

U.S. DEPARTMENT OF TRANSPORTATION

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PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION

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GAS PIPELINE ADVISORY COMMITTEE

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PUBLIC MEETING

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WEDNESDAY

JUNE 26, 2019

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The Pipeline and Hazardous Materials
Safety Administration met in the U.S. DOT Media
Room 1200 New Jersey Avenue, SE, Washington, DC,
20590 at 8:30 a.m., David Danner, Committee
Chair, presiding.

COMMITTEE MEMBERS PRESENT

**DAVID DANNER, Committee Chair; Chair, Washington
Utilities and Transportation Commission**
**W. JONATHAN AIREY, Retired Partner, Vorys, Sater,
Seymore, and Pease, LLP**
RONALD BRADLEY, Vice President, Gas PECO
**MARK BROWNSTEIN, Associate Vice President & Chief
Counsel, U.S. Climate & Energy Program,
Environmental Defense Fund**
**DIANE BURMAN, Commissioner, New York State Public
Service Commission***
**J. ANDREW DRAKE, Vice President, Asset Integrity
and Technical Services, Enbridge Gas
Transmission and Midstream**
**ROBERT HILL, County Development Director &
Emergency Manager, Brookings County,
South Dakota**
**SARA LONGAN, Deputy Commissioner, Alaska
Department of Natural Resources**
**MARY PALKOVICH, Vice President, Gas Engineering &
Supply, Consumers Energy**
**SARA ROLLET GOSMAN, Assistant Professor
University of Arkansas School of Law**
**RICHARD WORSINGER, Director of Energy Resources
City of Rocky Mount, North Carolina**
**CHAD ZAMARIN, Senior Vice President of Corporate
Strategic Development, The Williams
Companies**

PHMSA STAFF

HOWARD "SKIP" ELLIOT, PHMSA Administrator
DRUE PEARCE, Deputy PHMSA Administrator
**ALAN MAYBERRY, Associate Administrator for
Pipeline Safety**
AMAL DERIA
LINDA DAUGHERTY
JOHN GALE
STEPHEN GORDON
CHRIS McLAREN
STEVE NANNEY
CAMERON SATTERTHWAITE
MASSOUD TAHAMTANI

ALSO PRESENT

CLAYTON BODELL, Williams
KEITH COYLE, GPM
CHRISTOPHER KUHMAN, API
MARY FRIEND, NAPSR
SUSAN GINSBERG, Independent Petroleum

Association of America

MATTHEW HITE, GPA Midstream Association, Vice
President of Government Affairs

JEANNETTE JONES, Noble Midstream

RANDY KNAPP, PPI

THERESA PUGH, Theresa Pugh Consulting

CARL WEIMER, Executive Director, Pipeline Safety
Trust

CHARLES YARBROUGH, Texas Pipeline Association

AARON MARTINEZ, Andeavor

JOSHUA LOWERY, O'Donoghue & O'Donoghue LLP

*Present via teleconference

P-R-O-C-E-E-D-I-N-G-S

(8:35 a.m.)

CHAIR DANNER: All right, good morning everybody. Today is June 26th, 2019 and this is the meeting of the Gas Pipeline Advisory Committee, and we are back on the record.

So do we need to take roll today, or are we good with that?

PARTICIPANT: I think we're good.

CHAIR DANNER: All right. I note that Chad Zamarin has joined us in person today. Welcome.

MEMBER ZAMARIN: Thank you.

CHAIR DANNER: And Commissioner Burman will be joining us in progress. So with that, I'm going to turn it over to Alan for some morning remarks and then we'll get work.

MR. MAYBERRY: Good morning everyone. I hope everyone had a nice evening, and welcome, Chad.

I want to start off with just a bit of good news is, one of our rules has made its way

1 over to the Office of Management and Budget.
2 It's the notice of proposed rulemaking on valve
3 and rupture detection.

4 So we're pleased to see that progress.
5 So I just wanted to mention that. And I'll turn
6 it back over to you. That's my good news for the
7 morning.

8 CHAIR DANNER: Okay.

9 (Laughter.)

10 CHAIR DANNER: And I'm hoping that
11 we'll get some proposed rules today that we'll
12 take over to OMB at some point. So we are
13 working on language regarding the scope.

14 And maybe, I think what I would like
15 to do is turn it over to Andy get a progress
16 report on discussions that he had with industry
17 folks on following up the discussion we had
18 yesterday afternoon.

19 MEMBER DRAKE: Sure. Thank you. This
20 is Andy Drake with Enbridge.

21 As we discussed last night, we had a,
22 at the end of yesterday's session we had a

1 breakout session among the industry's
2 representatives and trade associations to try to
3 vet out the proposal that was tabled yesterday.

4 I do think it's fair to frame that the
5 industry has been really wrestling with this
6 issue for a very long time. The issues about
7 data collection over a long period of time.

8 The field for decision makings is
9 across all of the industry, and that's a pretty
10 big lift. That, greater than 12 3/4 issues I
11 think is considered a significant lift from where
12 they were even, they, we, were a few weeks ago.

13 I think the issue that was put on the
14 table was not something that the group was
15 prepared to vet on the fly. I think that's a
16 fair comment.

17 It was a big challenge, a lot of
18 unknowns. And there was a sense, to be very
19 frank, we could not reach consensus last night
20 with all the trade associations. So I think
21 that's where the trade associations is.

22 Now, that said, we, I heard a lot, and

1 I think Chad did as well, some of the other
2 members did as well, from several of the lager
3 operators, and those that are present in the
4 room.

5 And some representatives from some
6 other trade associations that we think that this
7 proposal could be vetted out. And there's a
8 possibility that this is a practical next step.

9 And so the industry representatives on
10 GPAC and I counseled this morning, and we believe
11 that in the interest of trying to take that next
12 step, that despite the fact that we could not
13 reach consensus last night on moving forward, we
14 are electing to move forward with the discussion
15 to vet out this issue.

16 We think that there is possibility and
17 promise there and we'd like the Committee to
18 engage in a conversation. And I'd like to ask
19 the Members, just by show of hand, that they are
20 in alignment with this discussion. Just so that
21 I think everybody in the room can see that there
22 is support.

1 So if the trade association member, or
2 the industry representatives on the GPAC could
3 raise their hand showing that they'd like to vet
4 this out, I'd like that just for the record?

5 CHAIR DANNER: Okay. So let the
6 record show the five industry members have raised
7 their hands.

8 MEMBER DRAKE: I think what we'd like
9 to do in this discussion, I think there's some
10 tenants that Sara Gosman put forward. We'd like
11 to vet some of those out.

12 I think we'd like to try to vet out
13 the risk-based approach that I think is very
14 fundamental to the flight plan of prioritizing in
15 a long term direction for the industry. And I
16 think the PIR is a big part of that, so we'd like
17 to vet out how the PIR fits into this discussion.

18 I think we'd like to take some of
19 those issues that you put on the table and
20 discuss things like, what standard of care is
21 appropriate, how could they be instituted, in
22 both implementation and time frame, and which

1 ones are the biggies.

2 Which ones are not all the same.

3 Which ones are really important, which ones are
4 nice to have. Sort of get a sense for what the
5 key fundamental things is we want to do with this
6 particular tranche of pipes.

7 So with that, I can turn it over to
8 Chad. I know Chad has a lot of thoughts on the
9 PIR and how that might play in, or we can open it
10 for the rest of the discussion.

11 And, Alan, you probably have done some
12 homework over the night as well, I'm sure.

13 MR. MAYBERRY: I want to clarify, the
14 focus of discussion is the range of 8.65 to 12
15 3/4, right? I think there's, above 12 3/4 is
16 kind of where we were with this general agreement
17 for that.

18 MEMBER DRAKE: There is agreement that
19 if we take above 12 3/4, we vetted that
20 yesterday, that that is one tranche. And what
21 kind of obligations are associated with that
22 tranche were very clear yesterday. Except maybe

1 for the PIR discussion.

2 This middle tranche is eight inch to
3 12 inch nominal. And I think that there is a
4 separate set of issues that we're trying to vet
5 out for that group, or what we talked about
6 yesterday, a tranche.

7 I do think issues about new
8 construction, forward looking, is an issue we
9 should keep isolated because a standard of care
10 going forward is much easier to institute than
11 some of the retroactive issues. So I think we
12 should disassociate looking forward versus
13 looking backward.

14 It just helps from a practicability
15 standpoint, maybe get some things that are good
16 lines in the sand that we should draw, that we
17 can take advantage of. Society can get value out
18 of and industry can institute much more
19 reasonably. Is that fair?

20 CHAIR DANNER: All right, I see that
21 Steve has put some language up on the screen.
22 Maybe, Chad, do you want to speak first before we

1 talk to this? Chad?

2 MEMBER ZAMARIN: Thanks. Chad
3 Zamarin, Williams.

4 I think, the way that I've tried to
5 think about this, maybe over the last 24 hours,
6 it seems like we have maybe two issues I think
7 that can be woven into one solution. But I think
8 when we talk about eight inch nominal pipe and
9 larger, maybe not just this eight to 12 inch, I
10 think we're saying that there is some fundamental
11 requirements.

12 And so I think the introduction of the
13 PIR, maybe we're missing where it has its most
14 potential impact. I think what we're saying here
15 is that a pipeline eight inches or greater should
16 be subject to some minimum, primarily focused on
17 damage prevention, leakage survey or emergency
18 planning, line marking.

19 I'm not sure that we want to use the
20 PIR. I think the PIR was introduced because we
21 were talking about a broad set of requirements
22 applied to a pipe, so I wonder if we should

1 consider just saying that for eight inch and
2 larger there is some minimum amount of
3 requirement.

4 And then for some population of pipe
5 we're going to allow the use of the PIR to not
6 have to go beyond that minimum because it's got a
7 different risk profile.

8 So I think we may be confusing where
9 PIR really helps us by putting it in this
10 particular area. So I don't know if you're
11 following my logic, but I just wonder if, we're
12 almost saying here that any pipe greater than
13 eight inches should, at a minimum, have line
14 marking over -- I think we're talking about over
15 125 pounds still, aren't we?

16 So eight inch greater than 125 pounds,
17 correct? Yes. Would have, subject to line
18 marking, emergency planning.

19 I mean, we can talk through each of
20 these elements, is, what are the right kind of
21 minimum requirements. But I wonder if that
22 should just be independent of some maximum size.

1 And then we talk about the benefit of
2 allowing the PIR to be used for the purpose of
3 other requirements that might be added to
4 pipelines.

5 Because, really, what the PIR does is
6 it takes care of those issues that would have
7 impact outside of just the top of line. And so
8 it seems like these are taking care of that very,
9 on the top of the line issue that a PIR most
10 doesn't have a big influence over.

11 If you're going to have damage, it's
12 because someone is standing on top of your
13 pipeline.

14 And so my thought is maybe the PIR
15 doesn't make sense here. And maybe the limit to
16 16 inch doesn't make sense, we're just saying,
17 this is the floor requirement for pipes of eight
18 inch, 125 pounds and greater.

19 And then we maybe have a separate
20 discussion is, okay, what pipes should have
21 application of additional requirements beyond
22 those. Thanks.

1 MR. MAYBERRY: If I may, when you say
2 additional requirements, above and beyond the
3 four so maybe -- yes.

4 MEMBER ZAMARIN: Yes. So I think it's
5 what we're talking about when we talk about the
6 pipes above 12 3/4 that are, we're saying now,
7 subject --

8 MR. MAYBERRY: Well, definitely above.

9 MEMBER ZAMARIN: -- a broader set of
10 regulations. And then the PIR may allow us to
11 say, look, we're not taking away damage
12 prevention, we're not taking away emergency
13 planning, but we're not going to extend all these
14 additional requirements to a pipe that has a very
15 limited PIR.

16 MR. MAYBERRY: Right. Okay.

17 CHAIR DANNER: All right, Jon.

18 MEMBER AIREY: The productive
19 discussion that we've had last night doesn't
20 organize it this way. It's, eight inches to 12
21 inches would be treated separately and with a
22 lower level of regulatory requirement and lower

1 cost profile since that hasn't been vetted
2 broadly and the 12 inches and above has been.

3 So I would suggest that we might want
4 to split it out that way because that's been
5 consistent with the discussions that have taken
6 place with the industry s.

7 CHAIR DANNER: All right, Sara.

8 MEMBER GOSMAN: I think at the end of
9 the day I'm interested in making sure the
10 substance is there, but I conceived of it when I
11 began this discussion yesterday as a floor for
12 all pipelines. And then I think the question
13 would be, what are we going to add to it as the
14 risk profile changes in terms of diameter
15 increasing, and also PIR.

