

UNITED STATES DEPARTMENT OF TRANSPORTATION

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PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION

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GAS PIPELINE ADVISORY COMMITTEE

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TUESDAY
MARCH 27, 2018

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The Gas Pipeline Advisory Committee met in the Ballroom of the Hilton Arlington, 950 North Stafford Street, Arlington, Virginia, at 8:30 a.m., David Danner, Chair, presiding.

PRESENT

DAVID W. DANNER, Chair
W. JONATHAN AIREY, Member
STEPHEN E. ALLEN, Member
RONALD A. BRADLEY, Member
DIANE BURMAN, Member (via teleconference)
J. ANDREW DRAKE, Member
SARA ROLLET GOSMAN, Member
ROBERT W. HILL, Member
SARA W. LONGAN, Member
TERRY L. TURPIN, Member

RICHARD H. WORSINGER, Member

ALSO PRESENT

JOHN GALE, Director, Standards and Rulemaking

ROBERT JAGGER, Transportation Specialist

**ALAN MAYBERRY, Associate Administrator for
Pipeline Safety**

CHRIS McLAREN, Program Manager

STEVE NANNEY, Program Manager

SAYLER PALABRICA, Transportation Specialist

DRUE PEARCE, Deputy Administrator

CHERYL WHETSEL, Advisory Committee Manager

1 P-R-O-C-E-E-D-I-N-G-S

2 8:37 a.m.

3 MR. DANNER: All right, good morning.

4 I would like to call the second day of this Gas
5 Pipeline Advisory Committee meeting to order.

6 And today is March 27th, Tuesday, 2018.

7 Again, this meeting is being recorded
8 and a transcript is being produced so I ask that
9 everybody speak into the microphone so that it
10 can be picked up. The transcript and
11 presentations will be available on the PHMSA
12 website, this is meeting 132, and on the eGov
13 docket at www.regulations.gov. And again, the
14 docket number for this meeting is PHMSA 2-0-1-6,
15 2016-0136.

16 So with that -- I don't know if we
17 need to take roll today; I don't think so -- I'm
18 going to hand it over to Alan and we can continue
19 the discussion from last evening.

20 Alan.

21 MR. MAYBERRY: Thanks, Mr. Chairman.

22 Just real quickly, two to go over.

1 Quick safety briefing, since I believe
2 we might have some newcomers here. If we
3 evacuate the building, to my right you see the
4 exit signs on the doors there. Go into that
5 service area there and turn right or left and go
6 down the corridors and you'll get to the outside
7 downstairs.

8 If you go to my left, you'll end up
9 going down the stairs to the lobby area to get
10 out -- downstairs, turn left to get outside that
11 way.

12 Don't try to go through the double
13 doors. There's some construction work going on
14 there.

15 So with that and also just a reminder,
16 silence your cell phones.

17 And with that, we will get moving on
18 Day 2.

19 Yesterday, you'll recall that we were
20 discussing the MAOP reconfirmation Section --
21 let's see -- 192.624(c)(1), which is Method 1,
22 and 192.624(c)(2), which is Method 2.

1 As you may recall, when we left
2 yesterday we were working on wording. It got a
3 bit late. We though well, let's give PHMSA staff
4 some time to tweak the wording and come back to
5 you today with some proposed wording.

6 So we're back here today I know
7 bright-eyed and bushy-tailed, hopefully coffeed
8 up or whatever gets you going in the morning,
9 ready to talk turkey here about this wording
10 that's new and improved up on the screen here.

11 So with that, I will turn it over to
12 our able staff here and get going.

13 Or I guess, for that matter, actually,
14 as you recall, we were -- well, anyway, let me
15 just cut right to the chase here. We've got the
16 revised wording in red there. And you know you
17 may recall that related to testing for material
18 properties, as a part of this Method 1 pressure
19 test, there's discussion around that testing.
20 You wouldn't necessarily need that. The operator
21 needs to determine what they need to determine to
22 perform the pressure test. So that may recall

1 digging two headers and seeing what they have and
2 determining, based on their good engineering
3 judgment, to determine what that pressure test
4 would be. As you know, a lot of things go into
5 that.

6 Related to that, though, we also have
7 built in, if you do not know the materials that
8 you use in method or the procedures in 607, which
9 are opportunistic in nature, to over time
10 determine, you know gradually gather the records
11 on that segment of pipe but you wouldn't
12 necessarily need to have every material test
13 document in advance of performing that pressure
14 test.

15 So the wording up here is designed to
16 accomplish that and I guess, with that, Mr.
17 Chairman, I would turn it over to you and the
18 committee to discuss it, see if that hits where
19 we need to hit.

20 MR. DANNER: All right, you see the
21 language up on the screen before you in red. Are
22 there any comments from the committee about this

1 language and whether it satisfies you?

2 Yes, Steve.

3 MR. ALLEN: Steve Allen, IURC.

4 Is it necessary to basically define
5 opportunistically?

6 MR. MAYBERRY: That points to really
7 what's already in 607 which, by nature, is that.
8 I would probably argue you don't really even need
9 to say that because 607 is just that. So, that's
10 just here to reinforce what's already in 607.

11 MR. DANNER: All right, any other
12 thoughts or questions?

13 Okay, if there are no other thoughts
14 and questions, then I'm going to take that as
15 this language appears to be satisfactory.

16 We have a motion before us from
17 yesterday. So I think we can -- Steve, you can
18 either withdraw the motion from yesterday and we
19 can start over -- oh, I'm sorry.

20 Sara has her tent card up. So, let's
21 hear from her first. Sara?

22 MS. GOSMAN: Hi. Yes, thank you. I

1 just want to revisit the look-back period issue
2 again. And one question I guess I have, which I
3 raised at the end of yesterday, is why the
4 notification provision at the end of that
5 pressure reduction section doesn't address the
6 issue of needing I suppose a different pressure
7 reduction.

8 So, rather than opening up that look-
9 back period further, why we couldn't do this on a
10 case-by-case basis through the notification?

11 MR. DANNER: So I think that's -- does
12 anybody from PHMSA want to respond?

13 MR. McLAREN: Chris McLaren with
14 PHMSA.

15 Sara, by the word further, do you mean
16 beyond five years or beyond 18 months?

17 MS. GOSMAN: Beyond 18 months, so
18 keeping it where it was but just using the
19 notification provision.

20 In part I think because -- Cheryl can
21 talk more about here concern but what I heard was
22 some concern about going back even further. So

1 it strikes me that that notification provision is
2 the waiver version, the ability to accept that
3 should handle these types of issues again, rather
4 than opening it up for all.

5 MR. DANNER: Okay, Cheryl and then
6 Rich.

7 MS. CAMPBELL: Thank you. Cheryl
8 Campbell, Xcel Energy. So, thank you, sir, for
9 bringing this back up.

10 And I think my comment yesterday was
11 actually the other way, right, can we push it
12 back to the beginning of TIMP because I know for
13 a fact that many operators have reduced the
14 pressure to meet the TIMP as part of their
15 integrity management program. And I think the
16 concern is from the operators is if you keep it
17 at either an 18-month or a five-year look-back
18 period, if I reduce that pressure seven years ago
19 as a part of my integrity management program,
20 then you know am I faced with having to reduce
21 the pressure, again, to reconfirm MAOP? And I
22 might not be able to do that and still hold my

1 load.

2 So you know we've done it. You know
3 I know my company's done it and I think Sara --
4 sorry -- what Sara and I were talking about
5 yesterday afternoon was hey, there's already a
6 provision in there that you could provide that
7 documentation to PHMSA.

8 So I think we're just looking for some
9 clarity around how do we really want that part of
10 it to work. And I don't believe it's your
11 intention to say you have to reduce it again if
12 you've already reduced it under integrity
13 management.

14 Is that fair?

15 MR. DANNER: Steve, you want to
16 respond to that?

17 MR. NANNEY: Yes. Am I on? Yes.

18 I'm not sure it's fair or not fair.
19 So I just gave you a non-answer, I guess.

20 But the answer I would say first we
21 started out with the 18 months and we heard the
22 responders from the public and the committee the

1 last time and we went back and looked at it. And
2 maybe five years, based upon the look-back period
3 when the code came into play in 1970, and also
4 the five-year look-back period when we had
5 integrity management come into play in 2003-2004.

6 My question back would be is on these
7 previous cutbacks, MAOP reductions, or pressure
8 reductions, however you want to determine, have
9 they been for integrity management for HCAs or
10 have they been for these -- or have they been to
11 not go repair anomalies? What have they been
12 based upon? That would be one thing I think that
13 would have to be taken into consideration.

14 Or have they been made because there
15 wasn't adequate MAOP and it was done for this
16 exact same issue that we're talking about, that
17 there wasn't a verified MAOP and you took it at
18 that time really doing what we're talking about
19 here today? And I guess that's one thing that
20 I'm not sure of.

21 And I think before we would consider
22 going past the five years, we would need to look

1 at that. You know we can look at it and I think
2 we probably already have in this notification
3 that if you can't do something like that to us
4 you can come back and give us a notification.
5 You know we can look at something along that line
6 but I'm not sure just saying that you made a
7 reduction back then, we'd have to look at what it
8 was about and everything.

9 MR. DANNER: Do you have follow-up,
10 Cheryl?

11 MS. CAMPBELL: You bet. Cheryl
12 Campbell, Xcel Energy.

13 So Steve, yes, I understand what
14 you're saying and I think what you would find is
15 that most companies -- I mean clearly I can speak
16 for what we've done but I suspect other companies
17 are in the same boat where we didn't necessarily
18 have all of the MAOP records and you know when
19 you look at the system, you might say all right I
20 don't need that higher pressure and I don't have
21 the records, so I'm going to drop the MAOP to
22 validate it as a pressure reduction under

1 integrity management and call it a reconfirmation
2 of my MAOP.

3 So otherwise, I mean it's kind of --
4 there's only a set number of reasons why you
5 would do that. Otherwise, you are looking for
6 that upward flexibility if you have growth and
7 stuff like that.

8 So I think, for the most part, the
9 reason we've done it is because we didn't have
10 the records to support the MAOP and we decided we
11 didn't need that higher MAOP. But I would
12 imagine that there's a wide variety of reasons
13 that like you were talking about. And again, I'm
14 just trying to clarify what's the path forward on
15 that that we can all agree to so that we don't
16 end up spending a lot of time talking about it.

17 MR. DANNER: All right, Rich.

18 MR. WORSINGER: I was actually going
19 to go back to the other slide. So if you want to
20 let this discussion play out first.

21 MR. DANNER: Okay, that might be a
22 good idea.

1 Alan, do you want to -- are you on
2 this topic?

3 MR. MAYBERRY: Yes, I was just -- yes,
4 it's on this topic, really Cheryl, what you were
5 talking about.

6 You know certainly it sounds like in
7 your situation that might be easier if it went
8 beyond say 18 months or five years. I guess
9 where we are now it would be easy to make that
10 justification.

11 But you know as we develop a one-size-
12 fits-all approach, there are a variety of reasons
13 why people -- and we've seen them from our
14 inspections and from incidents why operators are
15 taking pressure reductions. You know maybe I've
16 lost sight of the fact of you know perhaps there
17 was growth in the defects, defects that may have
18 been in the line that ultimately led to failure
19 that you know maybe we needed to have that
20 provision to make sure that operators are looking
21 at -- you know not just blindly accepting what
22 was done 18 years ago or 15 years ago but really

1 having a thoughtful consideration of well, okay,
2 I did it back in 2005. Is it still valid? Is it
3 still relevant or do I have other issues going
4 on?

5 MR. DANNER: Okay, Cheryl.

6 MS. CAMPBELL: Yes, I just want to ask
7 Alan -- so I mean are you suggesting, Alan -- and
8 I don't disagree with what you're saying. Are
9 you suggesting that -- well, say I dropped an
10 operator. I have this friend who has this
11 pipeline.

12 (Laughter.)

13 MS. CAMPBELL: Let's say an operator
14 dropped the pressure in 2010, so I'm beyond the
15 five-year look-back period, and that operator did
16 it because they didn't have the records for MAOP.
17 So their solution to reconfirm MAOP was to drop
18 the operating pressure and they were able to do
19 that.

20 Are you suggesting that the close the
21 loop on that is the notification and the
22 conversation with the State and with PHMSA to

1 verify that we're all on the same page or is
2 there more that would need to be done there so
3 that you're not in that trap? To me, it feels
4 like a trap; I have to drop it again. And that's
5 what I'm trying to avoid.

6 I'm not trying to avoid doing
7 integrity management. I'm just trying to make
8 sure that we're very transparent and we all agree
9 on what the MAOP is.

10 MR. MAYBERRY: I was suggesting that
11 it is already in that later section for
12 notification that you would use that method
13 that's there to notify PHMSA, the State, if it's
14 beyond say five years, for instance. Okay?

15 MR. DANNER: Again, Rich has had his
16 tent up but I think we're still on this topic.

17 So, Sara.

18 MS. GOSMAN: Just quickly, you know
19 when I read the notification provision it looks
20 to me like it's focused on the pressure reduction
21 factors and a concern about those.

22 But if it's the question of the base

1 pressure and which one we are going to take, it
2 seems to me like we could add that into that
3 language, again, as a way of making this specific
4 to particular concerns by operators rather than
5 just opening it up.

6 But I'm curious whether you agree with
7 that way of using that notification provision.

8 MR. DANNER: All right, Steve, you
9 want to respond?

10 MR. NANNEY: Yes, that's what we had
11 proposed in the Notice of Proposed Rulemaking is
12 just what you're saying, Sara. If you look just
13 justification that the reduced MAOP determined by
14 the operator is safe based on analysis of the
15 condition of the pipe segment, including material
16 records, properties verified in accordance with
17 607, history of the segment, particularly known
18 corrosion and leakage, and the actual operating
19 pressure, and any additional punitive measures
20 that's been taken.

21 So what we would want is an overall
22 general look at the pipeline and why you're doing

1 it, if you're trying to do something different
2 than what the five years and what we've got laid
3 out.

4 And so we've got a procedure in here
5 to do what you're saying and what I think Cheryl
6 was saying. And we were not adverse to that when
7 we first came out with the rule.

8 MR. DANNER: All right, Andy.

9 MR. DRAKE: Andy Drake with Enbridge.

10 I agree with Steve. I think you have
11 a procedure in here that's built in how to deal
12 with it.

13 I think the question that seems
14 relevant to me is what is the appropriate period
15 to look back and why is it more than 18 months.
16 I think that's really just a balancing act, quite
17 frankly. It's like a little bell curve. You
18 know what is the population of pipes that would
19 be running at their MAOP within a short period of
20 time? Not very many, probably. I mean the MAOP
21 is the highest pressure we're allowed to operate
22 under. So the tighter you make that time frame,

1 the less likely we are to be at that pressure,
2 especially when you get into some of the market
3 areas where a lot of other influences drive what
4 is our operating pressure.

5 So you can go where a customer's
6 dynamics occur, they have other takes that
7 they're taking, and that operating pressure for
8 that pipe could drop down 10, 15, 20 percent and
9 stay there for two years. Well, you just
10 deescalated your MAOP.

11 And you can kind of get into it.
12 Well, now let's reset it. So it's now this lower
13 MAOP and we'll redo it again. You can end up
14 kind of ratcheting your MAOP down over time. So
15 what operators would have to do is basically
16 block in the pipe and pressure it up,
17 periodically. Or you open the period up so they
18 can look further back to deal with some of those
19 natural dynamics.

20 The point is you don't want to open it
21 up so long that something could happen in there
22 and that's the balancing act we're looking at.

1 Eighteen months is pretty tight, actually. I
2 think normal market conditions are going to see
3 pipes running below their MAOP because they
4 naturally have to but they could be running quite
5 a bit below it. And if they can't look past --
6 back far enough to get some data, they're going
7 to end up resetting their MAOP under this
8 scenario, which you don't want to do that.

9 I think the other piece is how far is
10 too long, when there could be accruing things in
11 there that we would need to know about that could
12 be growing into that margin and then you pressure
13 up into a problem. And I think that's the
14 balancing act.

15 We did this yesterday I think,
16 actually, when we were talking about four or five
17 years. It's the same discussion. How many
18 waivers do you want to have? If you're down to
19 18 months, I think you'll have a lot of waivers
20 because it's naturally, those cycles are going to
21 be pretty predominate. People are going to have
22 to file to get back kind of claw back to a

1 reasonable place. If you get it at five years,
2 maybe that's a little long. I don't know. It's
3 somewhere probably in that four range.

4 The same conversation we had yesterday
5 I think is kind of where --

6 MR. DANNER: Do you have a proposal
7 which we can then debate?

8 MR. DRAKE: This is -- I don't have a
9 lot of these kind of pipes. I'd like some --
10 that's why I'm kind of listening, just sitting
11 here listening to folks like Ron, and Cheryl, and
12 other people that have more of the demand side of
13 the pipeline. What is normal for them?

14 I would think four years is pretty
15 reasonable. I think 18 months is probably too
16 little.

17 MR. DANNER: Okay, thank you for that.

18 Steve Nanney.

19 MR. NANNEY: Again, just to state,
20 PHMSA was agreeable on the five years. We do not
21 have any problem with that and also, the
22 notification that we have in the rule, as

1 written.

2 We were open to listening because some
3 of the points Cheryl has made, Amy has made, and
4 Sara, we hear you and we're not closed to looking
5 past the five but we would need to see what was
6 in it.

7 And that's what Sara was saying we
8 needed to do and we think we've got that
9 appropriately addressed in the rule.

10 MR. DANNER: All right, Sara. Oh,
11 he's on a different topic. So we're -- he's
12 hanging out.

13 MS. GOSMAN: Yes, so just to be clear
14 I think I raised this both because I knew we
15 would be talking about longer provisions but
16 because I was interested, actually, in pulling
17 back on the look-back period and trying to sort
18 of tighten that back up again. But I hear the
19 concern about the sort of operational
20 characteristics.

21 So the five years comes from historic
22 practice, in terms of how PHMSA has dealt with

1 this starting back in 1970 with it. Is that
2 where you're coming from on that five year?

3 MR. NANNEY: Yes.

4 MR. DANNER: All right, Andy and then
5 Cheryl.

6 MR. DRAKE: Very quickly, Andy Drake
7 with Enbridge.

8 That's exactly where I was going is
9 there is a precedence for five years and that is
10 actually, I think, a good confidence builder for
11 folks. That was a precedent set in the code.

12 MR. DANNER: Cheryl.

13 MS. CAMPBELL: Cheryl Campbell, Xcel
14 Energy.

15 I can live with the five years. Sure,
16 I'm fine with that and I appreciate the
17 conversation about where we've been. I was just
18 suggesting that there's been a lot of work on
19 integrity management but I'm perfectly fine with
20 the five years and then requesting the
21 conversation with PHMSA, if you've got something
22 beyond that.

1 MR. DANNER: Okay. So is there
2 anything further on this topic? It looks like --
3 oh, all right, hi.

4 MR. BRADLEY: Thanks, Chair. Ron
5 Bradley, PECO.

6 So Alan, in your opening comments, I
7 think you covered this. But just in the sense
8 the first sentence, second half of it, after
9 March 2016 -- or March 26, 2018, if the pressure
10 test segment does not have TVC records, your
11 implication was TVC MAOP records, correct?
12 That's my question because that's what we talked
13 about yesterday.

14 And to follow the sentence does seem
15 to lead there, use the best available information
16 upon which an MAOP is currently based.

17 So it may be a good add to add in TVC
18 just the acronym MAOP between TVC and records,
19 just to enhance the statement.

20 MR. MAYBERRY: Okay, sure. I can do
21 that.

22 MR. DANNER: Okay. Great, so we have

1 --

2 MR. WORSINGER: Thanks, Ron.

3 MR. DANNER: Was that it, Rich?

4 You've been waiting for ten minutes.

5 (Laughter.)

6 MR. DANNER: You don't want to say
7 anything? All right.

8 MR. WORSINGER: I thought I just did.

9 MR. DANNER: Okay, is there --

10 MR. WORSINGER: Great minds speak --
11 think alike.

12 MR. DANNER: All right. Is there
13 anything more on the look-back period or do we
14 think we're worked out on that one?

15 Okay and the language in bullet 3.

16 Steve.

17 MR. ALLEN: Thank you, Chairman.

18 Steve Allen, IURC.

19 I think it might be more expedient for
20 me to go ahead and withdraw my motion from
21 yesterday and start over.

22 MR. DANNER: Thank you. So I think

1 we're at that point. So Steve has withdrawn his
2 motion, which was not seconded yesterday, and I
3 believe he is about to make a new motion.

4 MR. ALLEN: All right, that's fine.
5 Steve Allen, IURC.

6 The proposed rule, as published in the
7 Federal Register, and the draft regulatory
8 evaluation with regard to the provisions for
9 Method 1 and Method 2 of MAOP reconfirmation are
10 technically feasible, reasonable, cost-effective,
11 and practicable if the following changes are
12 made.

13 For Method 1 pressure test, the
14 paragraphs (ii) and (iii) to remove spike testing
15 for lines with suspected crack defects; in
16 Section 192.624(c)(1) refer to Subpart J instead
17 of Section 192.505(c); as discussed in the
18 committee meetings of December 2017 and March 26,
19 2018, if the pressure test segment does not have
20 TVC MAOP records, use the best available
21 information upon which the MAOP is currently
22 based; create a requirement for an operator to

1 add the test segment to its plan for
2 opportunistically verifying material properties
3 in accordance with Section 192.607. Most
4 pressure tests will present at least two
5 opportunities at test manifolds for material
6 verification.

7 For Method 2 pressure reduction,
8 increase the look-back period from 18 months to
9 five years; and strike the requirement in Section
10 192.624(c)(2)(ii) to perform fracture mechanics
11 analysis on the segments that confirm MAOP via
12 Method 2 Pressure Reduction.

13 MR. DANNER: All right, thank you for
14 that. Is there a second?

15 MR. WORSINGER: I'll second, Rich
16 Worsinger.

17 MR. DANNER: All right thank you,
18 Rich.

19 All right, there is a motion before
20 us. It has been seconded. If there is no
21 further discussion on the motion I think, Cheryl,
22 we're ready for a roll call.

1 MS. WHETSEL: All right, thank you.
2 Before I get started, I just want to mention that
3 somebody left a notebook here last night. So if
4 you're missing it, here it is.

5 Okay and so now on with the vote.

6 Okay, Steve Allen.

7 MR. ALLEN: Aye.

8 MS. WHETSEL: Dave Danner.

9 MR. DANNER: Aye.

10 MS. WHETSEL: Diane Burman.

11 MS. BURMAN: Aye.

12 MS. WHETSEL: Sara Longan.

13 DR. LONGAN: Aye.

14 MS. WHETSEL: Terry Turpin.

15 MR. TURPIN: Aye.

16 MS. WHETSEL: Cheryl Campbell.

17 MS. CAMPBELL: Aye.

18 MS. WHETSEL: Andy Drake.

19 MR. DRAKE: Aye.

20 MS. WHETSEL: Ron Bradley.

21 MR. BRADLEY: Aye.

22 MS. WHETSEL: Rich Worsinger.

1 MR. WORSINGER: Aye.

2 MS. WHETSEL: Chad Zamarin. Oh, I'm
3 sorry, he's not here.

4 John Airey.

5 MR. AIREY: Aye.

6 MS. WHETSEL: Mark Brownstein is not
7 here.

8 Robert Hill.

9 MR. HILL: Aye

10 MS. WHETSEL: Sara Gosman.

11 MS. GOSMAN: Aye.

12 MS. WHETSEL: And Rick Pevarski is
13 also not here.

14 And the motion passes.

15 MR. DANNER: All right, thank you very
16 much. And now we're ready to move on to Method
17 3.

18 MR. McLAREN: Chris McLaren with PHMSA
19 and I'm here to introduce the 192.624(c)(3)
20 Method 3 MAOP reconfirmation method. We have
21 about 30 slides and then we'll do another vote,
22 as we break up these methods into voting

1 packages.

2 Firstly, the public comments on Method
3 3 for the engineering critical assessment from
4 the December meeting were to remove requirements
5 from ECA that relate to operations and
6 maintenance or integrity management, which are
7 not pertinent to the MAOP and put fracture
8 mechanics in a different section.

9 Also, the public supported fracture
10 mechanics but it requires a lot of data not
11 always available. And the rules should clarify
12 when fracture mechanics is required.

13 With regard to those public comments,
14 PHMSA suggests striking requirements related to
15 addressing pipe segments with crack incident
16 history from 192.624 and addressing the new
17 paragraph under IMP and in 192.917(e)(6).

18 PHMSA also suggests moving the
19 fracture mechanics methodology out of 624 and
20 putting it into a new standalone section,
21 192.712.

22 The new 192.712 would be limited to

1 the procedure for performing fracture mechanics
2 but would not specify when or for which pipe
3 segments fracture mechanics would be required.

4 So PHMSA would clarify when fracture
5 mechanics is required in other code sections by
6 referencing 712, since those references were
7 taken -- will be taken out.

8 For MAOP reconfirmation, fracture
9 mechanics would be required only when performing
10 ECA, 192.624 Method 3 -- (c)(3), or for other
11 technology notifications on pipe segments that
12 have cracks and crack-like defects remaining in
13 the pipe.

14 In Method 3, reference 192.712 is
15 needed as fracture mechanics. PHMSA suggests
16 revising 624(c)(3)(i)(B) to read as follows:

17 (B) The ECA must analyze any cracks or
18 crack-like defects remaining in the pipe or that
19 could remain in the pipe to determine the
20 predicted failure pressure of each injurious
21 defect in accordance with 192.712.

22 Also, PHMSA suggests that specific

1 technical requirements for fracture mechanics,
2 including default Charpy values would be deleted
3 from 192.624 and only addressed in the new
4 912.712.

5 Also we suggest adding a requirement
6 to verify material properties in accordance with
7 192.607 if information needed for a successful
8 engineering criticality assessment is not
9 documented in the traceable, verifiable, and
10 complete records as discussed in the December
11 committee meeting.

12 With regards to the fracture mechanics
13 requirements and in response to public Notice of
14 Proposed Rulemaking comments, committee comments,
15 and research that was completed after the NPRM
16 was published, PHMSA suggests the following.

17 We suggest amending the fracture
18 mechanics procedure, so much as to revise
19 192.624(d)(1) to strike language that specifies
20 when or for which segments fracture mechanics
21 analysis is required and replace with language
22 that clarifies that 192.712 only addresses the

1 purpose and procedure for performing fracture
2 mechanics analysis.

3 Also, strike 192.624(d)(1)(iii), the
4 sensitivity analysis, and replace with
5 requirements that operators account for model
6 inaccuracies and tolerances.

7 PHMSA suggests amending the fracture
8 mechanics procedure by striking references to
9 192.624, MAOP reconfirmation; strike references
10 to 192.506, the spike pressure test; and add a
11 paragraph to require records be retained, since
12 the record requirement for MAOP reconfirmation at
13 192.624(f) would no longer apply; also, rewrite
14 the remaining requirements to be more
15 performance-based and restructured according to
16 the outline: (a) applicability, (b) modeling,
17 (c) fatigue analysis and remaining life, (d)
18 subject matter expert review, and (e) records.

19 To continue with the public comments
20 on fracture mechanics methodologies, industry
21 reps on the committee agreed and industry
22 commented that -- well, industry commented

1 discretely that default Charpy values proposed by
2 PHMSA are too conservative and suggested using 13
3 foot-pounds in the body for the Charpy value for
4 fracture toughness and seven foot-pounds in low-
5 frequency ERW weld seam for the fracture
6 toughness -- oh, four. What did I say? Sorry --
7 four foot-pounds.

8 PHMSA's response is that the
9 established default values proposed of five foot-
10 pounds in the body and one foot-pound in the
11 seam, based on research documented in the Final
12 Report, Task 4.5 titled Comprehensive Study to
13 Understand Longitudinal ERW Weld Seam Failures,
14 Phase One under a DOT Contract shown on the slide
15 with the work completed October 23, 2013 provided
16 us with those values that we proposed.

17 The study was based on 569 actual
18 failures from the Keifner/DNV and Battelle
19 databases and some important conclusions are
20 summarized on the next slides, as we discuss this
21 topic.

22 Conclusions from the ERW Seam Research

1 Failure conducted by PHMSA. Use of failure
2 predictive models in the integrity management
3 process can be effective if the gaps that lead to
4 issues in predicting failures are bridged.

5 Toughness must be quantified for the
6 seam type/manufacturer involved, and must be
7 determined relative to the location of the
8 defect; otherwise, significant predictive errors
9 can be anticipated.

