Pipeline and Hazardous Materials Safety Administration

Natural Gas & Hazardous Liquid Pipeline ROW Patrolling

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Operator ROW Activities

- Ground Patrol and leak surveys (walk, drive, atv, bike)
- Aerial Surveillance and Aerial Leak Surveys
- Excavation Damage Prevention
- Routine Maintenance Access:
  - Smart PIG validation digs
  - Repairs/Maintenance (reconditioning, replacement)
  - Corrosion Control (Cathodic Protection Surveys)
- Emergency Response Access
Regulatory Requirements

- **Natural Gas Pipelines:**
  - §192.705 Transmission lines: Patrolling
    - (a) continuing surveillance and take action
    - (b) The minimum frequency of patrols is:
      
      | Class | Hwy & RR Xing's                  | All other               |
      |-------|----------------------------------|-------------------------|
      | 1,2   | 7-1/2 months, 2X year            | 15 months, 1X year      |
      | 3     | 7-1/2 months, 2X year            | 7-1/2 months, 2X year   |
      | 4     | 4-1/2 months, 4X year            | 4-1/2 months, 4X year   |

- (c) Methods of patrolling include walking, driving, flying or other appropriate means of traversing the right-of-way.
Regulatory Requirements

- **Natural Gas Pipelines:**
  - § 192.706  Transmission lines: Leakage surveys.

  - Class 1 & 2 – at least each calendar year, not exceeding 15 months (leak detector equipment required if not odorized)
    - (a) Class 3 - at least 2X calendar year, not exceeding 7-1/2 months
    - (b) Class 4 - at least 2X calendar year, not exceeding 7-1/2 months
Regulatory Requirements

- **Hazardous Liquid Pipelines:**
  - §195.412 Inspection of rights-of-way and crossings under navigable waters
    - (a) inspect 26 times per year, the surface conditions on or adjacent to each pipeline. **Methods of inspection include walking, driving, flying or other appropriate means of traversing the right-of-way.**
    - (b) inspect each crossing under a navigable waterway at least every 5 years
Frequently Asked Questions

- Does PHMSA requirements for Patrolling/Surveillance of Pipeline ROW’s state the method of patrol?
  - No (waking, biking, driving, aerial, atv, etc.)

- Does PHMSA require an X feet clear cut ROW width for operations & maintenance?
  - No (contracts between landowner and Operator typically govern)

- Does PHMSA require the Operator to remove trees, shrubs, overgrowth along ROW’s?
  - No. 10 interpretations on file for §192.705 (Surveillance) §195.412 (Inspection)
Thank You!

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Backup Slides
§ 192.933 What actions must be taken to address integrity issues?

(a) General requirements. An operator must take additional measures beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area.

• An operator must base the additional measures on the threats the operator has identified to each pipeline segment.
Integrity Management (HCAs)

- § 195.452 Pipeline integrity management in high consequence areas
  - (i) What preventive and mitigative measures must an operator take to protect the high consequence area? —
    1. General requirements. An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area.
Regulatory Requirements

- Natural Gas Pipelines:
  - §192.613 Continuing Surveillance.
    - (a) Each operator shall have a procedure for continuing surveillance (class location, construction, unusual conditions)
    - (b) If a segment is determined to be in unsatisfactory condition, the operator shall initiate a program to recondition or phase out