

NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES

RESOLUTION

National Board Resolution 2013-2-AC1 Action Category <u>1</u>

ENCOURAGING PHMSA TO ADOPT ADDITIONAL REGULATIONS RELATIVE TO "FARM TAPS"

WHEREAS, the mission of National Association of Pipeline Safety Representatives ("NAPSR") includes strengthening pipeline safety programs through the promotion of improved pipeline safety standards; and

WHEREAS, "Farm Taps" are distribution service lines per 49 CFR § 192.3; and

WHEREAS, during the Distribution Integrity Management Program ("DIMP") rulemaking, little consideration was given to the potential impact, or appropriateness, of subjecting "Farm Taps" to DIMP; and

WHEREAS, NAPSR agrees with PHMSA that these "Farm Taps" are usually located in rural areas and generally should pose a lower risk in regard to threat mitigation under DIMP; and

WHEREAS, currently the regulator and relief equipment associated with "Farm Taps" are not subject to any inspection or testing requirements to ensure that such pressure regulating or overpressure devices are in good mechanical condition, adequate from the standpoint of capacity and reliability of operation for the service in which it is employed, set to control or relieve at the correct pressures, and properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

NOW THEREFORE BE IT RESOLVED: That NAPSR encourages PHMSA to:

- 1. Amend the applicable Part 192 sections to exempt those pipelines commonly referred to as "Farm Taps" from the requirements of Subpart P, Gas Distribution Pipeline Integrity Management; and
- 2. Amend Part 192 to include periodic inspection requirements in a new section covering "pressure regulating and over-pressure-relief equipment" on a pipeline that originates from a transmission, gathering, or production pipeline that serves a service line.