



U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration



# **NAPSR – PHMSA Public Workshop on DIMP Implementation**



**National Association of Pipeline Safety Representatives  
Office of Pipeline Safety**

**Chris McLaren, PHMSA**



# PHMSA Regulatory Perspective

- DIMP Website and Performance Measures Reporting
- Farm Taps
- “Near Misses” and Potential Threats
- Questions and Answers



# **DIMP Website and Posting of DIMP Performance Measures**



# DIMP Home Live Demo, as time allows



U.S. Department  
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**DIMP Home**

DIMP Communications:  
Public Meetings,  
Webinars, Webcasts,  
and State Seminars

DIMP History

DIMP Resources

FAQs

Performance  
Measures

Questions and  
Comments for OPS

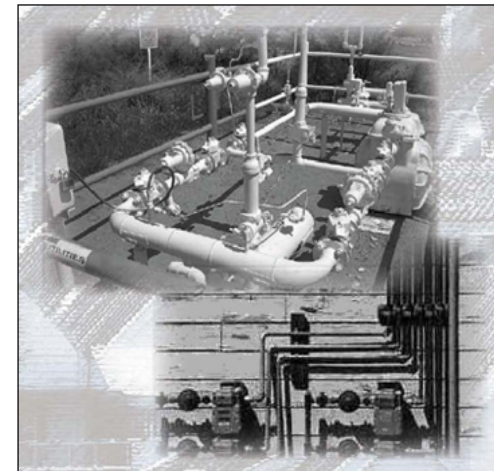
Regulator Contacts



## Distribution Integrity Management

The Pipeline and Hazardous Materials Safety Administration (PHMSA) published the final rule establishing integrity management requirements for gas distribution pipeline systems on December 4, 2009 (74 FR 63906). The effective date of the rule is February 12, 2010. Operators are given until August 2, 2011 to write and implement their program.

PHMSA previously implemented integrity management regulations for hazardous liquid and gas transmission pipelines. These regulations aim to assure pipeline integrity and improve the already admirable safety record for the transportation of energy products. Congress and other stakeholders expressed interest in understanding the nature of similarly focused requirements for gas distribution pipelines. Significant differences in system design and local conditions affecting distribution pipeline safety preclude applying the same tools and management practices as were used for transmission pipeline systems. Therefore, PHMSA took a slightly different approach for distribution integrity management, following a joint effort involving PHMSA, the gas distribution industry, representatives of the public, and the National Association of Pipeline Safety Representatives to explore potential approaches.



The regulation requires operators, such as natural gas distribution companies to develop, write, and implement a distribution integrity management program with the following elements:

- Knowledge
- Identify Threats
- Evaluate and Rank Risks
- Identify and Implement Measures to Address Risks
- Measure Performance, Monitor Results, and Evaluate Effectiveness
- Periodically Evaluate and Improve Program
- Report Results

The DIMP Inspection Forms as well as other resources to support operators implement their program are on the [DIMP Resources page](#) and through [PHMSA's Pipeline Safety website](#).

PHMSA has developed and continues to enhance guidance to help the public and the affected industry understand the requirements of the final rule in the form of [FAQs](#).



# DIMP Website

Please regularly use PHMSA websites as they are a primary form of communication

PHMSA Office of Pipeline safety

<http://phmsa.dot.gov/pipeline>

DIMP Home Page

<http://primis.phmsa.dot.gov/dimp/index.htm>

Pipeline Safety Stakeholder Communications

<http://primis.phmsa.dot.gov/comm/>



# Distribution Annual Report Revisions

Distribution Annual Report modifications to align leak causes with the Incident Report have initiated and should be completed in time for the 2012 Annual Report submittals.

Other modifications are being discussed and solutions identified for their implementation, and these include:

- Easier data input fields for mileages and services
- Definition of the type of operator
- Definition of the commodity transported.
- Added input fields for Sections on EFV's and Excavation Damage



