



PAPUC

Gas Gathering FAQ's

GAS GATHERING Frequently Asked Questions

- <https://www.phmsa.dot.gov/faqs/gathering-pipelines-faqs>

Gas Gathering Type A, B & C

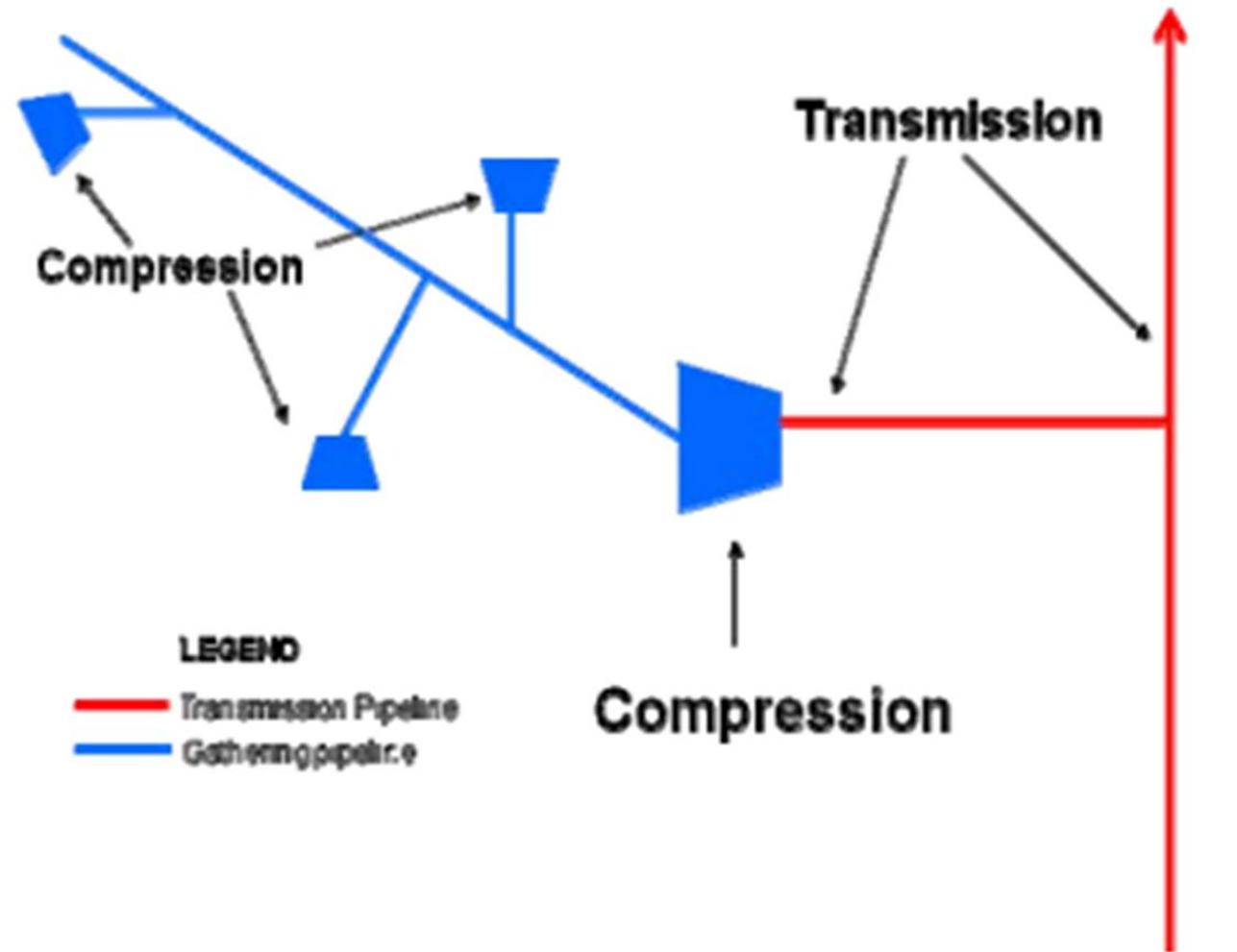
These Frequently Asked Questions (FAQs) are intended to clarify, explain, and promote better understanding of the gas gathering line rules. These FAQs are not substantive rules and do not create rights, assign duties, or impose new obligations not outlined in the existing gas gathering line regulations and standards. Requests for informal interpretations regarding the applicability of one or more of the pipeline integrity management rules to a specific situation may be submitted to PHMSA in accordance with 49 C.F.R. §190.11.

