

Pipeline Safety



T R U S T

Credible.

Independent.

In the public interest.

Pipeline Leak Detection, Leak Repair, and Methane Emission Reduction

Pipeline Safety Trust History



Guys -
I'm fishing. Will
be back before dark.
Homework is done.

Liam



**Pipeline
Safety**



TRUST

Pipeline Safety Trust History



“... there’s going to be a Trust that’s going to be funded as part of today’s sentencing. With \$4,000,000 ... they’ve nowhere near the lobbying potential of the oil industry. It’s not even David and Goliath. It’s more like Bambi and Godzilla. No industry polices itself very well... you need outside people, and these are going to be the people so pay attention to them.”

The Honorable Barbara Rothstein
United States District Judge
at Olympic Pipe Line Co Sentencing

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Importance of Sections 113 and 114

- Explicit recognition that methane emissions from pipeline facilities are hazardous to the environment
- Pipeline methane emissions are PHMSA's responsibility, not EPA's
- Statutory requirements are aimed at both fugitive emissions and intentional emissions
- Direction for PHMSA to produce leak detection rules with minimum performance standards
- Recognition that pipeline safety, environmental protection, and public health are interconnected and inextricable

Strong Legislation



PIPES Act Sections 113 and 114 Mandates

| Act sections | Responsible Party | Description | Due Date |
|------------------|---------------------|---|--------------|
| Sec. 113(q)(1) | PHMSA | Rulemaking under Section 113 | January 2022 |
| Sec. 114(b) | Operators | Update Inspection and Maintenance Plans – find and eliminate leaks, and minimize intentional releases | January 2022 |
| Sec. 114(d)(1) | Secretary | Report on minimizing intentional releases and recommended timeline for rulemaking | July 2022 |
| Sec. 114(a)(3) | Secretary | Review updated Inspection and Maintenance Plans | January 2023 |
| Sec. 114(d)(2) | PHMSA | Rulemaking under Section 114 | January 2023 |
| Sec. 114(c)(1-2) | Comptroller General | Study and Report on Secretary review of plans | January 2024 |
| Sec. 114(c)(3) | Secretary | Response to Comptroller report | April 2024 |

Timeline and Operators' I&M Plans

1. Operators may need to update plans more than once
2. Many of the operators' obligations are self-executing

Find Them, Fix Them

- PHMSA is required in its new regulations to include minimum performance standards to “identify, locate, and categorize all leaks that are hazardous to human safety or the environment or have the potential to become explosive or otherwise hazardous to human safety.”

Find Them, Fix Them

- Repair and replacement schedules must include plans for “each leaking pipe, except a pipe with a leak so small that it poses no potential hazard, with appropriate deadlines.”
 - Given what we know about methane, there is no leak that poses no potential hazard

Find Them, Fix Them

- Prioritization will still be important:
 - Risk of explosion
 - Super-emitters
- However, the message from Congress is clear: Operators may no longer ignore leaks just because they are not likely to explode

Intentional Emissions

- PST and EDF commissioned a report from MJ Bradley identifying practices and technologies to reduce intentional methane releases
- <https://pstrust.org/wp-content/uploads/2015/10/PHMSA-Blowdown-Analysis-DRAFT-FINAL-30jun16.pdf>
- Mitigation Options from Report:
 - Flaring
 - In-Line Compressors
 - Mobile Compressors
 - Transfer to Low Pressure System
 - Isolate Small Section Using Stopples

Continuous Improvement

- Operators will need to update their I&M plans multiple times as regulators work through the process and new technologies develop
- PHMSA will need to revisit performance standards regularly as commercially-available technology improves
- PHMSA will need to revisit its plan review process after feedback from Comptroller General

Culture Change

- PIPES Act calls for a reset on how the industry and PHMSA think about methane leaks and emissions
- No longer just about preventing facilities from blowing up
- New practices, new technologies to find all leaks, fix all leaks, and minimize emissions

Strong Legislation

