



U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration



# **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





# Integrity Management (HCAs)

- § 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