



Pipeline Leak Detection, Leak Repair, and Methane Emission Reductions Public Meeting

Matthew Hite, VP of Government Affairs • May 5, 2021

Overview

- Introduction
- PIPES Act of 2020
- Regulated Onshore Gas Gathering Lines
- Leak Detection and Repair Requirements
- Considerations





Introduction

- GPA Midstream Association has served the U.S. energy industry since 1921
- Nearly 70 corporate members that directly employ more than 75,000 employees that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to as “midstream activities”
- Membership accounts for more than 90% of the NGLs produced in the United States from more than 400 natural gas processing facilities

PIPES Act of 2020



- Bipartisan legislation enacted as part of broader omnibus appropriations and COVID-19 relief package
- Reauthorizes the federal pipeline safety program through fiscal year 2023
- Midstream industry collaborated with other stakeholders in developing leak detection and repair provisions

Section 113 Leak Detection and Repair

- PHMSA to issue final regulations for gas pipeline leak detection and repair by December 2021
- Applicable to operators of regulated onshore gas gathering lines in Class 2 locations, Class 3 locations, and Class 4 locations
- Minimum performance standards that reflect capabilities of commercially available advanced technologies
- Does not alter PHMSA's authority to regulate gathering lines as defined pursuant to 49 U.S.C. 60101

Section 114 Inspection and Maintenance Plans

- Requires inspection and maintenance plans to meet gas pipeline leak detection and repair final rule
- Directs PHMSA/state authorities to consider the extent to which inspection and maintenance plans
 - will contribute to public safety, eliminating hazardous leaks and minimizing releases of natural gas, and protection of the environment
 - address replacement or remediation of pipelines that are known to leak
- Requires operators to update inspection and maintenance plans by December 2021

Regulated Onshore Gas Gathering Lines

- Type A Gathering Lines
 - High Stress/Pressure
 - Class 2, Class 3, Class 4 Locations
- Type B Gathering Lines
 - Low Stress/Pressure
 - Class 2, Class 3, Class 4 Locations
- Class 1 Exemption



Leak Detection and Repair Requirements

- Type A Gathering Lines
 - Promptly repair hazardous leaks per §192.703(c)
 - Comply with the requirements for gas transmission line patrolling in §192.705, leak surveys in §192.706, recordkeeping in §192.709, and repairs in §§ 192.711-192.719
- Type B Gathering Lines
 - Conduct leakage surveys in accordance with the requirements for transmission lines in §192.706, using leak-detection equipment
 - Promptly repair hazardous leaks in accordance with §192.703(c)



Leak Detection Practices

- Leak detection surveys
 - Aerial, vehicle, or foot patrols used to conduct visual surveillance of pipeline right-of-way
- Leak detection equipment
 - Infrared, flame ionization, laser gas detection, or other technologies used to conduct surveys

Considerations

- Unlike transmission and distribution lines,
 - Rulemaking mandate in Section 113 only applies to regulated onshore gas gathering lines in Class 2, 3, or 4 locations
 - Existing leak detection and repair requirements in 49 C.F.R. Part 192 only apply to certain regulated gathering lines
 - Gas gathering line operators are not regulated as public utilities and cannot shift costs onto captive ratepayers
- Leak detection and repair requirements should be risk-based and cost-effective



mhite@GPAmidstream.org