10 Likewise, the defect size must be
11 reasonably quantified and care taken where
12 adjacent features can interact axially along the
13 pipe.

14 And feature shapes and sizes must be
15 reasonably represented by idealizations that
16 underlie the fracture toughness -- fracture
17 analysis. Sorry.

18 Again addressing the comment by
19 industry that PHMSA Charpy values are too
20 conservative, PHMSA provides some of the
21 conclusions from our ERW seam failure research.

22 One of the conclusions is that the use

1 of lower-bound estimates for the failure stress
2 levels of cold weld defects and hook cracks with
3 Charpy energy of four foot-pounds and selective
4 seam weld corrosion with Charpy energy of 0.4
5 foot-pounds.

6 So based on this research and
7 analysis, PHMSA proposed default values of five
8 foot-pounds in the body and one foot-pound in the
9 seam. And it's important to note that those
10 default values would only be required when actual
11 values are unknown.

12 To continue along this discussion,
13 default values of five foot-pounds in the body
14 and one foot-pound in the seam would only apply
15 for pre-'70 pipe and post-'70 pipe with unknown
16 or suspected low toughness properties or where
17 vintage materials, technology, or other technical
18 publications are not available for not
19 applicable.

20 To continue, operators must use known
21 values for or values obtained through pipe
22 property testing whenever available or would only

1 use default values if actual values are unknown.

2 We have some example calculations
3 illustrating the effect of raising the default
4 Charpy values on predicted failure pressures in
5 the next four slides.

6 The first two slides are examples of
7 a 50 percent pipe body crack in a Class 1
8 location. It shows on the left in the body the
9 red line of being five foot-pound value, a black
10 line being seven foot-pound value, some number
11 in-between the other research, and then the blue
12 line being the 13 foot-pound.

13 This would show the effect of changing
14 the Charpy V-notch values for fracture toughness
15 on that predicted failure pressure of a crack in
16 the pipe body that is 50 percent through wall.
17 So it would show that that crack could actually
18 be one-inch long on the red line and then prior
19 to reaching one and a half inches long would be
20 where it exceeded the predicted failure pressure.

21 Likewise, on the seven Charpy V-notch
22 value, or black line, it would be around two

1 inches in length. And on the blue line, the 13
2 Charpy foot-pound value, about three and a half
3 inches in length.

4 The next slide is going to show in the
5 seam the Charpy values of 1, 2, and 4. Again,
6 showing that that half-inch -- that on the red
7 line, where it's a Charpy value of 1, that a
8 half-inch crack in length that is half-through
9 wall would not be predicted to carry the full
10 MAOP.

11 The black line at two foot-pounds
12 would fall below the PFP somewhere between a half
13 inch and one inch. And the blue line would
14 exceed the PFP ratio at about one inch in length.

15 So in addition to looking at Class 1,
16 we looked at Class 3. So here we have, again, a
17 half-inch pipe body crack. And this is in the
18 body with Charpy V-notch values of 5, 7, and 13,
19 illustrated by the red, black, and blue lines
20 respectively and how long that defect could be in
21 a Class 3 location, where we would have a higher
22 safety margin.

1 The five foot-pound value half-wall
2 thickness crack could go up to three and a half
3 inches. The seven foot-pound crack could go up
4 to -- the seven foot-pound value could have a
5 crack length of five inches. And the blue line
6 could have an anomaly somewhere larger than that
7 for a half pipe body crack. And that is for the
8 body.

9 Looking at the seam where those values
10 are lower, looking at one foot-pound in the red,
11 it would exceed the predicted failure pressure at
12 somewhere between half inch and one inch.

13 The black line for two foot-pounds
14 would exceed it somewhere between one and one and
15 a half. And the blue line for four foot-pounds
16 in the seam would allow an anomaly of two and a
17 half inches that was half-through wall.

18 These numbers were run for us since
19 the last meeting, based on the committee comments
20 using the Battelle model that was developed in
21 our research.

22 So INGAA also commissioned a

1 statistical study of Charpy values, which was
2 submitted to the docket, performed by Structural
3 Integrity Associates titled Statistical
4 evaluation of Charpy Toughness Levels for Gas
5 Transmission Pipelines. That report number is
6 there and it was completed on July 7, 2016.

7 This study suggested using 13 foot-
8 pounds for the body and four foot-pounds for the
9 seam, based on a 90 percent confidence level that
10 the values would be conservative.

11 The INGAA study pointed out that the
12 values proposed by PHMSA represent a 99 percent
13 confidence level that the values would be
14 conservative.

15 To talk a little bit more about the
16 INGAA report, that study notes that the
17 conservative values may result in excavations
18 that, in the final analysis, may be proved to
19 have been unnecessary.

20 PHMSA acknowledges that using
21 conservative values to assure safety in the
22 absence of knowledge about the pipeline may

1 result in excavations for cracking anomalies,
2 pipes, bodies, or seams.

3 PHMSA desires that industry make
4 greater efforts to know the physical
5 characteristics of the in-service pipe when
6 records are not available.

7 Again to continue along that
8 discussion, PHMSA encourages more excavation,
9 testing of material properties both of pipe and
10 body and seam, of pipe without records, at which
11 times operators may verify the physical
12 characteristics using the procedures established
13 under 192.607.

14 Industry commented that default Charpy
15 values proposed by PHMSA are too conservative and
16 again suggested using the 13 foot-pounds in the
17 body and 4 foot-pounds in the seam.

18 PHMSA commented that the Weibull
19 probability distribution curves developed in the
20 INGAA study show the effect of small differences
21 in assumed Charpy toughnesses on statistical
22 confidence in the predicted failure pressure, as

1 illustrated on the next slide from that report.

2 This was the Weibull distribution
3 curve in the INGAA-sponsored report done by
4 Structural Integrity Associates showing on the
5 red line a 90 percent confidence value utilized
6 in the report for its proposed Charpy V-notch
7 values; the blue line showing a 95 percent
8 confidence for seven foot-pounds, which was the
9 other number we evaluated when looking at pipe
10 body to understand what the differences in our
11 numbers were; and then a 99 percent confidence
12 level for the five foot-pounds value for pipe
13 body that PHMSA proposed.

14 It shows the number of tests on the
15 left in that Charpy V-notch value as we go down
16 on the right -- on the bottom.

17 So just to sort of reiterate one more
18 time as we present data for this topic, this is
19 probably the tightest case of a Class 1 location,
20 that having the lowest safety factor, with a seam
21 anomaly having the lowest Charpy V-notch values
22 proposed in both of these studies, showing what a

1 half-through wall crack would look like in terms
2 of its length and its ability to withstand the
3 predicted -- to carry the predicted failure
4 pressure as its length grows.

5 This is one of the slides we looked at
6 previously and provides discussion for why we
7 proposed one foot-pound for unknown values in the
8 seam.

9 To continue on with several more
10 slides, PHMSA comments again on the same topic
11 that to address cases where default Charpy values
12 may be too conservative, PHMSA suggests allowing
13 operators to use differing values upon submittal
14 of a notification demonstrating conservative
15 Charpy values would be used.

16 I seem to have lost control. There we
17 go.

18 So this concludes the PHMSA response
19 to the comments on Method 3 and fracture
20 mechanics.

21 The following slides summarize a
22 number of revisions that PHMSA suggests the

1 committee consider to address comments received
2 in the NPRM and in our March teleconference
3 committee meeting.

4 In light of the committee comments
5 from the December 2017 meeting, PHMSA suggests
6 the committee consider the following.

7 PHMSA suggests revising 192.624(c)(3),
8 Engineering Critical Assessment, and 192.624(d),
9 Fracture Mechanics as follows. Specify that if
10 information required for the ECA is not available
11 on TVC records, the operator must use
12 conservative assumptions or verify missing
13 information for 192.607. Remove ILI tool
14 performance specifications and replace with
15 requirements to verify tool performance using
16 unity plots or equivalent technologies.

17 In light of the committee comments
18 from the December meetings, PHMSA suggests the
19 committee consider that, since crack defects
20 would be addressed by IMP and not addressed as
21 part of the MAOP reconfirmation in 192.624, to
22 strike 192.624(d), Fracture Mechanics Analysis,

1 for failure stress and crack growth analysis and
2 move Fracture Mechanics to a new standalone
3 section, 192.712, making conforming edits to
4 refer to 192.712.

5 The new 192.712 would not specify when
6 or for which segments fracture mechanics analysis
7 would be required. It would be limited to the
8 procedure for performing fracture mechanics
9 analysis, when required or allowed by other
10 sections of Part 192.

11 In 192.624, it would not contain
12 default Charpy values or other technical fracture
13 mechanics requirements. Requirements to perform
14 fracture mechanics as part of the ECA in
15 192.624(c)(3) would simply refer to the new
16 192.712.

17 And PHMSA suggests revising
18 192.624(c)(3)(i)(B) to read as follows: The ECA
19 must analyze any cracks or crack-like defects
20 remaining in the pipe, or that could remain in
21 the pipe, to determine the predicted failure
22 pressure of each injurious defect in accordance

1 with 192.712.

2 Also in light of those comments from
3 the December meeting, PHMSA suggests amending the
4 fracture mechanics procedure to address technical
5 comments received from the NPRM and committee
6 comments. PHMSA suggests utilizing the fracture
7 mechanics requirements originally proposed for
8 192.624(d) in the new 192.712 with the following
9 revisions.

10 Strike the language previously
11 proposed in 192.624(d)(1) that specifies when or
12 for which segments fracture mechanics analysis is
13 required and replace with language which
14 clarifies that 192.712 only addresses the purpose
15 and procedure for performing fracture mechanics
16 analysis.

17 Also in light of the comments from the
18 December meeting, PHMSA suggests the committee
19 consider striking the (d)(1)(iii) sensitivity
20 analysis and replace with requirements that
21 operators account for model inaccuracies and
22 tolerances.

1 Strike reference to the 192.624 MAOP
2 reconfirmation.

3 Strike references to the 192.506 spike
4 pressure test.

5 And add a paragraph to require records
6 be retained, since the record requirements for
7 the MAOP reconfirmation at 192.624(f) would no
8 longer apply.

9 Also, as previously discussed, we
10 propose rewriting and restructuring according to
11 the following out line for the new 192.712: (a)
12 applicability; (b) modeling; (c) fatigue analysis
13 and remaining life; (d) SME review; and (e)
14 records.

15 Also in light of those December
16 meeting comments, PHMSA suggests that the
17 committee consider clarifying that default Charpy
18 values of five foot-pounds in the body and one
19 foot-pound in the seam only apply to pipe with
20 suspected low-toughness properties or unknown
21 toughness properties and clarify that use of
22 differing default Charpy values may be requested

1 by notification to PHMSA.

2 Thank you.

3 MR. DANNER: All right, thank you.
4 Anything else? Otherwise, we'll go into public
5 comment.

6 All right, is there anyone from the
7 public here today who wishes to comment on Method
8 3?

9 Go ahead, sir.

10 MR. TOMAR: Good morning. This is
11 Munendra Tomar from Kinder Morgan.

12 I'd just like to present a couple of
13 observations and things that I think we should be
14 considering, specifically in relation to the
15 default CVN values that have been proposed and
16 some of the justification that has been provided
17 in the slides previously provided by PHMSA for
18 the use of those and to counter or not accept the
19 recommended values from the Structural Integrity
20 INGAA study.

21 I have some slide numbers noted here,
22 which seems to have changed since the first

1 iteration of these slides came. So if I'm off by
2 a couple slides in my references, pardon me.

3 So the slide 48 seems to address or
4 refer to the Task 4.5 Report from the Phase 1
5 Battelle ERW Study, which was a summary report.
6 And there's reference to the sample size of CVN
7 values used as 569. And when I went through the
8 reports, I noticed that the values that are
9 referenced in these slides and forms the basis
10 for the default values recommended comes from the
11 detailed reports 2.3 and 2.4 sub-tasks, which
12 were by DNV and Keifner, respectively.

13 In Task 2.4, which is where the values
14 of .4 and 4 foot-pounds come from, those were
15 based on 33 failures, no actual testing was done,
16 and the CVN values were calculated by back-
17 calculating from the failures.

18 Now this back-calculation is based on
19 predictive models, which we all accept and want
20 to be conservative but, by that logic, the CVN
21 values calculated would also be conservative. So
22 that's one point I would like to consider or I

1 would like to request for consideration is that
2 we need to keep that in mind that the CVN values,
3 as were found in Task 2.3 and 2.4 were
4 conservative, inherently.

5 The other point is that on slide 54,
6 there are some plots, and this is one of those
7 plots, which seems to suggest that -- now this is
8 for pipe body but when we look at the same plot
9 for seam, there seems to be a suggestion that
10 between one foot-pound and four foot-pound,
11 there's not a big difference in terms of which
12 crack would be acceptable.

13 In reality in the NPRM, a 50 percent
14 anomaly is deemed as an immediate. So in order
15 to truly understand the effect of these default
16 values, we need to look at smaller defects, a 25
17 or 30 percent defect. In those cases, the effect
18 of changing the CVN values would be actually
19 larger.

20 The other point I'd like to make is on
21 slide 64 there is mention that operators can use
22 higher default values if they can notify PHMSA

1 and provide justification. However, the industry
2 report from INGAA which Structural Integrity
3 presented, which uses most of the same data that
4 was used in the Battelle Study and just performs
5 a more statistical evaluation, takes the entirety
6 of the set into consideration and PHMSA doesn't
7 deem that acceptable. Then that brings into
8 question what kind of justification can we, as
9 operators, provide that would be acceptable to
10 PHMSA.

11 And the other question is if the
12 comment is that 99 percent is the confidence
13 level that is acceptable, then that goes beyond
14 the norms of most other industries we know. Most
15 of the drugs we use every day are not tested to
16 that kind of rigor. Why do we want to impose
17 that on pipeline CVN values?

18 Thank you.

19 MR. DANNER: All right, thank you very
20 much.

21 Yes, sir?

22 MR. PASKETT: Good morning, Mr. Chair,

1 members of the committee. I want to thank you
2 for the opportunity this morning to provide
3 comments to the docket.

4 For the record, my name is Bruce
5 Paskett. I'm Chief Regulatory Engineer for
6 Structural Integrity Associates, who did the
7 study for INGAA with respect to Charpy impact
8 values.

9 For those of you who are not familiar
10 with Structural Integrity, as the name suggests,
11 the company, since the early 1980s, has done
12 structural analysis for nuclear power plants
13 using fracture mechanics. So fracture mechanics,
14 although it's kind of a new area for oil and gas,
15 for pipelines, it is certainly not new to
16 Structural Integrity.

17 I will tell you that I am not a
18 fracture mechanics expert but my colleague, Mr.
19 Peter Riccardella, who performed the analysis for
20 INGAA, is a recognized industry expert and I
21 think it's also important for you to note that
22 Mr. Riccardella provides guidance for the Nuclear

1 Regulatory Commission. So, he is well-respected.

2 When Mr. Riccardella conducted the
3 study for INGAA he used and found reasonable
4 default values in the absence of TVNC records.
5 And those numbers, as contained in PHMSA slides
6 today from slides 48 to 63, were based on 13
7 foot-pounds of body cracks and 4 foot-pounds for
8 seam cracks.

9 Mr. Riccardella has reviewed PHMSA's
10 slides today that you've all seen this morning,
11 slides 48 to 63, and he points out if Structural
12 Integrity were doing this analysis for a
13 pipeline, fracture toughness is only one of the
14 parameters that are considered in the analysis.
15 So the other input parameters would also be
16 applied -- loading, fracture toughness, crack
17 growth rate, and defect size.

18 So Structural Integrity and Mr.
19 Riccardella's analysis and study was based on a
20 90 percent confidence rate for the toughness. If
21 you take a 90 percent confidence rate for those
22 four parameters that I just mentioned, the event

1 frequency of a failure would be one in 10,000
2 years. In my opinion, that would be a very
3 acceptable safety factor.

4 So to summarize, although certainly as
5 PHMSA has proposed, a 99 percent confidence level
6 or percentile in the toughness values would
7 certainly be more conservative than 90 percent
8 that's proposed in Structural Integrity's report
9 performed for INGAA. When you combine that with
10 other conservatisms that are included in typical
11 fracture mechanics, we believe that that 90
12 percent and specifically the 13 foot-pounds and 4
13 foot-pound numbers that were included in the
14 report for INGAA are more than adequate for
15 pipeline safety. So we would like to encourage
16 the GPAC Committee to reconsider and PHMSA to
17 reconsider the numbers that are proposed in the
18 rule.

19 Thank you.

20 MR. DANNER: All right, thank you very
21 much.

22 MR. HERETH: Mr. Chairman and members

1 of committee, I'm Mark Hereth from the Blacksmith
2 Group. I appreciate the opportunity to comment
3 on this topic of use of the Charpy values, the
4 default values.

5 In actual experience, we haven't seen
6 failures that have actually occurred that are two
7 and a half inches in length and 50 percent or
8 more deep or, as in the case of Mr. McLaren's
9 example with the seams, where it was one-inch in
10 length and greater than 50 percent.

11 The failures that we've seen are more
12 typically eight inches or greater with that kind
13 of depth. This, we think, provides an indication
14 that the values are very, very conservative, as
15 supported by the report prepared by the previous
16 speaker. And we can appreciate the conservatism
17 but it seems like the conservatism goes far
18 beyond the experience that we've had in the
19 industry.

20 Thank you.

21 MR. DANNER: All right, thank you very
22 much.

1 MR. OSMAN: C.J. Osman from INGAA and,
2 believe it or not, I actually have a comment
3 unrelated to fracture mechanics.

4 So INGAA appreciates PHMSA's revisions
5 to separate out and clarify the fracture
6 mechanics process from the ECA procedure but
7 there were a variety of other topics related to
8 the ECA procedure that were discussed at the last
9 GPAC meeting, I guess the December GPAC meeting,
10 and were also brought up during public comment
11 that we do want to make sure PHMSA addresses at
12 some point. These were related to separating out
13 the aspects of the ECA that are related to
14 integrity management and managing long-term
15 integrity threats and focusing the ECA method on
16 confirming material strength similar to a
17 pressure test.

18 So there are a variety of other
19 components to the ECA, other than the fracture
20 mechanics process. The fracture mechanics part
21 of it is important. We want to make sure those
22 other issues and comments and discussions that

1 the GPAC had are reflected in PHMSA's final ECA
2 process for MAOP reconfirmation.

3 Thank you.

4 MR. DANNER: All right, thank you.

5 MR. BELLEMARE: Good morning. This is
6 Simon Bellemare with MMT. This is my third
7 meeting I attend so I know better the rules and
8 I'll be very brief here.

9 There is a written comment that was
10 submitted by Professor Eagar of MIT speaking to
11 the value of physical sampling. And I want to
12 bring into perspective because we heard from the
13 industry. There were four comments that were not
14 really public comment or comments from the
15 industry. And the intent from INGAA -- I'm sorry
16 -- PHMSA is very clear here. It's written in the
17 slides that it's an incentive to go and run tests
18 because there is a lot of steel from the
19 different lines that is available and it doesn't
20 take too many data points -- that's what you'll
21 see if you read the two-pager from Professor
22 Eagar -- to be able to validate a statistical

1 distribution that you already have some
2 information about.

3 So you take a bell curve or generate
4 a bell curve and then you adjust it for the type
5 of steel that you find from physical sampling.

6 And I believe that really is the
7 intent of these minimums here to say go and
8 collect some data. We're not talking about
9 digging out the whole pipeline, not at all. Ten
10 tests for a segment, if you read Dr. Eagar, tells
11 you something about the statistical distribution
12 that allows you to address the tail end of
13 fracture toughness, which is what can cause the
14 incident.

15 Thank you.

16 MR. DANNER: All right, thank you.

17 Okay, are there any other public
18 comments this morning?

19 All right, seeing none, I'll turn to
20 the committee. Andy.

21 MR. DRAKE: This is Andy Drake with
22 Enbridge. I think those were some very good

1 comments from the public and I appreciate that.

2 I think this is a good place for us to
3 pause and really think about what's practical
4 here. We can get into battling consultants. I
5 don't think that's terribly constructive here. I
6 think these are credible folks I think really
7 trying to figure out what is an appropriate level
8 to set here.

9 And I think the thing that helps me,
10 you know I think it was on slide 61, the test for
11 toughness was not really put into practice, the
12 Charpy V-notch test was not really put into
13 practice, I don't even know if it was invented,
14 until the late '60s, somewhere around there.

15 So when you think about that, more
16 than half this infrastructure was built before
17 the test existed. So by default, the pipe will
18 not have a test record for Charpy impact testing
19 in its MTR. It wasn't done.

20 And that doesn't mean, as you can see
21 on slide 61, that the pipe doesn't have
22 toughness. It has toughness. It just doesn't

1 have a record of toughness because the test
2 wasn't done.

3 So what is an appropriate assumption
4 here when we're dealing with the vast majority of
5 pipe that has toughness that just didn't have the
6 test done? Should we default that because it was
7 prior to 1970 and doesn't have the test that it
8 would be now assumed to be as tough as a Coke
9 bottle so that we can make sure that everything
10 is inside the envelope here? I think that is
11 ridiculously overly conservative, quite frankly.
12 It's actually beyond that. It's punitive.

13 I mean I think what you want to try to
14 do is look at that chart and say what's a
15 reasonable assumption to make for some kind of
16 anomaly assessment. I think the comment that
17 Mark Hereth resonated with me, when we look back,
18 slides 53 through 56 are an interesting technical
19 exercise. I appreciate that. It reminds me of
20 my fracture mechanics classes in college. That's
21 interesting.

22 What's relevant is what is really

1 happening. Are we having failures out there that
2 look like this? No. Well, that's good to know.

3 So how do those things fit together as
4 we try to model what's the appropriate thing to
5 do here? What's a practical solution?

6 When you look at engineering critical
7 assessments, and this really comes into play when
8 we look at anomaly, you know integrity management
9 anomaly response, there's a lot of variables that
10 play in here. This is one.

11 The tolerances associated with those
12 other ones have a lot bigger influence on what's
13 happening here. And what we're trying to do is
14 make a reasonable, practical assumption about the
15 tail end here.

16 I appreciate the last fellow's comment
17 about we're gather more data over time but while
18 we're in this interim place, what is an
19 appropriate assumption to be making about this
20 one variable and what is its impact in our defect
21 assessment modeling?

22 And I think that when we scoop all

1 this together, I think the fact that there are
2 1500 data points that were used in this
3 assessment, and we are trying not to bias the
4 population one way or another but just look at
5 this distribution, and we find that levels exist
6 that are much higher than that, obviously, but
7 even the tail end, as we make those assumptions,
8 I think if we don't recognize the practicability
9 of the vast majority of the pipe being well above
10 that, we're going to end up having a lot of
11 excavations to go look at cracks and look at
12 anomalies that are not that significant. And I
13 think that's actually just inappropriate.

14 So I think right here what we're
15 trying to do -- and I appreciate the fellow's
16 comment about one in 10,000 years. I think I'll
17 have to rely on that statistical analysis but
18 thumbs up. That's good.

19 But I think the point here is what is
20 a practical level of conservatism. If one in
21 10,000 years seems reasonably conservative to me,
22 given that distribution right there that we're

1 looking at and the fact that what we've seen from
2 failures historically, and I just think you're
3 really trying to make an assumption about what we
4 can do that's practicable in the absence of so
5 much of the pipe not having had the test done
6 without being punitive.

7 MR. DANNER: All right, thank you.

8 Any other comments? No other
9 comments. Okay.

10 Oh, all right, Cheryl.

11 MS. CAMPBELL: Cheryl Campbell, Xcel
12 Energy.

13 So I'm not even going to pretend that
14 I know very much about fracture mechanics. I
15 depend on a lot of very sharp people. But the
16 one in 10,000 years resonates with me. I'm very
17 interested in hearing PHMSA's thoughts around
18 this.

19 What I do understand is I have a lot
20 of different things working together that's
21 layered on top of each other to try and make sure
22 that I've got -- I call it belts and suspenders

1 as opposed to an appropriate level of
2 conservative stuff. But you know I do understand
3 that my tool tolerance, you know I dig more holes
4 than I have to because I know what my tool
5 tolerances are.

6 So I'm very interested in PHMSA's
7 thoughts around this idea of one in 10,000 years
8 for failure mode.

9 And then Andy's comments about we're
10 not seeing failures based on this when we have
11 half of our infrastructure that's in this didn't
12 do a test. So how do we drive to that thing that
13 works but that keeps everybody safe, without
14 assuming my pipeline is essentially the toughness
15 of a coke bottle?

16 MR. DANNER: All right, thank you.

17 Anyone else? Steve, do you want to
18 respond?

19 MR. NANNEY: Yes, this is Steve Nanney
20 with PHMSA.

21 As Chris went over in the slides,
22 PHMSA is quite willing of looking at other values

1 than what we had proposed. In fact, we had put
2 other values even on the chart to have this
3 discussion or on the figure like the one that's
4 up there.

5 The key thing that we've been seeing,
6 and here's our point, is we do have operators
7 that are assuming numbers similar to this Weibull
8 or higher, where they've had numerous failures
9 and they've all been in the very low foot-pounds,
10 whether it has been in the weld seam or the pipe
11 body. And the point is is when you're seeing
12 failures and multiple failures on your pipe and
13 you're seeing things come out at one foot-pound,
14 or a half a foot-pound, or three foot-pounds, or
15 some number like that is what it's showing in
16 that weld seam are maybe 10, or 12, or 6, or 7 in
17 the pipe body, going and using something like
18 this to take its place is not using a
19 conservative value. In fact, it's using the
20 opposite of that when you've got multiple data
21 points that show the opposite.

22 And just like Chris went over in the

1 slides, you know we're willing to work with
2 something but it needs to be reason and it needs
3 to be based upon what the operator is seeing.
4 And the operator needs to take an effort to find
5 out what they've got, not just assume something.
6 Whether the numbers we're proposing or these
7 other numbers are right, wrong, or indifferent,
8 the key is is to try to get some data to back up
9 whichever one you're using is our point and
10 especially if you've got failure data points that
11 are not backing up the report.

12 MS. CAMPBELL: Can I respond to that,
13 Mr. Chair?

14 MR. DANNER: Yes, go ahead, Cheryl.

15 MS. CAMPBELL: Steve, that sounds like
16 PHMSA has data on failures of these lower Charpy
17 values. Is that -- I mean that's what I heard
18 you say.

19 MR. NANNEY: Yes.

20 MS. CAMPBELL: Can we see that data?

21 MR. NANNEY: I don't have it here
22 today. The answer is no, not today.

1 MR. DANNER: All right, Sara.

2 MS. GOSMAN: So, like Cheryl, and
3 maybe even more, I can't pretend to be versed in
4 this technical area but I just want to pull back
5 here for a moment.

6 So as I understand what we're doing,
7 we're looking specifically at pipelines that
8 don't have records on toughness or are
9 grandfathered and are in particular areas, so
10 areas where we're going to see more vulnerability
11 by populations.

12 And there are a series of possible
13 responses to that, including pressure tests,
14 pressure reduction, pipe replacement. So this is
15 -- plus other technologies that people can bring
16 to PHMSA. So this is one set of responses and
17 it's the one that is an assessment that you would
18 do instead of doing things like pressure tests,
19 which I understand. You know we had this
20 conversation yesterday where we really want to
21 get to. In a lot of these cases, as I understand
22 it, there's a pressure test.

1 So it seems to me that I don't know
2 what the right number is but I think to be
3 conservative about the basis for this assessment,
4 given the other things out there that are
5 available, makes a lot of sense.

6 And I guess I would also say that you
7 know in the kind of academic work that I've done
8 say in the toxics arena, we make a lot of very
9 conservative assumptions about toxics because we
10 want to stay very far away from the point in time
11 in which we say have enough exposure to result in
12 cancer.

13 So I think that extra conservatism,
14 while it's certainly a part of debate in risk
15 circles, is not unique to this particular area
16 and can be justified when really what you're
17 trying to do is to say there are these other
18 possibilities, including doing the testing
19 itself. But if you're going to do this kind of
20 assessment, then do it in a way that assures us
21 that really you're acting as if this pipeline
22 were the most risky possible.

1 So if that's in fact what we're doing
2 with this data, then it seems to me like we see
3 that in other regulatory context, too.

4 MR. DANNER: All right, thank you.
5 John.

6 MR. AIREY: John Airey, retired guy.
7 I'm curious about the data that you do
8 have and the nature of it because it appeared
9 there was very little practical field data. But
10 I'm curious. You said there's a lot of failures
11 that you've encountered and it seems like it
12 would be -- the nature of that.

