



## NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES RESOLUTION

**Central Region  
State of Kansas  
Resolution 2010-2 AC-2**

**Action Category 2**

### **URGING PHMSA TO ESTABLISH REGULATORY REQUIREMENTS FOR GAS GATHERING LINES IN CLASS 1 AREAS**

**WHEREAS:** Congress has recognized that some rural gas gathering lines might present unacceptable risks and authorized DOT to regulate gathering lines whose risk warranted regulation;

**WHEREAS:** PHMSA amended its regulations in March of 2006 that regulated certain gas gathering pipelines located in no-rural areas and excluded all gas gathering located in Class 1, (rural), areas from regulation;

**WHEREAS:** In the preamble to the final rule for gas gathering, PHMSA stated its belief that the potential for harm of some onshore gathering lines is too low to warrant DOT regulation because these lines generally have small diameters and operate at low pressures in remote or secluded areas;

**WHEREAS:** There are approximately 230,000 miles of rural, (located in Class 1 areas), gas gathering lines that are not regulated by PHMSA;

**WHEREAS:** With the advent of new production technologies, there has been rapid development of gas production from shale formations such as the Barnett, Marcellus, and Bakken that have resulted in a significant amount of new gas gathering systems being built; and

**WHEREAS:** In the newer gas gathering systems, it is not uncommon to find rural gas gathering pipelines up to 30" in diameter and operating at a MAOP of 1480 psi.

**NOW THEREFORE BE IT RESOLVED:** That NAPSR urge PHMSA to modify 49 CFR Sections 192.8 and 192.9 to establish regulatory requirements for gathering lines in Class 1 areas:

1. Operating above 20% SMYS to be regulated as Type A gathering lines; and
2. To be subject to 49 CFR Part 192.614 and 192.707 in order to minimize damage from 3<sup>rd</sup> party excavation.

Adopted September 30, 2010 by vote of the Board of Directors