16 So, again, I would like to see us come
17 to consensus on this in whatever way we can frame
18 it up. But that was my original thinking on how
19 we would do it.

20 CHAIR DANNER: Andy.

21 MEMBER DRAKE: This is Andy Drake with
22 Enbridge. I think that's an excellent point.

1 And I'm going to throw this to Mary in a second
2 because I think she has a really good thought
3 here, in that we talked yesterday about a
4 preamble and trying to record the thinking that
5 we have here.

6 How many times have we leveraged the
7 preamble that we developed 20 years ago for
8 integrity management in the flight plan of the
9 gas transmission in the street.

10 And I think what we're doing here
11 right now is trying to set the context of the
12 thinking that we want to leverage in a forward
13 position for many, many years.

14 And I think recording what is the
15 floor, what is the thinking about gathering and
16 incentivizing a risk-based approach to make
17 decisions and how do you sort of setup that next
18 tranche to solve, sort of following in that
19 pattern and thinking, is really important.

20 And I know Mary was pretty passionate
21 about that. I'll let her --

22 CHAIR DANNER: Okay. Mary, Ron, has

1 his card up too but I think since you're on
2 point, you're following up, Ron, I'll ask your
3 indulgence and let Mary go first.

4 MEMBER PALKOVICH: Sorry, Ron. But
5 what we talked about, and what I think is
6 important, is that the preamble includes what
7 Andy suggested and lays sort of the overall kind
8 of intent and flight plan that we've been talking
9 about tranches and how we build upon the data
10 we're going to get from the annual reports, now
11 that we've got that past.

12 But we really should weave in some
13 language around the RP1173 and the pipeline
14 safety management systems concepts of building on
15 the data and continuously evaluating risk.

16 CHAIR DANNER: All right, thank you.
17 Ron.

18 MEMBER BRADLEY: Ron Bradley, PECO.
19 So I just wanted to make a comment. That I'm
20 encouraged by this conversation.

21 You know, and I tend to think back to
22 the days when I was asked to be a part of this

1 Committee and I think our charge is to find the
2 right balance. It's definitely to make sure that
3 we protect the safety of all people around our
4 pipelines.

5 Not only our workers and industry, but
6 the public, it's just a core tenant. And I'm
7 encouraged that we're stopping here. I think
8 it's a great conversation. I support where we
9 are.

10 I just think that you have to, people
11 have to know where our pipes are and people have
12 to be comfortable working around our pipes. And
13 we have to be responsible to let the world know
14 that we've got something down there that's got a
15 pretty volatile chemical in it.

16 So I'm encouraged by this. I
17 appreciate some of the push from representatives
18 of the public and I think we're moving in the
19 right direction. I think putting this on the
20 floor, just to start, is the right place to be.

21 I think there's got to be more though
22 in the future coming years as we keep driving

1 through this, but you got to get started
2 somewhere.

3 CHAIR DANNER: So it's my
4 understanding -- so this is part of a package.
5 So obviously you've got the one that's dealing
6 with the, what we talked about yesterday with the
7 larger pipes.

8 And so Steve and his team put together
9 some language, and I think it would be best to
10 show the package, so that we know what the
11 package looks like.

12 And then in addition, I think there is
13 some discussion about what might go in a
14 preamble. If we want to go there as well.

15 So maybe, Steve, if you could show us
16 what the other language is.

17 MR. NANNEY: All right, just to start,
18 to go back on what we were talking about
19 yesterday.

20 We were going through the mileage and
21 having a discussion on it. And just for
22 everybody's memory is, what we estimate the total

1 gas gathering mileage to be is 426,000 miles. So
2 just to understand that.

3 And then when you break it down is
4 whether we're talking about eight inch and above
5 or eight inch and below. As you can see, we
6 broke it out, the eight inch to less than 12
7 inches, the 46,000 miles.

8 And then the 12 inch itself is another
9 almost 20,000 miles. And then the mileage for
10 the 12 to 16 and then the greater than 16 was
11 about 25,000 miles.

12 So the total miles, on all of those,
13 were 90,000 miles. Of the 426,000. Just to let
14 everybody understand what the mileage is we're
15 talking about.

16 In going to the next slide, we broke
17 it down to where you could actually see an eight
18 inch, ten inch, 12, all the way down, what the
19 mileage is.

20 And I've looked before, I know the
21 mileages add up. So it's just here giving you
22 each a nominal diameter.

1 And from that is, we listened
2 yesterday on what we were hearing the voices from
3 the Committee say, and we've basically got three
4 slides. I'll go through.

5 One is dealing with the eight inch, in
6 two different versions, and one is what PHMSA was
7 proposing on the greater than 12 inch.

8 And so just going to the next slide is
9 what we had up while you were talking. As you
10 can see here, it's in, hold on, let me, I'm
11 sorry, I have a hard time seeing that, if you can
12 believe that. But I've gotten older, I guess.

13 As you can see here, for our Committee
14 voting slide, we've got pipelines larger than or
15 equal to 8.625 inches, which is eight inch
16 nominal in diameter, through 12.75 inches in
17 diameter. With a building intended for human
18 occupancy or another impacted site within the
19 PIR.

20 And, again, the items that we were
21 looking at, based upon the Committee, and we've
22 heard different items to be in there over the

1 past 12 or 18 hours is, one would be a damage
2 prevention program similar to what's in 192.614.

3 The second one would be an emergency
4 plans and response program, similar to 192.615.
5 The third would be leakage surveys in accordance
6 with 192.706. The next would be line markers in
7 accordance with 192.707. And then lastly would
8 be public awareness under 192.616.

9 So that's the items, either a
10 combination or all, that we've heard discussed
11 the past 12 or so hours here at the Committee.
12 So that's the ones we've got on the slide based
13 upon that.

14 And of course, we'll take any
15 suggestions from the Committee. But before we do
16 that, let me go to the next slide and let you see
17 it.

18 Is the only thing there that we
19 tweaked is you can see we've got a larger than or
20 equal to eight inch in diameter through 16.

21 And the reason we went through 16 was
22 to cover the ones that did not have a PIR.

1 Because when you look there, we took the PIR,
2 similar to what Chad was talking about earlier,
3 we took it out.

4 And so there is no PIR basis, it would
5 be all the mileage from eight inch through 16,
6 whether there was a house close to it or not.
7 And it would still have the same five items.

8 And then going to the next slide.
9 Again, this slide is what PHMSA was proposing to
10 the Committee. And it's the one with regards to
11 pipelines larger than 12.75 inches in diameter.

12 And again, what we would like there is
13 that you can see the first bullet under it is for
14 newly regulated gas gathering lines. If an
15 operator does not know the stress level and the
16 MAOP is greater than 125 pounds, then the segment
17 meets the Type A criteria.

18 And then the next bullet would be,
19 modify the diameter criteria for the newly
20 regulated Type A Area 2 gathering lines in Class
21 1 locations and operate at, at least 20 percent
22 SMYS or above 125 pounds for non-metallic pipe.

1 And it would be as follows. All
2 segments with a diameter greater than 12.75
3 inches and a segment may be accepted if it is 16
4 inches or smaller in diameter and has no building
5 for human occupancy or other impacted site in the
6 PIR.

7 And the blue bullets was the key part
8 that we were wanting to make sure that the
9 Committee today voted on. So that's the three
10 cases, as we see it, that have been discussed.

11 And, again, the last case is what
12 PHMSA came in proposing to the Committee.

13 (Off mic comments.)

14 MR. GALE: Yes, it's the site.

15 MR. NANNEY: Yes, it's the last --

16 MR. GALE: I looked at his screen too,
17 there's no blue.

18 (Off mic comment.)

19 MR. NANNEY: Okay. Okay. The last
20 two, Mark, I'm sorry.

21 CHAIR DANNER: Yes, I'm getting
22 cataract surgery next month so I'm, you know, I

1 can't see anything up there.

2 (Laughter.)

3 CHAIR DANNER: Chad or Andy first.

4 All right, Andy.

5 MEMBER DRAKE: I have a request that
6 we hold a placeholder to go back to the slide
7 that showed the eight to 12. But I think Chad
8 wants to talk about this slide in particular,
9 maybe if we can just get a placeholder to go back
10 to that other slide.

11 (Off mic comment.)

12 MEMBER DRAKE: Sometime in the near
13 future. I know you want to talk about something
14 specific to this slide.

15 MEMBER ZAMARIN: Yes. Chad Zamarin,
16 Williams. I actually have a, we're kind of
17 making sausage and I want to just recognize that
18 maybe an idea that I propose we entertain.

19 I would propose, as I think I was
20 saying, that that first slide for the population
21 of pipe greater than eight, greater or equal to
22 eight inch, that we establish, and I would say we

1 not limit the upside there, we just say that
2 there's a minimum amount required.

3 I would propose that that be damage
4 prevention, line marking, emergency planning,
5 public awareness and design and installation
6 requirements for new pipe.

7 And that we not include leak survey in
8 that requirement. But then for pipe greater than
9 12 3/4, kind of moving to you second slide, I
10 would propose that we include then the, you would
11 extend those additional requirements, which are
12 leak survey, corrosion control, MAOP to pipelines
13 greater than 12 3/4, but you have the ability to
14 use the PIR to exclude extending those
15 requirements.

16 And I would propose that that be
17 independent of kind of beyond, you know, not cap
18 that at some size. To me, those are requirements
19 that you, diameter has always been a, to me, a
20 frustrating criteria, because it's not really
21 what you're after.

22 You need to understand the diameter

1 and the pressure in order to understand the
2 impact of the pipeline, and that's why I think
3 PIR should be allowed to be used as a way to
4 exclude pipe and focus your efforts on pipe that
5 have a structure within the PIR.

6 So I don't know if that, we need a
7 chance to soak on that or think about what that
8 looks, but it feels like if we're establishing a
9 minimum set of requirements for pipe over eight
10 inch nominal, then we apply additional
11 requirements to the pipelines that have a higher
12 risk profile. And those are pipelines that have
13 a diameter greater than 12 3/4.

14 And if an operator chooses to, confirm
15 to have at least one structure within the PIR.

16 CHAIR DANNER: So can you clarify for
17 me, and I'm concerned about taking leak surveys
18 out of any pipe over eight, so tell me exactly
19 what is the subset that you're excluding leak
20 surveys from?

21 MEMBER ZAMARIN: So if you have a
22 pipeline, what I'm suggesting then is that if you

1 have a pipeline greater than 12 3/4, which is
2 kind of back to where we originally were, if you
3 have a pipeline greater than 12 3/4 and you have
4 a structure within the PIR, then you're going to
5 have to perform leak surveys.

6 But if you have a pipe greater than
7 12, I'm just suggesting that, when I think of
8 what should be the minimum requirements for a
9 pipeline, somewhat irrespective of pressure and
10 diameter, which is what we're, risk, which is
11 what we're talking about in this population of
12 eight to 12 inch, eight to 16 really, I don't see
13 how leak survey makes sense because it's a
14 predictive tool and you would want to focus your
15 leak survey efforts on pipelines that have the
16 greatest potential to impact people.

17 I recognize that damage prevention,
18 emergency planning, public awareness, you know
19 that's a pipeline that somebody can walk on top
20 of, put a backhoe bucket in the ground and create
21 an unsafe condition.

22 But I think of leak survey as actually

1 -- it's a predictive tool to look at the risk of
2 something bad happening. And I would just say,
3 I'm trying to figure out how to rationalize in my
4 mind what should be those minimum requirements
5 for any pipe. Irrespective of pressure,
6 diameter, PIR.

7 But then you're using those additional
8 requirements for those pipes that have the higher
9 risk profile. Again, I'm kind of rambling there
10 but I don't know if that make sense.

11 CHAIR DANNER: All right, Andy.

12 MEMBER DRAKE: This is Andy Drake with
13 Enbridge. I like the proposal that we're at
14 least starting to frame here. The details I
15 think is what the conversation is about.

16 I do think that when we talk about the
17 new pipe in particular, I agree that we should be
18 instituting that requirement on the eight inch
19 and larger pipes. I would offer, and I think
20 this is the challenge of the day, is how do you
21 make this practicable.

22 But when you look at the new, the

1 design criteria language it says, or replaced.
2 And I think we should at least have some sort of
3 caveat in there for new pipe. That when you say,
4 or replace, that there's some short segment of
5 pipe that we would not encumber with system
6 design requirements.

7 So if you're going to replace 40 feet
8 of pipe, you're either doing a pipe replacement,
9 the 40 feet will be designed to the new criteria.
10 But we can't go back and cleanup system design
11 issues like valve spacing and longer CP issues.

12 That's kind of -- incentivized people
13 do some very strange things, and we don't want to
14 get into that. I think it's just, those kind of
15 things I think are the things that we try to work
16 through here.