Gas Gathering Potential End Points

Section 192.8(a)(4) and the RP-80 definition of gas gathering includes as one of the **potential endpoints of gathering**, “the outlet of the furthestmost downstream compressor used to lower gathering line operating pressure to facilitate deliveries into the pipeline from production operations or to increase gathering line pressure for delivery to another pipeline.” **What is “another pipeline”?**

PHMSA Response

Another pipeline” would be a pipeline designated, according to §192.3, as a transmission or distribution pipeline. If the compressor is boosting gathering line pressure for delivery to another gathering pipeline, that would not be the end of gathering as illustrated below.

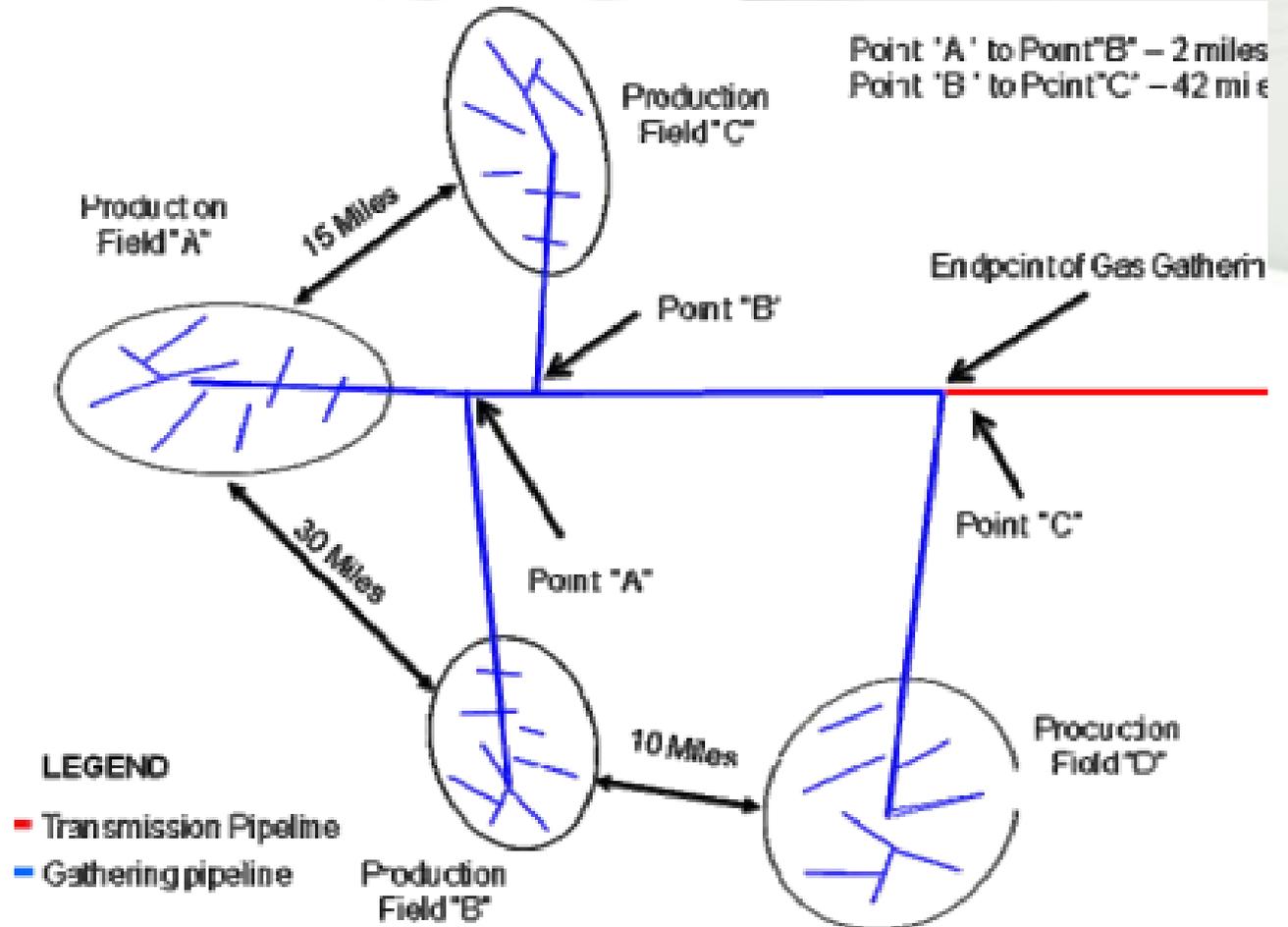


Point of Last Commingling

Section 192.8(a)(3) states: “If the endpoint of gathering under section 2.2(a)(1)(c) of API RP 80, is determined by the commingling of gas from separate production fields, the fields may not be more than 50 miles from each other, unless the Administrator finds a longer separation distance is justified in a particular case.” **What does this mean? How is the distance measured?**

PHMSA Response

The commingling of production from fields for determining the endpoint of gathering includes those fields which are no farther than 50 miles apart and also includes the point on the pipeline in which the gas from those fields is commingled. In the illustration above, four production fields are within 50 miles of each other and the points where the gas is commingled are no farther than 50 miles. In the illustration above, gathering ends at Point “C.”