13 MR. NANNEY: Well, can I?

14 MR. DANNER: Yes.

15 MR. NANNEY: Okay. My point was in
16 these older pipes normally what we see is if you
17 have a seam failure, normally, and it's an older
18 vintage pipe, it's going to be a single digit and
19 a low single digit number. Whether that's one
20 foot-pound, five foot-pounds, four, I'm not going
21 to sit here and put a stamp on any of them but
22 it's going to be normally a lower number.

1 If it's stress corrosion cracking or
2 something in the body, it's going to be higher
3 and everything.

4 My point that I was trying to make is
5 normally we see the low numbers when see the
6 failures.

7 The point that we were making and what
8 Chris went over in the slides, and why we put it
9 in front of the committee, we're willing to work
10 on the language as far as not just basing it on
11 some report that has nothing to do with your
12 pipe. You know we don't mind basing it on if
13 you've got something to show that it's in that
14 realm but that doesn't mean that it's in that
15 realm.

16 I've seen here in the past few weeks
17 some pipe made two years ago that failed and it
18 had one foot-pound strength and it was supposed
19 to be high frequency ERW pipe.

20 So my point is is just because we've
21 got this report is where you're seeing the
22 cracking and things is normally it's going to

1 happen in the low-toughness pipe. The high-
2 toughness pipe, you're probably not going to have
3 the cracking is normally what happens.

4 So the point is is this going to
5 happen in the low toughness. That's why we're
6 talking about it. But again, in what we're
7 wanting is, one, that if you have data showing
8 that it's less, you can't go to a report like
9 this and use higher data. That's the point I'm
10 trying to make to the committee.

11 And two, if you use a number, you need
12 to be actively trying to get data to back up what
13 you're using, if you're using a report such as
14 this. That's the two points Chris was going
15 through in the slides. We didn't quite maybe
16 state that exactly but that's the point where we
17 were coming from.

18 And yes, like it says on our slides,
19 we still have those numbers. And you know we
20 were looking at the discussion today to see
21 should we move up a little, should we leave it
22 like it is, or whatever. So that's what we were

1 seeing the discussion today as being.

2 MR. AIREY: Can I follow-up on that
3 for just a moment?

4 Are you suggesting that if you went to
5 the midpoint here that is something that PHMSA
6 would find acceptable?

7 MR. NANNEY: This is Steve Nanney with
8 PHMSA.

9 That is exactly what I'm suggesting,
10 that if we looked at some compromise and we
11 looked at something along the line that the
12 operator needs to take efforts if they don't have
13 that information to get it, and if they have
14 failures and other data like that that shows that
15 it's less, they've go to use it. I think that is
16 a very workable solution.

17 MR. DANNER: Andy.

18 MR. DRAKE: This is Andy Drake with
19 Enbridge.

20 Steve, I absolutely agree with that.
21 If an operator has the data, then they need to
22 use the data. You know I mean that's just

1 prudence.

2 I think you used the word a few
3 minutes ago interim. I see this as sort of an
4 interim solution because you've got a real
5 problem, a real issue with the fact that most of
6 the population of the pipe wasn't tested. It
7 doesn't have that information and yet we find
8 ourselves in the position of having to do defect
9 assessment and using this.

10 So as we're trying to gather this data
11 opportunistically, what is a reasonable
12 assumption to make about that population of pipe?

13 If you have data, you should be using
14 it, obviously. But in the absence of that data I
15 think both of these numbers are very low. I mean
16 when you showed slide 61, I mean they are way
17 down at the tail end and I think that's where we
18 get into the conversation about what's enough
19 conservatism. Is it one in 10,000 years or one
20 in 100,000 years?

21 I think this is a temporary issue, as
22 we gather more information and that's all I'm

1 saying is use something practical and don't damn
2 this large population. I don't think we're
3 creating an inordinate risk in one in 10,000
4 years of event while we work to gather the data.

5 But I do think if we don't do
6 something more practical, the toughness levels
7 you're talking about are going to create a lot of
8 excavations and a lot of work for pipes that
9 aren't having defects that are critical.

10 MR. DANNER: Cheryl.

11 MS. CAMPBELL: Cheryl Campbell, Xcel
12 Energy.

13 So again, I'm just trying to
14 understand, seek to understand. So what I think
15 I'm hearing both Steve and Andy say is we're
16 saying let's start with a number. And I, again,
17 don't know if it's 4, or 13, or 7, or something
18 else but I dig -- I make a dig based on that. I
19 make that assumption. I make a dig based on
20 that.

21 To your point, Steve, I don't have
22 that data about that pipe. So I attempt to

1 collect that data under 607 while I have that
2 excavation open.

3 If I learn it's one or two, when I
4 thought it was something else or I made an
5 assumption it was something else, then I think we
6 would all assume or expect the operator to take
7 appropriate action based on that new information.

8 Is that your point, Andy? And if it
9 is, I agree with that.

10 MR. DRAKE: Absolutely. I think
11 that's just prudence and diligence. You would
12 never discard the actual data that you have, in
13 lieu of trying to make some sort of assumption.
14 You're just making a reasonable assumption until
15 you get the data.

16 MS. CAMPBELL: So to your point and
17 Steve's point, what we're talking about is what's
18 that starting assumption for that pipe. And
19 again, I'm sorry, I'm just trying to make sure I
20 understand the -- okay.

21 MR. NANNEY: If I can say something,
22 I'm agreeing with you. I'm agreeing with you.

1 MR. DANNER: You may say that, yes.

2 So I have a question for Andy. You
3 keep using the word interim. Just how long is
4 this interim?

5 MR. DRAKE: Well, I mean we've got a
6 lot of consultants around here.

7 MR. DANNER: Yes, and they don't
8 agree.

9 MR. DRAKE: Well I think it's back to
10 the thought of opportunistic. I mean this is the
11 whole design, as we're gathering this
12 information, we're trying to make these
13 assumptions. You know you're just filling in
14 that data as you dig this pipe.

15 And how long does it take to get
16 statistically significant? I think one of the
17 consultants who was just talking a few minutes
18 ago says it's not that much. I don't think it's
19 a tremendous length of period of time. I think
20 you're talking probably the period of the
21 assessment interval, which is seven to ten years.
22 I think you're going to have a lot of information

1 in that period.

2 So, I see Steve shaking his head yes.

3 I mean I think that's a reasonable assumption.

4 MS. GOSMAN: All right, thank you.

5 I'm sorry I didn't see who put it up

6 first. So, all right, Sara, you're first.

7 MS. GOSMAN: All right, thank you.

8 So there's a time question which,
9 thank you. I also have just a question on scale.

10 So you, Andy, you had mentioned that
11 at a certain point in time this test came into
12 effect and before that, we don't have information
13 on toughness. So does that mean that for all
14 pipe previous to that date we don't have adequate
15 records so, therefore, we have to do ECA, or
16 pressure test, or a pressure reduce, or replace?
17 Is that what you're saying? No, okay.

18 So then what's the scope of the set of
19 pipelines that we're talking about here that are
20 in the world in which we don't have records and
21 we need to actually use ECA as one of the
22 possible responses?

1 MR. DANNER: Okay, I think Steve, you
2 want to take a stab at that?

3 MR. ALLEN: Yes, Steve Allen, IURC.

4 To go along with what Sara was saying,
5 from a cost-effectiveness, what are we -- what's
6 the delta between 90 percent confidence factor
7 and a 99 percent confidence factor, based on the
8 population of pipe that this method would be used
9 for? I mean there are other methods available.
10 Okay so there must be a certain number of pipes
11 that this particular method would be used.

12 Okay, given that assumption, based on
13 either 90 percent, or 99 percent, or somewhere
14 in-between, I'm curious as to what the financial
15 implications are because whatever rule we make,
16 it needs to be cost-effective. And that seems to
17 be absent in this conversation.

18 And one other thing. It also stuck
19 with me the failures of one every 10,000 years.
20 That's kind of interesting. I was just curious
21 as to what that number might be at 99 percent
22 confidence and at somewhere in-between, the 95

1 confidence. Are we talking about one in a ker-
2 billion or I mean because at some point it
3 becomes impractical and especially when you start
4 looking at the financial implications.

5 So you know I need to know what the
6 populations of pipes that would be subject to
7 this, as Sara had mentioned, and then some sort
8 of sense for what the financial impact is or the
9 economic impact.

10 MR. DANNER: All right, Andy and then
11 Alan.

12 MR. DRAKE: This is Andy Drake with
13 Enbridge.

14 Sara, it's a great question. I think,
15 to be very honest, what's happening here is this
16 is not so much about ECA. It's much more about
17 anomaly inspection criteria, which is a separate
18 section but it's the same numbers. So we're
19 having a conversation now about anomaly
20 inspections in remediation just because it's the
21 same criteria.

22 You know I don't know that we would

1 get too worried about doing the ECA so much
2 volumetrically from a population standpoint as we
3 would be about anomalies.

4 Steve, to your point, I'll give you an
5 exact example. In our world today, the tool
6 technology for crack assessments is at the edge
7 of the technical envelope. We are not where
8 liquid pipes are because the acoustic tools need
9 the fluid liquid to transmit the acoustic signal
10 into the pipes so they can get an accurate
11 assessment of the crack and they're very, very
12 advanced in that. I think the precision of those
13 tools, the accuracy of those tools is very high.
14 Unfortunately, in gas that sound, that ultrasonic
15 signal, doesn't transmit very well in gas. So
16 crack tools, ultrasonic tools, are on the edge of
17 development right now and our ability to use them
18 accurately is an experiment.

19 We ran a tool in Texas here a couple
20 of years ago. This thing basically was a thing
21 finder. It found millions of things, none of
22 which were cracks. It was great. I mean if I

1 could just dig up the entire pipe and assess
2 everything that it dug up -- that it identified,
3 that would be awesome. Unfortunately, that's
4 where we are in the state of technology.

5 So what we did, and now this is where
6 technology is right now, and many operators are
7 using this technology. It's evolving. It's
8 getting a little bit better. It's getting better
9 at identifying critical cracks, critical
10 anomalies. So basically you put like a stage-
11 gate filter on the tools' output. It's pretty
12 accurate at finding big things. Below that, man,
13 you are in the blender. That thing is finding
14 everything. It is looking for surface
15 irregularities, all kind of noise in the pipe.

16 So if I try to drop down and start
17 looking for tiny little cracks because I've had
18 to assume this thing is basically a Coke bottle,
19 I don't know why I would even run the tool, to be
20 quite honest with you. I don't know what I would
21 be going after. I need something that's
22 practicable, not just an engineering exercise in

1 crack sizing. That was interesting.

2 But when we play this, I've got to
3 figure out how do I use this tool that's at the
4 edge of its technical capability as a screening
5 device with some criteria that makes some kind of
6 sense. And that's all that's really happening
7 here.

8 And I think we're just trying to get
9 down to some -- how can you practice this, not
10 just the obvious curves here, slide 61 about the
11 majority of the population and where it is; it
12 actually has more toughness; what's a reasonable
13 assumption but also, where's the tools and what
14 are we looking for, and how does this play?

15 Well, this actually comes into play in
16 that. I'm trying to make an assessment from a
17 tool run not out in the ditch. If I'm in the
18 ditch, I'm going to get the toughness data.
19 That's the part that we learn over time. That's
20 why we're talking about gathering this. But for
21 that first assessment, if I have to assume
22 numbers like this with tools like we have and

1 tolerances that I'm trying to deal with with
2 those tools, I don't even know how it's
3 practicable, to be very frank with you.

4 MR. DANNER: All right, Alan.

5 MR. MAYBERRY: I'm kind of marveling
6 at the discussion here. This is a more
7 complicated version of the discussion we had
8 related to hydro and just what do you do you know
9 as you use the method, in this case, the ECA.

10 So and certainly we can appreciate
11 that wherever we dial in the sweet spot you know
12 more conservative is not necessarily -- you know
13 it's just going to take more resources. Where do
14 we find the ideal level that has you not digging
15 on the thing finder type situation, where you are
16 just digging on things. So what is the sweet
17 spot?

18 I think we have a similar
19 understanding on what we're after here. You know
20 really what are the boundaries we're working
21 within, as you work towards understanding what
22 you have in the ground through 607, similar to

1 the discussion we had, in a way, on the hydro.

2 So we have some voting language here,
3 I believe, that we could -- you know we're going
4 to put it up there just so we can talk about the
5 boundaries we're dealing with here.

6 MR. DANNER: So while we're doing
7 that, John, why don't you go ahead?

8 MR. AIREY: I haven't heard a
9 discussion about cost. If this addresses half of
10 the pipelines out there, what kind of a cost
11 implication is embedded in it?

12 MR. DANNER: Well, people have raised
13 cost. We don't have any estimates of costs in
14 front of us.

15 Steve.

16 MR. ALLEN: Yes, Steve Allen, IURC.

17 Then I'm not sure how we can vote on
18 that if we don't have a sense of the cost-
19 effectiveness. I mean isn't that what we're --
20 that's one of the criteria for passing a rule.

21 MR. MAYBERRY: We don't necessarily
22 have the costs. I mean that's what we do when we

1 leave here but we don't necessarily have
2 exhaustive cost-benefit for every scenario that
3 you deal with here. That's why we have the
4 public input, the input of the members, to kind
5 of get a sense of what the impact could be or
6 would be and then we'd go from here and deal with
7 that.

8 MR. ALLEN: Mr. Chair, may I follow-
9 up?

10 So with that, I would at least like to
11 hear from our industry members as to what you
12 believe the cost impact is of this. I mean is
13 this a non-starter or what?

14 So and also I might add the
15 conversation or the question I had about the --
16 and I don't know if this is accurate or not. It
17 was just handed to me. The one in 10,000 years
18 figure that was given at a 90 percent confidence,
19 at 95 percent confidence level, that was an
20 incident every one in 160,000 years. And they
21 say at 99 percent it's one at 100,000,000 years.

22 Now, I don't know if that's accurate

1 or not but if that is accurate, that's kind of
2 interesting to consider. What level of
3 conservatism is appropriate? Yes, it's likely
4 somewhere in-between but I just share it with the
5 membership.

6 But I would like to hear from industry
7 what you think the economic impact on a 90 versus
8 a 99 percent or something in-between.

9 MR. DANNER: So I think yes, the
10 conversation is really about diminishing returns,
11 too. And it could be you don't really need to
12 have precise cost information if you know that
13 there are diminishing returns.

14 So Cheryl, do you want to --

15 MS. CAMPBELL: So I can share one of
16 our experiences. We ran one of these crack
17 tools. I mean we had a line that -- I can't even
18 tell you why we -- you know we must have thought
19 that there might be an issue there, right, or we
20 wouldn't have put a crack tool in it. And it
21 came back -- and Andy's terminology about thing
22 finder is pretty interesting because that's

1 exactly what it felt like. It came back with it
2 said I had several one-half inch openings in the
3 pipe. And I am not talking about a longitudinal
4 crack like a hook crack. It said I had a half-
5 inch opening in the pipe. I clearly did not have
6 a leak on that pipeline, certainly one of that
7 size. It operated at 800 pounds. If I would
8 have had a half-inch opening in the pipe, I would
9 have known about that. I would have had a lot of
10 other issues telling me that.

11 And the net result is we ended up
12 digging I'd say probably 20 holes and found
13 absolutely nothing when you went down. Now, do I
14 feel better about the pipe? I know more about it
15 than I did before but I dug a whole bunch of
16 holes that didn't necessary help advance my
17 integrity program on that pipeline.

18 And we basically have moved away from
19 the crack tools and said the technology has got
20 to get better, unless we really are concerned
21 about cracks in specific pipes.

22 Now in fairness to my friends at

1 PHMSA, we have identified another pipeline where
2 we do have some cracks and we've taken some steps
3 to resolve that, which frankly just included
4 renewing the pipeline because I can't deal with
5 it.

6 But I think it's an interesting
7 problem and I think Andy's point is you end up
8 digging a whole bunch of holes and you don't
9 really advance your integrity program and you
10 haven't improved safety. I think that's what the
11 concern is.

12 And I can't tell you how much those
13 cost. I mean they could have been -- if they
14 were in an open field, they were five grand but
15 if they were under an interstate highway, it's a
16 whole other conversation.

17 MR. DANNER: All right, Andy. Yes,
18 just a brief comment. I think we're going to
19 take a break and we will come back with some
20 proposals.

21 MR. DRAKE: This is Andy Drake with
22 Enbridge. I think that would be awesome.

1 (Laughter.)

2 MR. DRAKE: I just feel like maybe
3 before break give you some fuel. I think it is
4 hard to come up with a cost but I think it's
5 almost more of a matter of practicability at this
6 point.

7 The tools that we're dealing with and
8 the assessments we're trying to use, we are not
9 even plugging in toughness really into that.
10 We're just trying to find cracks because the
11 tolerance of detectability is pretty -- is the
12 bigger issue actually at this point. If we try
13 to plug this in there I think there's
14 appropriateness here to plugging in a toughness
15 value. I think we don't want people to be too
16 optimistic, you know a conspiracy of optimism
17 that this pipe can stop the hammer. It can't.
18 It's got -- it's probably got low toughness, to
19 Steve's point. It's how conservative or how much
20 punitive do we want to be with that big
21 population of pipe about that assumption, given
22 the tool tolerances.

1 So when you scoop all that together,
2 I think you're just trying to say all right, we
3 want to feather in some toughness considerations
4 in your model. We don't want you to be super
5 optimistic. We want you to be conservative.
6 We've got 1500 data points to come up with this
7 answer. Put that into play while you're
8 gathering more data opportunistically. And I
9 think that's what we're trying to do -- I don't
10 mean to say thematically -- but at a high level.

11 But I would say if you go back to
12 those charts on 53 through 56, you get a sense
13 the defect size is two or three times longer.
14 Well, you add that to these tool tolerances and
15 all of a sudden, you're digging up anything, I
16 mean two or three times smaller. So you're
17 digging up a lot and that's the problem,
18 especially given the tool tolerances if you put
19 them together.

20 And I think it's just a matter of
21 practicability. That's really it. You're just
22 sort of feathering this new requirement in while

1 you gather more data. What's a reasonable and
2 practical assumption for this first tranche of
3 work. Does that make sense?

4 MR. DANNER: All right, thank you.
5 Alan.

6 MR. MAYBERRY: I think actually Andy
7 covered the practicality part. I just want to
8 know what's practical and I'm good. We can take
9 a break.

10 MR. DANNER: Okay, it's 10:19.
11 Everybody be back so we can start at 10:30.

12 (Whereupon, the above-entitled matter
13 went off the record at 10:19 a.m. and resumed at
14 10:51 a.m.)

15 MR. DANNER: Okay, let's go back on
16 the record here. All right. I'm going to turn
17 it over to Alan who will --

18 MR. MAYBERRY: Okay. Thanks, Mr.
19 Chairman.

20 MR. DANNER: Okay, Alan. Thanks.

21 MR. MAYBERRY: Yes, thanks. Right
22 before the break we put this -- some language up

1 there and, you know, based on the discussion we
2 just had prior to the break, we've edited the
3 language and of course the discussion centered
4 around the Charpy values. If you could put that
5 last slide back up there. Okay, cool.

6 So, in red you see up there, you know,
7 basically on -- you know the overall heading of a
8 revised Fracture Mechanics requirements by --
9 then we added related to that first one in red
10 there. Operators can use a conservative Charpy
11 energy value based on a sampling similar to the
12 requirements of 192.607. And the operators can
13 use Charpy Values from somewhere or the same
14 vintage pipe until properties are obtained
15 through an opportunistic testing program.

16 And then in that next one we're
17 looking to, you know, get input on defining what
18 the -- you know, the body and the seam values for
19 Charpies are and then adding a little more
20 clarification that -- related to -- let's see.
21 Unknown toughness properties in the history of
22 leaks and failures. That would also impact that

1 and operator must work diligently to obtain this
2 data if unknown. And then -- you know, different
3 from these you can do a notification.

4 We -- that, you know, as I've
5 discussed with many of you is a common feature
6 of, you know, why these revisions that we're
7 making is their notification provisions. If
8 you're going to go outside of that to PHMSA. So
9 we've got that aspect built into this as well.
10 And that -- we offer that up for comment. I
11 don't know. For starters, if anyone wants to
12 fill in the excess, that would be appreciated.

13 MR. DANNER: All right, Steve.

14 MR. ALLEN: Thank you. Steve Allen,
15 IURC. So, the second to last bullet point where
16 it says, and a history of leaks and failures, is
17 that to address the concern mentioned by Industry
18 and the public that we're just not seeing
19 problems with such small anomalies, or what?

20 MR. MAYBERRY: No, that's just if you
21 have those characteristics and a history of leaks
22 and failures. You know, that's where you would

1 use those.

2 MR. ALLEN: That's what I was saying.
3 If there is not a history of leaks and failures
4 then yes, it would apply.

5 MR. DANNER: Okay. All right, Sara?

6 MS. GOSMAN: I'm not sure --

7 Actually, I thought that was a great
8 question. I'm not sure I understood the answer
9 to it. So, if you don't have a history of leaks
10 and failures are you not using ECA or how does
11 this -- or you're using other Charpy values that
12 are different?

13 MR. MAYBERRY: Steve.

14 MR. NANNEY: I've forgotten how to
15 operate this. The -- what we're meaning there is
16 that if you have a history of leaks and failures,
17 we want you to work diligently to obtain the data
18 from the leaks -- from the leaks and failures.
19 In other words, not just to rely upon the X and Y
20 -- whatever we decide there for that number to
21 be. But if you've got other data that's less
22 than that -- those numbers to definitely use

1 those and any other information that you have on
2 that particular pipe.

3 MR. DANNER: All right, Andy.

4 MR. DRAKE: This is Andy Drake with
5 Enbridge. Yes, I think that would probably work
6 a little bit better if we put a period at the end
7 of toughness properties and said, if the operator
8 has a history of leaks and failures they must
9 work diligently to gain the data. I think that's
10 actually what you're trying to say.

11 MR. NANNEY: That's correct.

12 MR. DRAKE: Yes and I think that would
13 work a little bit better. I think just a little
14 bit of -- I think this is reflective of the
15 conversations we've been having and I appreciate
16 that. Just as a point of data, I would offer up
17 the 13 and 4 in the X's there which is congruent
18 with INGAA's proposal. And, I think, a bit of
19 data here is if we try to strike a balance here,
20 so to speak, or come from a balance; try to
21 strike a compromise at 95 percent and you end up
22 at 7 foot-pounds. I think the relevance of that,

1 it sounds -- I mean, when we've talked
2 negotiating that -- oh yes, that's good; but
3 we'll meet in the middle.

4 Well, the problem is that seven years
5 is still in the brittle regime. And what that
6 means is that you have to consider the pipe is
7 fully brittle and there's no ductility in it and
8 when you do the assessment, you cannot use the
9 modified lock, seek and assessment criteria to
10 assess the viability of that pipe which is a big
11 deal. It really has a huge effect on the
12 reassessment frequency. And I think that, again,
13 it's sort of like a little cliff. You just fall
14 off into this place that's very, very damning to
15 99.99 percent of the pipe. And I think -- that's
16 all we're trying to avoid.

17 I think the relevant issue here is
18 applying toughness is a huge step and we are in a
19 huge transition between not doing it at all and
20 now doing it. Where we also have a huge chasm of
21 data missing. What is a reasonable assumption to
22 make for this as we launch into this and gather

1 more information?

2 I think this is an interim position
3 that we're talking about. The question is, is in
4 this interim position is are we being
5 conservative. And, I think, through all the data
6 that we've seen both of these are conservative.
7 I think one of them is kind of overly
8 conservative almost to the point of being
9 impracticable. And, I think what we're trying to
10 do is do something that's a good positive step
11 that's practicable in the interim while we're
12 gathering more information.

13 And I think that's where the 13 and 4
14 really strikes the appropriate technical
15 solution.

16 MR. DANNER: Okay, Sara.

17 MS. GOSMAN: Just have a few more
18 questions here. When you say that the operators
19 can use a conservative Charpy energy value based
20 on sampling similar to the requirements of 607,
21 what do we mean here by similar as opposed to
22 just the requirements of 607? And then my second

1 question is given that operators can use Charpy
2 values from similar or the same vintage pipe, I'm
3 wondering why that doesn't address some of the
4 concerns about the default values. That is, if
5 you have similar, same vintage pipe which I
6 assume you would in a lot of these circumstances,
7 why wouldn't you just use the Charpy values from
8 those and not go to the default?

9 So, I guess one for PHMSA and maybe
10 one for Industry.

11 MR. DANNER: All right. So why don't
12 we start with Andy. Do you want to respond to
13 Sara and then, you got your tent up so maybe
14 something else you want to talk about.

15 MR. DRAKE: I'm glad to work on the
16 wording of the whatever number bullet that is;
17 the second red one there. But that is the intent
18 is that operators should be using the data that
19 they have and applying it appropriately to
20 similar materials. That's a reason -- that is
21 diligence. So, if we want to modify the words a
22 little bit but that's the intent, in my opinion.

1 I see Steve shaking his head. So, I
2 think, we're trying to go that direction and I
3 think that is reasonable and practicable also.

4 MR. DANNER: All right. Steve, did
5 you want to comment on this? Oh, okay. You
6 didn't -- I'm sorry.

7 MR. NANNEY: No. Andy basically said
8 the same thing I was going to say.

9 MR. DANNER: Okay.

10 MR. NANNEY: So --

11 MR. DANNER: All right. Cheryl?

12 MS. GOSMAN: Can I --

13 MS. CAMPBELL: Yes.

14 MS. GOSMAN: Can I just follow-up?
15 I'm sorry. I -- on the question of sampling
16 similar to the requirements, I'm just curious
17 about what that means. Why the word similar is
18 in there. That strikes me as saying we're not
19 really doing the same thing as 607 Board just
20 doing something similar to it and I just don't
21 understand what that means.

22 MR. DANNER: Yes, Steve. Please.

1 MR. NANNEY: We're going to change it
2 to same. Can we do that, Bob?

3 The only reason we put similar is
4 because I asked Sayler to do that. So, but
5 similar and the same, to me, is basically the
6 same.

7 MR. DANNER: So -- but if you're going
8 to say the same --

9 MR. NANNEY: Yes.

10 MR. DANNER: -- why not just have it
11 based on 607? Okay. So that's where it is now.
12 All right. Cheryl?

13 MS. CAMPBELL: Okay. So, I -- I'm
14 just trying to think through this, right? And
15 there's just a couple of -- and I wouldn't even
16 call them concerns, but I feel like we're very
17 close and that we're all trying to say the same
18 thing. So I'm just asking us, right?

19 Are we -- because I think the
20 intention is let's start with this assumption.
21 If you've got something else that you think is
22 similar then go ahead and use that. If you

1 don't, then here's a place to start. And, oh by
2 the way, if you've -- if you get down in there
3 and discovered something else, right? You need
4 to take some prudent action, right? I mean,
5 that's where we're all at.

6 So, my question for all of us is have
7 we made it clear enough in the guidance here.
8 Because I know we're not writing code, Alan,
9 right? Are we making it clear enough and are we
10 providing enough clarity for our friends at the
11 State who will be the one looking over my
12 shoulder, right? And trying to make sure that --
13 you know, I'm trying to make sure that I'm
14 following the rules, right? And we're not going
15 to get crosswise with the way it's enforced at
16 the State.

17 So, I just want to make sure we're
18 providing enough guidance to PHMSA, right? That
19 we get to a place that's going to work for all of
20 us and we're not going to get crosswised when our
21 friends at the States are enforcing it.

22 And I can live with that 13 and 4 as

1 a starting point as long as there's clarity,
2 right? Around -- if you don't know and you find
3 out something different then do something about
4 it.

5 MR. DANNER: All right. Alan?

6 MR. MAYBERRY: Yes. I was just going
7 to say in response to, you know, the State
8 component. I mean, we're getting pretty
9 prescriptive here by providing, you know, some
10 lower numbers. So, I think that makes that
11 easier.

12 MR. DANNER: Sara?

13 MS. GOSMAN: All right. I'm going to
14 try a proposal. See what you think.

15 So, I'm wondering if we can split the
16 bullet point second from the bottom here and
17 focus on those pipes that have a history of leaks
18 and failures and whether we can apply the more
19 conservative default assumptions to those and
20 apply the -- one of the 13 and 4 to follow
21 assumptions to those pipes that don't have that
22 history of leaks and failures. And here's why

1 I'm trying to cut it that way, right?

2 I understand that just getting to the
3 middle on the numbers is -- I mean, we don't have
4 the data for that, but maybe we want to be more
5 conservative when it comes to pipes that have
6 that kind of history. And, to me, that seems
7 defensible that we could apply different default
8 values to a pipe that is considered
9 differentially risky.

