

#### PIPES Act 2020, Section 114 Inspection

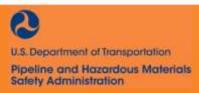
Western Regional Gas Conference (WRGC) August 23-24, 2022



Safety Administration

### Section 114, Inspection Natural Gas Emissions

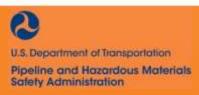
- 1. Reduction of Natural Gas Emissions from:
  - Fugitive Leaks
  - Intentional Releases from Operations, Maintenance and some Emergency Response Activities
  - Principally focused on operators who transport natural gas
  - Other operators who only use natural gas for power, controls or instruments on regulated facilities





## Section 114, Inspection Leak-Prone Pipe

- 2. Remediation or Replacement of Leak-Prone Pipe
  - Leak-Prone pipe criteria is for all operators, not just those who transport natural gas
  - Plans to address the replacement or remediation of pipelines that are known to leak based on the material, design, or past operating and maintenance history of the pipeline
  - Including, but not limited to cast iron, unprotected steel, wrought iron, and historic plastics with known issues





# Section 114, Inspection Pipeline Safety

- 3. Efforts must not erode Pipeline Safety
  - Public Safety
  - Protect the Environment





## Section 114, Inspection Scope and Timing of Inspections

- Inspections across all pipeline asset types:
  - > GT, GD, MM, UNGS, LNG, GG, HL
- PHMSA and State Partners to inspect all Operators in 2022
- Inspect to determine adequacy of Operators' programs
- Establish 5-yr Inspection cycle



U.S. Department of Transportation

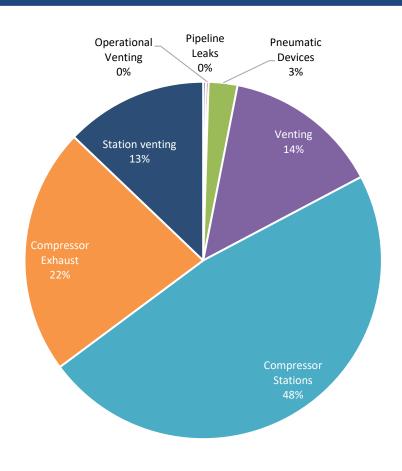
Safety Administration

Pipeline and Hazardous Materials



## Data – Gas Transmission

Source	Kt CH4 in 2018			
Pipeline Leaks	3.3			
Venting (Normal Operation)	3.0			
Pneumatic Devices	34.1			
Venting (Maintenance and Upset)	185.0			
Compressor Station Leaks	621.2			
Compressor Exhaust	291.5			
Venting (stations)	167.9			
Total	1,306.0			



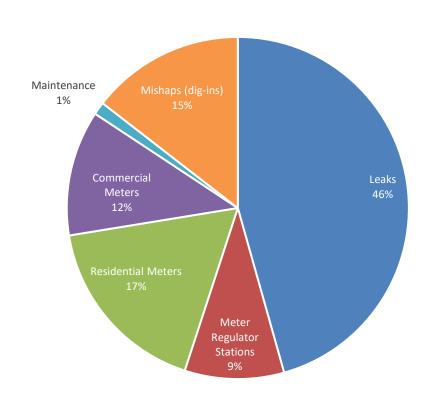
Note: 2018 emissions from the 2020 report are lower than the 2019 estimates on the previous slide,





#### Data – Gas Distribution

Source	Kt CH4 in 2018
Service/Mains leaks	215.8
Meter/Regulator stations	44.4
Residential Meters	82.3
Commercial/ Industrial Meters	56.1
Maintenance	5.7
Mishaps (dig-ins)	68.6
Net Emissions	472







## Inspection Topics for Section 114

- General
- Compressors
- Drivers & Engines
- Leaks & Releases
- Testing
- Flaring
- Regulator Stations
- Leak Mitigation & Repairs





## Pilot Inspections

	State	GT	GD	MM	UNGS	LNG	GG	HL
23-Sep	ОН						Х	
4-Oct	TX	Х			X		Х	
5-Oct	AK							Х
5-Oct	TX							Х
8-Oct	СТ	Х						
12-Oct	TX				Х			
12-Oct	UT	Х						
14-Oct	ОН		Х					
14-Oct	PA					Х		
19-Oct	FL			Х				
19-Oct	TX			Х				
20-Oct	IL		Х		Х	Х		
20-Oct	FL			Х				
25-Oct	TX	Х						





## Section 114, Program Milestones

- PIPES Act of 2020, December 2020
- Research Natural Gas Emission Sources
- Advisory Bulletin
- Develop Inspection Criteria
- Conduct Pilot Inspections
- Finalize Inspection Materials
- Inspector Training
- Inspections January 2022





#### PIPES Act of 2020 Section 114



- Following June 2021 advisory bulletin, we're working with state partners to implement plans to evaluate operator's programs by December 28, 2022
- Webinar was hosted in February 2022





#### PIPES Act of 2020 – Section 114

- The requirements apply to operators of all regulated pipeline facilities.
- By Dec 27, 2021, operators must have updated their inspection and maintenance plans to address:
- Section 114 contains self-implementing requirements for operators with respect to their inspection and maintenance plans.
- The requirements appear in the Act itself and 49 U.S.C. 60108.





#### PIPES Act of 2020 – Section 114

- Inspection and Maintenance Plan requirements in 49 U.S.C. 60108 applies to "each person owning or operating a gas pipeline facility or hazardous liquid pipeline facility.
- "Eliminating hazardous leaks and minimizing releases of natural gas from pipeline facilities"
  - Relevant to "pipeline facilities" under the Federal pipeline safety regulations—whether that facility transports natural gas or not.
  - Could apply to a hazardous liquid pipeline facility that utilizes natural gas in the pipeline facility.
- The requirement to address the replacement or remediation of leak prone facilities is also not limited to gas pipeline operators.





#### PIPES Act of 2020

Section 114(a) - (self-executing provision) requires:

 Operators to update their Operations and Maintenance Plans by 12/28/2021 to:

Address elimination of hazardous leaks and minimizing releases of natural gas from pipeline facilities.

- PHMSA and State regulators to evaluate the plans by 12/28/2022.
- GAO to audit PHMSA and State regulators efforts and report to Congress by 12/28/2023.