Vacuum Lines

Vacuum lines are exempt according to the final rule if they operate less than 0 psig. However, during upsets or on the far ends of these systems the pressure may be above 0 psig. **Are these still considered exempt provided the normal/average is less than 0 psig?**

PHMSA Response:

Pressures during upset conditions are not used in determining whether a line operates under vacuum pressure. These types of gathering systems are exempt from Part 192.

Regulated Gas Gathering Lines

Are all gas gathering lines regulated by PHMSA?

Yes, however not all gas gathering lines are subject to part 192. PHMSA introduced new definitions in 49 CFR 191.3 and 192.8(c) that are relevant to the regulatory status of onshore gas gathering lines: “regulated onshore gathering” and “reporting-regulated gathering.” Types A, B, and C gas gathering lines are onshore gas gathering lines subject to requirements under parts 191 (reporting) and 192 (safety), so the gathering lines in these categories are defined as “regulated onshore gathering.”

Reporting Gas Gathering Lines

Are all gas gathering lines regulated by PHMSA?

Yes, however not all gas gathering lines are subject to part 192. Type R are subject to limited reporting requirements under part 191 only and are called “reporting-regulated gathering.” Note that the classification (Type A, B, C, or R) for an onshore gas gathering line is determined in accordance with § 192.8. Offshore gathering lines are also subject to parts 191 and 192 requirements as specified in § 192.9.