10 MR. DANNER: So, just to clarify. So
11 that would be if a pipe has a history of leaks or
12 failures as opposed to an operator?

13 MS. GOSMAN: Yes, pipe.

14 MR. DANNER: Okay. Okay. Is there
15 any comments on -- Sara?

16 DR. LONGAN: Thank you, Mr. Chair.

17 If it remains if a pipe has a history
18 of leaks and failures, this goes back to us
19 better understanding the type of data PHMSA does
20 or does not have or the type of data that PHMSA
21 expects to have or not have in the future. I'm
22 just wondering how that addition is enforceable.

1 However, I appreciate your comments, Sara, and
2 understand that there might be an importance of
3 separating this. I just want to make sure that
4 if it is separated it is clear for operators to
5 understand what's expected and PHMSA has the
6 opportunity and the availability of the
7 information they need to comply here.

8 MR. DANNER: All right. Any other
9 comments on -- okay. Yes, Andy.

10 MR. DRAKE: Andy Drake. I think the
11 only -- I'm directionally good with this. I
12 think the only caution I would say is, where a
13 fatigue -- or where toughness plays in here it
14 would be if it has a history of leaks or failures
15 due to cracks, not -- I mean, if it has a
16 corrosion issue, that's a separate problem. Yes.
17 And if it had -- does that make sense? And,
18 look, just --

19 MS. GOSMAN: I think that's fine.
20 Yes. Yes, I understand the failure mode issue.

21 MR. DANNER: So, if a pipe segment has
22 a history of leaks or failures due to cracks --

1 MR. DANNER: All right. Any other?
2 That's five and one, isn't it?

3 PARTICIPANT: Yes, five and one.

4 MR. DANNER: Okay. Any comment on
5 this one? All right. I'm hearing silence which,
6 I think, it means it's time for a motion. Is
7 there anybody whose eyes are good enough to read
8 it from where they're sitting?

9 Cheryl, can you give it a shot? I
10 can't read it from here.

11 MS. CAMPBELL: Yes, I'll do it.

12 MR. DANNER: So --

13 MS. CAMPBELL: I'll do it. I'll do
14 it. It's a lot of talking. I'm just saying.
15 Okay.

16 MR. DANNER: I know.

17 MS. CAMPBELL: The proposed rule is
18 published in the Federal Registry in the Draft
19 Regulatory Evaluation with regard to the
20 provisions for Method 3 of MAOP Reconfirmation
21 Fracture Mechanics are technically feasible,
22 reasonable, cost-effective and practicable if the

1 following changes are made.

2 Strike Section 192.624(d), Fracture
3 Mechanics Analysis for failure, stress and crack
4 growth analysis and move Fracture Mechanics to a
5 new stand-alone section, 192.712. The new
6 Section 192.712 would not specify when or for
7 which segments Fracture Mechanics analysis would
8 be required. It would be limited to the
9 procedure for performing Fracture Mechanics
10 analysis from when required or allowed by other
11 Sections of Part 192.

12 Section 192.624 would not contain
13 default Charpy toughness values or other
14 technical Fracture Mechanics requirements.
15 Requirements to perform Fracture Mechanics as
16 part of ECA in Section 192.624(c)(3) would simply
17 refer to new Section 192.712. PHMSA suggests
18 revising Section 192.624(c)(3)(i)(B) to read as
19 follows: the ECA must analyze any crack or
20 crack-like defects remaining in the pipe or that
21 could remain in the pipe to determine the
22 predicted failure pressure of each injurious

1 defect in accordance of Section 192.712.

2 Add requirement to verify material
3 properties in accordance of Section 192.607 if
4 information needed for a successful ECA is not
5 documented in TVC records as discussed in the
6 December 2017 Committee Meeting. Remove ILI tool
7 preference specification -- or, tool performance
8 specifications and replace with requirement to
9 verify tool performance using unity plots or
10 equivalent technology. Revise the Fracture
11 Mechanic requirements by striking sensitivity
12 analysis requirements and replacing with
13 requirement that operators account for model and
14 accuracies and tolerances.

15 Striking references to Section
16 192.624, MAOP Reconfirmation. Striking
17 references to Section 192.506, Spike Pressure
18 Test. Adding a paragraph to require our records
19 be retained. Operators can use a conservative
20 Charpy energy value based on the sampling
21 requirements of Section 192.607. Operators can
22 use Charpy values from similar or the same

1 vintage pipe until properties are obtained
2 through an opportunistic testing program
3 clarifying that default Charpy values of 13 foot-
4 pound body and 4 foot-pound seam only apply to
5 the pipe with suspected low toughness properties
6 or unknown toughness properties.

7 If a pipe segment has a history of
8 leaks and failures due to cracks, the operator
9 must work diligently to obtain toughness data, if
10 unknown. In the interim, those segments must use
11 Charpy values of 5 foot-pounds body and 1 foot-
12 pound seam. Clarifying that use of differing
13 default Charpy values may be requested by a 90
14 day notification to PHMSA.

15 MR. HILL: Robert Hill, second.

16 MR. DANNER: Thank you. Is there a
17 second?

18 MR. HILL: Robert Hill, second.

19 MR. DANNER: Okay. Thank you very
20 much. All right. So, if there's any further
21 discussion. If there's no further discussion, we
22 are ready for a roll call vote.

1 MS. WHETSEL: Okay. Looks like we're
2 ready.

3 Steve Allen?

4 MR. ALLEN: Aye.

5 MS. WHETSEL: Dave Danner.

6 MR. DANNER: Aye.

7 MS. WHETSEL: Diane Burman.

8 MS. BURMAN: Aye.

9 MS. WHETSEL: Sara Longan.

10 DR. LONGAN: Aye.

11 MS. WHETSEL: Terry Turpin.

12 MR. TURPIN: Aye.

13 MS. WHETSEL: Cheryl Campbell.

14 MS. CAMPBELL: Aye.

15 MS. WHETSEL: Andy Drake.

16 MR. DRAKE: Aye.

17 MS. WHETSEL: Ron Bradley.

18 MR. BRADLEY: Aye.

19 MS. WHETSEL: Rich Worsinger.

20 MR. WORSINGER: Aye.

21 MS. WHETSEL: Chad Zamarin is not
22 here.

1 Jon Airey.

2 MR. AIREY: Aye.

3 MS. WHETSEL: Mark. Robert Hill.

4 MR. HILL: Aye.

5 MS. WHETSEL: Sara Gosman.

6 MS. GOSMAN: Aye.

7 MR. DANNER: Motion passes. All

8 right. Thank you everyone.

9 All right. So, let's go right into
10 Methods 4, 5 and 6. So, who's going to make the
11 presentation for staff?

12 MR. NANNEY: I will.

13 MR. DANNER: Okay. Mr. Nanney, go
14 ahead.

15 MR. NANNEY: Okay. I don't want to
16 skip something. Okay. Let me go -- okay. Am I
17 right? Okay.

18 Starting on Slide 77. This is Steve
19 Nanney with PHMSA. Committee comments on Method
20 4 in pipe replacement. There were no comments so
21 we will not be going into it. I think pipe
22 replacement's quite obvious.

1 Going to Slide 78. Seventy-eight is,
2 again, public comments on Method 5 for low stress
3 pressure reduction and that was from our December
4 2017 Meeting and it says here Method 5 applies to
5 less-risky pipe. Commenters have asserted that
6 it is more onerous than Method 2 with many
7 additional requirements related to enhanced
8 patrols, leakage surveys and suggested making 5
9 comparable to Method 2. In usage of a Method 5
10 should not limited based on pipe size or MAOP.

11 Going to Slide 79 a couple of things
12 that PHMSA looked at is, again, some of the
13 Committee comments on Method 5, Pressure
14 Reduction for small potential impact radius and
15 diameter from the December Meeting. Industry
16 representatives supported public comments which
17 questioned the need for some of the measures such
18 as patrols and leakage surveys in addition to the
19 10 percent pressure reduction. So, PHMSA went
20 back based upon the various comments that we've
21 received and I think we indicated this at our
22 December meeting.

1 If you look at Section 624(c)(5)(ii)
2 on ECDA, we would strike that. For six --
3 Section 624(c)(5)(iii) crack assessments, we
4 would strike that section. And again, we've got
5 Section 712 if anyone needs to do a crack
6 assessment that they could use. We're revising
7 Section 624(c)(5)(iv) and we're changing the
8 frequency of patrols to four per year.

9 Let's see. Section 624(c)(5)(v) the
10 frequency of leakage surveys would be four per
11 year. Strike 624(c)(5)(vi) on odorization and
12 then Section 624(c)(5)(vi) remaining life
13 calculations. We would strike it.

14 Going to slide 80.

15 MR. DANNER: Steve, I'm sorry to
16 interrupt. So, you have on the slide that you
17 have two (c)(5)(vi)'s, odorization and remaining
18 life. So, should one of those be seven?

19 MR. NANNEY: Oh, yes. One should be
20 seven. I did not see that.

21 MR. DANNER: Sorry to interrupt.

22 MR. NANNEY: Going to slide 80. slide

1 80. Okay. Slide 80, again, some of the other
2 comments that we received from the Committee, the
3 Industry representatives supported public
4 comments which promoted expansion of the
5 applicability of Method 5. In other words, not
6 limit the usage based on pipe size or MAOP.

7 And we went back and looked at that
8 and we suggest changing the applicability in
9 Method 5 by dropping the size and operating
10 pressure limits and utilizing a PIR of less than
11 150 feet. And that is the PIR that we had
12 originally had in the Notice of Proposed
13 Rulemaking. Also, in addition, PHMSA would
14 expand the look-back period to five years and in
15 response to the comments we had from Method 2
16 that we've discussed already.

17 Slide 81. And I don't know if you can
18 see that here in the room very well, but it is
19 showing the various pressures and if we went to a
20 PIR of 150 or less -- and just to give a few
21 points for the record, for an eight inch
22 pipeline, we show 149 feet as being the PIR. For

1 a 12 inch pipeline, it would be 144 feet. For a
2 16 inch pipeline, it would be 136 feet for the
3 PIR. For 20 inch, it would be 138 feet for the
4 PIR and on down if it was a -- some of the bigger
5 sizes, we have that also.

6 But anyway, just to put on record what
7 those would be. I believe originally we had
8 proposed an eight inch -- or an eight inch with a
9 PIR of 150 as being the maximum.

10 Going to Slide 82, the committee
11 comments on -- going down to Method 6, other
12 technology. And for Method 6, other technology,
13 the committee members commented to adopt the same
14 no-objection letter language as voted in 607 and
15 PHMSA suggests inclusion of the same no-objection
16 language as voted by the committee for Section
17 607 which would be applied to any notification of
18 any of the methods is what we would do.

19 All right. Going to Slide 30 -- I
20 mean, 83. What am I thinking? Slide 83. Again,
21 this concludes our response to Methods 4, 5 and
22 6. And again, the following slides will

1 summarize a number of the revisions that PHMSA
2 suggests. Slide 84. Again, this is what PHMSA
3 suggests the Committee to consider.

4 We suggest revising proposed Section
5 624(c)(5), Method 5 which is pressure reductions
6 for segments with small potential impact radius
7 and diameter as follows: the leak, the size and
8 pressure criteria. The applicability would be
9 based solely on PIR of less than or greater than
10 150 feet. Also, we would strike in Section
11 624(c)(5)(ii), ECDA. We would also strike
12 (c)(5)(iii), crack analysis program. We would
13 also strike (c)(5)(vi), odorization and
14 (c)(5)(vii), Fracture Mechanics Analysis.

15 And again, as I stated earlier, we
16 would change the frequency of patrols and surveys
17 for Class 1 and 2 to four times per year. Class
18 3 and 4 to six times per year.

19 Slide 85. Again, PHMSA suggests the
20 Committee consider the following: revising
21 proposed Section 624(c)(6), other technology as
22 follows. Use same 90 day, no-objection letter

1 language the Committee approved for Sections 607
2 for any notification under Section 624.

3 With that, I turn it back over to the
4 Chairman.

5 MR. DANNER: All right, thank you.

6 And at this point we will take public comment on
7 Methods 4, 5 and 6. Do we have anyone wishing to
8 speak?

9 Go ahead.

10 MS. KURILLA: Hi. Erin Kurilla with
11 the American Public Gas Association. One of the
12 -- I'm going to refer to Slide Number 79. I just
13 wanted to thank PHMSA a lot for taking another
14 look at Method 5 for low PIRs -- small PIR
15 pipelines. I think we definitely saw a fix for
16 the applicability of this method by changing it
17 to the 150 foot. I think that's cleaner and
18 helps a lot of operators understand if their
19 pipeline is in this bucket.

20 My concern is that while I appreciate
21 that PHMSA kind of really narrowed the, what
22 you're calling compensatory measures -- kind of

1 looks and talks and feels like P&N measures in
2 some way for these low-stress pipelines.

3 However, I find it interesting that you're still
4 asking these operators for -- that are working on
5 pipelines that are 150 feet or less in their PIR
6 to both do a pressure reduction and do additional
7 actions. It still feels like it needs to be an
8 or. We're talking about the lowest of the low
9 risk of these pipelines.

10 So, you know, again Method 2 is still
11 just a pressure reduction but here we're doing a
12 pressure reduction and we're doing additional
13 actions. Granted, I know it's a less pressure
14 reduction but it still feels like if I'm doing a
15 pressure reduction, why am I doing additional
16 activities?

17 Thanks.

18 MR. DANNER: All right. Thank you.
19 Is there any other public comment? Okay. Seeing
20 none, let's open it up to the committee. Any
21 thoughts on 4, 5 and 6 or the proposal you just
22 heard from APGA? Okay. Cheryl.

1 MS. CAMPBELL: I guess I'm interested
2 in PHMSA's comment about the additional actions.

3 MR. DANNER: Does PHMSA have a comment
4 about additional actions? Steve.

5 MR. NANNEY: I'm not sure I understand
6 what you mean by additional actions. I guess I
7 don't -- I'm not quite understanding the
8 question.

9 PARTICIPANT: Like surveys and all the
10 additional requirements.

11 MS. CAMPBELL: I think that -- can
12 you go back to the --

13 MR. NANNEY: So --

14 MS. CAMPBELL: Yes.

15 MR. NANNEY: Well, first of all, if
16 you go and look on that Slide 79, we're only
17 requesting -- asking for 10 percent pressure
18 reduction. If you go and look at Method 2, it
19 would be based upon a 25 percent. Also if you
20 look at the chart by taking the diameters. If
21 you go to that chart, Sayler, that -- and make it
22 a little bigger. If you look at some of the

1 smaller lines by -- without putting a limit on
2 pressures. If you look at the green there, you
3 can see 950. That's, I think, 4 inch and 6 inch.

4 So, the pressures can be very -- could
5 be potentially very high. I'm not saying they
6 are. I'm just saying that potentially. So, we
7 did unleash a lot of things. We thought that if
8 you did have a higher pressures on these smaller
9 lines, you still would have a potential of harm
10 and you needed to be checking it. We thought we
11 had done a lot of roll-back and compromise and --
12 but we also thought that if you had the higher
13 pressures and everything, you needed to still be
14 doing the surveys if you didn't take the full
15 pressure reduction.

16 MR. DANNER: Okay. Whose hand is
17 that? Sara.

18 MS. GOSMAN: Quick question.
19 Applicability. So this would still apply just to
20 those lines who cannot do an in-line inspection.
21 Is that right?

22 MR. NANNEY: I don't think we limited

1 it. I think we gave that as a -- you may be
2 looking at some wording that I haven't looked at
3 lately, but if it says that that's what we were
4 doing but I did not remember that, Sara. I ---

5 MS. GOSMAN: So I'm looking at 5 -- at
6 the bottom of that first paragraph that says,
7 which cannot be assessed using in-line inspection
8 or pressure tests. So that's retained in the
9 applicability.

10 MR. NANNEY: Yes --

11 MS. GOSMAN: Okay.

12 MR. NANNEY: The answer is yes.

13 MR. DANNER: Okay. All right. Any
14 other comments? All right. Seeing none, maybe
15 we can go to the voting slide then.

16 Okay. We have a motion in front of
17 us. Is there anyone who wishes to make this
18 motion? Thank you, Rich.

19 MR. WORSINGER: Rich Worsinger, Rocky
20 Mount Public Utilities. Cheryl, I'll give you a
21 break.

22 Voting language for MAOP

1 Reconfirmation Method 4: Pipe Replacement, Method
2 5: Pressure Reduction for Small PIR and Diameter,
3 Section 192.624(c)(5) and Method 6: Other
4 Technology, Section 192.624(c)(6).

5 The proposed rule as published in the
6 Federal Register and the Draft Regulatory
7 Evaluation with regard to the provision for
8 Method 4, Method 5 and Method 6 of MAOP
9 Reconfirmation are technically feasible,
10 reasonable, cost-effective and practicable if the
11 following changes are made.

12 For Method 5, pressure reduction for
13 segments with small potential impact radius and
14 diameter, delete the size and pressure criteria.
15 The applicability would be based solely on a PIR
16 of less than 150 feet. Strike ECDA Crack
17 Analysis Program, Odorization and Fracture
18 Mechanics Analysis requirements. Change
19 frequency of patrols and surveys. In Class 1 and
20 2 locations to four times per year. In Class 3
21 and 4 locations to six times per year.

22 For Method 6, Other Technology, use

1 the same 90 day no-objection language -- no-
2 objection letter language that committee approved
3 for 192.607.

4 The proposed rule as published in the
5 Federal Register --

6 MR. DANNER: That's the same line. Is
7 that the same on both sides?

8 PARTICIPANT: Yes, it's the same on
9 both sides.

10 MR. DANNER: Yes. So --

11 MR. WORSINGER: Good.

12 MR. DANNER: You're done. Is there a
13 second?

14 MR. BRADLEY: I second the motion.
15 Second.

16 MR. DANNER: All right. It has been
17 moved and seconded. Is there any discussion
18 before we go to a vote on Methods 4, 5 and 6?

19 All right. Seeing none. Cheryl, time
20 for a roll call vote.

21 MS. WHETSEL: Steve Allen.

22 MR. ALLEN: Aye.

1 MS. WHETSEL: Dave Danner.

2 MR. DANNER: Aye.

3 MS. WHETSEL: Diane Burman. Is she
4 there? Sara Longan.

5 DR. LONGAN: Aye.

6 MS. WHETSEL: Terry Turpin.

7 MR. TURPIN: Aye.

8 MS. WHETSEL: Cheryl Campbell.

9 MS. CAMPBELL: Aye.

10 MS. WHETSEL: Andy Drake.

11 MR. DRAKE: Aye.

12 MS. WHETSEL: Ron Bradley.

13 MR. BRADLEY: Aye.

14 MS. WHETSEL: Rich Worsinger.

15 MR. WORSINGER: Aye.

16 MS. WHETSEL: Jon Airey.

17 MR. AIREY: Aye.

18 MS. WHETSEL: Robert Hill.

19 MR. HILL: Aye.

20 MS. WHETSEL: And Sara Gosman.

21 MS. GOSMAN: Aye.

22 MS. WHETSEL: Okay. Motion passes.

1 MR. DANNER: All right. Thank you very
2 much. Let's go right into 624(e) and (f).

3 Presentation by PHMSA Staff.

4 MR. NANNEY: All right. Slide 89.

5 Again, the committee comments on the
6 notification procedure. There were none. The
7 committee comments on the records requirement
8 were none. PHMSA suggests retaining the
9 notification procedure as published in the Notice
10 of Proposed Rulemaking. Use the 90 no-objection
11 letter language the committee approved for
12 Section 607 for any notification under Sections
13 624. And again, PHMSA suggests deleting the word
14 reliable from the records requirement as voted on
15 during the June 2017 meeting.

16 And as discussed in our March -- the
17 second teleconference meeting, PHMSA will provide
18 guidance regarding TVC records in the preamble of
19 the final rule.

20 Mr. Speaker.

21 MR. DANNER: All right. Thank you
22 very much. So, is there any public comment on

1 these proposals? All right. Seeing none. Is
2 there any committee discussion? Andy.

3 MR. DRAKE: I got a couple of comments
4 and they may just may be questions. You know, I
5 think we still want to make sure that we're
6 clarifying in 192.619(a) that segments that a
7 complete at 192.624 test have a valid MAOP. I
8 think we've been through that. It just, I think
9 it's a good continuity check here.

10 I think -- the other thing that -- and
11 I'm trying to make sure I understand what you're
12 trying to accomplish here. I think we need an
13 exit ramp to 192.624 and I think (e) creates kind
14 of a counterproductive do-loop that may create a
15 compliance problem and I just wanted to try to
16 get your thoughts on that. It looks sort of like
17 you get stuck in there with (e) and I don't know
18 how you get out to 624.

19 Sorry, I was reading ahead.

20 MR. DANNER: Okay. So, in other words
21 you have no comments on 624(e) or (f)?

22 PARTICIPANT: No, just (f).

1 MR. DANNER: Okay. So do you -- would
2 you clarify? Did you -- you had no comments on
3 624(e) or (f)?

4 MR. DRAKE: I don't. This is just
5 (f).

6 MR. DANNER: Oh, I don't have a slide
7 for (e). All right. Okay. So, we have a motion
8 in front of us. Oh, okay. Yes.

9 MR. HILL: I'll be more than happy to
10 make the motion if you're ready.

11 MR. DANNER: I am ready.

12 MR. HILL: Mr. Chairman, the voting
13 language for MAOP Reconfirmation Notification
14 Procedure and Records under Section 192.624(e)
15 and 192.624(f). The proposed rule as published
16 in the Federal Register and Draft Regulatory
17 Evaluation with regard to the provisions for MAOP
18 Reconfirmation Notification Procedure and Records
19 are technically feasible, reasonable, cost-
20 effective and practicable if the following
21 changes are made.

22 PHMSA will provide guidance regarding

1 TVC records in the preamble of the final rule as
2 discussed in the March 2 meeting and retain the
3 notification procedure as published in the NPRM.
4 Use the same 90 day no-objection letter language
5 the committee approved for 192.607 for any
6 notification under Section 192.624.

7 My name's Robert Hill.

8 MR. DANNER: Thank you, Robert. Is
9 there a second?

10 MR. WORSINGER: Rich Worsinger.

11 Second.

12 MR. DANNER: Thank you very much. Is
13 there any discussion on the language before you?
14 All right. Hearing none. Cheryl, ready for roll
15 call vote.

16 MS. WHETSEL: Okay. Steve Allen.

17 MR. ALLEN: Aye.

18 MS. WHETSEL: Dave Danner.

19 MR. DANNER: Aye.

20 MS. WHETSEL: Diane Burman.

21 MS. BURMAN: Aye.

22 MS. WHETSEL: Sara Longan.

1 DR. LONGAN: Aye.

2 MS. WHETSEL: Terry Turpin.

3 MR. TURPIN: Aye.

4 MS. WHETSEL: Sorry. Cheryl Campbell.

5 MR. DANNER: She's not here.

6 MS. WHETSEL: Andy Drake.

7 MR. DRAKE: Aye.

8 MS. WHETSEL: Ron Bradley.

9 MR. BRADLEY: Aye.

10 MS. WHETSEL: Sorry. Rich Worsinger.

11 MR. WORSINGER: Aye.

12 MS. WHETSEL: Jon Airey.

13 MR. AIREY: Aye.

14 MS. WHETSEL: Robert Hill.

15 MR. HILL: Aye.

16 MS. WHETSEL: Sara Gosman.

17 MS. GOSMAN: Aye.

18 MS. WHETSEL: Thank you.

19 MR. DANNER: Okay. Motion passes.

20 So -- okay. We are going to keep

21 going with a hard stop at 11:55. So, let's get

22 right to it. Chris.

1 MR. MCLAREN: Well, very good. I'm
2 Chris McLaren with PHMSA. I understand I'm
3 what's standing between us and lunch. Okay. In
4 this set on mine, it says 3 but we'll use is the
5 A, B, C, D, E and F letter designation on the
6 left as we talk about these following topics in
7 this slide session.

8 A for 192.619(e), the proposal is to
9 require 192.624 for MAOP of Applicable Segments.
10 B, 192.503 make conforming edits to reference
11 192.624. And C in 192.619(a)(4) refer to 192.607
12 for that material documentation and D look at
13 192.619(a)(2) to update the Class 1 pressure test
14 factor. Topic E is 192.619(f) to -- revisions
15 for the MAOP records. And in 192.605(b)(5), the
16 operations and maintenance requirements.

17 Okay. On this topic session discuss
18 these A and B topics grouped together on 619(e)
19 and 192.503. So, from the December 2017
20 Committee Meeting and in response to the NPRM
21 comments, PHMSA suggested that the committee
22 consider the following. Shorten and clarify

1 192.619(e) to remove text that duplicates the
2 scope of 192.624(a) and in that modification to
3 read within (e), notwithstanding the requirements
4 of paragraphs (a) through (d) of this section
5 onshore steel transmission pipelines that meet
6 the criteria specified in 192.624(a) must
7 establish a document the maximum allowable
8 operating pressure in accordance with 192.624.

9 Withdrawal of the proposed revision to
10 192.503 is not needed since 192.503 already
11 invokes 192.619 which would adequately reference
12 the new requirements of 192.624.

13 Topic C, MAOP in 192.619(a)(4). The
14 NPRM we propose referring to material
15 verification. The issue is that it is part of
16 responding to the material documentation mandate,
17 establishment of MAOP under 192.619 should rely
18 on TVC records. PHMSA proposed to require that
19 operators use 192.607 to document missing
20 information as needed under 192.619(a)(4) from
21 Section 23 of the Pipeline Safety Act of 2011.

22 NPRM comments received a reference to

1 192.607 is not appropriate in 619(a)(4).
2 Proposal is vague and does not provide sufficient
3 information about what to do if material
4 verification has not been completed and records
5 for some components are not available or how to
6 determine the limiting condition.

7 PHMSA's response is that the
8 modifications proposed and approved by the GPAC
9 at the December meeting addressed this comment.
10 The amended 192.607 would allow operators to
11 verify material properties in specific cases such
12 as might be needed to establish MAOP without the
13 need for a long-term sampling program.

14 Also referring to the same topic area,
15 PHMSA believes that operators should evaluate
16 material properties under 192.619. Included
17 reference to 192.607, so that operators may
18 verify material properties if TVC records are not
19 available. PHMSA suggests clarifying that
20 192.607 does not necessarily apply to all
21 segments when determining MAOP by adding if
22 applicable after the references to 192.607 in

1 192.619(a)(4).

2 Still on Topic C, one of the NPRM
3 comments was to clarify if the proposed reference
4 to 192.607 in 192.619(a)(4) is addressing only
5 transmission pipelines or both transmission and
6 distribution pipelines. PHMSA's response is that
7 the scope of 192.607 applies only to transmission
8 pipelines. PHMSA suggests clarifying that
9 192.607 does not apply to distribution pipelines
10 when determining MAOP by adding if applicable
11 after the reference to 607 in 192.619(a)(4).

12 Topic D, 192.619(a)(2). The updating
13 of Class 1 pressure test factor for MAOP. The
14 issue is that one conclusion of the NTSB
15 investigation of the PG&E accident in San Bruno,
16 California was the premise that in Title 49, Code
17 of Federal Regulations, Part 192 of the Federal
18 Pipelines Safety Regulations that manufacturing
19 and construction-related defects can be
20 considered stable even when a gas pipeline has
21 not been subjected to a pressure test of at least
22 1.25 times the maximum allowable operating

1 pressure is not supported by scientific studies.

2 PHMSA proposed to require that the
3 MAOP pressure limitations specified in
4 192.619(a)(2) for new Class 1 pipe segments be
5 based on subpart J pressure test divided by 1.25
6 instead of 1.1. The basis was NTSB
7 recommendation P-11-15 Gas Research Institute
8 Report 04/0178 evaluating the stability of
9 manufacturing and construction defects in natural
10 gas pipelines, report number 05-12R in 2007.