17 I agree with Chad, I think a floor of
18 requirements about, this is just the minimums
19 that we do, is kind of what we want to walk
20 through here. But even in doing that, I think
21 things like line marking, the line marking
22 requirements say line of sight.

1 We have to remember that these pipes
2 are very, very rural very often. And if we're
3 going to say an eight inch pipe that's in the
4 middle of nowhere, so to speak, is going to have
5 to have line marking, line of sight, it will be
6 the only thing you see on the horizon is these
7 markers going off. Is that where we're trying to
8 go?

9 I think where we're taking it is a
10 requirement that in a convention that we're used
11 to deploying it, in more urban environments, and
12 taking it into a very rural environment. And we
13 just need to decide what is prudent there.

14 Those kind of things, I think, are the
15 challenges of this next couple of hours. Is, how
16 do you take some of these existing requirements
17 and plug them into an industry that's in an
18 environment that those rules were not really
19 intended to apply to. Is that fair?

20 CHAIR DANNER: All right, thank you.
21 Mark.

22 MEMBER BROWNSTEIN: So I very much

1 appreciate the nature and spirit of the
2 conversation.

3 Just for food for thought, as we think
4 about what those minimum requirements are, I
5 fully appreciate why we're making a priority of
6 protecting people. But I just want to remind all
7 of us that the Pipeline Safety Act of 1992, which
8 amended the Natural Gas Pipeline Safety Act of
9 1968, expands the DOTs responsibility to include
10 environment protection in addition to safety.

11 Specific amendments that came into
12 effect in 1992 talk about requiring that giving
13 PHMSA the option of requiring pipeline operators
14 to submit reports on any condition that is a
15 hazard to the environment, considering whether an
16 operator's inspection and maintenance plan is
17 sufficiently protective of the environment, and
18 promulgating minimum safety standards for
19 pipelines and facilities that are designed to
20 protect the environment.

21 So this is the reason why leak
22 detection and repair becomes such an important

1 piece, because for us to be fully discharging,
2 and for PHMSA to fully be discharging its
3 responsibilities as directed by Congress, I think
4 we need to think about environmental impacts,
5 along with personal impacts.

6 And that's why the PIR thing may wind
7 up being too constraining. As a, particularly as
8 it relates to leak detection repair.

9 CHAIR DANNER: All right, Andy.

10 MEMBER DRAKE: I think that's
11 reasonable and appropriate and a good reminder
12 for us. I think the thing that I think is
13 important for us here as we engage in this is,
14 cart and horse, what order. I can't do a leak
15 survey if I don't know where the pipe is. You
16 got to know where the pipe is.

17 So first, in this cascading
18 requirements, this is the floor. I got to know
19 where the pipe is with some certain degree of
20 accuracy, and then we engage in public awareness
21 and damage prevention and things like that, which
22 are appropriate floors.

1 I do think there is the possibility
2 here of a discussion where you provide the
3 opportunity to get the floor set, and then a
4 longer period of time to get to the next step.

5 So if it's some period of time, two,
6 three, pick a number, I don't care, to get a
7 location set, maybe do a leak survey in four or
8 five, so that you get the floor and then you
9 work. And I think that this is actually a great
10 place to incentivize technology.

11 What we think of leakage surveys in an
12 urban environment is probably not the right tool
13 for a rural environment. We want to be using
14 satellite imagery, we want to be using aerial
15 photography, aerial infrared cameras and planes.

16 That's not industry convention
17 everywhere. And I think giving that space helps
18 that technology get into place where we can use
19 it in an appropriate place.

20 MEMBER BROWNSTEIN: Chair, if I could
21 just ask a clarifying question.

22 CHAIR DANNER: Yes, go ahead.

1 MEMBER BROWNSTEIN: So when you say
2 phasing, right, there's two ways, I hear it in
3 two different ways, right?

4 One is to say, okay, for any new pipe
5 going forward, which where presumably we will
6 know the location of the pipe because we just
7 paid it, right, you would do, you know, leak
8 detection and repair would be part of the
9 convention going forward. So that's one way to
10 think about it.

11 The second way to think about it is,
12 you say no, in fact leak detection repair is
13 really important for existing pipe, but yes, we
14 don't know where some of this stuff is, and so we
15 will give operators time to figure that out.

16 So the requirement, instead of binding
17 in the first two years or rural promulgation
18 might be three or four years into rural, into
19 when the rule is promulgated, to give operators
20 the time to get their records in order.

21 You're nodding your head yes, I like
22 that. Okay. And we can probably agree on that.

1 MEMBER DRAKE: For the record, this is
2 Andy Drake. And yes, I'm nodding my head yes.

3 (Laughter.)

4 CHAIR DANNER: Okay, Chad and then
5 Sara.

6 MEMBER ZAMARIN: Yes, Chad Zamarin,
7 Williams. I do struggle though with, yes, we are
8 focused on the missions. And our largest sources
9 of emissions are not leaks in rural gathering
10 systems, it's at the compressor stations, it's
11 due to operational blow downs.

12 And the challenge I do think we need
13 to recognize, again, we're kind of, we're
14 building a ship while standing in the water and
15 we're not giving a lot of time to vet this.
16 We're working hard.

17 The ultimate solution, today, the
18 primary tool for leak surveying a rural gathering
19 system will be putting someone on the ground,
20 having them walk the right of way and use a gas
21 detector, manually surveying the line.

22 And I just worry that extending that

1 today, we don't fully understand the cost or
2 impact of doing so.

3 We are working very hard on technology
4 that would make that more practical. And we
5 could do that more broadly.

6 But I do worry that with today's
7 capabilities we're going to be deploying a lot of
8 resources on, yes, it's important, and yes, we
9 need to get to every leak on our systems. But
10 the largest of those leaks are not, are typically
11 at our compressor stations or due to operational
12 blow downs.

13 And it's just, I worry that we're
14 pushing a regulation too soon before the
15 technology really makes it feasible or practical.
16 Thank you.

17 CHAIR DANNER: All right, Sara and
18 then, Mark -- Mark did you have a follow-up?

19 MEMBER BROWNSTEIN: So just let me
20 respond to that. I, as I think about this, and I
21 take your point, we've been doing a lot of work
22 with many folks in industry to find better,

1 faster, cheaper ways to do leak detection, right?
2 No one is going to stand here and say that
3 infrared cameras are the, you know, the be all
4 and end all.

5 So I'd be very comfortable with the
6 idea of putting in place the requirement to do
7 leak detection repair, but then direct PHMSA,
8 maybe working with this Committee or working with
9 a work group, to develop the most cost-effective
10 way to achieve that outcome.

11 And then, so, the requirement is
12 there, and then subsequently, let's get together,
13 you know, in some kind of process, and figure out
14 what's the most cost-effective way to do that.

15 Obviously, we know walking the line
16 with infrareds is a possibility, but we can all
17 stipulate that that may not be the most cost, the
18 most cost-effective way to get this done. And so
19 we work on that.

20 And if we take Andy's point of view
21 that this is something that builds over a three
22 or four year period, that gives us all the time

1 to figure this out. Which I think serves
2 everyone's interest, right?

3 We're saying that this is important,
4 but we're also saying that we've got work to do
5 to develop the technologies. To figure out the
6 most cost-effective way to do it.

7 CHAIR DANNER: So basically what I'm
8 hearing then, Mark, is what you're saying is, we
9 need some sort of a placeholder that says, or a
10 ramp, a ramp up to be determined, but something
11 that memorializes that we are going to do leak
12 surveys on everything eight and above?

13 MEMBER. BROWNSTEIN: Isn't it -- It's
14 required, and PHMSA is directed to come up with
15 an interpolation or a guidance document, you
16 know, familiar with this context of, I'm familiar
17 in this, more in the context of what EPA does,
18 right?

19 Which is, they have a requirement in
20 place, you have to do leak detection, but then
21 the agency produces a guidance document, which
22 talks about the various ways in which this could

1 be done most cost-effectively. Right?

2 And it's a good opportunity. I mean,
3 yes, look, it's a good opportunity, right? We're
4 all committed to advancing the state of the art
5 here, so let's use this the opportunity to do
6 that. We would be very committed to that.

7 CHAIR DANNER: Okay, Sara.

8 MEMBER GOSMAN: So I'm interested in
9 Chad's proposal on using PIR, I guess all the way
10 up, on the diameter. And I know that PHMSA had
11 proposed a threshold in which they would apply
12 the requirements, the 16 above, the 16 inches or
13 above, I'm sorry I can't remember, just as a --
14 without PIR.

15 And so I can see administrative
16 reasons why that might be an easier program to
17 address those types of lines.

18 I can also see that there might just
19 be a determination that those lines are of more
20 risk, and so we aren't going to do the PIR
21 determination.

22 But I'm wondering if PHMSA could tell

1 us a little bit about why they decided to move
2 from PIR to just all lines in at that particular
3 threshold to help me understand that particular
4 issue.

5 Because I think we have come out and
6 said we're interested in PIR as a way of trying
7 to get at risk of gathering lines. So I'm
8 thinking about what Chad has said.

9 CHAIR DANNER: Okay. Maybe Steve can
10 respond to that.

11 MR. NANNEY: All right. Well, again,
12 as I think the chart, Andy asked to be put up, it
13 shows the PIR pressure diameters, is a good one
14 to have.

15 But the reason we looked at it for the
16 larger diameters is, like what we said yesterday
17 is, for the shale gas, the new lines, what we've
18 been seeing is the higher pressure, higher
19 diameter.

20 And so with that we felt like that you
21 needed to require the full gambit of what the
22 code required you to do. And by that I mean, is

1 the pressure testing, all the various design
2 factors to use, whether you were within a PIR,
3 whether you were crossing a railroad or a
4 highway, whether it was two lane, four lane, six
5 lane, whatever, that we felt like you needed to
6 protect it.

7 So that's why we had greater than 16
8 inch as far as being that. And you can see there
9 is, just by the PIRs and everything, with the
10 greater diameters, and, you know, we've been
11 seeing the 1,000 pounds and higher, they have a
12 lot more consequence. So that's the reason we
13 selected that.

14 And also we know that most of them are
15 going to be the newer lines. And so we were
16 trying to, from cradle to grave, making sure that
17 they're in accordance with the code. Just like
18 what we've been hearing this Committee say the
19 past two days.

20 MR. GALE: One more thing to add.
21 This is John Gale. In looking, Sara, in looking
22 at the incident costs by diameter, I'm looking at

1 the average incident cost, when you get to
2 roughly 20 inches, from 16 inches, the average
3 inch in cost almost doubles and the median ends
4 up cost, it more than doubles.

5 So that's why we looked at 16 or
6 basically at that 20 inch line, there was a
7 dramatic increase in the average cost of an
8 incident involving a gas pipeline.

9 CHAIR DANNER: Okay, Alan.

10 MR. MAYBERRY: I'm just going to say,
11 you know, one of the areas that I'm concerned
12 with is getting something we can actually move
13 into a final rule in the process involved.

14 I mean, we hear a lot about the delay
15 of rulemaking and the process. I'm just really
16 concerned with ending up with something that we
17 can actually move with success.

18 We really, either way we end up, we
19 are going to advance safety. That's our goal
20 here. That's all of our collective goals.

21 I think back to, you know, there's a
22 recommendation that the NTSB gave us on leak

1 detection. It came out of a prior action. It
2 was pretty far encompassing that, directs us to,
3 recommends that we develop leak detection
4 regulations.

5 Now, we've addressed that in a couple
6 of ways. One is, we're doing research and we
7 find a good bit of research in that area.

8 Two is, we have the rule that we just
9 send over to OMB, related to rupture detection.
10 But we're still some ways from actually
11 developing, where the technology being involved
12 enough to where we can actually have a leak
13 detection system that's SCADA based, for
14 instance, for distribution lines.

15 So we're kind of chipping away as we
16 can, and that's why I'm, just in this area of
17 leak surveys, while I agree it's good practice, I
18 just wonder if we really ought to let the
19 research play out, the technology play out.

20 We are increasing the lines that we
21 cover, but then address, as we collect data and
22 as technology evolves, we will not stop here. I

1 think that's, we've made that very clear.

2 This is a journey, we're going to keep
3 improving as we go along. So I just like to
4 mention that.

5 I don't want to get, I'm really
6 concerned about the process when we leave here
7 about developing a final rule and then just
8 taking a, I want to be able to move something
9 that, or end up with something that can really
10 move through the system effectively. Thanks.

11 CHAIR DANNER: All right, Chad.

12 MEMBER ZAMARIN: Chad Zamarin,
13 Williams. That is why I raised it as an issue.
14 I think it's the one that we don't have the great
15 solution for today and it will, probably will get
16 raised as being a challenge.

