

# Safe Pipelines

Know what's below

A Publication of the Pipeline Safety Trust

Summer 2014

## Come On Down to New Orleans and Join Us For The Pipeline Safety Trust's 9th Annual Conference

This year's theme is Developing Industry Awareness, which is a tongue in cheek reference to the industry's decade old efforts to develop Public Awareness as is now even required in federal pipeline safety regulations.

While we believe Public Awareness is a good thing, greater Public Involvement would be even better, so we will be examining how to "close the gap between what the industry and public want to talk about."

We believe our conference is still the only pipeline safety conference in the country that brings together significant representation from concerned citizens, state and federal regulators, and the pipeline industry. This mix of ideas, coupled with knowledgeable speakers addressing current pipeline safety issues, creates a richer conference experience that has brought back many attendees year after year.

### A few of this year's conference sessions

- Public Awareness vs. Public Involvement
- The wisdom of exporting our energy resources
- New state efforts on spill response planning
- Climate change and pipelines
- Safety Management Systems – the next big thing?
- Why clear cut rights-of-way?
- Local government efforts to increase pipeline safety
- New pipeline siting and construction - Who's in charge?
- They do it different in Canada - Real public involvement?
- Fines or no fines – Differing state enforcement strategies.

This year the conference will be held November 20th and 21st at Royal Sonesta Hotel, bordering Bourbon Street, right in the heart of the historic French Quarter. While the conference sessions are wonderfully educational, many attendees report that the best part of the conference is the opportunity to interact informally with different stakeholder groups during the conference reception, while out to eat some wonderful New Orleans food, or at the annual late evening pilgrimage to the Café Du Monde for a plate of beignets.

### We Need Your Help!

What makes our conference special are the ideas from, and interactions with, concerned and affected citizens. We have lots of people who would like to attend, but most of these people cannot afford to take time off work and spend \$1000 out-of-pocket for travel expenses to attend the conference.

We need to raise money to help pay for travel expenses so concerned citizens can attend. If you agree with us that public education and involvement is important please make a donation to our travel fund on your registration form or directly at <http://pstrust.org/donate>



You can learn more about this years conference, or register online, on our website at - <http://pstrust.org/no2014>.

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## Mission of the Trust

The Pipeline Safety Trust promotes fuel transportation safety through education and advocacy, by increasing access to information, and by building partnerships with residents, safety advocates, government, and industry, that result in safer communities and a healthier environment.

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## New Hampshire Undertakes Spill Response Rulemaking

In April, the New Hampshire legislature adopted and the Governor is expected to sign SB 325, authorizing the Department of Environmental Services to require that operators of hazardous liquid pipelines provide the department with a response plan meeting requirements the state will soon be putting in place. The bill was championed by the New Hampshire Audubon Society, enjoyed bi-partisan support, and the Trust was pleased to be able to provide written testimony in support of the bill.



The bill was prompted by concerns that the state’s only hazardous liquid line, the Portland Pipeline crossing the state between Portland, Maine and Montreal, may soon be transporting diluted bitumen. The legislature determined that the state should assume responsibility for ensuring that the operator and response agencies are fully prepared to deal with a spill from the line, regardless of its contents.

The Oil Pollution Act of 1990, adopted by Congress after the Exxon Valdez spill, requires pipeline operators along with vessel owners and facility operators to prepare spill response plans in case of a spill. That law specifically provides that it does not preempt the ability of states and local governments to also require response plans. Several states now require pipelines to have spill response plans approved by the state, and others are considering it. ■

## News from the Commonwealth of Pennsylvania

A few weeks ago, we noticed a news article (<https://groups.yahoo.com/neo/groups/safepipelines/conversations/messages/25212>) from the Pittsburgh Post-Gazette describing the rift between PA One Call and the State PUC on the one hand, and the Pennsylvania Independent Oil and Gas Association (PIOGA) on the other. The issue? Whether or not the thousands of miles of unregulated gathering lines in Pennsylvania should remain exempt from being part of the one-call utility location system. That’s right, all of those unregulated lines, increasing by thousands of miles a year, are currently exempt from participating in the one-call system. That means that when a responsible excavator calls 811 before digging a foundation, or doing road work or fixing drain tile or pulling tree stumps, the locator won’t know to look for buried gathering lines that are exempt from registering with 811. The lines are also exempt from all construction and design regulations, so they may not be buried as deep as regulated lines.

