Integrity Verification Process Workshop
Sponsored by PHMSA
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One Public Perspective
Presented by Carl Weimer, Executive Director
Data shows risk exists!

- Complete Records not reported for 264,935 miles (86.3% total GT) outside of HCA in Classes 1 and 2 (unclear to us if this was asked for – not part of congressional mandate)

- Records Incomplete for 5,402 miles – 12.0% of remaining miles in Classes 3 and 4 and any other HCA

- Thousands of people live within PIRs in Class 1 and 2 areas outside of HCAs
Surprised this is needed

The public had assumed that Integrity Management Planning had already dealt with this issue.

How can an operator have a plan to assess the risks to their pipe, if they don’t know what pipe they have in the ground?

Why did it take a San Bruno size tragedy to find this fatal flaw in integrity management?
Why the Delay? This was supposed to be done in July.

“§ 60139. Maximum allowable operating pressure

“(d) TESTING REGULATIONS.—

“(1) IN GENERAL.—Not later than 18 months after the date of enactment of this section, the Secretary shall issue regulations for conducting tests to confirm the material strength of previously untested natural gas transmission pipelines located in high-consequence areas and operating at a pressure greater than 30 percent of specified minimum yield strength.
We support this part of the PHMSA proposal. It is clear in 192.619 that it is the “lowest” of 192.619 (a) (1) – (4) so if you have no record for even one of those then you don’t know what the lowest MAOP might be
Creation of a Moderate Consequence Area

We support the creation of a Moderate Consequence Areas. It will go a long way toward helping the expansion of Integrity Management requirements outside of current HCAs as we and many industry groups have endorsed.

In Class 1 areas we support using 1 house/site in a PIR for inclusion in a MCA

*Moderate Consequence Area (MCA)* means non-HCA pipe in Class 4, 3, 2, locations & Class 1 locations with [TBD] houses/sites in PIR.
Concerns with giving low stress pipelines a pass

We have some concerns with giving low stress pipelines a pass for two reasons:

• There is evidence that some low stress pipelines do rupture. We suspect most all of these problems will be caught in the Legacy Pipe and Legacy Construction sections, but are not sure of that.

• It is unclear to us how large a problem leaks from these low stress pipelines are. With methane being more potent than carbon dioxide in affecting climate change, the environment along with human safety should be considered.
Material Sampling Protocol

It is not clear to us what the protocol for sampling pipe will be to ensure that there are enough samples taken to ensure that the material properties of all segments are known. This should be spelled out in the final program.
Unconvinced on ECA Option

Since the specific guidelines have yet to be developed we remain unconvinced that this ECA approach will meet the Congressional mandate of “equal or greater effectiveness” to a pressure test for determining MAOP.
Concerns with too much operator flexibility

Assessment and Analysis to Establish Material Condition of Pipeline and MAOP, commensurate with segment-specific issues and documentation shortcomings. Assessment could include, as appropriate specific assessments such as:

- ILI Program
- CIS
- Coating Survey
- Interference Survey
- Engineering Critical Assessment

Based on Results Take Appropriate Action to Establish MAOP

The appropriate actions to be taken in Step 19 need to be clearly prescribed
Still much to do

Develop Specific Guidelines

TBD
Our Preferred IVP

MAOP Est. by Grandfather clause

Yes

Derate pipe until one of the following is completed

No

Continue to follow PHMSA steps 2-8

Is segment in either HCA or MCA?

Yes

Perform Subpart J Pressure test and spike as per NTSB P-11-14, or Replace pipe

No

Follow Schedule (TBD) for one of the following

Continue to operate and maintain as per Part 192
Thank You!

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