17 But the idea that maybe there is some,
18 there's a path towards getting the technology
19 that enables us to do that more broadly is the
20 right answer.

21 But just on the issue of kind of,
22 John, your comments about capping the use of the

1 PIR at 20 inches, and I don't know if we want to
2 put that chart back up there, but I still just,
3 and I hear you about incidents of 20 inches
4 having the higher cost, but my guess is that
5 often times we're talking about incidents that
6 have higher pressure and larger diameter.

7 I just struggle with when we just used
8 diameter on its own is just not a very good
9 indicator or risk. The whole purpose of the PIR
10 is that it takes into account both the diameter
11 and the pressure and gives you an indication of
12 what could happen.

13 If I have a 20 inch diameter pipe with
14 only 125 pounds, it's very, and right next to it
15 I have a 12 inch pipe with 2,200 pounds, I have
16 two very different risk profiles. And I need to
17 know both of those pieces of information to
18 understand the difference between the risks of
19 those pipes.

20 Which is why I like the use of, the
21 ability to use PIR to focus the application of
22 requirements.

1 And so I still think that if we're
2 moving towards having some minimum requirements
3 that apply to all pipe, and then we're talking
4 about additional requirements that would apply to
5 certain pipe, I think it's prudent to have the
6 tool of using the PIR to try to focus those
7 additional requirements on pipe that have a
8 higher risk profile. Almost irrespective of some
9 maximum size.

10 I know we've got a floor of pressure,
11 125 pounds, so that does kind of limit the PIRs
12 used. But again, a 36 inch pipe that has very
13 low pressure, it looks a lot different than a 36
14 inch pipe that has very high pressure.

15 And the only way to understand that is
16 through understanding the PIR.

17 CHAIR DANNER: Okay, Mark.

18 MEMBER BROWNSTEIN: Yes, so, Alan,
19 absolutely, totally agree with you. And this is
20 exactly why we're having this conversation
21 because we're trying to get to something that can
22 give you greater clarity.

1 And so it's precisely why we're
2 spending some time on this. And why I think
3 actually it's, if I have to say, I think it's
4 pretty elegant for us to be able to say there's a
5 leak, basically detection repair requirement, and
6 work to be done to figure out how to do that most
7 cost-effectively.

8 And in terms of time line, right, if
9 we go with Andy's idea that this phases in over
10 time, right, that gives us a certain amount of
11 latitude. As a practical matter, it's going to
12 take the better part of a year or so, even if we
13 succeed in getting this all done today, for this
14 regulation to become effective, let's say.

15 You can take a year and then you take
16 a three or four phase. So we're talking about
17 four or five years from now, right, we figured
18 out how to do this cost-effectively.

19 I'll confess to being a lawyer, but
20 I've worked with enough engineers, when I was in
21 the utility business to know that at the end of
22 the day, for engineers, you just need to tell

1 them what needs to happen. What do you want me
2 to do?

3 And once you tell them, they figure it
4 out. And I think that if we say very clearly,
5 the expectation is, is that you're going to do
6 leak detection and repair and that you've got a
7 four to five year window to figure out how to do
8 that most cost-effectively, that's the kind of
9 parameters that any engineer can work with.
10 Right? And we'd be, in some ways, remiss if we
11 weren't clear on what the expectation was.

12 So I think actually it gives you what
13 you need, which is, yes, we're going to move
14 forward with this today. And it gives the
15 engineers what they need, which is clear
16 direction, and a time frame over which to
17 accomplish it.

18 CHAIR DANNER: All right, Andy and
19 then Sara.

20 MEMBER DRAKE: This is Andy Drake with
21 Enbridge. I agree with that, that thought.

22 And I think, and, Alan, to define, to

1 give guidance as part of this Committee, is part
2 of our charge. And I think to say that this
3 next, where we are going as an industry is, we
4 want to try to understand where leaks are.

5 To do that in this industry we have to
6 solve a problem. So we should structure clarity
7 around that problem and give a time frame. I
8 think that's reasonable.

9 We want to move in the direction of
10 deploying leak surveillance on this industry.
11 But to do it, the industry has to solve a
12 problem.

13 And I think what you're saying is,
14 give guidance to the problem and a challenge in
15 time frame. And I think that's appropriate, that
16 the industry should be given some time to define
17 an appropriate, cost-effective, practicable
18 solution to do a leak survey on these type of
19 pipes by X.

20 I think that's appropriate. I really,
21 I think that's a good challenge. And I think in
22 that context, I think that is something that is

1 appropriate.

2 The other thing that I think we want
3 to look at is the PIR, which disappeared from up
4 there. But I'm going to hold off until we get
5 that slide back up because I think is actually
6 quite illustrative of Chad's point.

7 CHAIR DANNER: Robbie, can we get the
8 other slide up? The PIR.

9 MEMBER DRAKE: It's going to come down
10 to, what is the characteristic of the big
11 pressure pipes and what do they look like and
12 what does the duck look like and then what does a
13 not duck look like.

14 If we look at, you know, we've got the
15 little X's there, a 30 inch, 1,000 pound pipe,
16 which is pretty typical of transmission piping,
17 that's an impact zone of about 660. That
18 correlates to the current corridor width that
19 we're using to assess class, which is crude
20 consequence tool, but nonetheless, our
21 forefathers figured out 660 was a good bandwidth
22 to look at for transition pipes. And it does

1 nicely correlate to this.

2 If you start, when you start to look
3 at, well, we're just going to throw diameter at
4 it, and then if you look at a 20 inch pipe, just
5 drop down that red line vertically down a little
6 bit, you come down to the gray line, that shows a
7 20 inch pipe operating at 1,000 pounds is about
8 425 feet. I calculated it, but I mean.

9 Okay, so that's a very different
10 consequence picture. It's 420 feet or 400 feet.

11 I think what's interesting is if you
12 don't, if you try to pick a cutoff of diameter
13 and you're not thinking about impact radius, a 16
14 inch, 1,440 pipe creates a 425 foot impact
15 radius.

16 So, oh dear, well, we picked 20. It's
17 like yes, but that's not the whole picture, which
18 is what Chad is saying.

19 If you have a 16 inch pipe that's at
20 1,440, it has an impact radius of 425 feet. I
21 think the point is, is if we drew a line and
22 said, pick a number, I would say 400 feet, okay,

1 a 20 inch pipe at 1,000 pounds is more like it's
2 going to trip, it's not going to come out of that
3 clasp. A 16 inch pipe at 1,440 is not going to
4 come out of that clasp.

5 But a 20 inch pipe at 600 pounds is
6 going to come out of that. Which is probably
7 appropriate. It's starting to look very
8 different in its impact profile.

9 Now, I picked 400 feet because it's
10 kind of, some sort of easy nexus to track here.
11 But I'm trying to use it to illustrate Chad's
12 point, is that if you pick a diameter, that's
13 interesting.

14 But that is half of the equation,
15 literally. But it doesn't define impact. And if
16 we stick to a simple solution to a complex
17 problem, we're probably not going to be happy
18 with some of the trades we're making.

19 So I am less worried, or perhaps just
20 pure risk pragmatism, I would be more
21 incentivized, understand my impact, and put the
22 energy in places where I create more impact.

1 Even if that's a 12 inch pipeline.

2 But I wouldn't want to get distracted
3 with a 20 inch pipe that's at 200 pounds. That's
4 not the same risk. And I think that's what we're
5 trying to articulate here.

6 I'm glad to talk around numbers, if we
7 want, but I think it's really important to get
8 the concept ironed out about why is this
9 important. And tapping it on a number that we
10 just say, well, that's just too damn big, it's
11 like, finish the equation. Too damn big at what?
12 And make a decision. That more informed is what
13 we're trying to drive industry towards
14 constantly. Not just the gas company but the
15 whole industry.

16 Driving and incentivizing more
17 information and better choices is what we really
18 think is one of those fundamental things that
19 belongs in the preamble. Married to it. I think,
20 Steve, you should pay attention, she's taking
21 notes.

22 CHAIR DANNER: All right.

1 MEMBER DRAKE: So I just throw that
2 out there.

3 CHAIR DANNER: All right, I'm glad
4 somebody is writing. Thank you. Sara.

5 MEMBER GOSMAN: So when I think about
6 the PIR set of issues, I want to make sure I
7 understand what, which requirements we're going
8 to tie to PIR and which ones we're going to put
9 in our base.

10 Because I think to me, the risk-based
11 concept makes a lot of sense, but I want to know
12 what those particular requirements are and how
13 closely they tie to consequence, which is what
14 we're really trying to get at there, aren't we?

15 So could you, Chad or Andy, could you
16 articulate for me sort of what's in your base
17 versus what you want to tie to PIR?

18 MEMBER ZAMARIN: Sure. Chad Zamarin,
19 Williams. And maybe the PHMSA team will have to
20 help me but I'm trying to decipher kind of the
21 way this rule is structure.

22 And I think what ultimately happens

1 is, if you're saying that there are these
2 fundamental floor kinds of requirements for eight
3 inch and greater, again, I propose that those be
4 damage prevention, line marking, emergency
5 planning and public awareness.

6 And we can talk about what we do with
7 new pipe. I think we've talked about it. It
8 seems like there is some alignment around a new
9 pipeline in having different requirements.

10 But I then, the way that I read the
11 document and the way that it was being drafted,
12 if you're greater than 12 3/4, then you would
13 become a regulated pipe, and we would go back to
14 those requirements that were kind of identified
15 for pipelines that would now be regulated under
16 this new requirement. And the additional
17 requirements.

18 Those that we just mentioned were
19 going to be some of the requirements, but then
20 additionally, leak survey, MAOP, corrosion
21 control. I think those are the primary ones. I
22 don't know if I'm missing anything else.

1 MEMBER DRAKE: The construction
2 requirements.

3 MEMBER ZAMARIN: Right. The design
4 installation, construction, additional inspection
5 and testing --

6 MEMBER DRAKE: For new lines, yes.

7 MEMBER ZAMARIN: -- for new or
8 replaced lines. So we're kind of jumping back to
9 Section 5, the things we talked about that would
10 be applied.

11 And what I'm suggesting is that, I
12 like the minimum list, and when I thought about
13 it I thought about, these are things that if I'm
14 standing on top of a pipeline, irrespective of
15 kind of the PIR, I want to know that it's marked,
16 I want to know that you have a damage prevention
17 program, I want to know that there's a public
18 awareness program.

19 Because those are the things that are
20 going to help me, somewhat irrespective of how
21 big the risk profile is, because that's just a
22 fundamental risk on any pipeline operating above

1 125 pounds. If we could maybe agree to that.

2 And then though, if we're going to go
3 further, again, these are pipes that have never
4 been subject to requirements before and we're
5 going to start implementing things that will
6 require people to get out on the ground and
7 continuously monitor and walk pipelines for leak
8 surveys.

9 Or perform corrosion control
10 activities that are, I'd like to think we're
11 focusing those efforts in areas where we have the
12 greatest potential to impact people.

13 And so that's why I'm suggesting that
14 those are the additional requirements that that
15 PIR process would allow you, now, I think the way
16 that it's written is, if you're greater than 12
17 3/4, those requirements are in, you can use the
18 PIR to exclude a pipe if there isn't a structure
19 within the PIR of that pipe. That's the way that
20 it's been written.

21 And I just want to make sure, John,
22 Steve, Alan, I just, Chris, I think I

1 interpreted, hopefully I got it right, but I
2 think that's generally how I read how this would
3 work.

4 CHAIR DANNER: Okay, Sara.

5 MEMBER GOSMAN: So, again, just to
6 clarify. So if I had to articulate my concern
7 about PIR, the one concern that comes to the top
8 for me is -- is on the new construction side.
9 Because that's the situation in which if you end
10 up with an occupied building or an impacted site,
11 right, because of development, you can't go back
12 and change it.

13 So I guess for me, if the baseline
14 includes that new construction, then what we're
15 talking about really is corrosion control, MAOP,
16 right? Is what I'm looking at here.

17 And those, to me, seem very tied to
18 consequence. And then I think I'm comfortable
19 with bringing PIR all the way up.

20 CHAIR DANNER: Okay, Mark and then
21 Andy.

22 MEMBER BROWNSTEIN: So what I hope is

1 a friendly amendment to the framework that Chad
2 just put out there, I thought where we were going
3 was to take the leak detection and repair and
4 make it a baseline, right, subject to what we
5 were just, some of the ideas that we were just
6 kicking around.

7 MEMBER ZAMARIN: I'm sorry, Chad
8 Zamarin, Williams. I was just going back to what
9 I had originally proposed.

10 I'm getting my head around how we
11 craft something on leak detection and repair
12 that, that works. And I think to Alan's point
13 that we'll get through OMB, that won't be
14 something that is a lightning rod for, we just
15 can't do that, so you're putting a requirement
16 out there that is going to make it difficult.