Apparently, Kevin Moody, the Vice President of PIOGA, has accused PA One Call and the Pennsylvania regulators of misleading legislators and the public about the dangers involved. There is no catalog of incidents involving these gathering lines, a fact Mr. Moody points to as evidence that there is no risk. However, there is no catalog because the lines are exempt from regulations requiring such incidents to be reported, so no reliable catalog can be created.

The issue highlights one of the differences between the two sets of oil and gas gathering pipelines in Pennsylvania: the conventional operators, whose lines are typically quite small and operated at low pressure; and the shale gas operators, whose lines are typically much larger and higher pressure. Some of the shale gas operators, many of whom are represented by the Marcellus Shale Coalition, voluntarily register with PA One Call and pay the membership fees.

The issue is being taken up by the legislature but the bill has not been up for a vote. The PUC is concerned that the presence of any exemptions in the law will jeopardize its federal pipeline funding. In 2011, Congress conditioned eligibility for state one-call grants on the elimination of exemptions for state and local governments and their contractors from participating in the 811 programs. ■

# Cast Iron Pipes: Are Replacement Programs Fast Enough?

## Gas Explosion Kills 8, Injures Scores, Levels 2 Harlem buildings



Firefighters try to extinguish the fire as smoke bellows from the site of an explosion caused by a gas leak in Harlem, New York. (Adnan Islam, Reuters, top; John Minchillo, AP)

On March 12, 2014, two five-story buildings were destroyed by a gas explosion in Manhattan, New York. Eight individuals were killed in the morning explosion, 48 were injured and many were left without homes. The National Transportation Safety Board launched a 'Go Team' to investigate the explosion on the likelihood that it was caused by a gas pipeline failure. The neighborhood is served by a cast iron gas main installed in 1887 and operated by Consolidated Edison. Monitoring tests completed shortly after the explosion showed high levels of gas concentration in the ground, strongly suggestive of a leak somewhere in the system. Leaks were located in the 8-inch cast iron main and additional tests are ongoing on the service pipes of the two buildings. The Board has thus far issued only a preliminary report on the accident.

Since 1991, the NTSB has been recommending that PHMSA (or its predecessor) accelerate the speed with which operators were replacing cast iron mains. Cast iron distribution mains are known to become brittle with age and their failure causes more incidents than other kinds of pipe, and more frequently cause injuries or fatalities. Two

cast iron failures in Pennsylvania in 2011 (Allentown and Philadelphia) killed 6 people and did tremendous damage to two neighborhoods. PHMSA issued an Advisory Bulletin following these two incidents urging operators to accelerate their



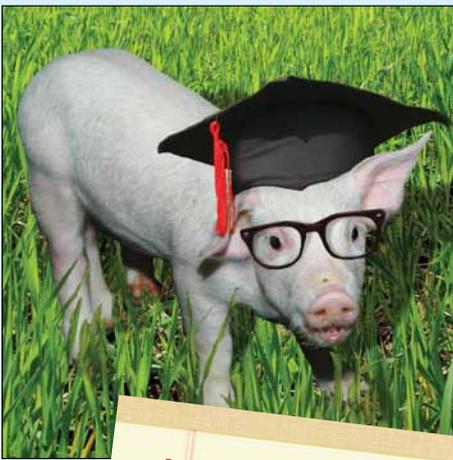
Old cast iron gas pipes being replaced in New York. (James Keivom, New York Daily News)

pipeline replacement programs to take cast iron pipes out of service. Also in 2011, Congress included in the reauthorization bill a requirement that PHMSA maintain an inventory of cast iron pipe mileage and report to Congress on the progress of replacement. That inventory, by state and by operator, can be found through links on this page: [http://opsweb.phmsa.dot.gov/pipeline\\_replacement/cast\\_iron\\_inventory.asp](http://opsweb.phmsa.dot.gov/pipeline_replacement/cast_iron_inventory.asp).

