NAPSR Perspectives on Class Location Methodology

National Association of Pipeline Safety Representatives

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The National Association of Pipeline Safety Representatives (NAPSR)

Panelists:

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NAPSR

- **The National Association of Pipeline Safety Representatives (NAPSR) is the national association representing State pipeline safety personnel.**

- **NAPSR strives to strengthen State pipeline safety programs through the promotion of improved pipeline safety standards, education, training, and technology.**

- **NAPSR members have oversight responsibilities for the safe and reliable transportation of natural gas and hazardous liquids through pipelines.**

General NAPSR Perspective

- **NAPSR bases its perspective regarding natural gas transmission and gathering facilities on the diversity of its members, the pipeline systems , system histories, and knowledge of the operators**
- **Integrity Management Plans (IMP) must adequately address potential and interactive threats through data elements and continual reassessment prioritizing life before property**
- **Although diverse ideas “Safety” is NAPSRs Objective**
- **Balancing the functional relationship approach : low and high pressure gathering of product > high pressure transportation of product > low pressure system distribution of product**

Pipeline Safety Act of 2011

- **Several studies are required and slowing rulemaking processes - *Class Location Methodology is just one action in support of addressing Section 5(a)(2) of the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 (Pub. L. 112-90)***

- **NAPSR is hopeful that all workshops/studies will provide information for an effective rulemaking process before the next reauthorization and related issues are not dropped between workshops**

- **Alert Bulletins and FAQ's cannot be the solution to quick fixes to pipeline safety**

- **If an expansion of the gas integrity management program (IMP) occurs, how are lessons learned from approaches to the IMP in 49 CFR Part 195 versus a 49 CFR Part 192 risk assessment processes to be evaluated? Do failure statistics and technology still support differing approaches to pipeline risk?**

Other Initiatives

- **API RP 1173 *Pipeline Safety Management System Requirements* - Under Draft comment review**
- **This RP refers to a "holistic" approach – functional relationship between parts and the whole. Current code "fixes" may be fragmented patches to larger safety picture.**
- **Holistic approach takes into account NAPSR IM concerns**

Class Location Methodology

- **A historic approach to design, operations and maintenance activities are based on a Class Location Concept such as compressor booster stations/pipelines, patrols, leak surveys, continuing surveillance, proactive damage prevention**
- **If public safety is the reason to expand the IMP into rural areas this will effect the nations rural "midstream" industry segment safety policy (currently not regulated) – how can states ignore joint transmission and gathering easements in class 1 (rural) locations ?**
- **PHMSA does not provide financial safety program support to State safety inspections of the rural "midstream" industry**

Class Location / Considerations

- **Consider Risk to the Public & Material Science in consequence areas. Clear testing options for unknown piping material specifications.**

- **If joint upstream and downstream operations exist - will lowering weighted risks in rural areas be mandated ? Can risk models be manipulated to emphasize risk due to financial considerations versus a direct risk focus to the public (safety) in populated areas ?**

- **Must an operator address existing priorities of covered segments established by their *baseline assessment plans* under 192.911(b) before focusing on rural threats ?**

Class Location / Considerations

- **If Gas quality not met due to system upsets at rural input metering points – should an additional safety buffer be necessary if an automatic shut in valve not used ?**
- **The numerous references to “class location” in Title 49 C.F.R. would need to be addressed in future rulemakings – design versus O&M**
- **Is potential solution to better define “rural” versus “non-rural” and include moderate consequence areas ?**
- **Can lessons learned from Part 195 assist in a Part 192 methodology approach or both subparts need attention ?**

Class Location / Considerations

- **Defining “Rural” versus “Non-Rural” in Part 192 would allow operators to continue to operate under a class location concept**
- **PIR equation must address raw gas (dual phase flow) or rich gas application if PHMSA expands IMP into rural areas. The PIR equation forces operators to know their systems**
- **PHMSA rulemakings should be prompt to minimize industry, regulatory confusion, and allow focused training**

Closing Comments

- **Can the current transmission valve spacing requirement (§192.179) assist in the class location methodology discussion and expand to *line sections*?**
- **Consider defining a "non-rural transmission HCA line section " between a block valve 4 miles upstream and 4 miles downstream of an area defined in §192.5(a)(3) & (4) - i.e. Class 3/Class 4. Result: Make shorter HCA segments within a larger non-rural area into a contiguous *line section*.**
- **Additional buffer zone: Rural transmission and gathering impact zone is equal to PIR for rich gas (.73 factor). Apply to High and Moderate Consequence Areas. See C-FER Technology Final Report TTO No. 13 and API B31.8S**
- **IM process must be risk based with risk factors weighted to protect the public so pipeline operator safety priorities are not diluted**
- **Complete existing *baseline assessments* before adding different focus to IMP**
- **A new approach to IMP must have an achievable and realistic timeline**


NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES

Thank You!