17 I think, it sounds like there are some
18 ideas in how we can do that, but I was just going
19 back to what my original kind of proposal was.
20 So, yes.

21 CHAIR DANNER: All right, Andy.

22 MEMBER DRAKE: This is Andy Drake with

1 Enbridge. Yes, you have to appreciate we may be
2 seating next to each other, but we aren't getting
3 much of a chance to chat. This is evolving as
4 we're talking.

5 But I feel confident that we can
6 address that. And I think that in last night's
7 conversation with the industry constituents, I
8 think there was a very much consensus around new
9 construction could be put as a floor issue.

10 I think we do have to deal with a --
11 or replaced part of it. Because that replaced
12 piece starts to encumber us with very low
13 thresholds that's not, that's more maintenance
14 work.

15 So if we can disassociate, figure out
16 how to qualify that, I think there's alignment
17 that that can be a good floor candidate.

18 CHAIR DANNER: Oh, yes, follow-up,
19 sure.

20 MEMBER GOSMAN: A clarifying question.
21 So floor down to eight inch nominal. Okay.

22 CHAIR DANNER: Andy. I'm sorry, Alan.

1 MR. MAYBERRY: For that really ages me
2 calling me Andy.

3 (Laughter.)

4 CHAIR DANNER: Too many --

5 MR. MAYBERRY: Yes.

6 (Laughter.)

7 CHAIR DANNER: My bad, my bad. All
8 right.

9 MR. MAYBERRY: I was just kidding. No,
10 I just was going to say, I think it's understood
11 that, regardless of where this body recommends we
12 go, we do have the cost benefit requirement that
13 we will have to fulfill, I think that's been
14 talked about this morning. I just wanted to
15 clarify, make sure everyone knew.

16 CHAIR DANNER: All right, I'm aware.
17 Okay, I don't see any other cards up. What I
18 would like to propose is that we take our break a
19 little earlier.

20 And let's take about 15 minutes. And
21 that will allow us to have, Mary -- Mary's
22 working I see. What's that?

1 (Off mic comment.)

2 CHAIR DANNER: Thank you. Thank you.
3 You're helping all of us.

4 And, yes, I think we need to put pen
5 to paper, share some ideas offline. So why don't
6 we take a 15 minute break and we'll be back.
7 Andy?

8 MEMBER DRAKE: Before we all run to
9 the door, I think it might help actually if we
10 can do a synergy here. If you could give me 20
11 minutes, I'd like to caucus with the industry
12 folks who have been patiently sitting or
13 listening to us re-shake this on the fly or build
14 the boat while we're standing in the water. I
15 like that actually, I'm going to enlist that in
16 my analogy book.

17 But I think if we could just get 20
18 minutes it would give us a chance to circulate on
19 what we like to do, come back with some language
20 even. And may challenge PHMSA to try to get some
21 language on the break too. So I'm kind of giving
22 you a homework assignment that I'm going to give

1 ourselves, is that fair?

2 So we can come back and try to get
3 into --

4 CHAIR DANNER: I think that's great.

5 MEMBER DRAKE: -- proposal talk.

6 CHAIR DANNER: It's 20 to ten right
7 now, so we can come back at 10 o'clock and see
8 where we go.

9 Wait a minute, before we break, Steve?

10 MR. NANNEY: Yes. Well, one question.
11 I think we heard a lot of back and forth, but
12 when we're leaving, are we looking at eight inch
13 and greater, eight inch and greater doing all of
14 these requirements?

15 MEMBER BROWNSTEIN: Plus,
16 construction.

17 MR. NANNEY: Plus, new construction.
18 Is that what I heard?

19 MEMBER ZAMARIN: I think that's what
20 we would propose. It would be nice to look at
21 that, but also then I would advocate that we at
22 least propose the ability to use PIR on a broader

1 set of pipes.

2 Because, again, we're saying we're
3 going to apply a minimum standard to all pipe,
4 but we're going to then, if you're greater than
5 12 3/4, you're in with these additional
6 requirements, unless you can demonstrate, through
7 the use of a PIR, that you don't have a structure
8 that could be impacted. Something of that
9 nature.

10 MR. GALE: And just to clarify, Chad,
11 you're talking about using the PIR solely for
12 cathodic protection in MAOP establishments, is
13 that correct?

14 MEMBER ZAMARIN: That's effectively,
15 I think, how it would work. Yes.

16 MR. GALE: So, yes, so basically these
17 five things here, plus construction, eight inches
18 and above, period, cathodic protection, MAOP
19 establishment, utilizing the PIR at a certain
20 diameter?

21 MEMBER ZAMARIN: Yes.

22 MR. GALE: Greater than 12.

1 MEMBER ZAMARIN: Yes, I think that's
2 right.

3 MR. GALE: Okay.

4 MEMBER ZAMARIN: I'm going to hold on
5 locking in my nodding until we get back, but --

6 CHAIR DANNER: All right. So Steve
7 and then Jon. Alan, your card is up, are you?
8 All right. Go ahead, Steve.

9 MR. NANNEY: Yes. When I was hearing
10 that is, the thing I wanted to make sure that
11 everybody understood, when you're saying PIR,
12 we're only talking about having to do this, would
13 be the footage in the PIR.

14 So if you're on either side of the
15 PIR, you would not have to do any of this. Even
16 if it grows, you would have a pipe in the ground
17 that would not have done this.

18 And so an impacted site would be part
19 of it also, correct? Is that what I'm hearing?

20 I'm just trying to make sure everybody
21 on both sides that are talking are at the same
22 understanding.

1 CHAIR DANNER: Yes.

2 MR. NANNEY: Okay.

3 CHAIR DANNER: All right, Jon.

4 MEMBER AIREY: The one caveat I think
5 should be out there that everyone has had trouble
6 identifying is, how to deal with leak survey. I
7 think leak survey is an open question on the 8 to
8 12.

9 CHAIR DANNER: Yes, and I agree. And
10 thank you for reinforcing that, I appreciate it.

11 Okay, we are going to take a break
12 until 10 o'clock and then we'll come back and
13 have, hopefully, some more language to discuss.

14 (Whereupon, the above-entitled matter
15 went off the record at 9:41 a.m. and resumed at
16 10:17 a.m.)

17 CHAIR DANNER: All right, we are back
18 on the record. Thank you, everybody. I'll turn
19 it over to Andy. Maybe you want to -- do you
20 want to give us a report?

21 MEMBER DRAKE: Yeah, I think Chad's
22 analogy is coming through louder and louder.

1 This is Andy Drake with Enbridge. You know,
2 building a ship while you're standing in the
3 water or a plane while you're flying it is a
4 challenge, and I think that's where we're finding
5 ourselves.

6 We're trying to write a rule at great
7 detail with a huge industry sector and a lot of
8 unknowns and a lot of other issues that are
9 coming onto the table here pretty quickly, which
10 is appropriate. That is the obligation of this
11 committee.

12 I think that some of that is I think
13 we can agree to some very good tenets that we,
14 and even some guidance criteria that we would
15 give to PHMSA for consideration in developing and
16 fleshing out a proposal or a rule-making, and I
17 think that we've come to those largely.

18 I do think that specifically there
19 were some issues that came up I think that we can
20 maybe record here or figure out how to work into
21 some language, but one of them was this issue of
22 new design criteria, and that is we have to

1 figure out how to deal with composite pipe, and
2 we need to have some sort of placeholder to
3 specifically --

4 And I think industry is willing to
5 offer up, this is what composite pipe looks like.
6 This is what it means. This is how we would like
7 to use it, and I think that some time frames,
8 being specific on some time frames that industry
9 has to provide that guidance and criteria would
10 be very helpful because it will avoid a trip wire
11 in the rule, and that is there is composite pipe
12 out there. We need to figure out how to use it
13 and what to do with it in a reasonable time, so
14 this is just sort of forward looking.

15 I think the other issue is leak
16 detection. I think there is a lot of leak
17 detection obligations that are now coming into
18 the rule-making with the larger than 12.75, which
19 is appropriate. As we start looking into the
20 eight to 12-inch pipes, I think it is a large
21 unknown.

22 I don't think there's a disagreement

1 over the theme of trying to figure it out and a
2 need to try to understand what we do on leak
3 detection in the eight to 12-inch pipe range, but
4 I think to figure out how to do it practicably is
5 really important, which is some of the discussion
6 we had earlier. I don't know that it would be
7 helpful to this group to try to break down into
8 how to do that.

9 I think we might -- I think it may be
10 helpful that industry would provide some sort of
11 guidance on what we think the issues are and a
12 time frame for which this would come back and be
13 reconsidered or vetted.

14 I don't want to get into separate
15 rule-making, but some process that we would lay
16 out on how to think through that and how that
17 could be done would be appropriate.

18 I think there are several other issues
19 that we talked about here that might require some
20 kind of criteria or specificity to help shape,
21 you know, or inform the process, and I think it
22 would be appropriate for industry and other

1 stakeholders to provide some sort of input by a
2 deadline for issues that we think should be
3 specifically considered, and we talked about line
4 of sight marking, I think, in particular.

5 I think the industry sector would have
6 to provide some sort of feedback to PHMSA within
7 a period, 30 days, 60 days, that says, this is
8 what practicable and appropriate means on this
9 issue for your consideration.

10 But I do think that we have, in the
11 past, we have precedence to move forward with
12 rule-making where we can agree directionally and
13 thematically and conditionally on how we would
14 inform the process and give PHMSA the discretion
15 to consider that guidance information and how to
16 deploy that, and I think that's probably the best
17 that we can get to at this juncture.

18 I don't know that another 20-minute or
19 half-hour segment is going to help resolve all of
20 those details. I'm just trying to preserve a
21 placeholder to try to get that guidance to PHMSA
22 for their consideration, but I think

1 thematically, we can agree to these issues.

2 Is that fair? I don't mean to speak
3 for everybody on the industry sector that sat in
4 that same discussion, but --

5 CHAIR DANNER: Okay, I'm seeing at
6 least some heads nodding, so, all right. So,
7 yes, it looks like the industry group is in
8 agreement with what you have just said. Sara?

9 MEMBER GOSMAN: So I really appreciate
10 this discussion and I agree that -- I mean, on
11 the one hand, we've been thinking about this rule
12 for a very long time. On the other hand, when
13 you get down to it and the specifics, of course
14 there's always questions about exactly how this
15 is going to work.

16 So I think there are areas where there
17 are questions about how we're going to actually
18 apply these requirements in the context of
19 gathering lines, but what I'm encouraged by and
20 what I would like us to be able to say to PHMSA
21 is we have a basic set of concepts here about how
22 this should work.

1 We have a set of baseline requirements
2 that we think PHMSA should apply to pipelines
3 that are greater or equal to eight-inch nominal.
4 These include -- well, we started out, right,
5 with damage prevention, public awareness, line
6 markers, sorry, emergency plans, thank you, and
7 we need to think a little bit more about leakage
8 surveys and exactly how those are going to work,
9 and then we have these other requirements like
10 design installation and construction that should
11 be applied to new or replaced lines, but we're
12 going to have to think carefully about how to do
13 that, particularly for replacements.

14 And then in terms of corrosion control
15 and MAOP, I think what I heard a little bit
16 during the break was a concern, at least as to
17 corrosion control, that perhaps the horse is
18 leaving the barn if we don't end up putting
19 corrosion control in at the beginning, so maybe
20 that's an issue that we need to punt back to
21 PHMSA on the question of what can we really
22 accomplish safety-wise in terms of using PIR?

1 But again, back to sort of the
2 fundamentals here, I think I'd like us to all be
3 in the same place on the question of the
4 categories at least, right, and then let's work
5 through.

6 Give PHMSA, the expert agency, the
7 ability to work through the details with the
8 information the industry can give PHMSA on best
9 practices, what's out there in terms of the
10 appropriate types of practices, and keep having
11 this conversation.

12 CHAIR DANNER: All right, thank you.
13 Chad?

14 MEMBER ZAMARIN: I'm Chad Zamarin with
15 Williams. I agree. I think, I do think kind of
16 writing this level of detail in two days just by,
17 no offense to any of us around the table, but by
18 us is probably dangerous, so I do think that the
19 themes of --

20 You know, we are, I think, suggesting
21 that there are some minimum requirements for all
22 pipe eight-inch and greater. I think we've had

1 good discussion around what those are.

2 Obviously we've heard what I think we
3 would like those to be, but also recognize that a
4 couple of those, I think, are untested and we
5 don't know exactly the practicality or the, kind
6 of the parameters around those that need to be
7 thought through.