Distribution companies typically budget their replacement programs based on their periodic rate cases before state regulators, allowing them to either recoup the cost of the replacements through regular rates or through a surcharge. Many states, particularly those with the oldest service mains, face significant challenges in allowing rates that are high enough to pay the costs of line replacement while maintaining affordable utility services. The National Association of State Pipeline Safety Representatives (NAPSR) has recently taken a position on pipeline replacement mechanisms, advocating use of the Washington Utilities and Transportation Commission [Policy Related to Replacing Pipeline Facilities with an Elevated Risk of Failure](#). ■



Emergency crews responding to the Feb. 9, 2011 explosion in the area of 13th and Allen streets in Allentown. (Chris Post, Times File Photo)



# The Smart Pig

[smartpig@pstrust.org](mailto:smartpig@pstrust.org)

**In pipeline parlance**, a smart pig is a high-tech device designed to root around inside pipelines. These intelligent little beasts inspect every square inch of the line, calling attention to any needed repairs.

I try to do the same thing for our readers. Send me a question and I'll root through the labyrinth of modern pipeline prevarications to get you the best answer piggily possible: the straight scoop, as we say back in the sty.

*Editor's Note: The views and opinions expressed by this pig do not necessarily reflect those of the Pipeline Safety Trust or any human being.*

Dear Smart Pig:

Can a pipeline operator come in and clear all the trees off the part of my yard where they have an easement? They are telling me and my neighbors that the federal regulations require the right of way to be clear of all trees. Is that true?

Sincerely,

Tree Hugger

Dear Hugger:

It won't come as a big surprise to you that disputes over trees in pipeline rights of way (ROW) are very common. Why are they common? Well, there are a bunch of competing interests involved:

- Most landowners don't want their trees cut down.
- Pipeline operators want to inspect their lines the cheapest way they can, which is by flying an airplane over it every few weeks. The trees make it difficult for the pilot to see the entire right of way (yes, frequently the person flying the plane at low altitude is also the person who's supposed to be looking out for pipeline problems and construction or excavation in the right of way, and keeping track of the location of any problems).
- Depending on the size, age and type of tree, the soils, the climate, the kind of coating, and the relative location of the tree and the pipe, sometimes tree roots can harm the coating on pipes and sometimes, they can damage the pipe itself.

- Operators need ready access to the right of way for equipment in case of an emergency, or for repairs or maintenance; however, this would rarely require removal of every tree in the right of way - just those necessary for clear access to the pipe.
- The documents governing the legal relationship between the operator and the landowner (easements, crossing permits, rights of way, and the like) are often not uniform, and frequently are not clear about the operator's right to remove trees, or under what circumstances they must pay landowners for their value.
- Some local governments have laws restricting the removal of trees for reasons as diverse as air quality, landscaping aesthetics, cooling effects, historic preservation, etc.

Because the legalities between the operator and the landowner are unclear (or, in some cases, in spite of the fact that they are clear), some operators try to change the discussion from one about acquiring the rights to clear the ROW, claiming they have no choice, as they did with you and your neighbors, by blaming "The Federal Regulations." That apparently works to convince many landowners that they have no options, and it allows the operator to do what it wants (clear the ROW) without doing what it wants to avoid (acquiring the right to do so or to pay the value of the removed trees or for any change in the value of the property).

There are many examples in the news where companies have tried to blame the regulations for tree clearing. Here are a few:

- "Enbridge regrets trees have to come down, but is clearing the land for safety reasons and **to comply with federal regulations** and industry best practices, Smith said. The company is required to fly a helicopter over the pipeline 26 times a year to make sure there are no encroachments that could slow down response times in the event of an emergency." Jennifer Smith, Enbridge, quoted in [nwitimes.com](http://www.nwitimes.com/business/local/enbridge-building-new-pipeline-clearing-land-around-current-one/article_42c556d2-a0f3-545b-a5f0-f5b12cc0340c.html). [http://www.nwitimes.com/business/local/enbridge-building-new-pipeline-clearing-land-around-current-one/article\\_42c556d2-a0f3-545b-a5f0-f5b12cc0340c.html](http://www.nwitimes.com/business/local/enbridge-building-new-pipeline-clearing-land-around-current-one/article_42c556d2-a0f3-545b-a5f0-f5b12cc0340c.html).

