



2026 PAPUC Safety Conference

2025 Non-Compliance Letters

Gas Midstream Regulations

Primary job of Pipeline Safety is to enforce:

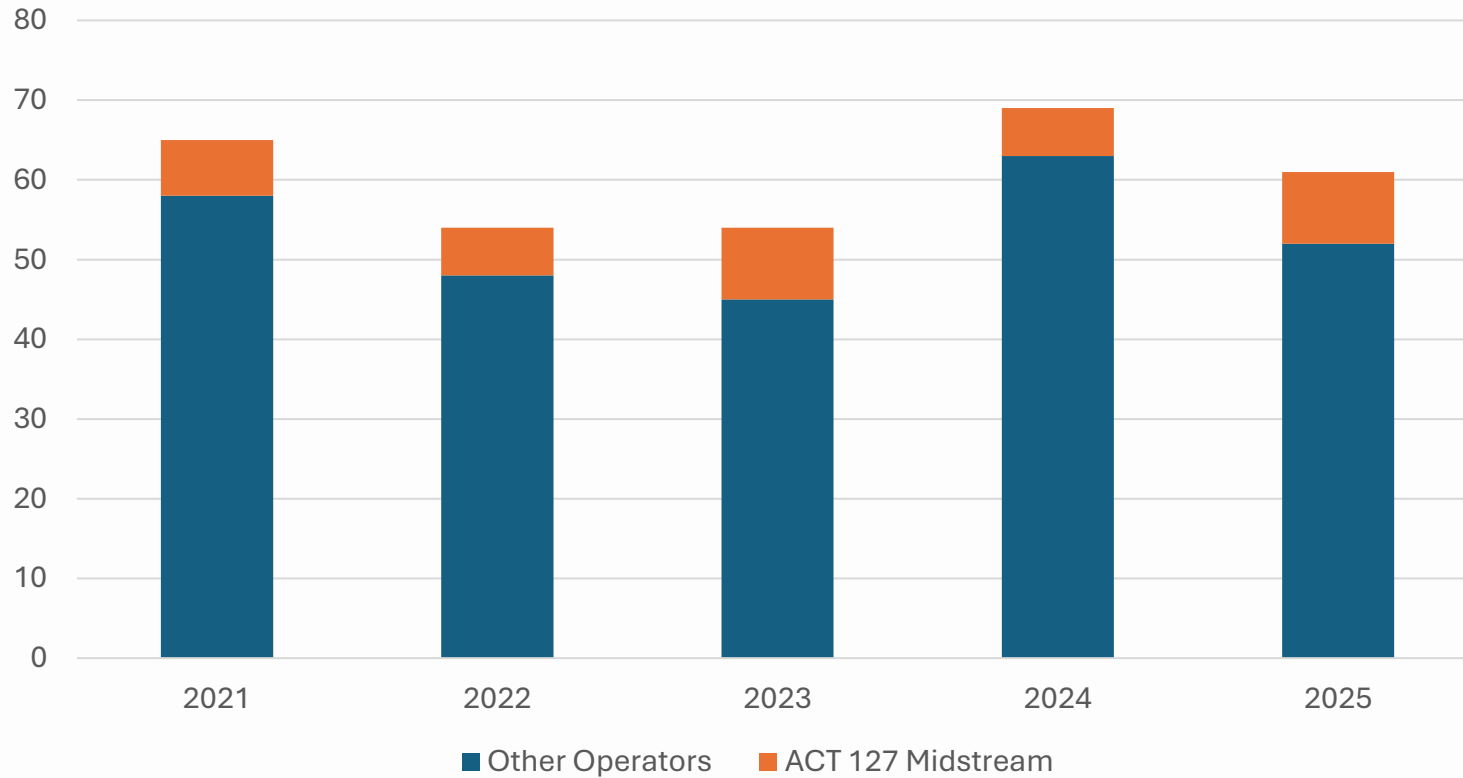
- US DOT regulations
 - 49 CFR 191 Reporting
 - 49 CFR 192 Natural Gas
 - 49 CFR 193 Liquefied Natural Gas
 - ~~49 CFR 195 Hazardous Liquids~~
 - 49 CFR 199 Drug and Alcohol Testing & Part 40
- State regulations **DO NOT APPLY** in Title 52 PA Code Chapter 59