11 It says recommendation. So on this
12 topic of increasing the class location factor for
13 pressure testing of steel pipe located in Class 1
14 areas installed after the publication of the
15 final rule, PHMSA received the comment that to
16 clarify the MAOP is to be based on the highest
17 pressure to which the segment was tested after
18 construction. PHMSA's response is that for pipe
19 segments installed on or after the effective date
20 of the rule, the MAOP limitations of
21 192.619(a)(2) is based on the test pressure of a
22 successful subpart J pressure test divided by the

1 applicable class location factor.

2 Another comment to the NPRM was
3 clarified at 619(a)(3). In cases where past
4 operating pressure records are not available but
5 pressure tests records are available. PHMSA's
6 comment is that per existing code requirements in
7 619(a)(3), the pressure restriction in
8 192.619(a)(3) based on past operating pressure
9 does not apply if the segment was tested in
10 accordance with requirements in paragraph
11 192.619(a)(2).

12 Another comment was that the effective
13 dates proposed for the revised factors being
14 applied the date of new rule or the date of new
15 rule minus one day, it seemed to cause
16 uncertainty and the commenter recommends that the
17 effective date for new Class 1 factors be -- the
18 new Class 1 test factor be 180 days after the
19 effective date of the rule.

20 PHMSA's response is the new pipelines
21 cannot be operated unless pressure tested
22 existing 192.505 prohibits the operation of a

1 pipeline greater than 30 percent SMYS if there is
2 a building intended for human occupancy within
3 300 feet of a pipeline unless that segment has
4 been hydrostatically tested of at least 125
5 percent of MAOP. The proposed rule would extend
6 this requirement which is already in effect of
7 day -- in effect today to all Class 1 pipe
8 regardless of the nearness of the buildings.

9 Topic F -- or Topic E, 192.619(f),
10 MAOP records. The issue is that in response to
11 the PG&E accident in San Bruno, California, the
12 Pipeline Safety, Regulatory Certainty and Job
13 Creation Act of 2011 mandated that operators
14 report pipe segments for which records could not
15 be verified that accurately reflect the physical
16 and operational characteristics of the pipeline
17 and confirm the MAOP of them. PHMSA proposed to
18 add a new paragraph, 192.619(f) to more clearly
19 specify that operators must have records to
20 substantiate MAOP. And the basis is Section
21 23(a) of the Pipeline Safety Improvement Act of
22 2011 and 49 USC 60139(a) and (b).

1 Some of the comments to the NPRM --
2 one was the proposed rule, as written, would
3 apply to distribution gathering onshore and
4 plastic pipelines. PHMSA suggests clarifying
5 that the MAOP Records requirements proposed in
6 192.619(f) would apply only to onshore steel gas
7 transmission pipelines. Another commenter was
8 that the 192.619(f) should clarify that it
9 applies only to records needed to establish and
10 document MAOP. PHMSA suggests revising
11 192.619(f) to clarify that it only applies to
12 records needed to demonstrate compliance with
13 192.619(a) through (e).

14 Still on Topic E. Another comment to
15 the NPRM advocated that new MAOP record
16 requirements only be applied prospectively
17 beginning one year after the date of the rule.
18 PHMSA's response is that similar to the proposal
19 that the committee voted on at the March 2nd,
20 2018 meeting, PHMSA suggests revising 192.619(f)
21 to clarify that MAOP record requirements are not
22 retroactive. Existing records on pre-existing

1 pipelines must be retained for the life of the
2 pipeline. New pipelines must make and retain
3 records for the life of the pipeline.

4 Other sections such as 192.624 and 917
5 would require when and for which pipeline
6 segments missing MAOP records must be verified in
7 accordance with either -- with 192.624 and/or
8 192.607. Also, MAOP records would be required
9 for any pipeline placed in service after the
10 effective date of the rule.

11 The next topic, Topic F dealing with
12 192.605(b)(5) within the Operations and
13 Maintenance Section. PHMSA proposed to add
14 clarification to the requirement for over
15 pressure protection applied to segments with
16 MAOP's established using MAOP Reconfirmation per
17 192.624 methods. NPRM comments were revised.
18 Subsection is redundant and unnecessary. PHMSA
19 should retract this proposed revision as
20 duplicative of the current requirements such as
21 in 192.605(b)(1).

22 Another commenter said to delete the

1 reference to 192.731. Another comment was
2 clarify if the requirement is addressing only
3 transmission or both transmission and
4 distribution. Another comment was PHMSA has not
5 provided justification for imposing this
6 requirement on distribution pipelines. And
7 lastly, code has never required operators to
8 include procedures specific for each individual
9 controller device in their manual.

10 PHMSA's response is the proposed
11 changes to 192.605(b)(5) was intended to be a
12 confirming change to clarify that applies
13 segments with MAOP determined under 192.624. The
14 proposed change was not intended to introduce any
15 new or substantially different requirement and
16 was intended only to provide clarification.
17 Based on the public comments received and the
18 unintended confusion it might create, PHMSA
19 suggests that the proposed revision of
20 192.605(b)(5) be withdrawn.

21 Thank you, sir.

22 MR. DANNER: All right. Thank you.

1 Yes, I think what we will do now is we're going
2 to break for lunch. It is currently eight
3 minutes to noon. So, I will come back at one
4 o'clock. One o'clock?

5 Yes, I think we can get started at one
6 o'clock. And we will take public comment on the
7 MAOP Proposals and we'll go from there.

8 So, thank you.

9 (Whereupon, the above-entitled matter
10 went off the record at 11:52 a.m. and resumed at
11 1:06 p.m.)

12 MR. DANNER: All right. At this
13 point, we are going to take public comment on the
14 MAOP proposals. Is there public comment on these
15 items?

16 MS. KURILLA: Yes, but I can't find my
17 page. I'll go off memory.

18 MR. DANNER: We'll give you a moment.

19 MS. KURILLA: Erin Kurilla, APGA. I
20 think it was slide number 79 maybe, although it
21 seems like that was a long time ago. Maybe not
22 slide 79. No. That was my last time I talked.

1 Anyway, not slide 79. I apologize but it is --
2 this is really, I guess, just a call to the GPAC
3 to kind of slow down and really think about the
4 changes that we're making to 619. Very
5 appreciative of PHMSA making it clear in a couple
6 of their slides that the changes, especially to
7 619(f) are prospective for transmission pipelines
8 only. I think it's really important, especially
9 since 619 applies to both distribution pipelines
10 and transmission, and I'll make a little joke
11 here. I always tell people I really don't want
12 in 20 years to be explaining to people when
13 619(f) went into code, so adding in a, you know,
14 effective date on a prospective basis for those
15 MAOP records is really important.

16 I'm going to tee Andy up. I know he
17 kind of gave this comment before we were on the
18 last topic, but I actually find 619(e)
19 unnecessary, although I understand why PHMSA is
20 including it. It's really to ensure that
21 everyone understands you have essentially three
22 ways to establish your MAOP now. You have 619(a)

1 which is the lowest of the four; you have 619(c),
2 the grandfather clause for still those pipelines
3 that are allowed to use that; and now you have
4 624. So I'd really encourage PHMSA to look at
5 the language in 619(a) and just add 624 there.
6 And I don't think you need 619(e). All 619(e)
7 does not is point operators to 624; 624 in and of
8 itself is self-activating. We don't need to be
9 told to go do 624. What we need is to make sure
10 there's not a loop between 619(e) and 624. And
11 by adding 624, again, as an option in 619(a),
12 it's a really clean way to do that, so thanks.

13 MR. DANNER: All right. Thank you.
14 Go ahead.

15 MR. OSMAN: CJ Osman with INGAA.
16 Similar to Erin, I'll admit these are probably
17 some wordsmith-type comments but with the
18 importance of 192.619 and 192.624 and how they
19 play together as well as places where the
20 specific words and being clear really do matter.
21 So we appreciate that PHMSA has clarified the
22 requirement in 192.619(f) will be to keep records

1 needed to establish document compliance with
2 192.619(a) through (e).

3 What wasn't clear from the slide deck
4 is whether that means PHMSA is proposing to
5 eliminate the list of examples that was in the
6 original proposed 192.619(f). We don't think
7 that those examples are helpful and we think they
8 actually create confusion. Just to remind folks,
9 the list there is records related to design,
10 construction, operation, maintenance, inspection,
11 testing, material strength, pipe wall thickness,
12 seam type, and other related data. And I think
13 the discussions yesterday and today confirm that
14 not all of those records will always be needed in
15 all cases to establish MAOP. So just removing
16 that and leaving the requirement to establish and
17 document records and compliance with 192.619 is
18 probably sufficient.

19 Let's see. Also, we're a little
20 concerned with the proposed requirement on the
21 slide deck for operators to retain existing
22 records on pre-existing pipelines for the life of

1 the pipeline. While certainly we understand the
2 sentiment, if you have a record related to your
3 MAOP, you shouldn't be throwing it out. But
4 we're concerned about how that could be enforced
5 and what type of obligation there would be on the
6 operator to prove that they have retained all of
7 their records on existing pipeline going forward
8 that they had in the past. So again, don't
9 disagree with the point there but just a little
10 concerned about how that could be enforced and
11 how that could be interpreted both by PHMSA
12 inspectors out in the field and also by the state
13 partners. So just something for the GPAC to
14 consider. Thank you.

15 MR. DANNER: All right. Thank you.

16 MR. MILLER: Hi. Shawn Miller with
17 Dominion Energy. Comment is related to the
18 previous two in that we're trying to eliminate
19 two clarifications, the looping effect that this
20 could have. We appreciate the clarifications
21 PHMSA has provided to 192.619. PHMSA should also
22 clarify in 192.619(a) that compliance with any of

1 the six methods to reconfirm MAOP in 624
2 satisfies the 192.619 requirement for pressure
3 test records. One of the triggers to reconfirm
4 MAOP under 192.624 is not having TVC records of a
5 pressure test for the pipelines installed after
6 1970 as outlined in 517(a).

7 If an operator reconfirms MAOP using
8 a method other than pressure tests, it may never
9 have a pressure test record. PHMSA will remove
10 ambiguity by referencing 624 in 619(a). Thanks
11 for your consideration.

12 MR. DANNER: All right. Thank you.
13 Are there any other public comments on these
14 items?

15 (No response.)

16 MR. DANNER: Hearing none, I'm turning
17 to the Committee. Andy?

18 MR. DRAKE: This is Andy Drake with
19 Enbridge, sort of a do over from my comments last
20 time, but I agree with the comments that were
21 made by the public. I think those are some good
22 comments, not to reiterate them but I do think we

1 need to clarify in 619(a) that a segment that
2 completes a 624 test has a valid MAOP. I think
3 we just need to kind of explicitly lock those two
4 together. They do interplay with one another. I
5 think that 619(e) does or can create a
6 counterproductive kind of do loop that creates a
7 compliance liability that we need to address, and
8 I don't think we lose too much by taking 619(e)
9 out.

10 The other comment that I would make is
11 about (f) and I think it's really more of an
12 enforcement clarification here. I just want to
13 be clear that (f) is interpreted -- when you have
14 this long list of things here, you start getting
15 into operations, maintenance, inspection testing,
16 you know, all these things. I don't know that
17 that helps us. I think it actually may confuse
18 some things. The confusion that I've seen in
19 enforcement issues even to date is that (f) can
20 be interpreted that any new operating or
21 maintenance data could require an MAOP to be
22 reevaluated. That's not appropriate and that's

1 not the intent of this.

2 If we have -- we run a pig and we find
3 an anomaly that has a depth, we may have to
4 restrict the MAOP until we can fix it, but we
5 don't revise the MAOP. And I think that seems
6 maybe like a subtle distinction. It's not. You
7 do the MAOP once. Then you safely operate your
8 pipe over a period of time. That's why we pull
9 the MAOP over here and technically management
10 over here. MAOP is a one-time thing. Operating
11 safely is an ongoing continuous event, so I just
12 want to make sure that that's -- I'm reading (f)
13 correctly, that it's not intended revise the MAOP
14 every time we get some sort of maintenance data
15 back in or inspection data back in. Thanks.

16 MR. DANNER: All right. Is there any
17 other comment on this? Ron.

18 MR. BRADLEY: Thanks, Mr. Chair. Ron
19 Bradley, PECO. So just a general comment. I
20 appreciate the work that the Committee and that
21 PHMSA's done in separating and making sure that
22 the language is very clear, that 619(f) and all

1 that we've worked on is relating to transmission
2 pipe. It's important; 619(f) isn't very clear if
3 someone were to take it out of context and just
4 apply it to any segment of pipe anywhere with
5 natural gas in it. I have seen this happen. I
6 wouldn't state it if I didn't. So I think we
7 really -- I really appreciate you guys making the
8 statement that these standards, 619(f)
9 specifically applies and you have it in there on
10 shore steel gas and transmission pipelines.

11 Thank you.

12 MR. DANNER: Okay. Oh, sorry, Andy,
13 that's you.

14 MR. DRAKE: I'm going to ask Steve
15 directly, did my interpretation resonate with
16 your expectations?

17 MR. NANNEY: I think so. This is
18 Steve Nanney, PHMSA. Yes. I was reading
19 something when you said -- so I think I caught it
20 but I'm not positive.

21 MR. DRAKE: Okay. I'll just -- I
22 don't want to put you in a tough spot. I mean

1 I'm doing the same thing over here so I can
2 totally appreciate that. The (f) -- section (f),
3 I think the -- my concern there is that the long
4 list of things that we have there, all those
5 examples can create some confusion. I think it
6 can be -- create an impression similar to Ron. I
7 have seen this in enforcement issues where people
8 come out and go "well, you've got an in-line
9 inspection line that shows an issue, you need to
10 revise the MAOP," and that is not how we look at
11 this. We look at MAOP as being validated one
12 time and then maintenance and operating data time
13 going is treated as an integrity management thing
14 that we may have to revise or temporarily
15 restrict the operating pressure until we fix
16 something. But we don't revise the MAOP. Is
17 that correct?

18 MR. NANNEY: Steve Nanney with PHMSA.

19 Yes.

20 MR. DRAKE: Thank you.

21 MR. DANNER: So is it your proposal,
22 Andy, to take the examples out?

1 MR. DRAKE: That would be my
2 recommendation. I think it just cleans this up a
3 little bit.

4 MR. DANNER: Okay. Sara?

5 MS. GOSMAN: I wonder if we could
6 solve this problem by putting in "may." So
7 records that establish the pipeline MAOP "may"
8 include but are not limited to?

9 MR. DANNER: Andy.

10 MR. DRAKE: This is Andy Drake with
11 Enbridge. I think the record we just created may
12 solve the problem. It's just we need some
13 guidance material to help clarify what the intent
14 of all this is. I don't know that it -- I don't
15 know that an exhaustive list helps or not helps.
16 I mean basically, you're saying everything should
17 be -- could possibly weigh in here, which is
18 accurate but I think the confusion it creates is
19 "do I have to consider all of this" or, you know,
20 "when have I done diligence to set this up,"
21 which is all the other sections that we've been
22 talking about to date. So I don't know how much

1 value it adds is really my point.

2 MR. DANNER: Sara.

3 MS. GOSMAN: Yes, I understand that.

4 I mean when I read it, in terms of interpreting
5 it, I think it's nice to sometimes have examples,
6 but I certainly understand the point that you
7 don't want to be limited by those examples. So
8 my thinking here is if it's -- if the word "may"
9 or something similar is in there, it gives us a
10 sense of the universe of the kinds of documents
11 that might be the ones being referenced here but
12 wouldn't imply that any given one of those or
13 perhaps all of them, right, are necessary.

14 MR. DANNER: Cheryl.

15 MS. CAMPBELL: Cheryl Campbell, Xcel
16 Energy. Another potential solution might be to
17 offer up some of those examples in guidance
18 rather than in the regs where they're a little
19 easier, shall I say, to adjust over time or, you
20 know, kind of change and evolve over time. So
21 maybe the solution is to pull it out of the
22 regulatory text but include it in guidance with

1 your word "may," right. It "may" include these
2 types of records and then it gives us a script to
3 have it change or evolve over time. They could
4 adjust that.

5 MR. DANNER: All right. Any thoughts
6 on Cheryl's proposal?

7 MR. DRAKE: This is Andy Drake with
8 Enbridge. I like that proposal. I think --
9 because that's the issue you're trying to get to
10 is give people guidance to give them clarity and
11 I don't know that we're adding a lot of clarity
12 here by adding this long list. I think if you
13 take it into the guide material, you have a
14 chance to actually explain what it is you're
15 trying to accomplish.

16 MR. DANNER: Okay. Any other
17 responses? All right. Yes, Steve, you have --

18 MR. NANNEY: From my perspective, from
19 PHMSA, we agree and we'll do like -- Sara and
20 Cheryl, Andy, we'll try to get language in there,
21 "may" and either in the preamble or something
22 like that, what Cheryl's talking about. I think

1 it's very doable.

2 MR. DANNER: Okay. Any other
3 comments?

4 (No response.)

5 MR. DANNER: All right. We have
6 voting language in front of us. Do you want to
7 look at it and make any further suggestions
8 before we entertain a motion? Andy.

9 MR. DRAKE: This is Andy Drake with
10 Enbridge. And Steve, I'd just like your thoughts
11 on section (e). I mean do you see it adding a
12 lot of value? I mean to me, it doesn't lose --
13 it doesn't hurt anything to get rid of it. It
14 just creates a compliance do loop. And if we
15 could clean that up, I think this is a good
16 chance to do that.

17 MR. DANNER: Yes, thoughts, Steve?

18 MR. NANNEY: Steve Nanney, PHMSA. I
19 would like for us to look at it. I'm not opposed
20 to it but I just want to make sure it makes good
21 sense before we do it.

22 MR. DANNER: So, Steve, we have a

1 motion in front of us so if you're going to look
2 at it, you should do that now. So -- yes, Steve.

3 MR. NANNEY: We'll look at putting it
4 in (a), and it may be a -- it'll be a subsection
5 just like the others.

6 MR. DANNER: So I'm sorry, I didn't
7 hear that.

8 MR. NANNEY: Drop -- we would move it
9 from (e) into (a) and it would be a subsection in
10 (a) is what I'm saying.

11 MR. DANNER: Okay. Andy.

12 MR. DRAKE: Last comment while we're
13 editorializing here. I think we do need to add
14 some kind of reference to 624 and 619(a). And if
15 -- is it getting typed up there? I was -- I
16 don't see it.

17 MR. DANNER: I don't see 624.

18 MR. DRAKE: On the left. Okay. Then
19 I think another comment that we would say is I
20 think just to help lock 624 and 619(a) together
21 that we should reference 624 in 619(a). And I
22 think that just locks them together. That's all

1 you're trying to do. I'm not trying to do
2 anything squirrely. I think it just clarifies
3 the interlock.

4 MR. DANNER: Steve?

5 MR. NANNEY: PHMSA agrees. We will --
6 that's what the purpose of 619(e) was.

7 MR. DANNER: Sara.

8 MS. GOSMAN: I'm just trying to follow
9 this conversation. Sara Gosman. So where in (a)
10 would we be putting this reference?

11 (No audible response.)

12 MS. GOSMAN: Is this your proposal?

13 MR. DRAKE: This is Andy Drake with
14 Enbridge. All I am proposing is that we would
15 add a comment in 619(a) that references 624,
16 maybe just trying to recognize that that hydro
17 test that you do in --

18 MR. DANNER: Right, but there's also
19 a proposal to put (e) into (a). I think her
20 question is where does (e) go in (a).

21 MS. GOSMAN: Yes.

22 MR. DRAKE: That was Steve's proposal.

1 MS. GOSMAN: Oh, all right.

2 MR. DANNER: I was just talking about

3 --

4 MS. GOSMAN: I'll look to Steve.

5 MR. DANNER: -- 624 but -- all right,

6 I think they're conferring on that as we speak.

7 So Sara's question was where in (a) should

8 subsection (e) go.

9 MR. NANNEY: I'm not sure yet. I just
10 had Erin to come by and show us -- I'd like for
11 us to be able to look at that. We've agreed that
12 we would put it in (a) and everything as
13 requested. To get down to a subsection of a
14 subsection, I would expect the Committee to let
15 us at least have a chance to look at it and make
16 sure we're not having any other unintended
17 consequences.

18 MR. DANNER: You're very demanding,
19 Steve.

20 (Laughter.)

21 MR. DANNER: So why don't we -- we
22 could just leave this language and then when you

1 figure out how best it should go in, just -- we
2 can have a conversation at that time, whether
3 that's later this afternoon or tomorrow. Is that
4 -- I think we're okay with it going in. We're
5 just -- it's a matter of where so -- which I
6 don't think is going to be particularly
7 contentious.

8 MR. DRAKE: I'm supportive -- this is
9 Andy Drake. I'm supportive of that. I think
10 we've got sort of direction here and I don't mean
11 to get in there and start wordsmithing about how
12 to do it. I just --

13 MR. DANNER: Right.

14 MR. DRAKE: I think directionally,
15 this is --

16 MR. DANNER: Okay. Alan.

17 MR. MAYBERRY: I was just going to say
18 why don't we just you guys decide where you want
19 it, advise us on it, and we'll take it from
20 there.

21 MR. DANNER: Andy.

22 MR. DRAKE: This is Andy Drake with

1 Enbridge. I endeavor to prepare to make a motion
2 here.

3 MR. DANNER: So that's excellent
4 because, again, I can't read it. So -- I'm not
5 wearing those glasses so yes, go ahead.

6 MR. DANNER: Okay. Voting language
7 for other proposed issues related to MAOP,
8 paragraphs 192.503, 192.605(b)(5), 192.619(a)(2),
9 192.619(a)(4), 192.619(e), and 192.619(f), the
10 proposed rule as published in the Federal
11 Register in Draft Regulatory Evaluation with
12 regard to MAOP-related provisions in sections
13 192.503, 192.605(b)(5), 192.619(a)(2),
14 192.619(a)(4), 192.619(e), and 192.619(f) are
15 technically feasible, reasonable, cost-effective,
16 and practicable if the following changes are
17 made.

18 With regard to proposed revision to
19 paragraph 192.503, with regard to proposed
20 revision to paragraph 192.605(b)(5), PHMSA will
21 consider moving 192.619(e) to be a subsection of
22 192.619(a) and will consider referencing sections

1 192.624 in 192.619(a); clarify that paragraph
2 192.607 does not apply to distribution pipelines
3 when determining MAOP by adding "if applicable"
4 after the reference to paragraph 192.607 in
5 192.619(a)(4); clarify that the MAOP records
6 requirements proposed in 192.619(f) would apply
7 only to onshore steel gas transmission pipelines;
8 clarify the MAOP records requirements at
9 192.619(f) only apply to records needed to
10 demonstrate compliance with 192.619(a) through
11 (e); move the example of MAOP documents to the
12 preamble and guidance material, and clarify that
13 the MAOP records requirements proposed under
14 Section 192.619 are not retroactive, similar to
15 the proposal that the Committee voted on at the
16 March 2, 2018 meeting; existing records on
17 preexisting pipeline must be retained for
18 pipeline's life; new pipelines must make and
19 retain records for life of pipeline; other
20 sections such as 192.624 and 192.917 would
21 require when and for which pipeline segments
22 missing MAOP records must be verified in

1 accordance with paragraphs 192.624 and/or
2 192.607; MAOP records would be required for any
3 pipeline placed in service after the effective
4 date of the rule. Wow. Is there a second?

5 MS. CAMPBELL: Second.

6 MR. DANNER: All right. It has been
7 seconded. Steve?

8 MR. ALLEN: Steve Allen, IURC. I just
9 wanted to point out that in the -- on the right-
10 hand side, the second bullet point where it talks
11 about "only apply to records needed to
12 demonstrate compliance with 192.619(a) through
13 (e)," if (e) is going to be moved to (a), then it
14 should be (a) through (d).

15 MR. DANNER: Good catch. So I take it
16 then you will revise the motion and the --

17 (Laughter.)

18 MR. DANNER: I think we're good. All
19 right.

20 MR. DRAKE: I'm good with that --

21 MR. DANNER: The motion and the second
22 are good. So any further discussion? Sara.

1 MS. GOSMAN: More just a request of
2 PHMSA, in putting in "if applicable" to what is
3 it, (a)(4), because that section, 607, as I
4 understand it now is not self-activating but
5 we're referencing it in various places, I just
6 would want to be clear that the applicability
7 references the type of pipeline, right, rather
8 than say anything about whether 607 applies in
9 this context or not, if that distinction makes
10 sense to you.

11 MR. DANNER: All right. Is that
12 something that we need to amend the motion to do
13 or is -- Okay, right. So we -- any further
14 discussion? Steve, your hand is up? Okay. All
15 right. No further discussion. Cheryl, roll
16 call?

17 MS. WHETSEL: Steve Allen?

18 MR. ALLEN: Aye.

19 MS. WHETSEL: Dave Danner?

20 MR. DANNER: Aye.

21 MS. WHETSEL: Diane Burman?

22 MS. BURMAN: Aye.

1 MS. WHETSEL: Thank you. Sara Longan?

2 DR. LONGAN: Aye.

3 MS. WHETSEL: Terry Turpin?

4 MR. TURPIN: Aye.

5 MS. WHETSEL: Cheryl Campbell?

6 MS. CAMPBELL: Aye.

7 MS. WHETSEL: Andy Drake?

8 MR. DRAKE: Aye.

9 MS. WHETSEL: Ron Bradley?

10 MR. BRADLEY: Aye.

11 MS. WHETSEL: Rich Worsinger.

12 MR. WORSINGER: Aye.

13 MS. WHETSEL: John Airey?

14 MR. AIREY: Aye.

15 MS. WHETSEL: Robert Hill.

16 MR. HILL: Aye.

17 MS. WHETSEL: Sara Gosman?

18 MS. GOSMAN: Aye.

19 MS. WHETSEL: And the motion carries.

20 MR. DANNER: All right. Thank you

21 very much. And that takes us to integrity

22 management. So who's going to tee this one up?

1 Yes, we're ready.

2 MR. McLAREN: Well, the next session,
3 Section 3, is going to be covering integrity
4 management in the 192.917(e)(3) and (e)(4) in the
5 threat identification section.

6 In light of the Committee's comments
7 from the June 2017 meeting, which were -- actions
8 were deferred to now until we had cleaned up some
9 of these other topics, PHMSA proposes that in
10 conjunction with striking the previously proposed
11 192.624(a)(1) to revise the proposed
12 192.917(e)(3) as follows. In paragraph (e)(3),
13 delete the phrase "and must reconfirm or re-
14 establish MAOP in accordance with 192.624(c)."
15 In paragraph 192.917(e)(3)(I), delete the
16 reference to 624(a)(1) and replace with, "the
17 segment has experienced a reportable in-service
18 incident as defined in 191(3) since its most
19 recent successful subpart (j), pressure test due
20 to an original manufacturing-related defect or a
21 construction, installation, or fabrication-
22 related defect."

1 And also from comments from the June
2 meeting, PHMSA suggests the Committee consider
3 that in conjunction with moving the previously
4 proposed 624(d) regarding fracture mechanics
5 analysis to a new section, 192.712, suggests
6 revising the proposed 192.917(e)(4) as follows.
7 In paragraph (e)(4), delete the reference to
8 192.624(c) and (d) and replace with a reference
9 to 192.712.

10 Also in light of those June comments,
11 PHMSA suggests the Committee consider that in
12 conjunction with striking the previously proposed
13 192.624(a)(1), add a new 192.917(e)(6) to address
14 cracking within the integrity management program
15 as proposed by the Committee. This would be
16 similar to the corrosion beyond clause in
17 192.917(e)(5) and proposed to read as follows.
18 New (e)(6), cracks; if an operator identifies any
19 crack or crack-like defect, including but not
20 limited to, stress corrosion cracking or other
21 environmentally-assisted cracking, unstable seam
22 defects, selective seam weld corrosion, girth

1 weld cracks, hook cracks, and fatigue cracks on a
2 covered pipeline segment that could adversely
3 affect the integrity of the line, the operator
4 must evaluate and remediate as necessary all
5 pipeline segments, both covered and non-covered,
6 with similar material properties and
7 environmental characteristics associated with the
8 crack or crack-like defect, and operator must
9 establish a schedule for evaluating and
10 remediating, as necessary, the similar segment
11 that is consistent with their operator's
12 established operating and maintenance procedures
13 under Part 192 for testing and repair. Thank
14 you.

15 MR. DANNER: All right. Thank you.

16 So we will now take public comment on these
17 integrity management proposals. Do we have any
18 public comment? Go ahead, sir.