- “Piedmont Natural Gas understands residents’ concerns about plans to remove encroachments that were previously allowed within our pipeline rights of way. However, **new federal regulations designed with the safety of the entire community in mind have made it necessary** for Piedmont to adopt a policy requiring clearance of all rights of way along our pipeline system.

And perhaps the most brazen, citing the wrong agency, a non-existent rule, and giving bonus bogus legal advice:

- A Wolverine contract right of way agent said the Federal Energy Regulatory Commission will fine a company that doesn’t clear the right-of-way. While the term recommendation is used, **it is a requirement**, he said. Meyer said residents could appeal to the FERC but others have tried so “don’t waste your time.” Quoted in the Holland Sentinel, <http://www.hollandsentinel.com/news/x1031161868/Loss-of-trees-in-Park-Township-upsets-residents>.

That’s enough. Stop, or I’ll start squealing like a...Oh.

The federal regulations do NOT require the removal of all trees from rights of way. They do NOT require that the mandatory ROW inspections be done by air. And the federal regulations CANNOT change the content of an easement - the contract between the operator and the landowner - without triggering the need for the operator or the government to pay the landowner for whatever property right might be affected by the change. Either the easement gives the operator the right to remove some or all trees, with or without conditions, or it doesn’t. If it doesn’t, and the operator wants to remove trees, then the operator needs to negotiate with the landowner to acquire that right.

There is currently some research underway to try to quantify the risk to pipes, and that may shed some light on these disputes. I’ve included some links to news coverage about that study and other related issues.

### PG&E Partners in Research to Determine How Tree Roots Impact Pipelines

<http://www.pgecurrents.com/2013/12/20/video-pge-partners-in-research-to-determine-how-tree-roots-impact-pipelines/>

### Root of the Problem: When trees invade pipelines in the right of way

[http://www.irwaonline.org/eweb/upload/web\\_may\\_11\\_RootProblem.pdf](http://www.irwaonline.org/eweb/upload/web_may_11_RootProblem.pdf)

### Will Tree Roots Damage Gas Lines?

<http://homeguides.sfgate.com/tree-roots-damage-gas-lines-66393.html>

### Tree roots don’t threaten pipelines, arborist says

[http://trib.com/news/local/tree-roots-don-t-threaten-pipelines-arborist-says/article\\_c1fd98fc-87dd-517b-96c9-ed5d64f64587.html](http://trib.com/news/local/tree-roots-don-t-threaten-pipelines-arborist-says/article_c1fd98fc-87dd-517b-96c9-ed5d64f64587.html)



## PHMSA Announces Second Phase Study on Transporting Dilbit by Pipeline

In the 2011 reauthorization bill, Congress directed PHMSA to undertake two tasks relating to the transportation of diluted bitumen (dilbit) to determine whether new rules or legislation might be needed:

1. A comprehensive review of hazardous liquid pipeline regulations to determine whether existing regulations are sufficient to regulate pipelines that carry dilbit; and
2. As part of that review, undertake an analysis of whether any increase in the risk of release exists for pipeline facilities carrying dilbit.

PHMSA held a public meeting, asked for comment on the scope of the initial study, and contracted with the National Academy of Science with a very narrow scope of work: using existing literature and data only, “analyze whether shipments of diluted bitumen have a greater likelihood of release from pipelines than shipments of other crude oils.” The report of the committee was published in July of 2013, concluding that “[t]he committee’s comprehensive review did not find evidence of any specific aspect of the transportation of diluted bitumen that would make it more likely than other crude oils to cause pipeline releases.” In spite of many concerns that the study completed by the NAS was only part of what Congress had directed PHMSA to do, PHMSA declared on its website that the work on this aspect of its obligations under the 2011 act was “completed.”

The Trust pointed out at the time that no comprehensive review of the liquid regulations had been completed, and neither had any investigation into whether the consequences of a dilbit spill were sufficiently different from spills of other hazardous liquids to require regulatory improvements.