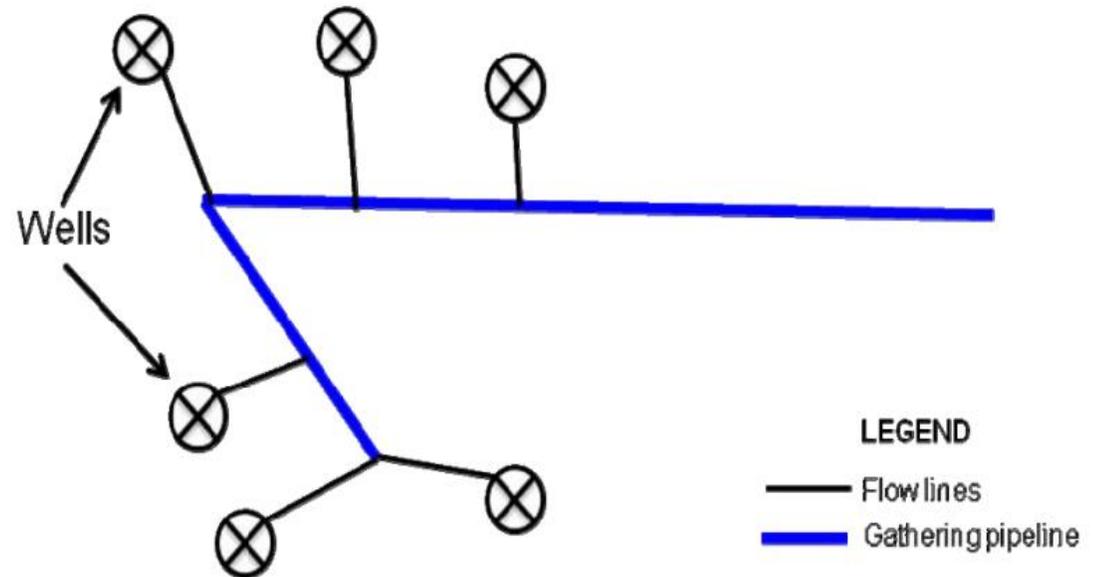
PHMSA's Question & Response

Does this limit the types of equipment that can be used in production operations? PHMSA Response:

No. The limitation in §192.8(a)(1) does not prescribe or limit the types of equipment that can be used in production operations.

In the example there is production equipment at each individual well. Separators and heater treaters separate the oil, gas and water. The gathering line begins where the first two flow lines intersect and then continues downstream with additional wells adding gas into the line.

Wells have separation, heater treaters and stock tanks.

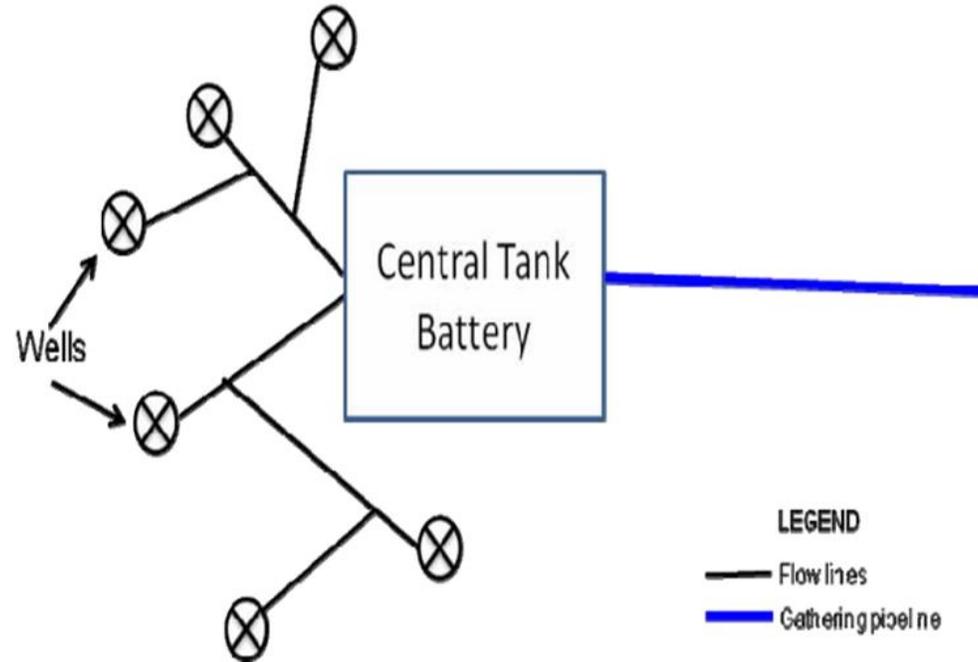


Multiphase Flow

A very common type of installation is shown below where there is no production equipment on the individual well locations. The well stream mixture (multiphase fluids) is piped from a number of wells to a central tank battery installation where the oil, gas and water are separated.