8 And I would just reiterate, I think
9 you mentioned those, the design installation and
10 construction requirements. I think there are
11 some potentially unintended consequences there.
12 The leak survey, I think, is one that, while
13 again -- I do just want to go back to if you read
14 the -- you know, we are fully supportive of
15 reducing emissions on our pipelines, but if you
16 go back to the mandate and kind of the
17 rulemaking, and if you look at all of the
18 comments, it was about --

19 And I went through yesterday and I
20 earmarked every time where I saw larger diameter,
21 higher pressure, looks like a transmission line,
22 this was a safety rule, this was focused on

1 extended safety requirements to, you know, to
2 pipeline systems.

3 And so I just want to make sure we at
4 least, you know, keep that in mind, that that's
5 what we came here, I think, kind of prepared to
6 focus on, so I think we haven't, I think, thought
7 through the practicality of leakage surveys.

8 And so, but the idea that there would
9 be some amount of minimum requirements that PHMSA
10 would fully flesh out for those pipes greater
11 than or equal to eight-inch nominal pipe size,
12 and then maybe some additional requirements that
13 would be subjected to pipelines that are larger
14 than 12 and three-quarters and, you know, with
15 some thought around consequence, something better
16 than just using an arbitrary diameter as a
17 dictation of consequence, I think, is a concept
18 that's important.

19 And then I think we talked about,
20 Mark, I think the idea of continuing to encourage
21 technology and technology development for leak
22 surveys I think is something that we fully

1 support.

2 Alan, when we were side-barring, had
3 mentioned that there is DOT funding going towards
4 the effort, but I think it's something that we
5 can continue to, you know, show support in
6 driving more R&D, more technology adoption, more
7 ability within the code to allow us to use newer
8 emerging technology.

9 CHAIR DANNER: All right, Commissioner
10 Burman?

11 MEMBER BURMAN: Thank you. Can you
12 hear me?

13 CHAIR DANNER: No, we can't hear you.

14 MEMBER BURMAN: You cannot hear me?

15 CHAIR DANNER: Now we can. Thank you.

16 MEMBER BURMAN: Okay, thanks. So I am
17 very, very encouraged by what I am hearing. I
18 really do like the idea of having this from a
19 flexible perspective.

20 I do think trying to flesh out a very
21 detailed proposal now that would likely not give
22 us what we need in isolation for an

1 implementation perspective long term would be
2 dangerous if we tried to do that today, so I like
3 the idea of what's being proposed.

4 I also like that it does seem to deal
5 with a lot of the issues that people had concerns
6 with, including the time frames and trying to
7 give some flexibility to PHMSA, but also not just
8 leaving it to them, they are then charged with
9 moving forward without the ability to engage with
10 those who would be able to provide the context.

11 So I do think it's very important that
12 industry and others be able to continue to be
13 engaged going forward. So for me, this sounds
14 very good and I am very supportive. Thank you.

15 CHAIR DANNER: All right, thank you.
16 Okay, so I think we have a list of issues and a
17 concept for going forward on this. Do we want to
18 hear -- I mean, this has been a discussion among
19 industry folks and the public having separate
20 conversations. I don't know if PHMSA has been,
21 has weighed in on this yet. Alan, do you want
22 to?

1 MR. MAYBERRY: Yes, we'll have some
2 voting, potential voting language here in a
3 second that addresses the concepts that were
4 brought up, so.

5 CHAIR DANNER: All right, and then in
6 addition, was there any thought given to preamble
7 language that -- Mary?

8 MEMBER PALKOVICH: Mary with
9 consumers. So I drafted just some rough language
10 that PHMSA can beautify, but it's really just
11 around in the spirit of the Plan Do Check Act,
12 which is 1173, that the GPAC plans to continue
13 improving pipeline safety by evaluating existing
14 and new data, assessing and prioritizing risks,
15 and proposing reasonable regulatory language,
16 with some bullet points below that that say
17 acting timely on GAO mandates, set minimum
18 pipeline safety standards, prioritize risks, and
19 here's a key bullet, building on regs, not one
20 and done, because what's been important to all of
21 us has been that we understand that this process
22 has to continue on and we have to continue to

1 build on, and then the final point I just
2 drafted, and I'll give you these handwritten
3 notes and then we can go from there, but assess
4 the data specifically to reduce pipeline safety,
5 so it's around analytics now that we're getting
6 this new body of data in on gathering lines.

7 CHAIR DANNER: All right, well, thank
8 you for that. I appreciate the work you did on
9 that. I think that, you know, my only friendly
10 amendment would be that while we're saying the
11 GPAC is going to continue, I think it would be
12 that GPAC's expectation is that these rules are,
13 I don't know what the word is, transitional or,
14 you know, that this is -- what's that, iterative,
15 there you go, thank you, and that our expectation
16 is that these rules will be revised periodically
17 and regularly.

18 MEMBER PALKOVICH: Yeah, I'll make
19 that note.

20 CHAIR DANNER: Thank you very much.

21 MR. MAYBERRY: I guess from our
22 standpoint, a note to staff, a note to PHMSA,

1 we'll go back to this segment of this transcript
2 to look at what to include.

3 CHAIR DANNER: Okay, so we are just
4 waiting for some language to get drafted.

5 MR. GALE: What we've done is put
6 together a vote slide that we thought captures
7 the tone and the dialogue that's been occurring.
8 Again, it's more of a set of tenets that we
9 thought the committee would want us to look at
10 the rule and to develop the final rule from.

11 CHAIR DANNER: Yeah, I think you can
12 take out the words in the future from the first
13 bullet point. Is this the entirety of the
14 proposal?

15 MR. GALE: That's the entirety.

16 CHAIR DANNER: I note that I do not
17 see leak survey in there.

18 MR. GALE: Sorry, so bullet two was
19 not supposed to be all encompassing. It's just
20 an example. We thought the way the discussion on
21 leak surveys, you know, was forming, that would
22 give us the flexibility to finalize our

1 recommendation on leak survey based on the
2 dialogue of the committee.

3 CHAIR DANNER: Just speaking for
4 myself, I would like to have some acknowledgment
5 of that. Perhaps it would be considering, for
6 example.

7 MR. GALE: Consideration for leak
8 surveys?

9 CHAIR DANNER: Well, just, you know,
10 where it says set a minimum set of requirements,
11 considering, for example, down trench and line
12 markers, public awareness, leak surveys, and
13 emergency plans. I mean, I would rather that we
14 get every one of the bullets that we talked about
15 into that list. Mark?

16 MEMBER BROWNSTEIN: Yeah, I'll just
17 second that. That seems to be a fairly important
18 reflection of the conversation we've been having.

19 CHAIR DANNER: Chad?

20 MEMBER ZAMARIN: Thanks, Chad Zamarin
21 with Williams. I would just ask that in the
22 third bullet, we do reference maybe at the end of

1 the sentence in parentheses, e.g. or greater than
2 12 and three-quarters because I think we spent a
3 lot of time talking about that.

4 We've referenced the eight-inch for
5 the minimum set of requirements, but I think, you
6 know, when we talk about larger diameter
7 pipelines, the concept of greater than 12 and
8 three-quarters was something that I think it
9 seemed like we had consensus around.

10 CHAIR DANNER: So how would you
11 wordsmith that?

12 MEMBER ZAMARIN: I would just, I
13 think, just put right there at the end like --
14 was it Robert doing the work -- greater than
15 12.75 inches. Happy face, all right. That's how
16 I end every sentence.

17 CHAIR DANNER: Actually, I like the
18 happy face. Okay, Sara?

19 MEMBER GOSMAN: So we did discuss new
20 construction, installation, and design, and I'm
21 wondering where we would put that in? I mean, I
22 think if we're going to list damage prevention,

1 line markers, public awareness, and now leak
2 surveys and repairs and emergency plans, we
3 should also list the other topic that we
4 discussed, which was new construction.

5 CHAIR DANNER: Would you, would it be
6 your proposal just to include that inside the
7 parenthesis there?

8 MEMBER GOSMAN: Yes.

9 CHAIR DANNER: Okay, Andy?

10 MEMBER DRAKE: This is Andy Drake with
11 Enbridge. I'm trying to build a plane while I'm
12 flying here. Your comment, Sara, I think had
13 perhaps bigger -- yeah, you're putting the design
14 requirements inside the floor, right, for new
15 pipe?

16 MEMBER GOSMAN: Right.

17 MEMBER DRAKE: Okay, I think one issue
18 that we would like to include in consideration in
19 that is a special consideration that will be
20 developed by PHMSA to address repair of that
21 section of -- that specific part of new includes
22 designing pieces for repairs.

1 If we start applying system issues to
2 repair pipes that are very small, that's not
3 practicable. So just that's another placeholder
4 in there because I think it is a floor issue.
5 We've just got to manage some of the unintended
6 consequences of deploying it on a system-wide
7 basis.

8 MEMBER GOSMAN: Andy, would -- I
9 apologize, Chair. Would you support adding
10 another bullet point that says, you know, so we
11 have the concept of setting minimum requirements
12 and then we say, and here are some of the issues
13 specifically that we want you to think about and
14 some of the minimum requirements. See this
15 particular, --

16 MEMBER DRAKE: Yes.

17 MEMBER GOSMAN: Okay.

18 MEMBER DRAKE: It could just be a
19 parking lot as far as I'm concerned, issues that
20 have to be considered.

21 CHAIR DANNER: All right, Chad?

22 MEMBER ZAMARIN: Yeah, I agree. I

1 think alternatively, you could just remove
2 replace lines, but still, I would think PHMSA's
3 going to have to decipher what it is we mean and
4 I think just so we're clear.

5 I mean, I think we're not talking
6 about if we're going out and doing maintenance,
7 replacements of discrete sections within long
8 pipeline systems, that you haven't then, you
9 know, for lack of a better term, infected the
10 whole pipeline with requirements that you can't
11 live up to because the entire pipe is not new,
12 and that's a replacement, a maintenance
13 replacement, not the construction of a new line,
14 which again I think was the intent of the code
15 was, or the regulation was for new
16 large-diameter, high pressure gathering systems.

17 CHAIR DANNER: Okay, Sara?

18 MEMBER LONGAN: Sara Longan, State of
19 Alaska. I want to echo the comments from my
20 colleagues that what we're doing here is
21 important, and I think that conceptually, we're
22 on the same page, but when I hear sausage making

1 and what I interpret as on the fly while
2 developing a rule, it makes me nervous.

3 So the cautionary tale, I think, needs
4 to be captured, and sort of the charge will be to
5 think this through, and I think that PHMSA is
6 really going to have to help on this part.

7 I want to also second and echo the
8 concerns raised about and repairs, and it's
9 because I'm a regulator and I don't know how
10 industry will interpret it and how enforcement
11 looks like for all of the issues raised.

12 Most commonly what section of the
13 repair impacting what portion of the entire line
14 I think comes into question, and that's a very
15 important distinction.

16 Finally, on the third bullet, the part
17 about the on the fly that makes me a little bit
18 nervous is that we've really been talking about
19 most of this, and I agree with you, Sara. We've
20 been looking at this rule for a very long time,
21 but the concept of PIR and how to use it and
22 where, I don't disagree with anything that I've

1 heard, but I think we need to be careful.

2 I ask PHMSA, and I don't mean to
3 wordsmith, to consider changing, use the PIR
4 concept, to, consider applying additional
5 requirements, because that, I think, displays the
6 flexibility that I believe we all agree is
7 important, and then I would propose removing the
8 second word, appropriate, before safety and
9 environmental. Thank you.

10 CHAIR DANNER: So we have no reference
11 to PIR in the proposal. Consider applying --

12 PARTICIPANT: PIR concepts. Consider
13 applying PIR concepts.

14 CHAIR DANNER: Sara, is that okay?

15 MEMBER LONGAN: Yes.

16 CHAIR DANNER: Okay, Sara?

17 MEMBER GOSMAN: I think that's a great
18 amendment. I really, again, I want to just say
19 that I appreciate the discussion that we're
20 having right now.

21 And I understand the difficulties in
22 trying to come to an agreement like this in a

1 limited period of time, but I also think it's
2 important to remember that, you know, again, this
3 rule has been out there for a long time.

4 The original proposal was for this
5 starting at eight-inch nominal diameter, so these
6 issues around practicality and appropriateness,
7 right, these are issues that have been
8 percolating, I think, for a while.

9 I think now that we're here and we're
10 discussing them, we've come to some good
11 conceptual understanding, and now we do need to
12 turn it over to PHMSA and let, you know, again,
13 with the appropriate set of information from
14 industry and from other groups around the table
15 about how to make this work.

16 But I just, I feel like, you know,
17 we're there conceptually, and that's where I
18 think we should be on an issue like this because
19 we're not the agency experts here. What we're
20 doing is giving advice.

