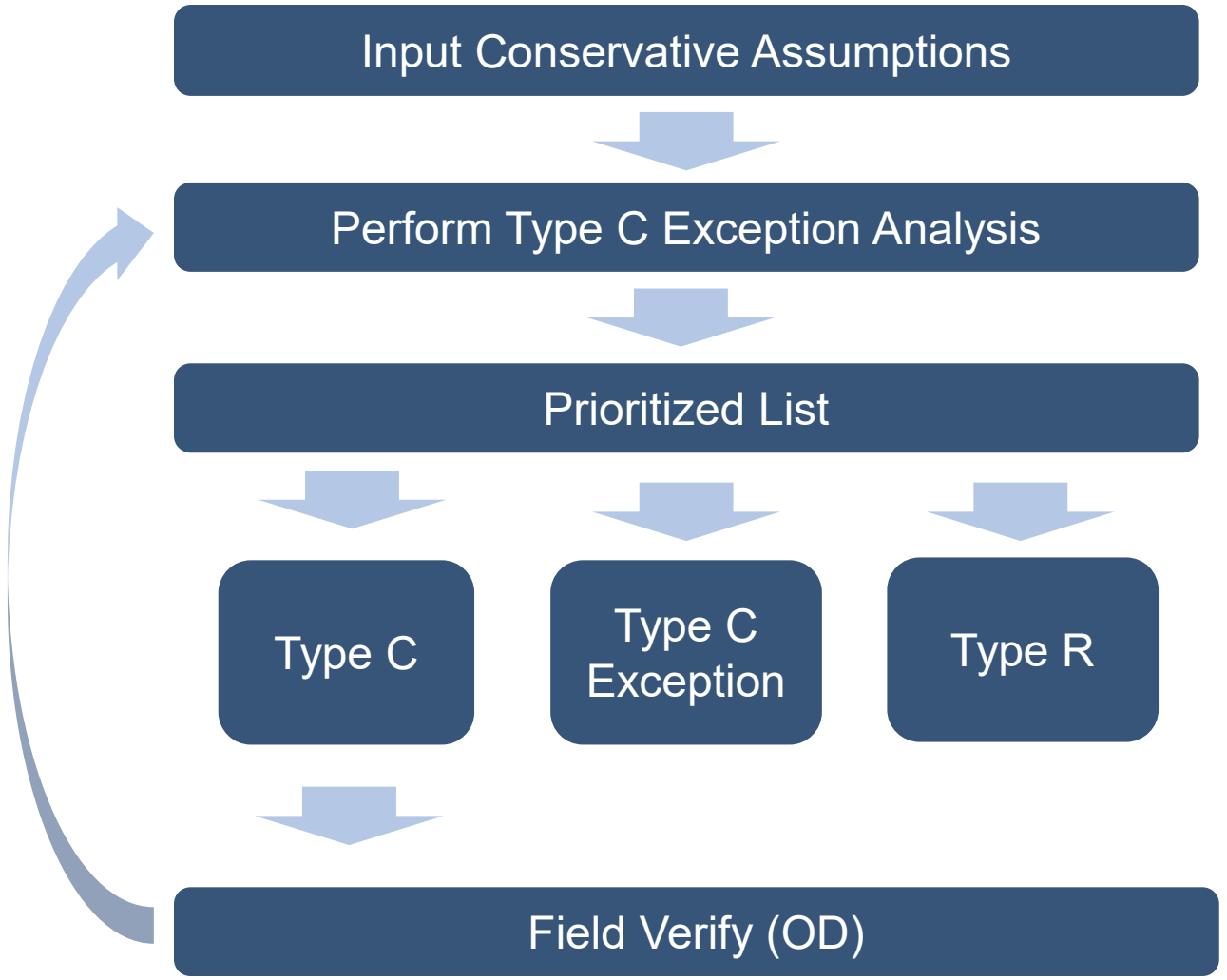
Use conservative assumptions

(8.625” OD, Grade 24,000, .150 WT, Operating Pressure or MAOP = 20% SMYS)

#3.1



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TYPE C EXCEPTIONS

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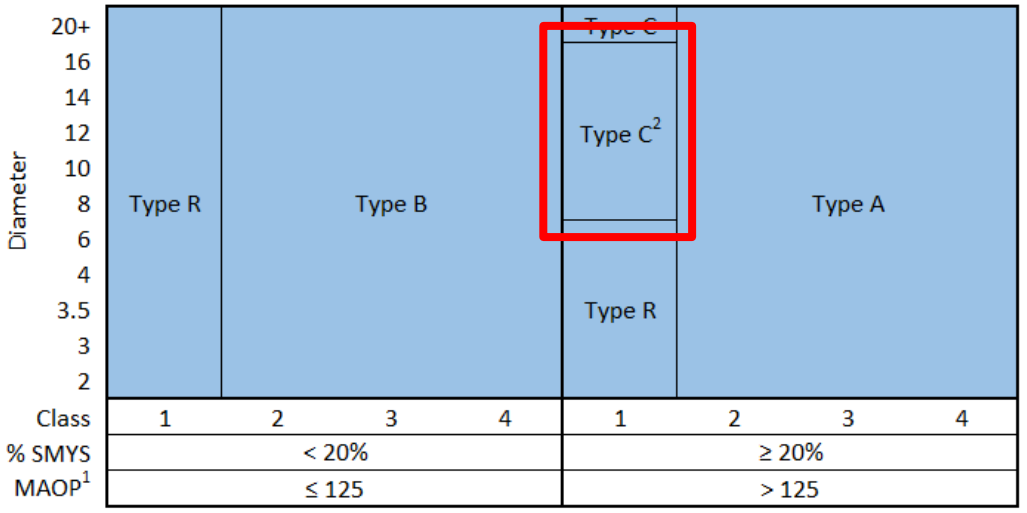
USE THEM!!!

Type C pipelines ≤16” can have reduced requirements if “Impacted Sites” are not present

Type C Exception analysis:

Class Location + parts of MCA = new Gathering Type Determination process



[1] If non-steel or unknown

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DEADLINES

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Questions....

LET’S STAY IN TOUCH

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