Gathering begins where the gas is separated into single phase flow.

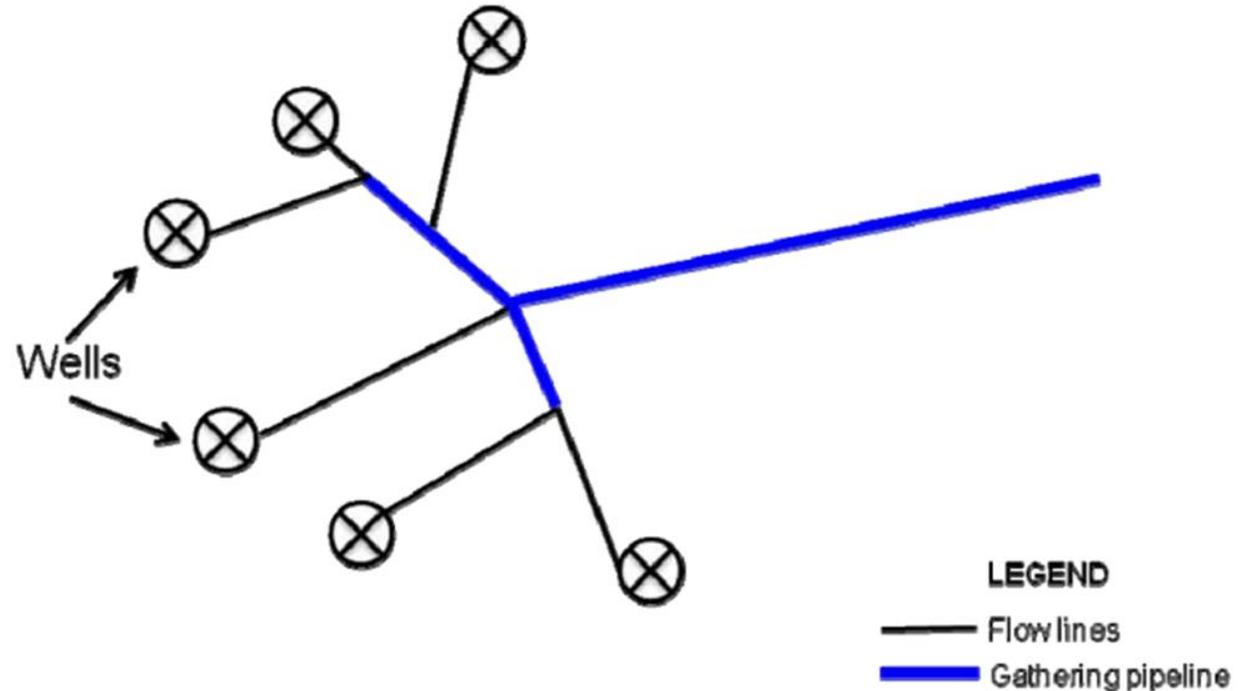
Wells all flow to central tank battery (no equipment for separation on location). Tank battery has separation, heater treaters and stock tanks.



Single Phase Flow

There are some formations that produce single phase gas with very little or no water or oil in the gas stream. As shown in the example below, **gathering begins where the two flow lines intersect.**

Wells flow gas in single phase. Wells produce gas and very limited water.



Operations and Maintenance (O&M) Manual

Am I required to have an O&M manual under § 192.605 for my Types B and C gathering lines?

There is no explicit requirement in the Federal pipeline safety regulations for operators of Type B or C gathering lines to have § 192.605-compliant O&M manuals. See 49 CFR 192.9(d) and (e). Nevertheless, operators of all gas gathering lines subject to part 192 safety requirements, including Types B and C gathering lines, are required to follow the statutory requirement of 49 U.S.C. 60108(a), which requires that “[e]ach person owning or operating a gas pipeline facility. . . shall carry out a current written plan (including any changes) for inspection and maintenance of each facility used in the transportation and owned or operated by the person.