NC Letter Breakdown

- **61** Total Non-compliance letters 2025
- **9** for Midstream Companies that resulted in...
- **20** violations federal within those non-compliance letters

2025 NC Letters by Company Type

5 year NC Letter Trend



Where Do We Find Violations?

Part 192 Violations 2025

- 1 Subpart A – General
- 1 Subpart D – Design of Pipeline Components
- 2 Subpart I – Corrosion Control
- 5 Subpart L – Operations
- 1 Subpart M – Maintenance
- 2 Subpart N – Operator Qualification

Where Do We Find Violations?

Part 191 (Reporting)

- 2 - violations

Part 192 (Natural Gas)

- 12 - violations

40 & Part 199 (Drug & Alcohol)

- 6 - violations



Opinions and content are attributed to I&E, an independent bureau that does not speak for the Commission.



Repeat issues

- Inadequate or Missing Program Manuals
 - Fewer eyes to catch omissions, possibly no Subject Matter Experts (SME's) to consult
 - Smaller companies do have the ability to make changes or improvements much quicker
- Procedures not being updated, followed or reviewed within the required timeframe
 - Can be weeks or more between jurisdictional operational activities
 - Employees not as familiar with infrequent tasks

A close-up photograph of several large, dark-colored pipes stacked horizontally. The pipes have bright yellow markings or labels running along their length. The perspective is from above, looking down at the circular openings of the pipes.

191 Immediate notice of certain incidents

- 191.5 (a) At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery, each operator must give notice in accordance with paragraph (b) of this section of each incident as defined in 191.3
- Paragraph (b) describes the notification requirements to the National Response Center (NRC)
- ACT 127 Midstream companies mostly reach the 3 million cubic feet gas loss

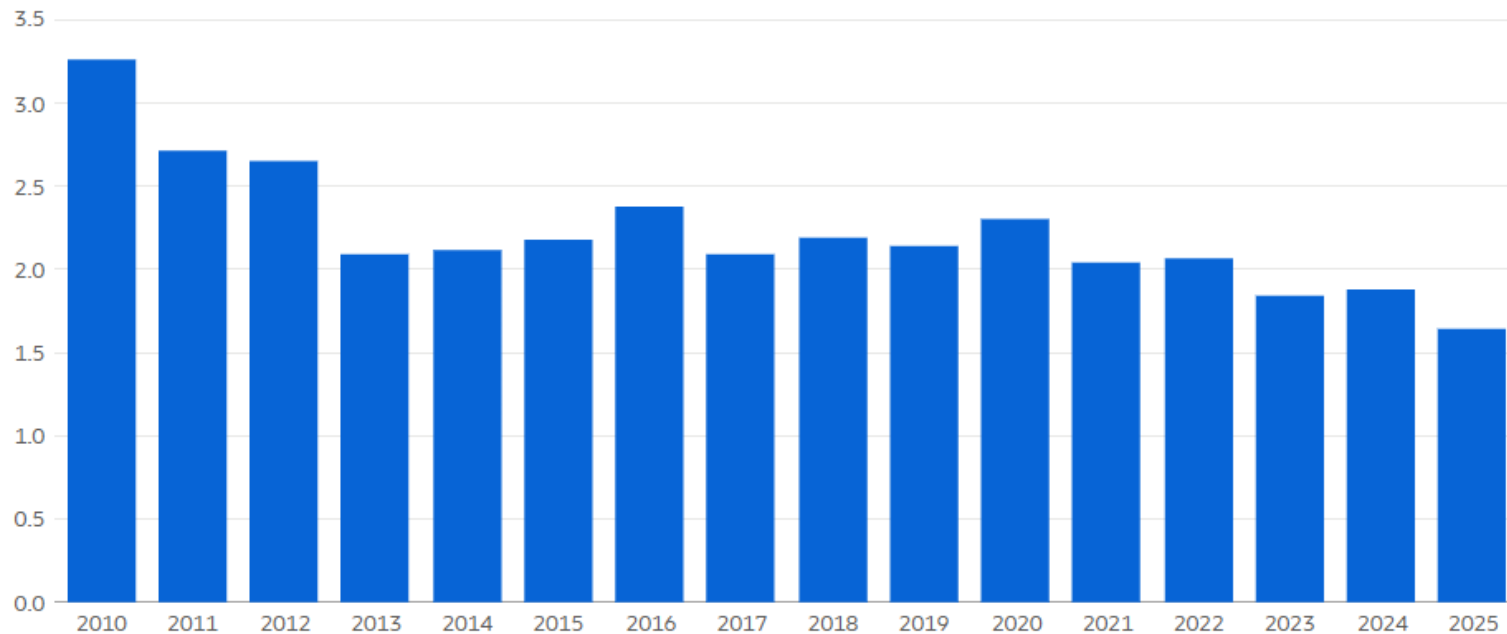
A stack of blue pipes with yellow markings, viewed from an angle, filling the left side of the slide.