To its credit, the NAS report itself pointed out that “[d]etermination of the risk of a pipeline release requires an assessment of both the likelihood and the consequences of a release.” (Executive Summary, emphasis added). But PHMSA insisted it was done studying dilbit.... until...

In late May, the PHMSA Administrator announced as part of her testimony at a House subcommittee hearing on implementation of the 2011 Act: “As a part of our 2014 budget, there was a requirement that we do a further study to evaluate whether dilbit spills are more risky than spills of other crudes,” said PHMSA Administrator Cynthia Quarterman. “We are in the process of finalizing a contract with the National Academy of Sciences to do that study.”

We have been trying to find out more: What is the source of this new “requirement”? It doesn’t show up in the omnibus appropriations bill or the Administration’s budget request, as far as we can see. So where did it come from? What will the scope of this second phase be? Health effects? Clean up methods for land and water spills and their efficacy? Will PHMSA or NAS ask for input on the questions to study or the scope of the investigation? Will the Academy do new research or be limited to existing literature again? And will PHMSA now complete a comprehensive review of hazardous liquid pipeline regulations, as required in the 2011 Act, to determine if new regulations for transportation of dilbit are warranted?

Stay tuned.



# Inspector General Finds PHMSA Oversight of State Programs Lacking



Aerial View of San Bruno Fire (<http://www.forbes.com/sites/williampentland/2014/02/23/is-californias-largest-utility-too-big-to-jail/>)

## Background

As many readers of this newsletter will know, state pipeline safety programs perform the bulk of all inspections of pipeline operations, enforce violations of safety standards on intrastate transmission and distribution lines, and some states inspect interstate lines within their boundaries. These state programs self-certify to PHMSA that they are capable of these tasks, and PHMSA audits them periodically to ensure that they are performing their responsibilities properly.

When the NTSB investigated the September 2010 PG&E natural gas transmission pipeline explosion in San Bruno, California, it noted that in spite of two integrity management audits - one in 2005 by CPUC with PHMSA's assistance and a second one in 2010 by CPUC alone, none of the deficiencies identified in the accident investigation had been identified in the inspections, and the deficiencies in the inspections had not been identified by PHMSA's review of CPUC, which received superior and outstanding scores from PHMSA for the several years before the tragedy. The problems at PG&E were not trifling shortcomings. As a quick reminder, the NTSB identified several major weaknesses in the PG&E integrity management program:

In summary, the PG&E gas transmission integrity management program (1) was based on a GIS that did not contain, and PG&E did not require it to contain, complete and accurate pipeline information; (2) significantly understated the threats due to external corrosion and design and manufacturing, and overstated the threats due to third-party damage and ground movement; (3) did not consider known longitudinal seam cracks in Line 132 dating to the 1948 construction and at least one longitudinal seam leak in a DSAW weld [double submerged arc weld] in its identification and assessment procedures; (4) allowed PG&E to choose an inappropriate assessment method for Line 132 that was inadequate to detect seam defects, such as the weld defect in the accident segment that led to the rupture; (5) considered known manufacturing- and construction-related defects on Line 132 to be stable even though the pipeline had not been pressure tested to at least 1.25 times its MAOP; and (6) included self-assessments that were superficial and resulted in no improvements to the integrity management program. Therefore, the NTSB concludes that the PG&E gas transmission integrity management program was deficient and ineffective.<sup>1</sup>

It further found that PG&E practices were inadequate because:

- The accident pipe segment did not meet any known pipeline specifications.
- Construction and quality control measures for the 1956 relocation project were inadequate in that they did not identify visible defects.
- The integrity management program, including self-assessment of that program, was ineffective.
- Emergency response to the pipeline rupture was slow, and isolation and shutdown of gas flow were unacceptably delayed.
- The postaccident drug and alcohol testing program had multiple deficiencies.
- SCADA [Supervisory Control and Data Acquisition] staff roles and duties were poorly defined.
- SCADA work clearance procedures were inadequate.
- Critical components at the Milpitas Terminal were susceptible to single-point failures.
- The public awareness program, including self-assessment, was deficient and ineffective.<sup>2</sup>

Among a host of other recommendations following its investigation, the NTSB recommended that the Secretary of the Department of Transportation conduct an audit of the effectiveness of PHMSA's oversight of performance based safety programs. More than two years after it was commenced, that audit was released by the Office of the Inspector General in May.