21 CHAIR DANNER: All right, thank you.
22 That's a very good point. All right, we have

1 language in front of us. Are there any further
2 suggestions for amending that language? If not,
3 are we ready to -- Andy?

4 MEMBER DRAKE: I do want to spend a
5 minute on leak detection. I think that's
6 important. Of all of the issues that are up
7 there right now, quite frankly, that's probably
8 the most volatile and the biggest concern for
9 everybody. I don't mean to just pick the
10 industry.

11 I think this is an important issue to
12 try to summarize a very animated discussion that
13 was happening over there a little bit ago at the
14 last break about leak detection was a very big
15 concern about a hole that could be very expensive
16 and without even a practicable answer, and that
17 was a bit of the anxiety that was happening in
18 that room.

19 And when we talk about doing it, I
20 think it's important to keep it in the context of
21 where is it right now? It is a huge unknown.

22 And Mark, the conversation at the

1 break that only you and I had, I think, might be
2 helpful to help cast an expectation here to give
3 PHMSA some guidance, and that is define the
4 practicable cost-effective solution within X
5 amount of time, and how to even do this is what
6 we're really talking about here.

7 It's just not do what you do now
8 everywhere. That won't work. It will not work
9 and I want this on the record. It will not work.
10 It will be the poison pill. If we don't get this
11 right, we'll crunch the rule when it gets to cost
12 benefit, and we don't want to do that. That's
13 not in anybody's --

14 We want to make progress, so I want to
15 get that accented syllable right because as we
16 give guidance, what is the expectation? It has
17 to be very thoughtful and deliberate about how to
18 deal with that because it is very volatile.

19 MEMBER BROWNSTEIN: I think the -- so
20 I appreciate that, and again, I would -- so in
21 the spirit of, you know, sort of fleshing out the
22 record here, all right.

1 I think, so first of all, I would
2 encourage the industry. I would encourage PHMSA
3 not to think of this as binary in the sense that
4 it's either this or nothing, and what I mean by
5 that is we've spent a fair amount of time this
6 morning talking about the time frame over which
7 requirements become effective.

8 We have talked about, you know,
9 applying principles of cost effectiveness. We've
10 talked about principles of practicality, and
11 we've also talked about the fact that the
12 technologies available to industry are rapidly
13 evolving.

14 And so while sitting here today, one
15 might be tempted to think that the way to do this
16 or the only way to do this is by, you know,
17 walking the line with an infrared camera.

18 In fact, right, we know that there are
19 technologies actually in the marketplace today
20 that would allow for collection of data much more
21 rapidly and much more cost effectively through
22 the use of, you know, various types of aircraft

1 and increasingly even satellites.

2 So all of that, I think, needs to be
3 looked at as we think about this, and I would
4 also suggest that we think about this in the
5 context of, you know, what we all just call sort
6 of common sense, right?

7 If I go back home tonight and I, say,
8 you know, talking to my wife, so what have you
9 been doing for the last day and a half? you know,
10 and I said, well, you know, we spent three hours,
11 you know, discussing whether or not, you know,
12 industry should inspect their lines once a year
13 for leaks, you know, I think her reaction would
14 be like, really? That's even an issue?

15 And so there is -- you know, so
16 representing sort of the public interest here and
17 sort of the citizen perspective on this, right, I
18 do think that there is kind of a threshold issue
19 here, right, which is, what do you mean they
20 don't go out and inspect their lines at least
21 once a year, right? And so there is kind of a
22 straight face test that I do think has to also

1 inform how we think about this, right?

2 So by all means, cost effective. By
3 all means, let's think about the time frame over
4 which this phases in. By all means, let's think
5 about what work groups we can put together to
6 help inform what good practice looks like to help
7 you guys develop an approach that makes sense.

8 Let's have all of that stuff, but
9 let's also keep in mind that, you know, from just
10 a general public perspective, like the idea that
11 you wouldn't, you know, inspect the lines at
12 least once a year, really? So.

13 CHAIR DANNER: All right, Andy and
14 then Chad?

15 MEMBER DRAKE: I appreciated that
16 conversation. I think it's, again, it is not
17 binary, and I just, I know you know this, but I
18 think for just perspective, the group is making a
19 significant commitment as we stand here today
20 already, and that's a good thing. They're moving
21 forward, you know, on the first try, so to speak,
22 and that includes leak detection.

1 So it isn't when we talk to our
2 spouses when we go home, and she does ask me the
3 same, what the hell have you been doing for so
4 long? and, you look so tired. Really, that's
5 what took all of the energy?

6 But we are making progress on that,
7 and this is not the end of it. It is the
8 beginning of it, and I think what we're really
9 talking about here is a certainty of greater than
10 12 inches that we do these things and they
11 represent a certain risk that we're going to
12 marshal.

13 What we're trying to do is set an
14 expectation of the next traunch, and what we're
15 saying here is that we have to be thoughtful
16 about how to do that because it won't be the
17 tools that we deploy traditionally.

18 And you're right, new technologies are
19 coming, but they're not here, so we've got to
20 figure out how to do that practicably on this
21 next traunch because it is a -- it just keeps
22 getting bigger and bigger, and we're not just

1 going to solve it this time. We're going to keep
2 figuring out how to solve it constantly.

3 And I think things like, and this
4 would be for the record, things like thresholds,
5 things like frequencies, things like technologies
6 and tools, mapping, sensitivity, those are all
7 issues that have to be a part of this thinking of
8 this work group or whomever that goes back into
9 this decision process or guidance to PHMSA. Does
10 that reflect that conversation?

11 MEMBER BROWNSTEIN: It does, Andy, and
12 I neglected to add one other thing which is, and
13 again, this is informed as much by my 10 years in
14 the electric and gas utility business as it is my
15 current portfolio as, you know, as an advocate in
16 the environmental community, and that is I know
17 as a practical matter that in order to get
18 innovation, you need to be clear on what the
19 expectation is, right?

20 And so that is the reason why I'm
21 reluctant to simply sign off on the idea that we
22 simply make a recommendation to PHMSA that they

1 study this issue because, you know, in fact, if
2 you want to mobilize the resources of not only
3 the industry, but the vendor community that
4 serves the industry, there has to be a clear
5 signal that this is something that will happen
6 because that is the only way that people can
7 justify expending time and resources and capital.

8 And I'm not just talking about the
9 folks here sitting around this table representing
10 industry, but I'm also talking about the
11 technology community and the vendor community.
12 They have to know that something is going to
13 happen so that they can then devote the resources
14 to figuring out and developing the products and
15 services to enable it to happen, and that comes
16 from PHMSA being very clear, right?

17 And so I know that there will be
18 temptation to take this recommendation and go
19 back and simply go, well, you know, there wasn't
20 real consensus here, so let's just do a study and
21 we'll put that in the preamble, and everyone --
22 that won't get to where we need to go.

1 So I'd much rather have a requirement
2 and then have a long lead time for implementing
3 it than to have a study of indeterminate, you
4 know, outcome and length.

5 CHAIR DANNER: So let me, Alan will be
6 next, but let me ask Mark this. With what you
7 have just stated, which is in the record, is the
8 language up here acceptable to you?

9 MEMBER BROWNSTEIN: Yes.

10 CHAIR DANNER: Okay, Alan?

11 MR. MAYBERRY: I was just going to
12 mention that I've heard the word practical,
13 practicable, technically feasible, cost-effective
14 use.

15 Perhaps we should have a qualifier in
16 there because we're saying the preamble, the
17 voting language says it's cost effective and all
18 of that, but set a minimum set of requirements
19 and maybe call it practicable, technically
20 feasible requirements or something like that.

21 I mean, does it matter? There's a
22 shopping list below that, but would that help?

1 Set a minimum set of --

2 MEMBER BROWNSTEIN: You may be gilding
3 the lily here, Alan. Just --

4 MR. MAYBERRY: Okay.

5 MEMBER BROWNSTEIN: All right.

6 CHAIR DANNER: All right, Chad?

7 MEMBER ZAMARIN: Chad Zamarin with
8 Williams. I do want to though ask Mark and the
9 committee that we be cautious because it has been
10 my experience that requiring things will drive
11 action, but we need to make sure that it's
12 driving action towards results that are what we
13 want to achieve.

14 And the reason why, for example, a
15 study may make sense is because I don't know that
16 going after pipelines that are smaller diameter,
17 one, you know, yes, we do have emerging
18 technologies, but most of those technologies are
19 being deployed on relatively large leak sources.

20 And, you know, when we start talking
21 about do I want to force a lot of activity across
22 just a bigger, you know, population of pipe, that

1 sounds like a great idea, but I'm not sure that
2 I'm getting value. There's a diminishing return
3 as I get to smaller and smaller pipe. I mean,
4 larger pipe do inherently have the potential to
5 emit more emissions.

6 So I just -- I worry about us making
7 requirements without being fully informed, and
8 what we do know is as you get to smaller diameter
9 pipe, the population grows, so the cost will
10 grow.

11 We know that as you get to smaller
12 diameter pipe, the volumes decrease, so the
13 detection is harder, so the technology needs more
14 capability.

15 So I just, the reason why you hear us
16 advocating for more work on the front is just to
17 make sure that we're not just getting more leak
18 surveys, we're reducing emissions, and the effort
19 that we're putting in place is really driving the
20 result that we're looking for, so that's the only
21 reason why I think it's important that we do
22 understand what we're proposing before we do it.

1 CHAIR DANNER: So from my point of
2 view, this is, you know, it's one thing to say
3 requirements. It's another thing to say we're
4 setting expectations and putting the industry on
5 notice that this is the direction that things are
6 going. All right, Mark?

7 MEMBER BROWNSTEIN: Yeah, and Chad and
8 I totally acknowledge that, which is why you're
9 not hearing me making an impassioned argument for
10 doing this on four and six-inch lines, which the
11 data suggests is going to be the lion's share of
12 new gathering infrastructure built, at least if
13 we take the ICF report as a good indication,
14 right.

15 So already, right, and maybe it needs
16 stating explicitly, right, by saying that this
17 applies to eight-inch and above, we're already
18 making a judgment that says we're focusing on,
19 you know, a subset of the total US gathering
20 system, and really a fraction of the total US
21 gathering system when we say eight-inch and
22 above.

1 It's less than -- I forget what the
2 exact numbers were, but it's, you know, we're
3 talking about 10 to 20 percent of the total miles
4 of lines in the United States to which any of
5 this would apply in deference to your point.

6 CHAIR DANNER: All right, so --

7 MEMBER BROWNSTEIN: Fifty, yeah, out
8 of what, 440,000, with another 300,000 to be
9 built? Yeah, it's a subset.

10 CHAIR DANNER: All right, so just a
11 reminder, we are nearing 11:00, so Chad?

12 MEMBER ZAMARIN: Yeah, I just wanted
13 to say one other thing. I hear you, but I also
14 just want to remind us that when we ask, you
15 know, our spouses ask what we accomplished, I
16 mean, we are extending, you know, reporting and
17 data collection to over 400,000 miles of pipe
18 that have never been subject to regulation
19 before.

20 We have identified requirements for
21 pipelines that have never had regulations before.
22 We are talking about extending, you know, these

1 requirements to pipe that are greater than
2 eight-inch, and again, this rule was about
3 identifying pipe that is being --

4 If you read the rule, it was about
5 primarily we believe the pipe that's being built
6 today is larger pressure, larger diameter than
7 maybe, you know, the gathering systems that
8 existed of old, and we're concerned that they
9 look more like transmission lines and therefore
10 need to be regulated like transmission lines.

11 We've veered off the fairway quite a
12 bit from what at least the original intent of the
13 rule was, in fact the mandate that came through
14 legislation that we were here to address pipeline
15 safety requirements for pipelines that might look
16 like a duck, quack like a duck, walk like a duck,
17 may behave like transmission lines. We weren't
18 asked to take on these other issues.

19 I think it's good that as a group,
20 we've weighed in and provided guidance, but I
21 think we've accomplished a lot in extending
22 safety requirements to a population of pipe that

1 haven't been before, and I think you've heard us
2 say this is the beginning.

3 I get very nervous, and I think I
4 voiced this, making decisions about things
5 without understanding the impact of those
6 decisions, and I think that the data collection
7 and reporting that we're going to now have for
8 this population of pipe is going to allow us to
9 understand how much pressure is in these
10 pipelines, when were they built, what were the,
11 you know, the locations and the potential
12 impacts, so I do think we want to take time to
13 understand that before we make decisions that are
14 beyond the scope.

15 MEMBER BROWNSTEIN: I think we're in
16 a great place right now, okay. I hear what
17 you're saying. I think we're in a great place
18 right now exactly where we are right now, and
19 that frankly, we may have reached the point of
20 diminishing returns in terms of conversation, and
21 in fact, could be starting to take a few steps
22 backwards, I think, if we just keep this colloquy

1 going, so why don't we leave it there?

