Gathering Pipelines
A State Perspective

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Regulatory Authority

- Natural Gas Act of 1968
- USC §60101
  - Jurisdictional authority over types of pipelines
- USC §60105
  - State certification as agent of PHMSA
  - Intrastate pipelines and State granted authority
- USC §60104
  - Meet minimum federal requirements
  - States may adapt stricter rules
A Tale of Two Gathering Systems

- Small diameter low pressure pipelines from vertical or conventional wells
- Large diameter high pressure pipelines from horizontal wells
- PHMSA regulations designed to protect the public

What are the risks?
Risk Comparison
Small Diameter Pipelines

- Smaller diameters 1 – 6 inches
- Older lines, lower pressure
  - <100 psig
- Sold multiple times
  - Who is the operator
- No knowledge of
  - Location of pipelines
  - Maintenance issues - leaks
  - Materials and legacy construction issues
Risk Comparison
Large Diameter Pipelines

- Large diameter – 8 to 36”
  - Multiple wells at pad into single header
- Newer lines, higher pressures
  - 1440 psig
- Constructed without regulatory jurisdiction
  - Materials not approved in regulations
  - Inspection/testing practices
- Operator changes and sales
### How many miles?
#### West Virginia Statistics

<table>
<thead>
<tr>
<th>Active Wells</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vertical (Conventional)</td>
<td>56,833</td>
</tr>
<tr>
<td>Horizontal</td>
<td>3,150</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>59,983</strong></td>
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</tbody>
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- 1 mile per well – 60,000 miles
- 2 miles per well – 120,000 miles

2018 – 399 miles regulated gathering pipelines
NAPSR

• 2008 Resolution Gathering Line Reporting
  – Limited reporting for all gathering lines

• 2010 Resolution Gathering Line Regulations
  – Class 1 areas Operating >20% SMYS as Type A, all gathering subject to damage prevention and pipeline markers
State Challenges

- Operator name changes
- Leaks –
  - Cannot force unregulated to fix
- Exposed Pipe
- Emergency Response
- Damage prevention
  - State one call regulations
Additional Challenges

• Industry initiatives
  – API RP 1182
  – API RP80

• Categorization by size, pressure
  – Parsing pipeline into multiple segments
  – Confusion regarding requirements
  – Maintenance costs and abandonment

• States writing own stricter regulations
  – Ohio, Texas
State Wish List

- Gathering line regulations that make sense
  - Protect the public
  - Address the appropriate risk
  - Compliance that is easy to understand and implement
  - Balance between safety and other issues