## The OIG report

The Office of Inspector General assessed PHMSA's policies and procedures for managing its State Pipeline Safety Program and its oversight of state programs. In short, the OIG found, among other things:

- PHMSA's guidelines, policies, and procedures for state pipeline safety programs lack elements to ensure State inspections cover all federal requirements, and that operators maintain safety standards.

<sup>1</sup> National Transportation Safety Board. 2011. Pacific Gas and Electric Company Natural Gas Transmission Pipeline Rupture and Fire, San Bruno, California, September 9, 2010. Pipeline Accident Report NTSB/PAR-11/01. Washington, DC, at p. 114. <http://www.nts.gov/doclib/reports/2011/PAR1101.pdf>

<sup>2</sup> NTSB San Bruno report at p.116.

- Staffing formulas and communication of new expectations are inadequate and inspection guidelines do not detail how state programs should integrate risk factors into their audit prioritization.
- PHMSA's oversight is not sufficient to ensure states comply with evaluation requirements, resulting in undisclosed safety weaknesses in state programs.
- PHMSA's assessments of state programs are not accurate.

The OIG report (<http://www.oig.dot.gov/library-item/6514>) concludes with a series of recommendations for improving how PHMSA oversees the state programs. What is notable about the list of recommendations is that they are so common sense that it leads one to wonder what PHMSA had done in its oversight role before. The recommendations include things like (these are paraphrased):

- Revise the staffing formula to take into account risk base and non-standard inspections, and check occasionally to see if the staffing levels continue to make sense;
- Include lead inspectors' minimum training requirements in state guidelines;
- Set up a system to tell the states when new federal inspection forms are available;

- Train PHMSA evaluators so that they can determine whether states have complied with all program evaluation requirements and accurately notify states of non-compliance with state program evaluation requirements.
- Develop a procedure to review the adequacy of inspection procedures as part of the annual evaluation by PHMSA of state programs.

Following the San Bruno explosion, the City of San Francisco had its own questions and concerns about PHMSA's oversight of the California regulator and the process that PHMSA used to accept state self-certifications. San Francisco brought suit under the Pipeline Safety Act challenging PHMSA's actions. A federal district court ruled against the City not on the merits of its claim, but by finding that the Act did not provide for a right of action against PHMSA for injunctive relief. The City has appealed, and the Pipeline Safety Trust has joined the City as amicus curiae on the issue of whether the Act allows for injunctive relief against PHMSA. The case is briefed and awaiting argument at the 9th Circuit Court of Appeals. Many of the improvements in PHMSA's process initially sought by the City have now been made recommendations of the OIG, and PHMSA has indicated to the OIG it will undertake several of them. ■

## State Enforcement of Pipeline Safety – Is There a Problem?

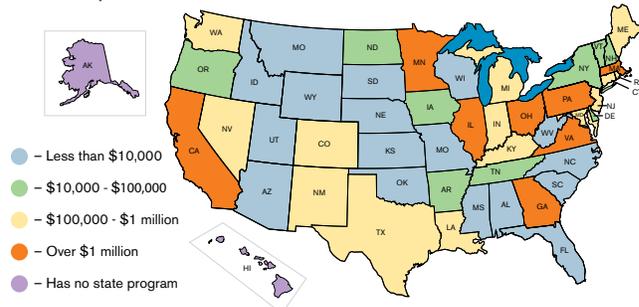
After the 2010 San Bruno tragedy the National Transportation Safety Board (NTSB) was concerned with the way that PHMSA provides oversight to state pipeline safety programs. This is especially important since state pipeline inspectors make up the majority of personnel out inspecting pipelines in this country. The NTSB made a series of recommendations to both the Secretary of Transportation and PHMSA asking for an audit of how PHMSA oversees state programs that they provide a good deal of the funding for. They also recommended that PHMSA:

*“Work with state public utility commissions to (1) implement oversight programs that employ meaningful metrics to assess the effectiveness of their oversight programs and make those metrics available in a centralized database, and (2) identify and then correct deficiencies in those programs.”*

PHMSA told the NTSB in August of 2013 that they are working with the National Association of Pipeline Safety Representatives (the state regulators) to develop these effectiveness measures. To date, we have not seen any meaningful metrics released by PHMSA, although they have made a good deal of state enforcement data available on their website. You can find it at: <http://primis.phmsa.dot.gov/comm/states.htm>

Looking at the state enforcement data that PHMSA has provided the Pipeline Safety Trust tried to create our own measurable metrics to judge state enforcement efforts. We looked at each state's number of incidents per mile of gas main and service line. We looked at how many probable violations were found per mile of pipe in each state, and how many fines were assessed compared to the number of violations found. We spent a good deal of time crunching individual numbers from all 50 states (except Alaska and Hawaii who don't pay any attention to any of this) and in the end there

State Pipeline Enforcement Fines – Natural Gas – 2009 – 2013



were so many problems with the data from PHMSA, and so little consistency with how individual states were reporting things, that no real conclusion could be reached.

But our review did raise some interesting questions that we hope PHMSA and the states will address at some point. For instance, we found that there are eleven states (Alabama, Arizona, Florida, Idaho, Mississippi, Missouri, Montana, Nebraska, South Carolina, Wisconsin, Wyoming) that in the past five years have found over 9,200 probable violations of the rules, but have not issued one fine. How do they justify that? Does their state patrol have the same enforcement strategy for speeders? We have no idea, but hope to find out.

On the other hand, during that same five year period there were eight states (California, Georgia, Illinois, Ohio, Massachusetts, Minnesota, Pennsylvania, Virginia) that had all fined companies over \$1 million. Were pipelines in those states safer? We could not see any real discernable difference between the numbers of incidents per mile of pipeline in those states compared to the states that had not fined anyone.

So what does this tell us? Well, it's complicated so stay tuned to see what PHMSA and the states come up with. There will be a session discussing some of this at our conference in November. ■

# Pipeline Safety

TRUST

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## The Trust Welcomes Two New Board Members

The Trust is pleased to announce two people have joined our board of directors recently: Jeff Insko and Paul Blackburn. They both bring expertise, experience and a passion for advocacy on behalf of those affected by pipelines.



**Jeffrey Insko** is a Michigan landowner with a pipeline easement on his property. He writes and maintains the Line 6B Citizens' Blog (<http://grangehallpress.com/Enbridgeblog/>), a resource for Michigan residents affected by the Line 6B replacement project and other pipeline operator-landowner issues. After he and his wife Katy Bodenmiller negotiated with Enbridge for the use of their own property, they became active with pipeline safety and right of way issues. They recognized a lack of public awareness, regulatory oversight, and knowledge and communication among affected residents, and have since sought to inform property owners and encourage greater scrutiny of the project and others like it. Jeff holds a PhD in English from the University of Massachusetts, Amherst and is an Associate Professor of American Literature at Oakland University in Rochester, Michigan.



**Paul Blackburn** is an energy and environmental law attorney based in Minneapolis. He provides legal and consulting services on pipeline, electric utility, and mining matters. He represented nonprofit clients in the South Dakota Public Utilities Commission hearing on the Keystone XL Pipeline, and in the Minnesota Public Utilities Commission hearing on expansion of Line 67, an Enbridge pipeline. He has provided policy analysis and strategic advice on a variety of pipeline matters and authored reports on pipeline safety and oil spill response. Paul started his legal career in Washington, DC, at the law firm of Van Ness Feldman. After leaving private practice, he worked for a number of non-profit organizations, including the Sierra Club, the National Environmental Trust, and Oceana. He also has experience in community wind energy development, both as a senior policy analyst for Windustry and as the Executive Director of the Community- Based Energy Development Initiative. Paul holds a B.A. in Biology from Macalester College and a J.D. from Boston College Law School.

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## 2014 Annual Pipeline Safety Trust Conference

**Mark your calendars now and plan to join us!**

November 20th & 21st, 2014 at the Royal Sonesta Hotel, New Orleans

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