192 Violations

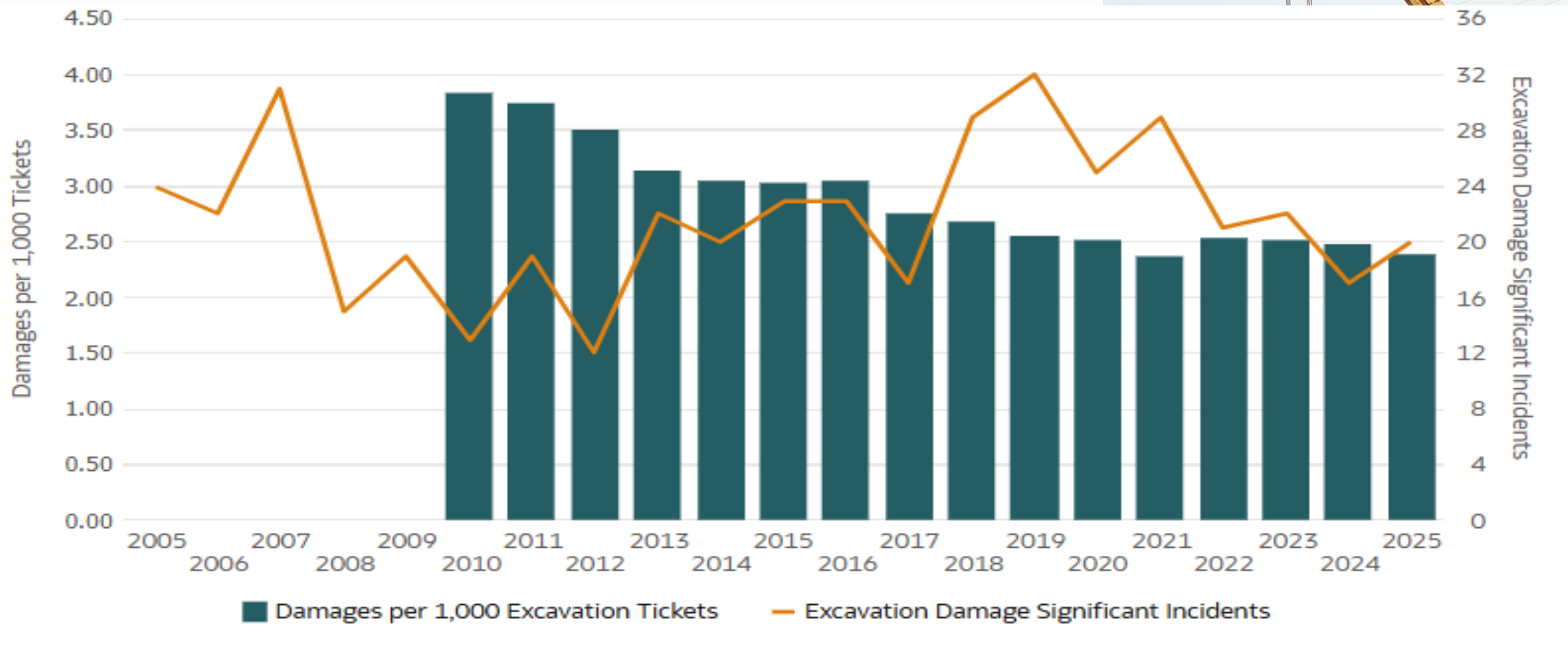
- 192 Subpart I
 - IR Drop issues
 - TYPE C Gathering lines have Corrosion requirements
 - Annual Corrosion testing falls within a short timeframe
- 192 Subpart M
 - Valves are a critical maintenance item
 - Differences between Distribution and ACT 127 Midstream are the location of the valves (above vs below ground) and purpose of the valves (isolation vs pressure relief)

