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Docket No PHMSA -2017-0151
Class Location Change Requirements

Comments of the Pipeline Safety Trust

On July 31, 2018 PHMSA published the Advanced Notice of Proposed Rulemaking (ANPRM) in the Federal Register entitled "Pipeline Safety: Class Location Change Requirements". Docket No. PHMSA – 2017-0151, RIN 2137-AF29, which outlines proposed revisions to the class location requirements in the existing rule in Part 192. In the ANPRM, PHMSA requested response to a series of questions, all trying to determine under what conditions and with what alternative management criteria might an operator be permitted to leave pipe segments in the ground when they would currently be required to be replaced, have their operating pressure reduced or seek a special permit waiving the application of the replacement requirement.

We have recently read the comments submitted on this docket by the National Association of Pipeline Safety Representatives, and concur with their comments on questions 1-6. It is imperative that the design requirements for higher population areas remain in place, only being waived by special permits when PHMSA finds that the alternative presented by the operator provides an equal or higher level of safety. We further qualify that to suggest that PHMSA should not issue any special permits waiving design criteria on pipes that are not capable of being tested by in line equipment, or for which the operators do not have complete, accurate and verifiable records for the characteristics of their pipelines.

The Trust feels strongly that no rulemaking should be undertaken to remove or provide alternatives to the current special permit process for class location changes until the gas safety rule, now in the works for 7 years, is complete and the "IVP" process for identifying and verifying operator system records is in place and shown to be working to improve operator assessments of their systems. At least until that records and strength testing issue is resolved, PHMSA should retain the existing special permit application process and NEPA review to insure that there is a review of the characteristics of pipe being proposed to be left in the ground and that the public has notice of those times when an operator is seeking to be exempted from strength or testing regulations. The

current rules provide operators options other than pipe replacement, while assuring that pipe that stays in the ground is of known strength and that the public is made aware of proposed exemptions.

We appreciate the opportunity to comment on this proposal.