19 MR. TU: How's everyone doing. My
20 name is Wen. I represent AGA. Just a comment on
21 192.917(e). There is a reference to, in subpart
22 -- or in paragraph 3, there is a reference to

1 hydrostatic pressure tests. We are recommending
2 that that word, "hydrostatic," be removed because
3 any strength test -- we're talking about strength
4 tests here and any strength test that's approved
5 by subpart (j) should be -- should qualify.

6 And additionally, in that same
7 section, I would suggest adding a language so
8 that a pressure reduction or in the assessment
9 done with ILI, for example, engineering critical
10 analysis, be allowed to confirm manufacturing
11 construction defects as well. Thank you.

12 MR. DANNER: All right. Thank you.

13 CJ, go ahead.

14 MR. OSMAN: CJ Osman with INGAA. Just
15 a couple small points. First is in (e)(4), which
16 addresses ERW pipe, there's a reference to pipe
17 body cracking. ERW is a seam type. This section
18 is about seams so the reference to pipe body
19 cracking here probably doesn't belong. It
20 probably makes more sense in the next section on
21 cracks, which is new. That was a holdover from
22 some previous versions so probably something that

1 PHMSA could consider moving over.

2 Also, we'd certainly agree with
3 PHMSA's proposal to evaluate pipes with cracks
4 using fracture mechanics modeling and cyclic
5 fatigue analysis, but including the reference to
6 712 here might be duplicative with the anomaly
7 response and repair requirements that you all are
8 going to consider later. Those sections specify
9 what an operator has to do as far as analysis is
10 concerned if they identify cracks. This section
11 is not about anomaly response and repair. It's
12 simply about establishing assessment
13 requirements, which is a little bit different.

14 Lastly, for the new section on cracks,
15 we're suggesting that PHMSA and the PAC consider
16 whether to add operating and maintenance history
17 in the list of variables to consider when
18 determining whether and where crack evaluation
19 and remediation is important. Certainly,
20 operation and maintenance history factors into
21 consideration when determining where the crack
22 threat may be active.

1 Lastly, getting back to a list of
2 examples here. There's a list of crack types,
3 one of which is unstable seam defects and not all
4 unstable seam defects are crack or crack-like, so
5 we're not sure that that specific example is
6 appropriate here. Thank you.

7 MR. DANNER: All right. Thank you.
8 Are there any further public comments?

9 (No response.)

10 MR. DANNER: Okay. Seeing none, now
11 turn to the Committee. Any comments on these
12 proposals or the public comments that you've
13 heard? Sara?

14 MS. GOSMAN: On slide 111, I'm looking
15 at the proposed language and I just wanted to
16 understand the use of the term "as necessary."
17 So, for example, it says, "The operator must
18 evaluate and remediate 'as necessary' all
19 pipeline segments, both covered and non-covered,
20 with similar material, properties, and
21 environmental characteristics associated with a
22 crack or crack-like defect." So to me, this

1 reads in a confusing way because we're requiring
2 operators to evaluate and remediate but then
3 we're -- all pipeline segments with similar
4 material, properties, and environmental
5 characteristics, but then we're saying "as
6 necessary." And I'm wondering which part of that
7 is supposed to be "as necessary."

8 MR. DANNER: Or are they all necessary
9 and we don't need to say it? Steve?

10 MR. NANNEY: I think we can probably
11 delete it. We would consider doing that.

12 MR. DANNER: Okay. Ron?

13 MR. BRADLEY: Thanks, Mr. Chair. Ron
14 Bradley, PECO. So to tag onto one of the
15 comments that was made by one of our public --
16 don't recall who it was -- but PHMSA should
17 ensure that the pressure test method allowed by
18 Part 192 can be used to confirm stability of
19 manufacturing and construction defects. That
20 word "hydrostatic," I think we can delete the
21 word. My sense is -- that would be my
22 recommendation.

1 MR. DANNER: All right. Steve, do you
2 have a response to that?

3 (Off microphone comment.)

4 MR. DANNER: Microphone.

5 MR. NANNEY: Sorry. I thought I'd
6 punched it. We'll consider doing that as long as
7 it meets subpart (j), yes.

8 MR. DANNER: Okay. And we also had a
9 comment about the list of examples. Addition to
10 that?

11 (No response.)

12 MR. DANNER: All right. Any other
13 comments on this section?

14 (No response.)

15 MR. DANNER: All right. Hearing
16 nothing -- sorry, do you have a --

17 MR. GALE: Yes. John Gale, PHMSA.
18 Just real quick for the members. What we did is
19 -- so to kind of save your voice a little bit --
20 we've added just a reference to that to the
21 definition of cracks there on (e)(6). So we have
22 the definition or the section there on the right-

1 hand side, so you'd have to read it off
2 completely. We just have a reference to it if
3 that's suitable to the Committee.

4 MR. DANNER: Okay. And that -- so the
5 words "as necessary," I understand are coming out
6 on the right side. All right. So I guess if
7 that's the case, we're ready to -- anybody want
8 to volunteer to read on the left side?

9 MR. GALE: Just the left side, that's
10 correct.

11 MR. DANNER: Ron, thank you.

12 MR. BRADLEY: Okay. This is Ron
13 Bradley, PECO. Voting language for integrity
14 management clarifications paragraph
15 192.917(e)(3), (e)(4), and (e)(6), the proposed
16 rule as published in the Federal Register and the
17 Draft Regulatory Evaluation with regard to the
18 provisions for IM clarifications are technically
19 feasible, reasonable, and cost-effective and
20 practicable if the following changes are made.

21 Revise proposed paragraph
22 192.917(e)(3) as follows. In paragraph (e)(3),

1 delete the phrase, "and must reconfirm or re-
2 establish MAOP in accordance with paragraph
3 192.624(c)." In paragraph 192.917(e)(3)(I),
4 delete the reference to 192.624(a)(1) and replace
5 with, "The segment has experienced a reportable
6 or in-service incident as defined in 191.3 since
7 its most recent successful subpart (j) pressure
8 test due to an original manufacturing-related
9 defect or a construction, installation, or
10 fabrication-related defect."

11 In conjunction with striking the
12 previously-proposed 192.624(a)(1), add a new
13 192.917(e)(6) to address cracking within IMP as
14 suggested by PHMSA staff during the meeting,
15 presented in the slides and revised by the
16 Committee.

17 MR. HILL: Robert Hill, seconds.

18 MR. DANNER: Thank you. It has been
19 moved and seconded. We have language in front of
20 us? Any further discussion on the language
21 before us? Andy.

22 MR. DRAKE: This is Andy Drake. I

1 know we're trying to move along here and I don't
2 mean to slow us down, but I thought there was a
3 good comment made about removing the references
4 to "body" -- pipe body cracking. Is there any
5 concern with adding that, or having that removal
6 restriction?

7 MR. DANNER: I believe that would be
8 a question for PHMSA staff. Okay.

9 MR. McLAREN: Maybe CJ could refresh
10 me on where exactly that is.

11 MR. DRAKE: Mr. Chairman, while
12 they're deliberating?

13 MR. DANNER: Sure.

14 MR. DRAKE: This is Andy Drake with
15 Enbridge. I thought that there was in -- in
16 (e)(6), when we're looking at this new language
17 that's being proposed, slide 111, about halfway
18 down where it says, "All pipeline segments, both
19 covered and non-covered with similar material,
20 properties..." yadda, yadda, yadda, I think "all"
21 opens it up to everything which is okay but I do
22 think it would help if we added a couple words of

1 -- you know, to help qualify it, with similar
2 operating history and maintenance history,
3 material, properties. If you're trying to help
4 people fingerprint what the subset of "all" is,
5 it's not just everything that has similar
6 materials. It's similar operating history,
7 similar operating environment. You know, I think
8 given that "all" is in front of that, I keep a
9 couple more qualifiers doesn't hurt.

10 MR. DANNER: And so what are the
11 qualifiers that you're looking to add?

12 MR. DRAKE: I would just when it says,
13 "with similar," -- who's got the pen, so to
14 speak, over there, the typewriter, you know,
15 keyboard -- I would add with similar operating
16 history and maintenance history and then it says,
17 "material, properties, environmentally." That's
18 all I would add in there. That's the things that
19 cause the cracks. That's what you're trying to
20 tell people to look for.

21 MR. DANNER: Okay. So do the scribes
22 want to put that in? All right. Cheryl?

1 MS. CAMPBELL: Okay. So I -- again,
2 so I apologize. I hate to do this but I want to
3 go back to these words, "as necessary" that Sara
4 brought up. And as I think about this, right; as
5 I kind of think through this, right, so an
6 operator must evaluate, right. So you identify
7 these features, these anomalies, whatever, and
8 you evaluate them, I don't need to remediate
9 "all" of them. So I -- is it possible that the
10 phrase "as necessary" was -- I'm not an attorney
11 so I apologize, Sara -- I'm going to use some
12 words that may or may not be grammatically
13 correct -- does "as necessary" qualify it, right,
14 to say those that you should be remediating?

15 MR. DANNER: So what I think you're
16 proposing is that we would put a comma after
17 "evaluate" and remove the comma after remediate
18 so that it would read, must evaluate, comma, and
19 remediate as necessary, comma --

20 MS. CAMPBELL: Correct, because -- so
21 simple example, right, I mean we -- one of our
22 pipelines, the first time put a tool in it, I got

1 like 20,000 hits back, anomalies back, right.
2 But the vast majority of them were coding faults
3 or little scrapes and scratches, right, because
4 it's in an area where there was a -- there had
5 been a lot of construction and excavation. And,
6 you know, we went through it and picked out the
7 ones that were serious and needed to be
8 remediated and the rest of them, we are
9 monitoring, right, on subsequent runs. So I mean
10 that's -- so I don't know what the right words
11 are to qualify it like that, but that's really, I
12 think, what we're trying to say.

13 MR. DANNER: Well, I think this -- if
14 we change the commas, that does it, because it
15 says you evaluate everything and you remediate
16 what needs to be remediated.

17 MS. CAMPBELL: There you go. That's
18 what we want to do.

19 MR. DANNER: So that would mean you
20 would do it there and you would also do it at the
21 second "as necessary," so there would be a comma
22 after "evaluate," the third line up from the

1 bottom.

2 MS. CAMPBELL: Yes.

3 MR. DANNER: So it be evaluating,
4 comma and remediating as necessary, comma.

5 MS. CAMPBELL: Yes. I mean that's
6 what our intention is.

7 MR. DANNER: I think that is what our
8 intention is.

9 MS. CAMPBELL: Okay. Ron.

10 MR. BRADLEY: I read it I have no
11 business doing this. The agreement to remove
12 hydrostatic in lieu of a subpart (j) test medium,
13 we should include that up there, that we would
14 pull that -- we got agreement on that that we
15 would pull the word "hydrostatic" as the medium
16 and, you know, we said as long as we would use
17 the subpart (j), I don't know, the test would be
18 okay.

19 MR. DANNER: Okay. Actually, I was
20 waiting to see what PHMSA staff was -- said about
21 that.

22 MR. NANNEY: Yes. We did the thumbs

1 up on that.

2 MR. DANNER: Oh, we did give thumbs up
3 that? So "hydrostatic" is not the only test that
4 -- okay. And then there was a question about
5 whether the operating and maintenance histories
6 would be something we want in the list of
7 examples. Andy.

8 MR. DRAKE: This is Andy Drake with
9 Enbridge. I think Ron's got a good point. I
10 think you want to keep the tools open because you
11 may actually use a pressure reduction, a pressure
12 restriction to meet this. It may not be a hydro
13 test. It may be a pressure restriction to
14 satisfy this which is one of the other sections,
15 which I think is where you're going, Ron.

16 MR. DANNER: Yes. So did -- we got
17 the okay from PHMSA staff that they didn't have a
18 problem with it. That's what I think we wanted
19 to hear.

20 MR. NANNEY: We will consider it,
21 PHMSA will.

22 MR. DANNER: Okay. So we don't have

1 a "yes" or "no" yet. I think we're waiting to
2 hear back from them. So are there any other
3 issues? Sara?

4 MS. GOSMAN: Okay. So I think that
5 the "as necessary" with the relevant commas is
6 fine with me and that makes sense. I think I was
7 trying to figure out where that "as necessary"
8 came in and that makes sense to me. I'm just --
9 we're wordsmithing a lot here but I'm trying to
10 figure out -- the point of this -- so the point
11 of it is to look at similar segments, evaluate
12 them, and remediate them as necessary. The more
13 that we add in what constitutes a similar
14 segment, the more that we potentially constrain
15 the ability to evaluate and then remediate. And
16 so I don't know operating and maintenance
17 history. That strikes me as the kind of thing
18 that could be very specific to any given pipeline
19 and thus might make similar, right, mean a very
20 narrow set of possible other pipelines. So --
21 but perhaps I'm reading that incorrectly. So I
22 guess, Andy, since you proposed this language,

1 I'm wondering how broad or narrow that term is
2 meant to be or whether we just want to say
3 "similar pipelines" or "pipelines with similar
4 characteristics," right, and leave it to a
5 broader determination what those things would be
6 in any given context?

7 MR. DRAKE: This is Andy Drake with
8 Enbridge. My intention there was trying to help
9 people fingerprint what drives crack growth. You
10 know, an operating environment, if it's in a
11 fatigue environment, that is very relevant and
12 you would want to know that, and you would want
13 people thinking about that, and that will not
14 flare if you're just picking materials.

15 So you're trying to find --- you're
16 trying to fingerprint the bad guy here. You
17 know, operating environment, if we're in stress
18 corrosion crack, if you're trying to look at
19 stress corrosion cracking threats, the operating
20 environment is hugely germane to trying to
21 fingerprint the bad guy. By this discussion, we
22 are creating a record of intent here. But I

1 think you'd need those to help people focus in
2 the areas that are driving the problem.

3 If you're just going to look at all of
4 the materials, well, theoretically, all materials
5 are susceptible to stress corrosion cracking.
6 That's not going to help terribly. You've got to
7 compliment these two to start fingerprinting.
8 It's not intended to inordinately narrow it.
9 It's intending to try to characterize it, if that
10 makes sense.

11 MR. DANNER: But doesn't it have the
12 legal effect that when you -- the more things you
13 put in that can be dissimilar, the more you're
14 saying that we don't have to evaluate because
15 it's not -- this pipeline is not similar because
16 it's operating history is different?

17 MR. DRAKE: I assume that question was
18 asked to me so. This is Andy Drake with
19 Enbridge. I think it -- that's certainly not the
20 intent. The intent is genuinely to try to
21 characterize what's causing cracks and give the
22 attributes that drive that. If we're only going

1 to do one of the attributes so that we can keep
2 it open, we're really not helping people
3 characterize what causes cracks. You're just --
4 if the material is susceptible to cracking, then
5 you should go look for cracks. It's like all
6 materials are susceptible to cracking so that
7 didn't help narrow the universe down very much.
8 You need to start of putting some sort of shape
9 around what causes cracks to form and drive and
10 if you add a couple things, I think you start
11 getting people thinking about the environments
12 where this is a problem. It's not intended to be
13 inordinately exclusive. It truly, I think, is
14 helpful to people to start trying to characterize
15 what is the problem.

16 MR. DANNER: Well, so one thing that
17 we could do is simply say "all pipeline segments,
18 both covered and non-covered, with similar
19 characteristics, 'comma,' which may include..."
20 and --

21 (Off microphone comment.)

22 MR. DANNER: Okay. Did the scribes

1 get that? Yes, Steve.

2 MR. NANNEY: Steve Nanney with PHMSA.
3 This is all part of a section, 192.917, and part
4 of it is a section (b) that you have to go look
5 at data gathering and integration. And that data
6 gathering and integration has all of this that
7 you're talking about as part of it and some more.
8 So the point is, it is just like what Andy said
9 and the questions from Sara, is you're going to
10 have to do it whether it's in there or not so
11 from a PHMSA standpoint, we'll consider it either
12 way because it's implied in (b) in your data
13 integration you got to look at all of that, under
14 917(b) which is part of this. So I guess we'll
15 consider it however this Committee recommends and
16 everything.

17 MR. DANNER: Okay. That's helpful.
18 Thank you. Ron.

19 MR. BRADLEY: Yes. Ron Bradley, PECO.
20 I would ask similar to what we did earlier today
21 with a PHMSA consideration that there be a bullet
22 in here similar to what we did where PHMSA didn't

1 make the agreement but at least considered
2 removing, and in this case, the term
3 "hydrostatic." I would like to have it on the
4 slide for voting purposes.

5 MR. DANNER: Okay. So that -- you
6 would add that on the left side to say that PHMSA
7 will consider removing the term "hydrostatic."

8 MR. BRADLEY: In paragraph, was it,
9 917(e)(3)? Thank you.

10 MR. DANNER: So, yes, Cheryl?

11 MS. CAMPBELL: Thank you, Mr.
12 Chairman. Cheryl Campbell, Xcel Energy. I agree
13 with that and I think we talked about this
14 earlier but I just want to make sure. I mean the
15 intent here is not to limit the tools that the
16 operator has in (e)(3), I think. Is there a way
17 to make it clear -- I mean I like removing the
18 term "hydrostatic," but is there a way to make it
19 clear that -- I mean I think your intent, Steve,
20 is that the operator confirm that the
21 manufacturing and construction-related defects
22 are stable. So one way to do that is a pressure

1 test but there might be other ways to do that
2 such as, you know, pressure reduction could take
3 you out of that range or if there's a tool,
4 right, that could confirm that the
5 manufacturing/construction defect is stable. All
6 I'm suggesting is that we make sure that the
7 tools, right, people have tools in their toolbox
8 to use because the goal is verifying the
9 stability of that unless we're trying to say this
10 is the only way to verify that it's stable, and I
11 don't think that's the intention. I'm asking, I
12 guess.

13 MR. DANNER: Okay, Steve?

14 MR. NANNEY: We'll consider it. I
15 mean we would consider other tools, yes.

16 MR. DANNER: So do we want to change
17 that sentence, amend it further and PHMSA will
18 consider removing the term "hydrostatic" from
19 (e)(3) in order to allow other appropriate
20 testing procedures?

21 PARTICIPANT: Sure.

22 MR. DANNER: Okay. So I'm just trying

1 to get a sense of the Committee. So if we
2 further amended that to say we'll consider
3 removing the term "hydrostatic" 'and' allowing
4 other appropriate testing procedures or effective
5 testing procedures?

6 PARTICIPANT: That would be my
7 recommendation.

8 MR. DANNER: All right, folks, it's
9 only 2:00 o'clock so -- all right, so are there
10 any further comments on this voting language?

11 (No response.)

12 MR. DANNER: All right. So hearing
13 none, we have an amendment -- or we have a motion
14 in front of us which has now been amended. So I
15 think we --

16 PARTICIPANT: We're going to have to
17 withdraw the last motion.

18 MR. DANNER: So, yes, I hate to say
19 it. We're going to have to withdraw the last
20 motion and re-read this page. So who made the
21 motion?

22 MR. BRADLEY: I did.

1 MR. DANNER: Ron, will you withdraw
2 the motion and make a new motion and then read
3 it?

4 MR. BRADLEY: All right, Mr. Chair.
5 This is Ron Bradley, PECO. I withdraw the motion
6 that I just made and would like to make a new
7 motion. For voting language for integrity
8 management clarifications, paragraphs
9 192.917(e)(3), (e)(4), and (e)(6), the proposed
10 rule as published in the Federal Register and the
11 Draft Regulatory Evaluation with regard to the
12 provisions for the integrity management
13 clarifications are technically feasible,
14 reasonable, cost-effective, and practicable if
15 the following changes are made.

16 Revise proposed paragraph
17 192.917(e)(3) as follows. In paragraph (e)(3),
18 delete the phrase "and must reconfirm or re-
19 establish MAOP in accordance with paragraph
20 192.624(c)."

21 In paragraph 192.917(e)(3)(I), delete
22 the reference to 192.624(a)(1) and replace with,

1 the segment has experienced a reportable in-
2 service incident as defined in paragraph 192(3)
3 since its most recent successful subpart (j)
4 pressure test due to an original manufacturing-
5 related defect or a construction, installation,
6 or fabrication-related defect.

7 In conjunction with striking the
8 previously proposed 192.624(a)(1), add a new
9 192.917(e)(6) to address cracking within IMP and
10 suggested -- as suggested by PHMSA staff during
11 the meeting, presented in the slides, and revised
12 by the Committee.

13 In 192.917(e)(4), delete the phrase
14 related to pipe body cracking.

15 PHMSA will consider removing the term
16 hydrostatic from (e)(3) and allowing other
17 authorized testing procedures.

18 MR. DANNER: Thank you. Is there a
19 second?

20 MR. HILL: Robert Hill, second.

21 MR. DANNER: All right. Thank you.
22 Any further discussion?

1 (No response.)

2 MR. DANNER: All right. Cheryl, we're
3 ready for a roll call.

4 MS. WHETSEL: Okay. Steve Allen?

5 MR. ALLEN: Aye.

6 MS. WHETSEL: Dave Danner?

7 MR. DANNER: Aye.

8 MS. WHETSEL: Diane Burman?

9 MS. BURMAN: Aye.

10 MS. WHETSEL: Sara Longan?

11 DR. LONGAN: Aye.

12 MS. WHETSEL: Terry Turpin?

13 MR. TURPIN: Aye.

14 MS. WHETSEL: Cheryl Campbell?

15 MS. CAMPBELL: Aye.

16 MS. WHETSEL: Andy Drake?

17 MR. DRAKE: Aye.

18 MS. WHETSEL: Ron Bradley?

19 MR. BRADLEY: Aye.

20 MS. WHETSEL: Rich Worsinger?

21 MR. WORSINGER: Aye.

22 MS. WHETSEL: Chad Zamarin?

1 (No response.)

2 MS. WHETSEL: Not here. John Airey?

3 MR. AIREY: Aye.

4 MS. WHETSEL: Robert Hill.

5 MR. HILL: Aye.

6 MS. WHETSEL: Sara Gosman?

7 MS. GOSMAN: Aye.

8 MS. WHETSEL: Motion carries. Thank
9 you.

10 MR. DANNER: Okay. So -- all right,
11 so we're ready for presentation on definitions?

12 MR. McLAREN: Chris McLaren with
13 PHMSA. Seeing about 17 pages of definitions in
14 this section 4. The status of Committee comments
15 and votes related to new or revised definitions
16 proposed for 192.3; definitions previously voted
17 upon in the March 2nd meeting included the
18 moderate consequence area and occupied site. So
19 the status of Committee comments and votes
20 related to new or revised definitions proposed
21 for 192.3 include definitions scheduled for
22 discussion at this meeting, Agenda Item 2, MAOP

1 confirmations.

2 So PHMSA suggests deleting three of
3 the proposed definitions from the NPRM in
4 conjunction with changes to the scope of 192.624,
5 MAOP reconfirmation. Those three definitions no
6 longer utilized or needed include legacy
7 construction techniques, legacy pipe, and modern
8 pipe.

9 The following definitions relate to
10 topics previously discussed and voted upon but
11 the vote did not explicitly include a vote on
12 related definitions. So we'd like to take up the
13 following definitions at this time; electrical
14 survey, close interval survey, dry gas or dry
15 natural gas, transmission line, distribution
16 center, in-line inspection or ILI, in-line
17 inspection tool or instrumented internal
18 inspection device, a pipe segment that
19 accommodate inspection by means of an
20 instrumented in-line inspection tools, and that
21 was new based on a comment received to the NPRM;
22 and definition of traceable, verifiable, and

1 complete records, and that is a new definition
2 per an NPRM comment.

3 Electrical survey; the existing
4 definition means a series of closely-spaced pipe-
5 to-soil readings over pipelines which are
6 subsequently analyzed to identify a location
7 where a corrosive current is leaving the
8 pipeline. The NPRM proposed a revision such that
9 electrical survey means a series of closely-
10 spaced measurements of the potential difference
11 between two reference electrodes to determine
12 where the current is leaving the pipe on an
13 ineffectively-coated or bare pipe line.

14 PHMSA suggests the Committee consider
15 withdrawing the proposed NPRM changes to this
16 definition. The proposed changes were minor
17 technical clarifications proposed in conjunction
18 with the changes proposed to Appendix D. And
19 during the June 2017 meeting, the Committee voted
20 to withdraw the proposed changes to Appendix D
21 and as a result, the revised definition is not
22 needed.

1 Close interval survey; the NPRM
2 proposed a revision such that close interval
3 survey means a series of closely-spaced pipe-to-
4 electrolyte potential measurements taken to
5 assess the adequacy of cathodic protection or to
6 identify locations where a current may be leaving
7 the pipeline that may cause corrosion and for the
8 purposes of quantifying voltage or IR drops other
9 than those across the structure electrolyte
10 boundary.

11 PHMSA suggests the Committee accept
12 the definition as modified per the comments
13 received in response, the comments modified below
14 per the comments received in response to the
15 NPRM. Continued, and the proposed definition was
16 based on the use of this term and the proposed
17 changes to 192.465, external corrosion.

18 During the June 2017 meeting, the
19 Committee voted on 192.465. However, the new
20 definition was not explicitly included in the
21 vote. So the definition for consideration would
22 be that close interval survey means a series of

1 closely and properly spaced pipe-to-electrolyte
2 potential measurements taken over the pipe to
3 assess the adequacy of the cathodic protection or
4 to identify locations where a current may be
5 leaving the pipeline that may cause corrosion and
6 for the purpose of quantifying voltage IR drops
7 other than those across the structure electrolyte
8 boundary such as when performed as a current
9 interrupted, depolarized or native survey. Those
10 items in red for the revised ones.

11 Dry gas or dry natural gas; the NPRM
12 definition was dry gas or dry natural gas means
13 gas with less than seven pounds of water per
14 million cubic feet and not subject to excessive
15 upsets allowing electrolytes into the gas stream.
16 PHMSA suggests the Committee accept the
17 definition as modified below per comments
18 received in response to the newest proposed
19 rulemaking. The proposed new definition was
20 based on use of this term in the proposed changes
21 to 192.927, internal corrosion direct assessment.

22 During the June 2017 meeting, the

1 Committee voted on 192.927. However, the new
2 definition was not explicitly included in the
3 voting language. Proposed revisions would read
4 as follows. Dry gas or dry natural gas means gas
5 above its dew point and without condensed liquids
6 being formed via pressure reductions.

7 Transmission line; the existing
8 definition of transmission line means a pipeline
9 other than a gathering line that one, transports
10 gas from a gathering line or storage facility to
11 a distribution center, storage facility or large
12 volume customer that is not downstream from a
13 distribution center; two, operates at hoop stress
14 of 20 percent or more of SMYS; or three,
15 transports gas within a storage field. Note, a
16 large volume customer may receive similar volumes
17 of gas as a distribution center and includes
18 factories, power plants, and institutional users
19 of gas.

20 The proposed revision is that a
21 transmission line means a pipeline other than a
22 gathering line that transports gas from a

1 gathering line or storage facility to a
2 distribution center storage facility or large
3 volume customer that is not downstream from a
4 distribution center; has an MAOP of 20 percent or
5 more of SMYS; or transports gas within a storage
6 field. Note, a large volume customer such as
7 factories, power plants, and institutional users
8 of gas may receive a similar volume of gas as a
9 distribution center. That was in the proposed
10 NPRM.

11 PHMSA suggests to the Committee that
12 accept the definition as modified below per
13 comments received in response to the NPRM.

14 Transmission line means a pipeline or connected
15 series of pipelines other than a gathering line
16 that one, transports gas from a gathering line or
17 storage facility to a distribution center,
18 storage facility or large volume customer that is
19 not downstream from a distribution center; two,
20 has an MAOP of 20 percent or more of SMYS; three,
21 transports gas within a storage field; or four,
22 is voluntarily designated by the operator as a

1 transmission line. Note, a large volume customer
2 may receive similar volumes of gas as a
3 distribution center and include factories, power
4 plants and institutional users of gas.

5 Distribution center; there is not an
6 existing definition in the NPRM proposed that a
7 distribution center means a location where gas
8 volumes are either metered or have pressure or
9 volume reductions prior to delivery to customers
10 through a distribution line. PHMSA's response is
11 since this section of the NPRM is applicable
12 through transmission lines only and since this
13 definition may significantly impact distribution
14 lines, PHMSA suggests the Committee review
15 withdrawal of this definition from the rule.

16 In-line inspection; in the NPRM, it
17 was proposed that an in-line inspection means the
18 inspections of a pipeline from the interior of
19 the pipe using an in-line inspection tool, which
20 is also called intelligent or smart pigging.
21 PHMSA suggests that the Committee accept the
22 definition as modified below per API RP 1163

1 based on the comments received in response to the
2 NPRM. And that would be that an in-line
3 inspection means an inspection of a pipeline from
4 the interior of the pipeline using an inspection
5 tool, also called intelligent or smart pigging.
6 Note, this definition includes tethered and self-
7 propelled inspection tools.