PA Gas Distribution Damages

Pennsylvania Public Utility Commission: Natural Gas Distribution
Excavation Damages per 1,000 Tickets



National Damage Statistics-Gas

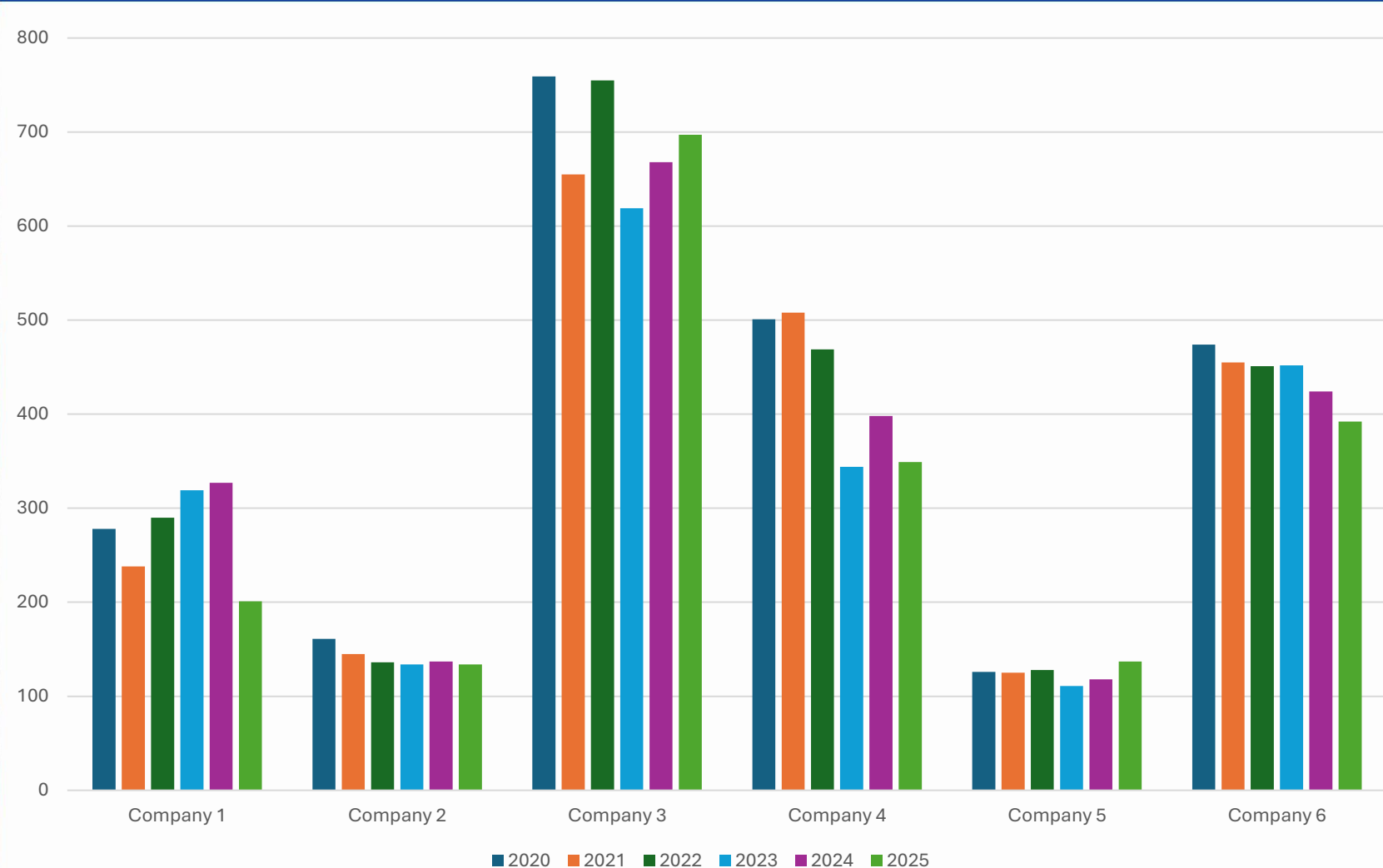


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TOTAL DAMAGES- 6 LARGE OPERATORS





Damage Prevention Facts

2025- Record Setting year for Gas Distribution:

- 1.64 hits per 1,000 tickets (Lowest on record)
 - 2024: 1.87 hits per 1,000 tickets
 - 2025 National Average 2.38 hits per 1,000 tickets
- 1,162,087 tickets received (Highest on record)
- 1,903 Damages (Lowest on Record)
- No Significant Incidents reported for Excavation Damages in 2025

A close-up photograph of a gas stove burner with a blue flame. The burner is black and metallic, and the flame is bright blue and steady. The background is slightly blurred, showing other parts of the stove.