2 CHAIR DANNER: Excellent idea. Okay,
3 Sara, you have the last word and then we're going
4 to --

5 MEMBER LONGAN: Very quickly, I just
6 wanted to support the Chairman's suggestion of
7 using the word expectations instead of
8 requirements, and it actually builds upon what
9 Chad and Mark are both discussing.

10 Requirements makes it sound like PHMSA
11 needs to go and do something when, in fact, they
12 do not have the data presently to operate from.

13 CHAIR DANNER: I think that's a fairly
14 significant change, so I think we're going to
15 have to discuss that. Sara?

16 MEMBER GOSMAN: So I think we're
17 giving -- Sara, as I understand, what we're doing
18 with that language is we're giving them, sending
19 it back to them to decide what the requirements
20 are going to be.

21 That is they are going to have to
22 ultimately decide, right, that something is

1 required or not required. It's not going to be
2 that -- at the end of the day, it's just an
3 expectation.

4 So that is how I read it just for the
5 record, and if anyone disagrees with that, they
6 should let us know, but that's how I understand
7 it.

8 I just, I want to ask one more
9 clarifying question, which is newly regulated gas
10 gathering, right, I'm assuming when you say newly
11 regulated gas gathering, that means new and
12 existing because that's the scope of the lines
13 we've been talking about?

14 Okay, so you're just meaning that set
15 of lines that we are considering whether to
16 regulate in the future? Okay, thank you for that
17 clarification.

18 CHAIR DANNER: Okay, Sara Longan?

19 MEMBER LONGAN: I agree, Sara, and it
20 is my full expectation that the second bullet
21 evolves into a set of requirements that we
22 continue to advise PHMSA on what it should look

1 like, but I do think the Chairman raises an
2 important point.

3 On its face and as read, PHMSA can't
4 do that second bullet yet, and I believe it's
5 really important. I think we're talking about
6 the need for data collection. We've talked about
7 the industry representatives who aren't present
8 today who will probably be a part of providing
9 information and maybe conducting studies to
10 understand what this looks like.

11 I didn't want it to be lost because I
12 think what the Chairman suggested is a good
13 thing. A go-between might be, and I hate to do
14 this again, is PHMSA consider setting a minimum
15 set of, and I still support the word
16 expectations. I'm fine if requirements stays
17 within.

18 CHAIR DANNER: So since I was the
19 first person to say expectations, I was really,
20 you know, looking at whatever the requirements
21 are, they have to set expectations. If we want
22 to put the word expectations in there, well, I

1 don't see an easy place to do so, but I wouldn't
2 want to replace the word requirements. Sara?

3 MEMBER LONGAN: I can move on. I do
4 think it's an important distinction and it's
5 something PHMSA has to live with, so --

6 CHAIR DANNER: Okay.

7 MEMBER LONGAN: I'm fine either way.

8 CHAIR DANNER: Okay, Ron?

9 MEMBER BRADLEY: I was just going to
10 remind us that everything we say is on the
11 record, and I suspect as PHMSA would go back to
12 dig through and cull through this and bring more
13 people aboard, there's going to be a thorough
14 record that captures all of our intent.

15 CHAIR DANNER: Thank you for that
16 point. Alan?

17 MR. MAYBERRY: And I appreciate the
18 comment. We've been dealing with this stuff for
19 a good bit, and typically when we hear the word
20 requirements, it does mean to develop a set of
21 regulations, so, I mean, I'm comfortable with it.

22 You know, either way, the outcome is

1 going to be a set of regulations that considers
2 those attributes there, so I probably prefer
3 requirements.

4 CHAIR DANNER: I have faith in PHMSA
5 to develop a minimum set of requirements that
6 create expectations, so I think we're going to be
7 okay there.

8 All right, so we have language in
9 front of us. I see no cards up. I would ask for
10 a motion if we are at that point. Just before we
11 do that, let me just say we also had some
12 preamble language, and I don't know. Do we need
13 to vote on that or do we need to just ask PHMSA?
14 If PHMSA acknowledges that that's our intent, is
15 -- all right, very good.

16 All right, is there -- Andy, are you
17 willing to make a motion? All right, please do.

18 MEMBER DRAKE: This is Andy Drake with
19 Enbridge. In the context of building a plane
20 while we're flying it, I will introduce this
21 proposal, and that is I can make a motion that
22 the committee consider voting on the language

1 that's in front of us here, and I'll read that.

2 This is scope of new regulated gas
3 gathering, paragraphs 192.8(b) and (c). With
4 regard to the scope of newly regulated gas
5 gathering in 192.8(b) and (c), the proposed rules
6 as published in the Federal Register and draft
7 regulatory evaluation are technically feasible,
8 reasonable, cost effective, and practicable if
9 PHMSA considers the following. Establish an
10 initial framework to build upon based on future
11 information and experience.

12 Two, set a minimum set of
13 requirements, for example, damage prevention,
14 line marking, public awareness, leak surveys and
15 repairs, design installation considerations, and
16 initial inspection and testing for new lines, and
17 emergency plans for pipelines, paragraph, or for
18 8.625-inch diameter and greater.

19 Given particularly the due
20 consideration to the discussion the GPAC
21 committee has had regarding leak surveys,
22 consider applying a PIR concept and additional

1 requirements to provide safety and environmental
2 protection for larger diameter pipelines, for
3 example, greater than 12.75 inch and ensure that
4 composite pipe is adequately addressed to
5 minimize the impact on its continued use.

6 CHAIR DANNER: Is there a second?

7 MEMBER GOSMAN: I'll second.

8 CHAIR DANNER: All right, thank you
9 very much. All right, Cameron, can we have a
10 roll call?

11 MR. SATTERTHWAITE: Okay, if you
12 agree, yes, if not, no, and we'll go right
13 through. Ron Bradley?

14 MEMBER BRADLEY: Yes.

15 MR. SATTERTHWAITE: Andy Drake?

16 CHAIR DRAKE: Yes.

17 MR. SATTERTHWAITE: Rick Worsinger?

18 MEMBER WORSINGER: Yes.

19 MR. SATTERTHWAITE: Chad Zamarin?

20 MEMBER ZAMARIN: Yes.

21 MR. SATTERTHWAITE: Mary Palkovich?

22 MEMBER PALKOVICH: Yes.

1 MR. SATTERTHWAITE: Jon Airey?

2 MEMBER AIREY: I would support PHMSA's
3 original proposal, but not this modification. I
4 would suggest that PHMSA stay close to what was
5 vetted from its December proposal, and I vote no.

6 MR. SATTERTHWAITE: Sara Gosman?

7 MEMBER GOSMAN: Yes.

8 MR. SATTERTHWAITE: Mark Brownstein?

9 MEMBER BROWNSTEIN: Yes.

10 MR. SATTERTHWAITE: Robert Hill?

11 MEMBER HILL: Yes.

12 MR. SATTERTHWAITE: David Danner?

13 CHAIR DANNER: Yes.

14 MR. SATTERTHWAITE: Sara Longan?

15 MEMBER LONGAN: Yes.

16 MR. SATTERTHWAITE: Diane Burman?

17 MEMBER BURMAN: Yes.

18 MR. SATTERTHWAITE: All right, that's
19 11 to one. The motion carries.

20 CHAIR DANNER: All right, thank you,
21 Cameron, and thank you, members of the committee.

22 So the last thing we have, we have the

1 issue of the mapping in front of us, and I guess
2 my own thought is with time running out for us
3 here and some issues that are still not decided,
4 I would propose that we table that issue, but
5 bring it back at a future GPAC meeting. Okay,
6 Diane Burman?

7 MEMBER BURMAN: I agree with tabling
8 that. The only other thing I'd like to ask if
9 the next meeting date. I know, I think we had
10 set it as November 14. Is that correct?

11 CHAIR DANNER: Yes.

12 MEMBER BURMAN: Yes, that's the only
13 date that didn't work for me because it's my
14 state public session, so I would just like to ask
15 if we can reconsider that?

16 I know it's just my issue, but I would
17 just like to raise it because I would like to try
18 to be there and I won't be able to be there not
19 only in person, but not on the phone either if it
20 is November 14.

21 CHAIR DANNER: Okay, Diane, we'll take
22 a look.

1 MEMBER BURMAN: Okay, thank you.

2 CHAIR DANNER: Oh, Sara?

3 MEMBER GOSMAN: So I'm fine with
4 tabling the NPMS, but I guess I would ask, since
5 there are people around the room who are
6 interested in the issue, and because PHMSA has
7 put forth a legal interpretation that they are
8 limited, well, barred from being able to require
9 gas gathering operators to submit information to
10 NPMS, I would be interested in further discussion
11 in that particular interpretation and sort of
12 generally the issue, but I acknowledge that it's
13 not the right time to have it now.

14 I also want to be really clear that I
15 don't want this to hold up the rule. That is
16 it's very important for me that this issue -- I
17 mean, this is a longer term issue. I don't see
18 this as being necessary for PHMSA to move forward
19 on the rule that we have just now spent a lot of
20 time talking about.

21 CHAIR DANNER: All right, and I agree
22 with those points, and I would like to hear

1 PHMSA's view on that language. Alan?

2 MR. MAYBERRY: Thank you. Just we
3 weren't ready to really discuss it. I know it
4 looks like, in doing some high level research, it
5 looks like we may have taken a foray into
6 considering mapping of gathering, which might,
7 you know, it seems to imply that perhaps we do
8 have the authority, but, yeah, if we could table
9 it to the future, we will commit to looking at it
10 and coming back to you.

11 CHAIR DANNER: All right, thank you
12 for that. Andy?

13 MEMBER DRAKE: This is Andy Drake with
14 Enbridge. Just as a point of perspective,
15 pragmatic if nothing else, I think one of the
16 things that we were thinking about yesterday that
17 I think has evolved is the use of the NPRM as the
18 basis for providing the data on gathering.
19 Distribution is in a similar state. There is
20 data gathered on distribution that's not in NPRM
21 on purpose.

22 I think for gathering, for the

1 purposes of this discussion, the NPRM standards
2 are not appropriate because the amount of data
3 that's required, the attributes, the elements of
4 precision, it's not appropriate to try to jump
5 this industry into that space. So the NPRM is
6 sort of a separate venue, vessel almost for this.

7 We wouldn't need the NPRM mandate from
8 Congress to collect locational information on
9 gathering in the context that we're talking about
10 here. We would just collect it just like we do
11 in other sectors. So it may be a parallel issue,
12 but we don't need to solve that to do what we're
13 talking about here. Is that fair?

14 MEMBER GOSMAN: Thank you for that.
15 And so when you talk -- you're talking about
16 NPMS, the mapping system? Yes, okay, yes, I take
17 the point.

18 CHAIR DANNER: Yeah, I still would
19 like to hear what PHMSA's lawyer views, so, yeah.
20 All right, I think that takes us to the end, not
21 quite. John wants to say something?

22 MR. GALE: Just real quick, Chairman

1 Danner, I just want to point out a milestone for
2 this committee real quick. If you all don't
3 realize, but with that last vote, the work of
4 this committee with the rule-making that was
5 published on April 8, 2016 entitled Safety of Gas
6 Transmission and Gas Gathering Pipelines is now
7 complete.

8 And we'd like to thank the committee
9 for all of their efforts and all of their work in
10 getting this done, and Chairman Danner, thank you
11 for your leadership in getting us through all of
12 these issues. We greatly appreciate it, sir.
13 Thank you.

14 CHAIR DANNER: All right, so --

15 (Applause.)

16 CHAIR DANNER: So we could go around
17 the room and everybody thank everybody else for
18 their good work, or we could do that offline, but
19 it has been quite a journey, and I think we're
20 getting very good at building airplanes. So with
21 that, Alan?

22 MR. MAYBERRY: If I could just thank

1 the PHMSA staff over here that puts this on the
2 table?

3 (Applause.)

4 MR. MAYBERRY: I think we've got a
5 good combo, a good team here. Thanks.

6 CHAIR DANNER: Yeah, and actually, and
7 everybody who commented, I think you've raised a
8 lot of good points. I appreciate everybody's
9 participation and I look forward to seeing the
10 committee members in November or whenever it is
11 we meet next.

12 So I think, with that, we can adjourn
13 and go off the record. Thank you.

14 (Whereupon, the above-entitled matter
15 went off the record at 11:13 a.m.)

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This is to certify that the foregoing transcript

In the matter of: Gas Pipeline Advisory Committee

Before: USDOT/PHMSA

Date: 06-26-19

Place: Washington, DC

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Court Reporter

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