8 On the in-line inspection tool, the
9 notice of proposed rulemaking proposed a revision
10 that in-line inspection tool or instrumented
11 internal inspection device means a device or
12 vehicle that uses a non-destructive testing
13 technique to inspect the pipeline from the
14 inside, which is also called an intelligent or
15 smart pig. PHMSA suggests the Committee accept
16 the definition as modified below per API RP 1163
17 and comments received to the NPRM. And that
18 would read that in-line inspection tool or
19 instrumented internal inspection device means an
20 instrumented device or vehicle that use a non-
21 destructive testing technique to inspect the
22 pipeline from the inside in order to identify and

1 characterize flaws, analyze pipeline integrity,
2 also known as an intelligent or smart pig.

3 Here's the definition of the pipe
4 segment; the pipe segment can accommodate an
5 inspection by means of an instrumented in-line or
6 inspection tool. It was not a proposed NPRM
7 revision but PHMSA plans to include a discussion
8 in the preamble since comments were received in
9 response to the NPRM trying to support
10 delineation of a pipe segment such that a pipe
11 segment would -- it can accommodate an inspection
12 by means of an instrumented in-line inspection
13 tool means a pipe segment that can undergo an in-
14 line inspection using an in-line inspection tool
15 without any permanent physical modification of
16 the pipeline.

17 Traceable, verifiable, and complete
18 records; the Committee commented previously that
19 a definition for TVC records is needed. Clarity
20 is needed that the TVC standard the operators
21 have been applying since 2012 based on the
22 Advisory Bulletin 2012-06 are being retained as

1 those that industry has been used to and
2 incorporating. PHMSA will explain TVC in the
3 preamble. Traceable, verifiable, and complete
4 records means a record or records that one, can
5 be clearly linked to the original information
6 about a pipeline segment or facility; two,
7 document information confirmed by other
8 complementary or separate documentation; and
9 three, is finalized as evidenced by signature,
10 date or other appropriate marking.

11 So in the next bit here, the status of
12 the Committee comments and votes related to new
13 or revised definitions proposed for 192.3; these
14 following definitions will be addressed in
15 conjunction with the repair criteria; significant
16 seam cracking; significant stress corrosion
17 cracking; significant selective seam weld
18 corrosion, new per an NPRM comment; wrinkle bend;
19 and hard spot.

20 Discussion of the following
21 definitions related to the gas gathering topic
22 will be deferred to the next meeting, such as the

1 revised definition of a gathering line and new
2 definitions of a gas processing plant, gas
3 treatment facility, and onshore production
4 facility operation. Thank you.

5 MR. DANNER: All right. Thank you.

6 So we will now take public comment on these
7 proposed definitions. So we will now take public
8 comment on these proposed definitions. Erin.

9 MS. KURILLA: Erin Kurilla, APGA. I
10 suggest that we break this up into buckets just
11 so that both the public comments can stay focused
12 on a couple of the definitions that are related
13 to each other and then the GPAC can vote and then
14 we'll kind of progress through that if that's the
15 will of the GPAC to do it in that manner.

16 MR. DANNER: Let me ask the GPAC what
17 their will is. So do we want to go through these
18 definitions one-by-one and take comments on the
19 individual definitions or do we want the
20 commenters to basically go through the list?
21 Andy.

22 MR. DRAKE: I think given some of the

1 motions we've had and then the revisions to
2 motions and things, I think it would probably be
3 in the best interest to take these one or two at
4 a time. I just think there are so many here that
5 we're going to be all over the board with trying
6 to dial these in. It would probably make sense
7 maybe to group them into two or three at a time
8 maybe for some of the bigger ones anyway, like
9 transmission line and pigging. I just hazard to
10 try to do this all at one time. I think you're
11 going to get comments all over the place.

12 MR. DANNER: Yes. So the thing is
13 there's going to be some that probably have
14 little discussion and so we're going to go
15 through -- well, why don't we just do it that way
16 then. Okay.

17 The first --- well, the first thing
18 I'm going to do -- we have before us the
19 suggestion deleting the proposed definitions of
20 legacy construction, legacy pipe, modern pipe.
21 Is there any public comment on the proposal to
22 delete those definitions?

1 (No response.)

2 MR. DANNER: All right. No one is
3 commenting on those. So we now have -- how about
4 why don't we do electrical survey and close
5 interval survey? Is there anybody who wishes to
6 comment on the definition of electrical survey or
7 close interval survey; anybody want to comment on
8 dry gas or dry natural gas?

9 MS. BYRNES: Yes.

10 MR. DANNER: Come forward.

11 MS. BYRNES: Good afternoon. I'm
12 Corrine Byrnes from National Grid. I just have a
13 really quick comment on the proposed definition
14 of dry gas or dry natural gas. The less than
15 seven pounds of water is deleted and replaced
16 with above its dew point and without condensed
17 liquids being formed by a pressure reduction.
18 That definition is -- it would not be correct.
19 There's always the possibility of liquids forming
20 if you have any water in your pipeline system at
21 all. And most tariffs say seven pounds per
22 million, you know, as the criteria. So there's

1 no way for us, as operators, to enforce that and
2 it's in contradiction with NACE guidelines.

3 Thank you.

4 MR. DANNER: All right. Thank you.
5 Any other comment with regard to definition of
6 dry gas or dry natural gas?

7 MR. DANNER: Okay. So we're going to
8 skip to in-line inspection and in-line inspection
9 tool or instrumented internal inspection device.
10 Any comment on in-line inspection.

11 MS. KURILLA: Yes.

12 MR. DANNER: Okay.

13 MS. KURILLA: Okay. I've got to
14 remember my chain of thought. Actually, no, I
15 don't have a comment on this.

16 MR. DANNER: Okay.

17 (Laughter.)

18 MR. DANNER: Does anybody else have a
19 comment or not have a comment on ILI?

20 (No response.)

21 MR. DANNER: Want to do pipe segments?

22 All right. We're going to -- how about pipe

1 segment can accommodate inspection by means of
2 instrumented in-line inspection tools.

3 And then, finally, the discussion of
4 TVC traceable, verifiable, and complete records.

5 MS. KURILLA: Erin Kurilla, APGA.
6 Just one. Love that we're trying to get this
7 into the preamble language. I think it's really
8 important with the amount of times that we see
9 TVC mentioned throughout the proposed rule, that
10 there's a lot of clarity and consistency around
11 what that standard means. Just encourage PHMSA
12 to maybe even expand their discussion of this in
13 the preamble to reference the, I guess, response
14 to a request from AGA back when this first was
15 introduced into kind of our jargon, that a single
16 record, if it's a quality record, can meet the
17 standard of TVC. I think we all know that now
18 but I'd love to see that included in the preamble
19 language. I think CJ has --

20 MR. DANNER: All right. Thank you.

21 MR. OSMAN: CJ Osman with INGAA. An
22 additional topic we'd like PHMSA and the PAC to

1 consider with the description of TVC is whether
2 it would be appropriate to focus the discussion
3 of TVC on MAOP records. Both the NTSB and PHMSA
4 have previously applied the TVC requirement
5 specifically to addressing MAOP records. It may
6 not be the appropriate standard to be applying
7 when talking about other records that are used in
8 anomaly response calculations and other things in
9 the code, so would like PHMSA and the PAC to
10 consider whether specifically calling out MAOP
11 records in this definition in the preamble.

12 Thank you.

13 MR. DANNER: All right. Thank you.

14 All right. Other comments? So I think that
15 covers all of the definitions with the exception
16 of transmission line and distribution center. Is
17 that right? Oh, it is. I'm just not speaking to
18 it. All right. We -- again, we have -- I think
19 we have covered all of the definitions with the
20 exception of transmission line and distribution
21 center and so Alan, is it your recommendation
22 then that we would go ahead with the discussion

1 of the voting language and just omit those two
2 definitions at this time?

3 MR. MAYBERRY: Yes. Let's go to a
4 discussion on what we've covered so far and then
5 we'll decide on voting.

6 MR. DANNER: Okay.

7 MR. MAYBERRY: As we do that.

8 MR. DANNER: All right.

9 MR. MAYBERRY: Either one big vote or
10 we're dividing it up. We'll see how the
11 discussion goes.

12 MR. DANNER: Okay. All right. So any
13 discussion from the Committee members on the
14 definitions that we have heard public comment on
15 so far? Cheryl.

16 MS. CAMPBELL: I'll kick it off,
17 Chair. Cheryl Campbell, Xcel Energy. So I'm
18 wondering if on a couple of these, probably close
19 interval survey and dry gas, is it appropriate to
20 reference the NACE definitions rather than
21 building a definition within Part 192? I mean
22 we've referenced outside standards groups prior,

1 you know, for certain things, or incorporated it
2 into the code, so I'm wondering if it's
3 appropriate to do that for those two in
4 particular, because those are -- I mean those are
5 common terms that we're all using and that NACE
6 has also said this is what this means.

7 MR. DANNER: So -- Andy.

8 MR. DRAKE: I would echo those
9 comments. I think trying to stay with
10 definitions that are common in the industry and
11 understood and how they connect to other things
12 we're trying to do are important. If we create a
13 separate definition for what NACE defines dry
14 gas, I'd just like to understand what are we
15 trying to accomplish? Is there something that's
16 not functional with the NACE definition, because
17 that is more of an industry standard term and
18 understood by a lot of folks.

19 MR. DANNER: Okay. Thank you. Steve.

20 MR. ALLEN: Steve Allen, IURC. Would
21 it be possible to hear the definition, the NACE
22 definition?

1 MR. DANNER: So does anybody have
2 access to the NACE definition. Cheryl.

3 MS. CAMPBELL: I think I have it.

4 MR. DANNER: Okay.

5 MS. CAMPBELL: NACE defines close
6 interval survey as a method of measuring the
7 potential between the pipe and earth at regular
8 intervals along the pipeline. And that is ANSI
9 NACE SP0502-2010, pipeline external corrosion
10 direct assessment methodology.

11 MR. DANNER: Okay. And is there a
12 definition of dry gas as well?

13 MS. CAMPBELL: NACE defines dry gas as
14 a gas above its dew point and without condensed
15 liquids and that references NACE SP0206-2006,
16 internal corrosion direct assessment for
17 pipelines carrying normally dry natural gas.

18 MR. DANNER: Okay. So that definition
19 is similar to the one that's proposed here. So
20 it does not address the concern we just heard
21 from National Grid about that not having enough
22 specificity about the seven pounds of water per

1 million and so forth. If we wanted to go with
2 the NACE, do we incorporate by reference or do we
3 simply lift it and put it into the rule? So
4 Rich?

5 MR. WORSINGER: Rich Worsinger, Rocky
6 Mount Public Utilities. Just wanted to reference
7 something, Steve, we talked about during the
8 teleconference.

9 MR. DANNER: Yes. He's focused on
10 some other things right now.

11 MR. WORSINGER: Steve, I just wanted
12 to reference something we talked about during the
13 teleconference about. We talked about that --
14 the qualifier with the MCAs, that this would only
15 apply to the free-swimming ILI tools that we
16 could use without modifying the pipeline. And I
17 didn't see that here today. I just wanted to
18 confirm that that's what the understanding was.

19 PARTICIPANT: I know. Now I'm going
20 to have to go back.

21 MR. NANNEY: All right. You said
22 without modification to the pipeline. Say that

1 one more time?

2 MR. WORSINGER: We want to make sure
3 this applies to pipelines that can be fully
4 assessed by a traditional free-swimming ILI tool
5 without modifying the pipeline. We talked about
6 that during the teleconference two weeks ago.

7 MR. DANNER: March 2nd, yes.

8 MR. WORSINGER: March 2nd, thank you.

9 MR. NANNEY: I'm trying to make sure
10 which one is -- this in-line tool definition or
11 which definition are you talking about?

12 MR. WORSINGER: Yes, definition of an
13 in-line tool or pertaining to an in-line
14 inspection.

15 MR. NANNEY: It's not the one pipe
16 segment can accommodate inspection --

17 MR. DRAKE: I think it actually is the
18 accommodate.

19 MR. WORSINGER: Yes.

20 MR. NANNEY: Okay. That's what I was
21 trying to make sure I understood. Well, if you
22 look, we've got on there without any permanent

1 physical modification of the pipeline.

2 MR. WORSINGER: It doesn't talk about
3 a traditional free-swimming tool, ILI tool.

4 MR. NANNEY: Well, there's some
5 pipelines that may be running some of these other
6 tools, whether it's tethered or self-propelled,
7 through them that they may make a modification
8 but not be permanent where you have to put
9 permanent launchers and receivers.

10 MR. DANNER: Okay. So, Alan, do you
11 have some --

12 MR. MAYBERRY: First off, are we --
13 let's make sure we close the loop on that. I was
14 going to address another issue.

15 MR. WORSINGER: Rich Worsinger, Rocky
16 Mount. I don't think the concern is the
17 launchers. It's that the pipeline itself can
18 accommodate it and --

19 MR. NANNEY: You're talking about
20 putting in -- like where you've got reduced port
21 valves or something like that? Just trying to
22 make sure I'm understanding what you're saying.

1 MR. WORSINGER: Yes.

2 MR. NANNEY: Okay. That's what we
3 thought the any permanent physical modification
4 to the pipeline meant, that we put in there.

5 MR. DANNER: Okay. So just want to
6 make sure we're just --

7 MR. DANNER: -- talking about pipe
8 segment. Okay. Andy?

9 MR. DRAKE: Yes. I think this may
10 actually be more important than I was first
11 thinking. The ability to accommodate inspection,
12 we voted on this many times now, you know. I
13 think we voted on it with the understanding that
14 we were talking about segments of pipe that would
15 support a free-swimming tool. Robotic tools can
16 go through all kind of stuff so if that is now
17 the definition of a section that accommodate
18 pigging, I think we need to stop, because that is
19 very radically different than the assumptions
20 that we made, at least I made, and I think that
21 would be consistent with most people's
22 understanding of the conversations and votes

1 we've had to date.

2 So I just want to be real careful
3 here. I appreciate that we don't want to say
4 operators shouldn't use robots or shouldn't use
5 tethered tools but here you're trying to say for
6 the scope of when we consider a segment
7 supporting piggability, it should be free-
8 swimming, because that is a huge difference in
9 how we would approach even our cost benefit
10 study. What does that mean? Well, anything can
11 accommodate a robot. I mean even piping in a
12 station can deal with robots. So that -- but
13 that wasn't what we were talking about today, at
14 least not what I was thinking about. Is that
15 right?

16 MR. NANNEY: Well, let me just ask
17 what wording are you looking for is what I'm
18 trying to find out.

19 MR. DANNER: I think Rich had that
20 language, didn't you?

21 MR. NANNEY: That's why I'm asking it.

22 MR. WORSINGER: Rich Worsinger, Rocky

1 Mount Public Utilities. Regardless of whether a
2 pipeline is able to accommodate robotic, the
3 definition of able to accommodate is considered
4 only for free-swimming tools. I believe your --
5 the analysis is based on the premise that you can
6 cheaply I -- use an ILI tool and I don't believe
7 a robotic tool --

8 MR. NANNEY: Okay.

9 MR. WORSINGER: -- would be a cheap
10 tool.

11 MR. DRAKE: This is Andy Drake.

12 MR. DANNER: Andy.

13 MR. DRAKE: Just to complement that,
14 I don't -- I think we're just trying to define
15 what does a -- when we say piggable segment, what
16 is it we're talking about. We're talking about
17 segments that's for free-swimming tools. It
18 doesn't mean that when we define an in-line
19 inspection tool, it may -- there may be all kinds
20 of in-line inspection tools. But I think that
21 definition of accommodating inspection tool is
22 important because it really sets the expectation

1 of the operator. And I think it's the basis of
2 our cost benefits and our comments to date is how
3 readily can this thing be made piggable. If it's
4 free-swimming --

5 MR. NANNEY: Okay.

6 MR. DRAKE: -- that's one thing but if
7 it's the ability to do any kind of tool, that's
8 not what we've been talking about.

9 MR. NANNEY: Can I say something? Do
10 not strike -- what I think we're all agreeing
11 upon is in 130, pipe segment means of --
12 instrumented inspection tool means a pipe segment
13 undergo the inspection -- an in-line inspection
14 using a free-swimming is what -- yes, we'll add
15 that. We'll consider it as we -- you know, a
16 free-swimming in-line inspection tool, that's
17 what -- we'll add that.

18 MR. DRAKE: All right. Alan?

19 MR. MAYBERRY: Before we got off on
20 that, I was going to go back to the NACE; you
21 know, this proposal for the NACE wording on dry
22 gas. And, you know, where we are right now is

1 really based on the comments we've received. If
2 there's a suggestion for us to consider that, I
3 would encourage the Committee to, you know, word
4 it as such that to consider the NACE definition
5 in revising or providing a definition of dry gas
6 or dry natural gas.

7 MR. DANNER: So anyone want to respond
8 to that? Sara.

9 MS. GOSMAN: I think -- so Sara
10 Gosman. I'm in agreement that it's helpful to
11 make sure that we're consistent with terms used
12 in the field. I wouldn't want to see us directly
13 incorporate by reference a NACE definition,
14 because I think essential to public regulation is
15 the Agency setting the regulation -- by
16 regulation the definitions that it's going to be
17 using to regulate. And when I look through the
18 definitions already in the code, there aren't any
19 others that directly reference a standard so --

20 MR. DANNER: So --

21 MS. GOSMAN: -- but I think, you know,
22 if we want to take language from NACE because

1 that's language that we use in the field to
2 understand that particular term, that makes
3 complete sense to me.

4 MR. DANNER: So yeah, I think from my
5 point of view, the goal would be to make it as
6 consistent as possible and lift it verbatim
7 unless we have an objection to what they have or
8 we think that we can come up with a better
9 definition.

10 MR. MAYBERRY: I think that would be
11 consistent with intellectual property laws so --

12 MR. DANNER: Okay. Any other
13 comments? Steve.

14 MR. NANNEY: Yes. Can I ask the
15 Committee one thing? Originally, PHMSA
16 recommended that we have with less than seven
17 pounds of water and not subject to excessive
18 upsets for electrolytes or water liquids into the
19 gas stream. And hearing the public comment from
20 the individual from National Grid, it sounds like
21 what I think we were hearing is that we might,
22 should reconsider that. I think PHMSA would

1 consider either or, you know, based upon the
2 comments. We're not -- either or of them would
3 be fine with us so whatever you would like to
4 recommend to us, we'll consider.

5 MR. DANNER: So this is Dave. What I
6 heard is that without the language that
7 references the seven pounds, that it's actually
8 not an accurate definition and that concerns me.
9 So I would be comfortable going back to the
10 original definition in the NPRM. Andy?

11 MR. DRAKE: I would avoid using the
12 seven. I think that created -- I think the
13 direction that comment was going, I think, was it
14 isn't constructive consistently across the
15 industry. I think the NACE definition is more
16 consistently applicable and I'd just stay with
17 the --

18 MR. DANNER: Oh, so I think I
19 misunderstood the comment then. Maybe -- I
20 wonder if the person from National grid could
21 clarify for me.

22 MS. BYRNES: I think the concern is

1 around the pressure reductions because when you
2 regulate gas from a high pressure to a low
3 pressure, you can then introduce liquids that
4 were previously in vapor state.

5 MR. DANNER: Okay. So let me ask did
6 you have a problem with the original NPRM
7 definition that's at the top of the page on the
8 screen on the right?

9 MS. BYRNES: Well, going back to some
10 of the other comments, I think it is -- I think
11 there's an assumption whether or not every
12 operator has the same tariff, you know. I mean,
13 you know, seven pounds is kind of an arbitrary
14 number.

15 MR. DANNER: Okay. Thank you very
16 much.

17 MS. BYRNES: Thank you.

18 MR. DANNER: Cheryl.

19 MS. CAMPBELL: So I think this is kind
20 of an interesting conversation and I hear you. I
21 think seven pounds is an arbitrary number that a
22 lot of interstate pipelines have sort of used

1 over the years. I will tell you, you know, we
2 have a lot of gen behind our own system and
3 connected to other interstates, and we have
4 considered -- I'll say it this way -- starting a
5 national conversation about changing that seven
6 pounds, right, because it does create problems at
7 times at those generation plants where -- when it
8 kind of moves around.

9 So I mean from our point of view, we
10 would consider tightening that so to -- I would
11 struggle leaving the seven pounds in there, I
12 think, is what everybody's saying, right, because
13 it's something that I think is -- gets talked
14 about between pipelines and customers.

15 So can you solve it? I mean I think
16 the problem here is the water, right. So I mean
17 can you solve it by saying that the liquids --
18 it's not necessarily hydrocarbons, it's the water
19 that's the problem. Is that -- Corrine, is that
20 where you're going?

21 MS. BYRNES: Yes. The water causes
22 the internal corrosion.

1 MS. CAMPBELL: Yes, because it's water
2 that's creating the internal corrosion risk, not
3 the hydrocarbons, right?

4 MS. BYRNES: Yes.

5 MS. CAMPBELL: So can we just say it
6 by clarifying that the dew point is related to
7 free water and not to hydrocarbons? Or does that
8 just create more confusion?

9 MR. DANNER: Andy.

10 MR. DRAKE: This is Andy Drake with
11 Enbridge. I agree with the seven pounds. That's
12 really more of a tariff condition and it -- what
13 it means to the pipe as far as dry varies from
14 pipe to pipe and the situations that you're in.
15 I do think the key that is coming up over -- and
16 you may reiterate this or hopefully, this -- the
17 last five words in PHMSA's proposal, I think, is
18 where the hitch in the get along is being formed
19 via pressure reductions. If we took that out,
20 you are the NACE definition, and I think that's
21 where there's some angst building, you know,
22 because I can create all kinds of things to

1 happen with a pressure reduction and that's not
2 terribly helpful in the definition of dry. So
3 that's where I think going back to the NACE
4 definition helps provide some continuity of how
5 that is effectuated on the pie. That's really
6 all I think the issue is.

7 MR. DANNER: All right. Steve.

8 MR. ALLEN: Steve Allen, IURC.
9 Cheryl, could I ask you to read that definition,
10 that NACE definition again, please?

11 MS. CAMPBELL: Happy to, Steve. NACE
12 defines dry gas as a gas above its dew point and
13 without condensed liquids. So there's probably
14 people smarter than me in the room about this
15 but, I mean, to me that says -- and I'm dry -- a
16 long time ago, right, when I was -- used to be an
17 engineer, without condensed liquids, so without
18 liquids entrapped in the gas stream? I meant
19 they're vaporized at this point, right? Am I
20 interpreting that correctly?

21 MR. DANNER: Steve.

22 MR. ALLEN: Steve Allen, IURC. So the

1 intent here is to define dry gas to be gas
2 without electrolytes in it?

3 MS. CAMPBELL: Without what?

4 MR. ALLEN: Without electrolytes,
5 without water?

6 MS. CAMPBELL: Without water.

7 MR. ALLEN: And that, I don't know,
8 condensed liquids? I mean I'm really kind of
9 okay with the NACE definition but I that causes
10 angst for others, I'm all ears but I think the
11 key is, is you want to define dry gas as gas that
12 doesn't have any electrolytes in it or doesn't
13 have any water in it. I'm -- you know, I'm
14 trying to make it simple.

15 MR. DANNER: So could I hear the NACE
16 definition one more time? Cheryl, do you have
17 that?

18 MS. CAMPBELL: I'm sorry, Mr. Chair?

19 MR. NANNEY: Could I hear the
20 definition -- the NACE definition one more time?

21 MS. CAMPBELL: For dry gas?

22 MR. NANNEY: Dry gas, yes.

1 MS. CAMPBELL: You bet. Dry gas is a
2 gas above its dew point and without condensed
3 liquids. So a pretty simple definition.

4 MR. DANNER: Okay. Alan.

5 MR. MAYBERRY: I was just going to say
6 we can -- we'll work with the suggestion here
7 and, you know, the concern of a condensed liquid,
8 I mean I know I've seen issues even below seven
9 pounds; if you don't add heat, for instance,
10 you're going to have issues as you take a
11 pressure drop. So we'll work within the -- you
12 know, considering the NACE definition and have
13 really more of a performance standard as opposed
14 to prescriptive standard and probably also add a
15 little clarity in the preamble I would say, too,
16 to what we need.

17 MR. DANNER: Okay. So I think we need
18 to have that reflected in the voting language.

19 PARTICIPANT: Yeah. It's being
20 tweaked.

21 MR. DANNER: Yes.

22 MS. BYRNES: I just want to say thank

1 you.

2 (Laughter.)

3 MR. DANNER: Thank you. All right.

4 Sara.

5 DR. LONGAN: Thank you. Sara Longan,
6 DOI. It would be helpful to me to hear either
7 PHMSA or the Committee's dialogue, in part, to
8 respond to the comments that CJ made regarding
9 TVC applicability to MAOP. Is this only or is it
10 elsewhere? And I ask in order to inform the
11 Committee on how it might impact the TVC
12 definition before us.

13 MR. DANNER: Okay. Anyone want to
14 respond to that question?

15 (No response.)

16 MR. DANNER: I guess -- I think PHMSA
17 is still trying to dot the i's and cross the t's
18 on the last issue, so -- or -- Steve?

19 MR. NANNEY: Well, the -- this is with
20 15 seconds of thought, so TVC would mean an
21 MAOP, of course, but it would also be in support
22 of items that maintain that integrity. In other

1 words, if you make a repair, you would want to
2 have that documentation to maintain it. If you
3 have to have pressure test records, you would
4 have to have those type records, but any records
5 that you need to maintain your MAOP would be part
6 of it. In the section such as pressure tests,
7 but it would be subpart (j) already requires
8 those records to begin with and 619 reference
9 back to them. And if you go look in the section
10 around -- I'm going to probably say the section
11 wrong but it's like 701, 703, the sections for
12 doing repair. If it's in a non-HCA -- Chris is
13 telling me 713 -- and also in the subpart (o),
14 the 900 series where you're doing anomaly
15 repairs, there's also a section on repairs in the
16 corrosion section. But any of those that you're
17 doing to maintain the MAOP, you would need to
18 keep those under TVC to maintain that pressure.

19 MR. DANNER: All right. Any further
20 discussion on that, questions about that? Andy.

21 MR. DRAKE: This is Andy Drake with
22 Enbridge with a similar 15-second response to

1 digest that -- or opportunity to digest that.
2 I'm trying to just think through out loud. I
3 mean TVC, we've been sort of trained over the
4 last year TVC and MAOP, TVC and MAOP, and it has
5 a -- is a very definitive mean -- you know,
6 luggage that comes with that.

7 When we start talking about
8 opportunisticly gathering data for anomaly
9 criteria, is -- I'm trying to -- I'm literally
10 thinking on the fly, which is probably dangerous
11 but we're going to vote on something here in a
12 minute so I need to do this, but when we're
13 gathering data opportunisticly, is that going
14 to meet all of the hurdle criteria of TVC? Or
15 are we really saying you need to have records to
16 support those decisions, because TVC is a very
17 specific hurdle rate standard of care, and we
18 reserve that for this once in a lifetime
19 decision. I'm trying to -- I'm literally not
20 sure how that plays with data that we collect
21 kind of as we go. I don't know if it's going to
22 meet all of the TVC hurdle rates. It's just

1 we're gathering information as we go to keep
2 populating those decision trees. You know what I
3 mean?

4 And I just want to be out loud because
5 if we keep forcing everything back to TVC, I
6 don't even know what might happen for records
7 that aren't related to MAOP, they're just
8 decisions we're trying to make on IM. Are we
9 really burden -- loading up the system with all
10 of the requirements of TVC; is that really
11 necessary? I'm asking. I'm really just thinking
12 out loud.

13 MR. DANNER: All right, Sara.

14 DR. LONGAN: Sara Longan, DOI. I'm
15 going to ask a question and if it needs to be
16 rhetorical, I accept that and then provide maybe
17 a comment by example. What I'm curious about is
18 if there are data collected and records produced
19 to comply and satisfy pressure testing or anomaly
20 repairs that may not meet the standard of TVC,
21 which I've learned over the course of a day-and-
22 a-half or a day is quite high, is that something

1 PHMSA would accept? And I see this as another
2 possible do loop, maybe, unless PHMSA has
3 flexibility and acceptance of data that might not
4 reach the TVC standards. And I ask these
5 questions because I don't want to go down a
6 rabbit trail, but in other regulatory frameworks
7 where the bar has been excessively or exceedingly
8 high and increasingly high, the agency doesn't
9 win and maybe the private sector doesn't win
10 either, because they're producing good data that
11 could inform PHMSA potentially, but it may or may
12 not meet that very high TVC standard. Thanks for
13 hearing me out.