MAOP for Gathering § 192.619(a)(3) or (c)

What is the length of time required to hold a “highest actual operating pressure” to claim that pressure as the MAOP for a gathering line under § 192.619(a)(3) or (c)?

Neither § 192.619(a)(3) (c), nor § 192.8(c)(4)(ii) specify a minimum hold time for identification of the highest operating pressure over a five-year period, but the operating pressure must be documented. Documentation methods include electronic (e.g., supervisory control and data acquisition system) or hardcopy records of pressure readings on the segment of pipe. MAOP records must be retained for the life of the pipeline until it is properly abandoned or removed in accordance with § 192.619(f). For additional provisions applicable for Type C gathering lines, reference § 192.619(c)(2).

PIR and MAOP

How do you calculate PIR if you are not obligated to establish an MAOP pursuant to § 192.9(e)(ii)?

The maximum allowable operating pressure (MAOP) of a pipeline is an input to the threshold determination pursuant to § 192.8 that a facility is a Type C gathering line. When no MAOP has previously been calculated for a given gas gathering line and the operator is not obliged to establish an MAOP pursuant to § 192.9(e)(2)(ii), an operator may make that threshold determination using one of two methods. First, the operator may calculate an MAOP consistent with the methods at § 192.619(a) or (c)(1). Alternatively, as a substitute for MAOP, an operator may use the highest operating pressure to which the segment was subjected during the preceding five years. See 49 CFR 192.8(c)(4). PHMSA clarified this method for operators without an available MAOP in a technical correction to the final rule, which issued May 4, 2022 (87 FR 26296)

Class Location Study

Do the requirements under § 192.9 require a class location study or survey for Type C gathering lines?

No, operators of Type C gathering lines are not required to comply with the requirements of § 192.609. However, operators of Type C gathering lines are required to understand the area in which their pipelines are located. Section 192.9 at subparagraphs (g)(3) and (g)(5) require operators of Type C (as well as Type R) gathering lines to be aware of information that may lead to a class location change, such as dwelling density and MAOP increases. Section 192.452(c) similarly contains requirements for operators of Type C gathering lines to be aware of information that may lead to a class location change. Additionally, certain regulatory requirements, such as leakage surveys and other inspections, require operators to periodically access the pipeline right-of-way where changes in class location would be apparent.

Service Lines (i.e. Farm Taps)

Are individual service lines (i.e., farm taps) that are connected to a Type C gathering line subject to the requirements of § 192.740?

Yes. Although the term “farm tap” is not defined in part 192, the term is commonly used to describe the “individual service lines” referred to in § 192.740. Individual service lines connected to a Type A, B, or C gathering line are subject to part 192 requirements, including § 192.740; they are not gathering lines subject to the requirements of § 192.9.

Compressor Stations

Do the new Type C regulations apply to compressor stations or other facilities?

Yes. A gathering line is defined by § 192.3 as “a pipeline that transports gas from a current production facility to a transmission line or main.” A pipeline is further defined as “all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.” Thus, a qualifying station or compressor unit would be included and subject to the same regulatory requirements as a gathering line under § 192.9.

Operator Qualification

Am I required to have qualified staff per subpart N perform covered operations and maintenance tasks on my Type B or C gas gathering line?

No. While PHMSA believes a prudent operator of a facility that transports hazardous commodities will ensure that operations and maintenance personnel are adequately trained and capable of safely performing their assigned tasks, compliance with the requirements in subpart N of part 192 is not required for Types B or C gathering lines.

**192.8 (h) Composite
Materials. Pipe and
components made with
composite materials not
otherwise authorized**

192(h)(2) Operators must
notify PHMSA in
accordance with **192.18**
at least 90 days prior to
installing new or
replacement pipe or
components made of
composite materials



QUESTIONS ?