2025 Damage Prevention Inspections

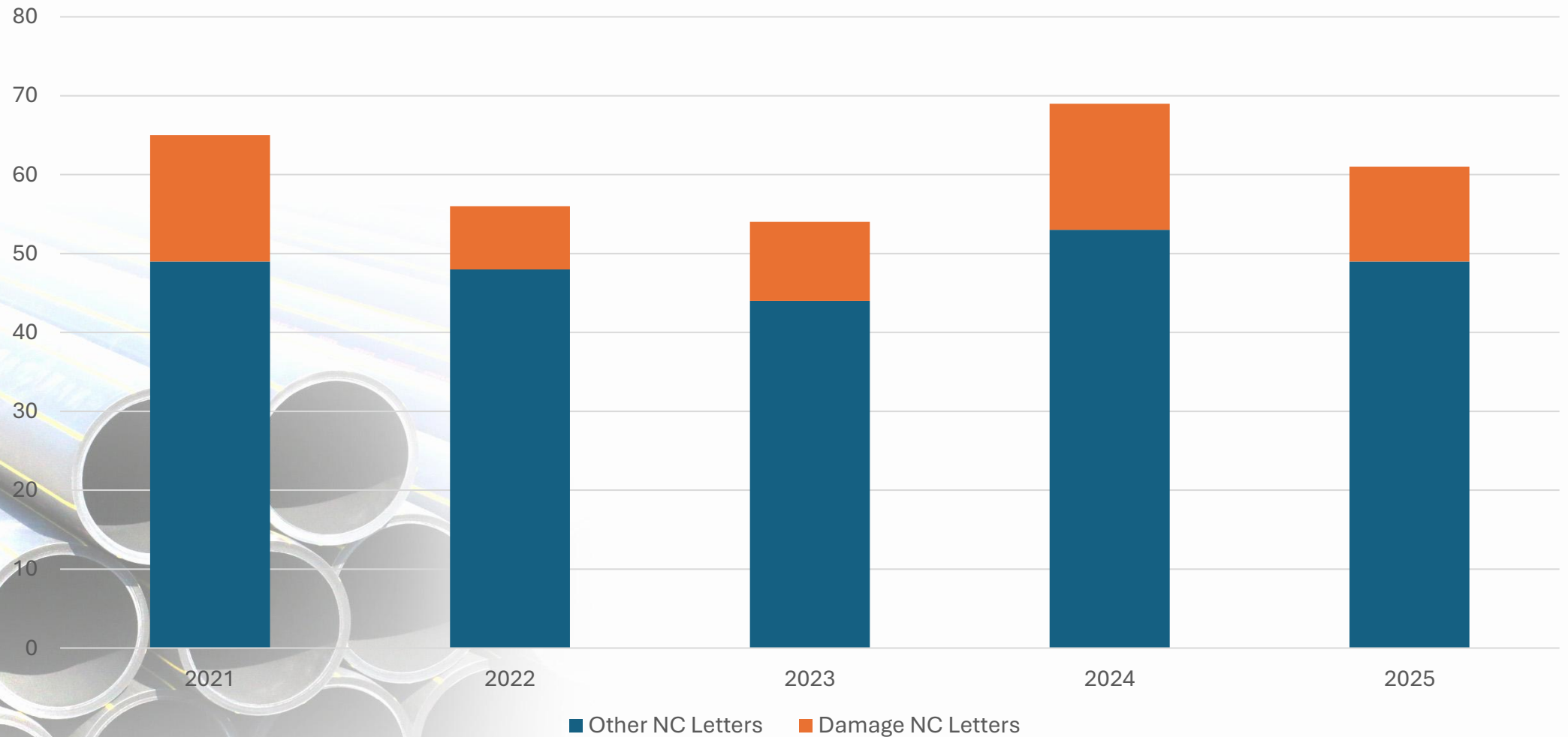
- 6 Damage Prevention Program Inspections
- 52 Facility Damage Inspections
- 107 One Call Locate Verification Inspections

Inspections

- Damage Prevention Program – Tied in with DIMP to review program performance and metrics, annual report information
- Facility Damage Inspections – Review specific Damage information, Notifications come from PEMA, Company, Contractors, PUC Damage Prevention Group, News, or other sources
- One Call Verification – Selecting tickets to look at in the field based on tickets needing marks, marked tickets, tickets marked clear, Karl responses
- Other inspections can involve damage prevention activities including but not limited to construction, leak repair, valve inspections, compliant investigations

Damage Prevention NC Letters

5 Year NC Letter Trend



2025 Damage Prevention NC Letters

- 12 out of 61 letters were for Damage Prevention related issues
- Issued because of company and contact locators, 1st party, second party, and 3rd party damages

Letters Cited:

- Not following Company Procedures(192.605)
- Procedures not adequate(192.13)
- Mismarked/no marks of facilities/not marking entire scope(192.614)
- Mapping and records issues(192.603, 59.37)
- Not following the PA One Call Law(192.614) – legal dig dates, potholing facilities, prudent excavation techniques, KARL responses
- Locator Qualification(192.805)

Common NC Letter Recommendations for Damage Prevention

- Retraining Locators
- Issuing Advisor/Technical bulletins
- Performing Root Cause investigations to prevent reoccurrence
- Performing more inspections of the work occurring
- QA/QC of locates performed
- Risk analysis through DIMP on problem areas
- Finding unknown stubs(mains and services), taps, risers, etc..



