

API RP 1170/1171 2nd EDITIONS

May 16, 2023

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CENTRAL GAS PIPELINE

OUTLINE

- Timeline
- Process
- Significant Changes
- Other Changes
- Lessons Learned



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TIMELINE

- First planning meeting May 7, 2020
- First Task Group meeting September 17, 2020
- First complete revised drafts sent for comments within Task Group
 - 1171 - October 7, 2021
 - 1170 - November 12, 2021
- Sent to Ballot
 - 1171 – February 16, 2022
 - 1170 – May 17, 2022



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TIMELINE

- Review and Respond to comments – June 2022
- Confirming Ballots – September 1, 2022
- Proofs - October 13, 2022
- Published – November 29, 2022



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REVISING API RP 1170/1171

- Sought input from industry, federal and state regulators, and the public
- Task Group included industry, federal and state regulators and the public
- Compiled the comments and Sub-groups took it from there
- Decided to make certain sections within both documents as similar as possible



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SIGNIFICANT CHANGES OVERVIEW

- API RP 1170
 - Addition of Section 8 Risk Management
 - Addition of safety, training and procedures requirements
 - Just the addition of these sections significantly increased the **shall** statements
- API RP 1171
 - Increase in **shall** statements of approximately 30%
 - Spread across all aspects of the RP



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SIGNIFICANT CHANGES 1170

- Section 8 – Risk Management added to API RP 1170
 - Already required as part of PHMSA Final Rule
 - Inserted as Section 8 in API RP 1170
- Site Security & Safety Programs (Section 12) and Procedures & Training (Section 13)
 - Task Group decision
 - Important to make these sections as similar as possible



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SIGNIFICANT CHANGES 1171

- Operator shall verify the integrity of the production casing by pressure testing or corrosion logging
 - Frequency determined by the risk analysis
 - shall evaluate areas of apparent metal loss
 - impact on the allowable operating pressure

- Introduced well barrier concept – Section 6.5
 - Dual barriers not required
 - Risk based determination for new wells



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SIGNIFICANT CHANGES 1171

- Annulus monitoring
 - Frequency determined by risk assessment or at a minimum annually
 - If not accessible, determine enhanced monitoring plan or remediation plan to access annulus
- Site Security & Safety Programs and Procedures & Training
 - Revamped as part of making the section fit both 1170/1171
 - Minor updates on requirements



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Other Changes 1170

- ESD valves **shall** be part of an ESD system
- Periodic sonar surveys **shall** be run
- Workover considerations, Operator **shall** keep records
- Section 6.3 – all casing **shall** have MTRs and be kept for life of well
- Wellhead design, new should conform to API 6A , 6D or equivalent
- Cement **should** be circulated to surface



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Other Changes 1171

- Section 6.3 – included tubing
- Revised language on connections and included table in appendix
- Added - Well conversion to Storage Service
- Added – Well, wellhead and completion schematics, should maintain
- Section 8 – updated risk management approach and performance measures
- ERP and Well Control Plan have added required items
- Removed Fences and Enclosures fire code statement
(Applause!)



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LESSONS LEARNED

- Great collaboration between industry, government and the public
- Recommend next revision needs more time
 - 2-year window was a tight fit
 - If doing a larger revision, 3 or 4 years might be needed
- Why everything can't be a **shall** statement
 - Should/Shall differences
 - Open discussion in groups promotes better understanding



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LESSONS LEARNED

- Requirements were reviewed during the revision
 - All shall/Should statements were considered
 - 2nd Edition has a few additional shall statements
- Limit comments during task group work to only edited items
 - First draft received many comments on non-edited items that we had to address
 - Task Group bogged down in this process longer than anticipated



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Please volunteer!



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THANKS!

- Anders Johnson – Kinder Morgan – Co-chair
- Andy Theodos – INGAA
- Leads for the sub-groups
- All the other participants on the task group



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Questions?