



GATHERING LINES and API RP 80

Pennsylvania Public Utility Gas Safety Conference

September 9, 2015

49 CFR § 192.8

- How are onshore gathering lines and regulated onshore gathering lines determined?
- An operator must use API RP 80
 - Incorporated by reference, see **49 CFR § 192.7**
- **49 CFR § 192.8(b)** describes what regulated onshore gathering means
 - Type A or B gathering



Type A & B Gathering

- Type A Gathering (Class 2,3 or 4)
 - Metallic and the MAOP is 20% or more of SMYS
 - Non-metallic and MAOP is more than 125 psig
- Type B Gathering (Class 2,3 or 4)
 - Class 2 is 10 to 45 dwellings 150 feet from pipe along sliding mile or 5 or more dwellings 150 feet from pipe in a continuous 1000 feet
 - Metallic and the MAOP is less then 20% SMYS
 - Non Metallic and MAOP is 125 psig or less

49 CFR § 192 Requirements Type A Gathering

- Type A Gathering must comply with all applicable parts of **49 CFR § 192** except:
 - **49 CFR § 192.150** Passage of internal inspection devices.
 - Subpart O
 - Demonstrate compliance by describing the process to comply with subpart N (OQ) in a Class 2 location



49 CFR § 192 Requirements Type B Gathering

- Type B Gathering
 - If a line is new, replaced, relocated, or otherwise changed the design and construction must comply with **49 CFR § 192**
 - Only 5 other code requirements may apply:
 - Subpart I, damage prevention, MAOP, line markers and public awareness

Compliance Deadlines

Regulated onshore Gathering line existing on April 14, 2006 and not previously subject to **49 CFR § 192**, then an operator has until the following dates for compliance as per Docket No. PHMSA-1998-4868; Amendment 192-102:

- April 15, 2009 – Subpart I (Corrosion)
- October 15, 2007 – Damage Prevention
- October 15, 2007 – Establish MAOP
- April 15, 2008 – Install & maintain line markers
- April 15, 2008 – Establish a Public education program



Compliance Implementation

- Change in Class Location after April 14, 2006
 - Type B Gathering has 1 year to comply with the appropriate sections of **49 CFR § 192.**
 - Type A Gathering has 2 years to comply with the appropriate sections of **49 CFR § 192.**



Definitions

- *Gathering line* means a pipeline that transports gas from a current production facility to a transmission line or main.
- *Transmission line* means a pipeline other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not downstream from a distribution center; (2) operates at a hoop stress of 20 % or more of SMYS; or (3) transports gas within a storage field.



API RP 80 Appendix

- Under definition of an onshore gathering line
 - Appendix A – Onshore gas gathering decision trees
 - Two alternative guidelines to help determine gathering
 - Appendix B – Applications
 - Detailed figures showing gas gathering scenarios and the decision trees that leads an operator to determine the limits of gas gathering



API RP 80 2.2 (a)(1)(E)

- Under definition of an onshore gathering line
 - 2.2 (a)(1)(E) the connection to another pipeline downstream of: (i) the furthestmost downstream endpoint identified in (A), (B), (C) or (D)
 - PHMSA considers the fifth possible endpoint (E) to be a “drafting error” that does not reflect PHMSA’s intent as stated in Interpretation 192.8 1

PUC Enforcement

- Prudent operators can classify pipelines connecting gas gathering systems to an existing transmission line as a transmission line if the line meet the requirements of 2.2 (a)(1)(A), (B), (C) and (D).
- Regardless of class location the full length of the transmission line is jurisdictional to the PUC



PUC Enforcement

- Operators can classify pipelines connecting gas gathering systems to an existing transmission line as gathering as per API RP 80 2.2 (a)(1)(E)
- Only the “incidental” gathering lines that fall in Class 2,3 or 4 areas would be jurisdictional to the PUC



Physical Parameters

- During the development of API RP 80 physical parameters were considered and rejected as a means of determining a gas gathering pipeline definition
- Factors such as pipeline length, size and operating pressure were determined to not be a reliable means of capturing pipeline function

In Closing

- Remember, call before you dig!



**Know what's below.
Call before you dig.**