Master Meter and Propane Regulations

Master Meters – Jurisdictional Determination

- US DOT regulations
 - 49 CFR 192 Natural Gas
 - Exemptions: (DIMP, Public Awareness, Odorization Testing)
- State regulations **DO NOT APPLY** in Title 52 PA Code Chapter 59

Master Meter and Propane Regulations

Propane Operators

Not all Propane Operators are jurisdictional to the PA PUC:

- US DOT regulations
 - 49 CFR 192 Natural Gas
 - Exemptions: Fewer than 10 customers; Providing service to a single customer
- State regulations **DO NOT APPLY** in Title 52 PA Code Chapter 59

What we're finding....

Part 192 Violations

Subpart A – General

Subpart I – Corrosion Control

Subpart L – Operations

Subpart P – DIMP(Propane)

Areas of concern

- Operational Procedures lacking
 - Not following plans, procedures, and programs
 - Inadequate procedures – missing critical steps
- Corrosion issues
 - Not cathodically protecting pipelines
 - Not monitoring for corrosion control
- Damage Prevention
 - Not following guidelines for marking facilities adequately

Incident Investigation

- **What the PUC Investigator Is Evaluating**

- Emergency response
- Evidence
- Cause
- Compliance
- Systemic risk

We're there to find out...

- What Happened?
- Safety – is the scene secure?
- Is/Was the emergency response adequate?
- Jurisdictional?
- Could this happen again?

Probable Incident (Accident) - Observation

- **Recognition and classification** of the emergency
- **Dispatch**, staffing and **arrival** of qualified personnel
- **Coordination** with fire, police and Incident Command
- Leak/hazard **assessment and protection** of life/property
- **Gas-control** (Product) strategy: pressure reduction, valves, squeeze-off, stopping, shutdown or excavation
- **Communications**
- **Compliance** with §192.615 (§195.402) and the operator's own written procedures

Follow the Gas (Product) — Isolation Performance

When did the operator know the product needed to be controlled, and what happened before actual isolation?



Identify **unexplained delays**: inaccurate maps, inaccessible/inoperable valves, staffing, system configuration, equipment, communications or decision-making.

Determine whether §192.747 (195.420) valve maintenance or other compliance issues affected the duration or consequences of the event.

5. Preserve the Evidence

PHYSICAL

- Failed pipe / fittings
- Valves / regulators / meters
- Orientation & measurements
- Fracture / fire / debris evidence
- Corrosion

ELECTRONIC (Records)

- SCADA / pressures / alarms
- Dispatch recordings & calls
- GIS / maps / GPS
- Work & maintenance systems
- Pictures
- Surveillance Cams
- 911 recordings
- Cell phone records

HUMAN (Interviews)

- Operator personnel
- Controllers / dispatchers
- Fire / police responders
- Public witnesses

Document before disturbing. Electronic systems often overwrite.

For instance...Gas Damage...



§192.617 (requires analysis of accidents and failures to determine root causes and to minimize recurrence.

For Gas, potential regulatory paths may include §192.615, §192.617, §192.747, Operator Qualification, DIMP and reporting requirements.

Red Flags - Conditions that could trigger deeper compliance inquiry

Unexplained delay controlling gas

Critical valves cannot be located

Valve inaccessible or inoperable

Maps conflict with field conditions

**Missing / overwritten
pressure data**

Emergency procedure not followed

Corrective actions

Conflicting operator timelines

Prior similar failures or known condition

Same equipment/condition exists

Incident

The PUC investigator's job is not merely to determine what failed.

Determine what happened and whether the public or system is **safe**.

Evaluate how the operator responded and whether regulatory requirements were met.

Identify direct, contributing and systemic **factors** that affected consequences.

Determine whether immediate corrective action is necessary **elsewhere** in the system.

Build a **factual, evidence-supported** report capable of supporting regulatory conclusions.



• Thank you for your attention!

NATURAL GAS