# Farm Taps



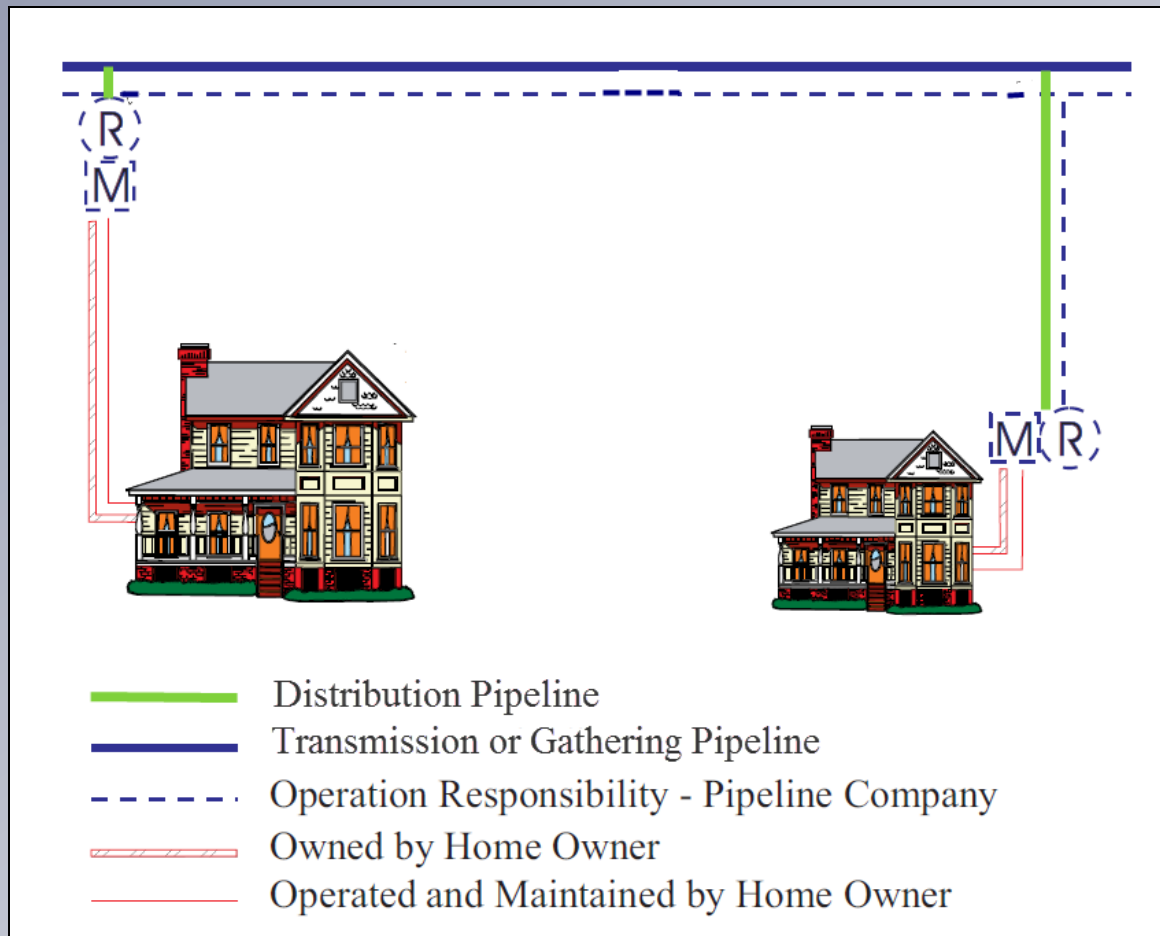
## Farm Taps

- PHMSA has recognized farm taps as distribution lines for many years.
- Historically, PHMSA and its predecessor agencies have held that farm taps are service lines, a subset of distribution pipelines.
- Farm taps were first referenced in the pipeline safety regulations in 1971 when the Office of Pipeline Safety proposed to broaden the definition of a service line.





# Farm Taps [from June 8, 2011]



- Do the facilities meet the definition of Gathering? No.
- Do they meet the definition of transmission? No.
- If No to both, Then the facilities are distribution.

The “farm tap” is pipeline upstream of the outlet of the customer meter or connection to the customer piping, whichever is further downstream, and is responsibility of the operator. The pipeline downstream of this point is the responsibility of the customer. Some States require the operator to maintain certain portions of customer owned pipeline. The pipeline maintained by the operator must be in compliance with 49 Part 192.



# Treatment of Farm Taps in DIMP

We have discussed the treatment of farm taps in DIMP FAQ C.3.7 (issued 08/02/2010) and in the 3 DIMP Webinars.

PHMSA's position is that if a farm tap is neither a transmission pipeline or a gathering pipeline it is a distribution pipeline

From 192.3 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 gas distribution center, storage facility, or large volume customer that is not down-stream from a gas distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field.”



## Treatment of Farm Taps in DIMP

- PHMSA continues to meet with and talk to industry groups to gather information, understand the need for change, and discuss solutions.
- The Farm tap discussion involves regulated and unregulated production, gathering, transmission, and distribution pipeline operators.
- PHMSA takes Industry's concerns on the treatment of Farm Taps and their inclusion in DIMP very seriously.
- As a result of the many scenarios in which Farm Taps occur, all of the various operator's positions must be considered to come to an appropriate solution.



## **DIMP's Regulatory required "Near Miss Initiative"**

- Existing and Potential Threats – 192.1007(C)
- In the evaluation and ranking of risk, an operator must consider each current and potential threat
- Existing threats that have not resulted in a leak must be considered
- Potential threats identified from in Industry and PHMSA published materials must be considered, as appropriate



# **Pipeline R&D Forum**

## **Arlington, Virginia July 18-19, 2012**

- LDC Participation Critical to Generate good research on distribution challenges!
- Specifically the forum will:
  - Identify key pipeline technical challenges facing industry and government;
  - Disseminate information on current research efforts; and
  - Identify new research that can help to meet known challenges



# Questions and Answers