14 MR. DANNER: All right. Anyone else
15 on that issue? Cheryl.

16 MS. CAMPBELL: So I'm -- as I think
17 through this, I'm looking at item three there
18 under traceable, verifiable, and complete, and
19 I'm thinking about the questions posed, right?
20 So I'm -- I've got a hole open. I'm evaluating
21 an anomaly. I'm doing non-destructive testing.
22 I'm doing whatever. How do I -- I don't know how

1 to do number three in that scenario. And I'm not
2 trying to -- I'm just trying to understand,
3 right; I mean I'm trying to figure out how do you
4 have a -- how do you generate, make, right, a
5 record that either helps me evaluate that anomaly
6 or does something with that repair. Or am I
7 over-thinking this?

8 MR. DANNER: Alan?

9 MR. MAYBERRY: You know, we've gone
10 down this road for a while. I can vividly
11 remember that first Advisory bulleting.
12 Actually, the NTSB recommendation that, you know,
13 first, you know, put those three words on it.
14 And we've been down this road together dealing
15 with that phrase, and it's all been within the
16 realm of establishing MAOP. So I don't know if
17 we put -- maybe make a tweak to that wording
18 there that it's -- related -- yes, record or
19 records related to MAOP that -- Yes. Okay. Here
20 I am wordsmithing but establishing -- related to
21 establishing MAOP.

22 MR. DANNER: All right, Steve.

1 MR. ALLEN: Steve Allen, IURC. Yes.
2 I think that makes an awful lot of sense to go
3 ahead and add something in here that says that,
4 you know, these records are related to records
5 that were created or associated with, you know,
6 the pressure. I mean that's where it first came
7 up in 192.624(2) on pressure test records, and it
8 was specifically talking about establishing --
9 necessary to establish maximum allowable
10 operating pressure. It doesn't bleed over into
11 other things. It's specifically talking about
12 that. So I think that makes a lot of sense to
13 add something there to say that.

14 MR. DANNER: All right, Andy.

15 MR. DRAKE: This is Andy Drake with
16 Enbridge. I agree with Steve. I think adding
17 something there just helps. That's been the
18 context of the conversation to date. I don't --
19 I'm not trying to undermine anything about the
20 other records. I just think when we say TVC,
21 that's what it's about. We're going to need
22 other records always. It's just the

1 applicability of this to the other things, I
2 think, starts to get kind of convoluted.

3 The other thing that I would bring up
4 here is, you know, I think PHMSA has acknowledged
5 that a TVC record can be a single quality record.
6 And I just want to make sure we're still in that
7 place. Everybody's shaking their head yes.
8 Good. Okay.

9 MR. MAYBERRY: I think we -- but the
10 wording should say record or records. It should
11 be very -- I mean --

12 MR. DANNER: So Sara Longan, did this
13 answer your questions? Do you feel like you got
14 what you were looking for?

15 DR. LONGAN: Quite well, thank you.

16 MR. DANNER: Okay, great. All right.
17 Any other --- any other questions about the
18 definitions? Now we have two definitions to go.
19 Do we want to do those and add them to this
20 amendment? Don't we -- we have two more
21 definitions.

22 Oh, Sara, go ahead.

1 MS. GOSMAN: Just quickly then to
2 follow up on this conversation, which is really
3 helpful. Are there references to TVC in other
4 parts of the proposed rule that do not relate to
5 MAOP? And if so, what is going to happen with
6 those now that we've had this conversation?

7 MR. DANNER: So who is that directed
8 toward?

9 MS. GOSMAN: PHMSA

10 MR. DANNER: Okay. So I believe Steve
11 is preparing an answer for you right now.

12 MR. McLAREN: Chris McLaren with
13 PHMSA. Yes, in 713, as I was reading through it,
14 I found it in three places talking about those
15 repairs.

16 MS. GOSMAN: That are not -- and
17 repairs not specific to MAOP?

18 MR. McLAREN: The repairs would be
19 made to the repair criteria based on the
20 predicted failure pressure, which does come into
21 play with MAOP but you have to know the data for
22 both, so it can be redundant.

1 MR. DANNER: Did that help, Sara?

2 MS. GOSMAN: I guess I would maybe
3 need to go back to the language and take a look
4 at it myself, too, but let me -- maybe let me
5 express my concern, which is if the conversation
6 that we just had is about limiting TVC to this
7 particular context, I'm just wanting to make sure
8 that wherever we've addressed this term
9 previously, that we know what that term means in
10 those other places, which might mean that we
11 might need to revisit those, sorry to say it, but
12 revisit those parts of the proposed rule if we
13 are going to now limit TVC to the context of
14 MAOP.

15 MR. DANNER: So another way to do that
16 could be to take the definition that we have here
17 and just say for purposes of and then cite the
18 parts of the code that we want it to apply to so
19 that if the term appears somewhere else, it
20 doesn't mean that this definition necessarily
21 applies to that. Even though it may be
22 undefined, it would nonetheless have some meaning

1 just from the plain language.

2 MS. GOSMAN: Yes. I think that's one
3 way of approaching it. I just worry because it's
4 such a specific term that it seems to me either
5 we have a definition for that term that's
6 consistent throughout, or we perhaps use
7 different terminology.

8 MR. DANNER: Okay. Andy?

9 MR. DRAKE: I think -- a little bird
10 just told me that we haven't voted on anything
11 where TVC has been used other than records so
12 far. So the allusion to it being covered in
13 repair criteria is a discussion we haven't had
14 yet. So there's -- I don't think we're going to
15 have to worry about going backwards. The
16 conversation is still in front of us about how
17 that fits. So if that helps kind of lower
18 anxieties a little bit, I don't think we've done
19 anything that's not related to records so far on
20 TVC.

21 MR. DANNER: All right. Sara?

22 MS. GOSMAN: So can I suggest that we

1 hold this conversation then until we talk about
2 the rest of the places where we see TVC and then
3 go back to the definition at that point?

4 MR. DANNER: Where else are we going
5 to see TVC?

6 MR. WORSINGER: Repair --

7 MR. DANNER: Repair criteria, okay.
8 Any response to Sara's proposal? Rich?

9 MR. WORSINGER: Rich Worsinger Rocky
10 Mount Public Utilities. Sara, I think you're
11 asking some good questions, but could we not
12 define this for related to MAOP here? And then
13 if we discover other areas, we address those so
14 that we're just not kind of leaving something
15 undone here? I guess doing the same thing, just
16 putting this to bed here and then when we see the
17 other areas that it might be needed, addressing
18 it at that time?

19 MR. DANNER: Sara?

20 MS. GOSMAN: Perhaps I think about
21 this like a lawyer but I -- so there is a
22 definition in front of us of a term that's going

1 to be used throughout the regulations. So to me,
2 it seems like we've got to decide what that terms
3 means and where it's being used in the
4 regulations and then decide whether we agree to
5 that or not. So I prefer to have that
6 conversation at one point in time in which all of
7 those are in front of us and we can work through
8 what it means.

9 MR. DANNER: Okay. So we do have a
10 couple of definitions that we are going to take
11 up separately, transmission lines and
12 distribution center. It could be that we hold
13 this one with those and we could vote on those
14 when we have a better idea of where else we might
15 see the TVC term applied. So what is the will of
16 the GPAC. Andy?

17 MR. DRAKE: I would agree to make a
18 motion that we just excise the issue about TVC
19 until we get there. We've done that with other
20 things and I think that gives the Committee, you
21 know, a deliberate discussion where we've all got
22 it all in context, which is, frankly, one of the

1 hardest things we're doing here, is we're talking
2 about single issues and then we never really back
3 up and look at how they fit together. So if
4 there's any concern about how it fits together,
5 I'd just say excise it and --

6 MR. DANNER: So the proposal would be
7 basically, let's take that definition, we'll park
8 it, we'll bring it back at a later date when
9 we've had a discussion about the other sections?
10 So I think that I'm hearing that and Alan and
11 then Steve.

12 MR. MAYBERRY: Yeah. I was just going
13 to say that's one option. We could also deal
14 with it here but then also pick it back up as we
15 go to anomaly repair, too.

16 MR. DANNER: So --

17 MR. MAYBERRY: Either way.

18 MR. DANNER: Okay. Yes. I mean I
19 think it's okay for this to sit in the parking
20 lot overnight. I mean I think we've agreed on
21 the language as regards to MAOP, so the question
22 is then if there need to be adjustments as we

1 deal with the other stuff. Steve?

2 MR. ALLEN: Steve Allen, IURC. Yes.

3 I think that makes sense to go ahead and pick it
4 up later, but while we're on it, Mr. McLaren, you
5 said that TVC was referenced in other areas. And
6 I think you specifically said 192.713. Is that
7 the only place that it's referenced?

8 MR. McLAREN: Without my computer open
9 to do a word search, I believe it is those three
10 times. It's -- yes, in a couple of different
11 instances or usages that it's applied towards.

12 MR. ALLEN: Thank you.

13 MR. DANNER: Okay. So -- all right,
14 so we're going to park that and again, we still
15 have definitions for transmission line and
16 distribution center which we're also setting
17 aside. And then we will basically figure out how
18 we want to proceed with this voting language in
19 front of us on the other definitions. Alan?

20 MR. MAYBERRY: I was just going to add
21 or remind the Committee that related to TVC, we
22 are going to put that in the preamble as opposed

1 to reg text. That's where we were addressing
2 that. Just make sure that we're not --

3 MR. DANNER: Okay. Right, but I think
4 the question was whether -- we just wanted to
5 make sure after we've talked about the other
6 parts, that the definition that we've arrived at
7 for TVC is the correct one. So that's going to -
8 - that's in the parking lot right now.

9 So I cannot remember if we have a
10 motion before us on this?

11 PARTICIPANT: No.

12 MR. DANNER: We do not, okay. So I
13 would look for a volunteer to read the large
14 type. All right, Rich.

15 MR. WORSINGER: Rich Worsinger, Rocky
16 Mount Public Utilities. Voting language for
17 definitions in 192.3; the proposed rule as
18 published in the Federal Register and the Draft
19 Regulatory Evaluation with regard to the proposed
20 definitions are technically feasible, reasonable,
21 cost-effect, and practicable if the following
22 changes are made. Strike the definition of

1 electrical survey; revise the definition for
2 close interval survey, in-line inspection, and
3 in-line inspection tool to read as recommended by
4 PHMSA staff during this meeting and as presented
5 in the slides; revise the definition for dry gas
6 or dry natural gas as revised by the Committee
7 during the meeting and reflected in the slides;
8 consider adding free-swimming to the definition
9 for pipe segment can accommodate inspection by
10 means of an instrumented in-line inspection tool
11 per Committee comments at the meeting.

12 MR. DANNER: Okay. Thank you. Is
13 there a second?

14 MR. ALLEN: Steve Allen, IURC. No,
15 Mr. Chairman. I just want to point something out
16 with that language.

17 MR. DANNER: All right.

18 MR. ALLEN: I think the language as it
19 exists, it would suggest that the language on
20 traceable, verifiable, and complete records,
21 transmission lines and distribution centers is
22 okay, because it says that the proposed language

1 is fine, it's technically feasible, so on and so
2 forth if the following changes are made. It
3 doesn't say except for distribution center,
4 transmission lines or TVC.

5 MR. DANNER: Okay. So we'll add that
6 language in there. Thank you.

7 MR. ALLEN: Yeah. It needed a
8 qualifier.

9 MR. DANNER: Thank you.

10 (Off-microphone comments.)

11 MR. DANNER: Okay. So what's that?

12 MR. WORSINGER: Can I modify --

13 MR. DANNER: Yes. You are hereby
14 modified so now I'm asking is there a second? Do
15 you have something else?

16 MR. WORSINGER: Do I need to say that
17 or --

18 MR. DANNER: I think we're good. So
19 -- well, I guess yes, why don't you orally modify
20 your motion.

21 MR. WORSINGER: Motion to modify my
22 motion to say everything but accepting the

1 definitions of transmission line, distribution
2 center, and traceable, verifiable, and complete
3 records.

4 MR. DANNER: All right. Thank you for
5 that. Is there a second on this motion?

6 DR. LONGAN: Sara Longan, I second.

7 MR. DANNER: All right. Thank you
8 very much. Is there any more discussion?

9 (No response.)

10 MR. DANNER: All right. Then I think
11 we're ready for a roll call vote, Cheryl.

12 MS. WHETSEL: Are there any
13 objections? All right. Steve Allen?

14 MR. ALLEN: Aye.

15 MS. WHETSEL: Dave Danner?

16 MR. DANNER: Aye.

17 MS. WHETSEL: Diane Burman?

18 MS. BURMAN: Aye.

19 MS. WHETSEL: Sara Longan?

20 DR. LONGAN: Aye.

21 MS. WHETSEL: Terry Turpin?

22 MR. TURPIN: Aye.

1 MS. WHETSEL: Cheryl Campbell?

2 MS. CAMPBELL: Aye.

3 MS. WHETSEL: Andy Drake?

4 MR. DRAKE: Aye.

5 MS. WHETSEL: Ron Bradley?

6 MR. BRADLEY: Aye.

7 MS. WHETSEL: Rich Worsinger.

8 MR. WORSINGER: Aye.

9 MS. WHETSEL: Jim Airey?

10 MR. AIREY: Yes, aye.

11 MS. WHETSEL: I mean, sorry, John.

12 It's the end of the day is it?

13 MS. WHETSEL: Robert Hill.

14 MR. HILL: Aye.

15 MS. WHETSEL: And Sara Gosman?

16 MS. GOSMAN: Aye.

17 MS. WHETSEL: Okay, motion carries.

18 Thank you.

19 MS. BURMAN: And I'm sorry. I was on
20 mute. Diane Burman.

21 MS. WHETSEL: Did you say aye, Diane?

22 MR. DANNER: Yes.

1 MS. WHETSEL: Okay. Thank you.

2 MR. DANNER: Ms. Burman says aye.

3 Okay. Thank you, Commissioner. It is now 3:13.

4 We are going to take a break and we'll try and
5 start again by 3:25, probably 3:30, but come back
6 soon as you can.

7 (Whereupon, the above-entitled matter
8 went off the record at 3:13 p.m. and resumed at
9 3:37 p.m.)

10 MR. DANNER: Okay. At this point, we
11 are going to take under consideration the
12 definitions for transmission line and
13 distribution center. So I'm going to turn it
14 over to PHMSA staff. And they will present on
15 this, on these proposals.

16 (Off-microphone comments.)

17 MR. DANNER: Oh, we've already -- oh,
18 I'm sorry. We've already had the proposals on
19 these definitions. So we're going to take public
20 comment on transmission line and distribution
21 center. So is there anyone who wishes to comment
22 on these proposed definitions?

1 MS. BARTHOLOMEW: Certainly. Good
2 afternoon. My name is Mary Bartholomew. I'm
3 with Southwest Gas Corporation. And I will be
4 commenting on the transmission line changes
5 specifically related to the change from operating
6 pressure to MAOP.

7 At Southwest Gas, we utilize operating
8 pressure in our hoop stress calculation for
9 determining whether a line is considered
10 transmission. New and replacement pipelines are
11 designed to one of a few set pressures typically
12 aligned with ANSI ratings associated with the
13 components, example being an ANSI 300 valve that
14 may be in the line. So we would set that design
15 pressure and our multiple here 720.

16 Further, the test pressure is
17 typically set to one and a half times the design
18 pressure, creating a pipeline with an MAOP of 720
19 psig. While the MAOP is established at 720, the
20 maximum operating pressure will typically be much
21 less. A common operating pressure at our company
22 is 300 psig.

1 It is important to note that by
2 conducting the pressure test at a higher pressure
3 it allows us to ensure that any construction
4 defects or manufacturing defects have been more
5 than adequately addressed.

6 In the future, if operating conditions
7 were such that we would need to increase the
8 operating pressure, our operating standards
9 dictate a very specific and stringent set of
10 requirements up to and including uprating in
11 order to increase that operating pressure.

12 At this time, as we understand the
13 requirements of the establishment of MAOP, once a
14 design pressure and test pressure have been set
15 for a new installation, the MAOP has been set and
16 cannot be arbitrarily reduced.

17 As proposed in the rule, utilizing
18 MAOP rather than operating pressure in the
19 definition of transmission would require many of
20 the pipelines operating at our company at very
21 low SMYS values within, to be reclassified as
22 transmission.

1 With the prescriptive nature of
2 transmission integrity management, these
3 pipelines typically operating at less than ten
4 percent of SMYS will have the same assessment
5 requirements and timeframes as pipes operating at
6 50 percent of SMYS, reducing our focus on the
7 lines that are creating the most risk.

8 We would ask PHMSA, excuse me, to
9 reconsider the proposed change from operating
10 pressure to MAOP in the definition of
11 transmission. Appreciate your time. Thank you.

12 MR. DANNER: All right. Thank you.

13 MR. BODELL: Yes, hi, my name is
14 Clayton Bodell with Williams.

15 Similar to the comment just previously
16 made, I think there's a slight distinction that
17 needs to be made in item number 2 as it relates
18 to, you know, MAOP versus operating pressure.
19 The way it's written the calculation of MAOP
20 versus SMYS is a different calculation that
21 results as, from the hoop stress generated at
22 that MAOP as a percentage of SMYS.

1 So the way that the rule is written
2 right now you end up with, you know, with a
3 number that makes sense. But what it should read
4 in 2 is maybe something similar to -- and this is
5 not withstanding the comment just made -- has or
6 is operating at an MAOP resulting in a hoop
7 stress of 20 percent or more of SMYS. Thank you.

8 MR. DANNER: All right. Thank you.

9 MR. MOIDEL: Good afternoon. Brian
10 Moidel with Dominion Energy Ohio.

11 With regard to this slide right here
12 where PHMSA suggests the committee review
13 withdrawal from the rule, I would recommend that
14 the committee considers the definition to
15 provide, of distribution center to provide
16 clarity and consistency with regard to the
17 transmission line definition. Thank you.

18 MR. DANNER: All right. Thank you.

19 MS. KURILLA: Erin Kurilla, American
20 Public Gas Association.

21 Just like Brian just mentioned, APGA
22 strongly recommends that the definition of

1 distribution center be included in this
2 rulemaking.

3 It's been an undefined term in our
4 industry for a very long time. And there's been
5 a lot of ambiguity around the definition of
6 distribution center. I know PHMSA has answered
7 countless interpretation requests on this term.

8 So we very much support looking at
9 that definition. In fact, APGA supported the
10 proposed definition in the NPRM. Since then,
11 we've seen a slightly revised version come from
12 AGA. And we would support AGA's revised
13 definition for distribution center as well.

14 Just two other comments for the
15 record, just encouragements to provide a little
16 bit of clarity during this conversation with the
17 GPAC around their justification for two changes.
18 One has already been mentioned.

19 In the preamble of the NPRM, there
20 really was no discussion about PHMSA's move from
21 operating pressure to MAOP for determining the
22 percent SMYS. So I'd encourage PHMSA to talk

1 about that and explain why they made that change.

2 And then the second change, which
3 we've heard no comments on, is in red on that
4 slide 126, is this addition of or connected
5 series of pipelines that was not in the proposed
6 rule nor have we heard any commentary on why that
7 change was added and why PHMSA felt that was
8 necessary.

9 So, encourage the GPAC to talk about
10 both of those items as well. Thank you.

11 MR. DANNER: All right. Thank you.
12 Are there any other comments on these two
13 definitions? All right. Turn it over to the
14 committee. Are there any comments? Steve?

15 MR. ALLEN: Yes, the PHMSA's
16 recommendation to exclude the definition of
17 distribution center I think is the wrong path. I
18 think we do need to have that definition in there
19 for clarity and consistency.

20 And I have seen the industries
21 proposal for the definition. And I honestly
22 would support that. I think it's a step in the

1 right direction.

2 MR. DANNER: Others, Rich?

3 MR. WORSINGER: Rich Worsinger, Rocky
4 Mount Public Utilities.

5 John Gale, did you happen to bring
6 that slide I sent to you?

7 MR. WORSINGER: I have an example for
8 the committee that I think will help explain why
9 we really want to have this put to bed.

10 This is a system in Lorimor, Iowa.
11 And this is simply the line that connects Lorimor
12 with their gas supply. It's a two-inch steel
13 line MAOP of 150 pounds. It operates at less
14 than one percent SMYS. And the Iowa Utility
15 Commission considers these are transmission lines
16 since distribution center has not been defined.

17 So this 4.7-mile line is considered as
18 a transmission line, and therefore has to have
19 DIMP and all the other various inspections and
20 surveys. And there are numerous systems in Iowa
21 that are subject to the same thing.

22 And if you need somebody from Iowa to

1 further testify, there's a guy who was born in
2 Iowa in the back of the room. And I told him --
3 he's shaking his head no. Thank you.

4 MR. DANNER: So how do you know about
5 Lorimor, Iowa?

6 MR. WORSINGER: Rich Worsinger, Rocky
7 Mount.

8 This was shared with me by John
9 Erickson at APGA. There was a pipeline class
10 location methodology workshop back in April 16,
11 2014 where David Hraha, program director for
12 IAMU, presented this and explained in more detail
13 -- that's where we put this slide together --
14 situations such as this were there.

15 MR. DANNER: All right. All right.
16 Thank you. So the definition that is up here, is
17 that a definition, if we were to include a
18 definition, is that a satisfactory definition?
19 Steve?

20 MR. ALLEN: Steve Allen, IURC. While
21 it is certainly better than what we had before,
22 which was nothing, I don't know if I can read the

1 recommended language for distribution center.

2 MR. DANNER: Recommended by whom?

3 MR. ALLEN: Industry.

4 MR. DANNER: All right.

5 MR. ALLEN: Distribution center means
6 the initial point where gas enters piping used
7 primarily to deliver gas to customers who
8 purchase it for consumption as opposed to
9 customers who purchase it for resale, for
10 example, one, at a metering location, two,
11 pressure reduction location, or three, where
12 there is reduction in the volume of gas such as a
13 lateral off a transmission line.

14 MR. DANNER: Okay. So, Steve, it is
15 your -- you would prefer that definition to the
16 one that's on the screen.

17 MR. ALLEN: I think that definition
18 provides even more guidance and more definition
19 and more clarity.

20 MR. DANNER: All right. Is there any
21 other conversation on this point, on distribution
22 center?

1 All right. Hearing none, I guess I
2 don't know how to sense the will of the
3 committee. A few members have said they would
4 like to have the industry definition substituted
5 for the NPRM proposed revision and that it be
6 included in the final rules. Cheryl?

7 MS. CAMPBELL: I guess I'm going to
8 add my voice to I think we -- I would like to see
9 us define what a distribution center is to add
10 some clarity. I do think that it goes with the
11 conversation about a transmission line since
12 we're terminating it, right, and a distribution
13 center.

14 And I will say, and I can see
15 Christina cringing over there, but having spent
16 the first 20 years of my career at an interstate
17 and then working at a utility and the, frankly,
18 the amount of energy and conversation around the
19 difference between a distribution line and a
20 transmission line is pretty incredible over the
21 time period that I've worked here.

22 And people just spend a lot of time

1 debating, right, what, is that really a
2 transmission line or is that really a
3 distribution line.

4 So I would like to see some clarity
5 around it, right, so that it's easier for all of
6 us to deal with. And if this is the appropriate
7 place to do that, then I would support that, Mr.
8 Chairman.

9 MR. DANNER: All right. And again,
10 you heard the definition proposed by Steve. And
11 there's a definition on the screen. Do you have
12 a preference?

13 MS. CAMPBELL: I guess I don't. I
14 mean, I agree with Steve that the one proposed by
15 industry has more specificity. But then do you
16 say -- I mean, I hate to throw this out there.
17 But, I mean, once you've defined that, do you
18 then say whatever doesn't fit in this category,
19 right, or a gathering line becomes a transmission
20 line?

21 It can only go into one of those three
22 categories. Is that correct, Alan? I mean, it's

1 got to be one of the three, right, a gathering
2 line, a transmission line, or a distribution
3 center. And to me, what's important is that
4 we're clear about which of those buckets a
5 pipeline goes in.

6 MR. DANNER: Okay. Steve, do you want
7 to respond?

8 MR. ALLEN: Are you pointing at --
9 Steve Allen, IURC. John, I just wanted to get
10 your attention. I've emailed that definition to
11 you.

12 MR. DANNER: All right. Alan?

13 MR. MAYBERRY: You know, we'll
14 consider it. If you want to bring something up
15 for consideration, you know, after we leave here,
16 we can do that.

17 MR. DANNER: Okay. May I ask? Is it
18 the will of the committee, though, that we have,
19 that we include a definition of distribution
20 center in the rule? It looks like it's, the
21 committee is pretty unanimous on that point.

22 So then the question is which

1 definition is preferred, especially keeping
2 Cheryl's comments in mind. Rich?

3 MR. WORSINGER: Rich Worsinger, Rocky
4 Mount. I know we don't like to wordsmith. But
5 if we could get John to put that definition on up
6 there and let us look at it, we might be able to
7 put this thing to bed today.

8 MR. DANNER: All right. All right.
9 And then, Cheryl, is your tent up? Okay.

10 MS. CAMPBELL: I'm sorry.

11 MR. DANNER: That's all right. Sara?

12 MS. GOSMAN: Rich, I'd just like to go
13 back to the example that you gave to the
14 committee to help me understand why in that
15 context a definition would be helpful.

16 Could you explain that again to me,
17 and perhaps, if you wouldn't mind, whether the
18 two definitions that are on the table right now,
19 whether they would affect the issue that you're
20 bringing up here?

21 MR. WORSINGER: Sure. Rich Worsinger,
22 Rocky Mount. Would the staff put that -- no, the

1 picture up there.

2 So, in this example here, in every
3 other state, that would be classified as a
4 distribution line. But in Iowa, the IAMU I think
5 it is, they interpret this, because a
6 distribution center is not defined, they
7 interpret this as a transmission line.

8 So that means this operator, which
9 serves a total of 198 customers, has got to
10 operate and maintain that line at the higher
11 standard of a transmission line. And so that's,
12 brings along with it higher costs. And then
13 those costs are borne by those 198 customers.
14 And it's just, it's overkill.

15 MS. GOSMAN: Thank you so much for
16 helping me to understand this. So the, it's the
17 gate station that's here that's not being
18 considered the distribution center?

19 MR. WORSINGER: Rich Worsinger, Rocky
20 Mount. I believe it's the, that line that's
21 depicted there. The yellow line is being
22 characterized as transmission pressure that feeds

1 the gate station.

2 And the root of the problem is that
3 there is no definition of distribution center.

4 MR. DANNER: Cheryl?

5 MS. CAMPBELL: So would the
6 definition, right, that's proposed, would that
7 solve this, because I hear what you're saying,
8 right. The PIR on this is 17 feet, right? And
9 it looks to me like it's a very rural, farming
10 area, if I can read the -- right? So I'm seeing
11 very little risk, right?

12 So will the definition, as proposed,
13 of distribution center fix this problem, because
14 if it does not, then we've not, right, we've not
15 helped anything?

16 I mean, I get the point here. We've
17 got a very small system, very small PIR. The
18 risk is incredibly small. We don't need the
19 higher, right, the higher standard.

20 But if we're not going to fix this
21 problem with the definition we're proposing, then
22 that doesn't necessarily help.

1 MR. DANNER: But the definition that
2 we've heard from Steve, where it basically, it's
3 based on retail customers as opposed to wholesale
4 customers, probably would clarify for that
5 particular utility. Rich?

6 MR. WORSINGER: A little more
7 clarification on there. So, at the gate station,
8 it's reduced down to 150 pounds. And then it
9 doesn't get to Lorimor. And so that's where it's
10 being interpreted as that's the distribution
11 center.

12 So, yes, you're right, Cheryl. That
13 line is, it's out in the country. So it's nobody
14 around there. But it's being classified as a
15 transmission line because they don't consider it
16 a distribution center till it gets down there to
17 Lorimor.

18 MS. CAMPBELL: So, under the proposed
19 definition, pressure reduction location moves to
20 that gate station where it gets dropped to 150
21 pounds. And the line now becomes a distribution
22 line and is handled under DIMP. That's your

1 point?

2 MR. WORSINGER: That's correct.

3 MS. CAMPBELL: Okay. Thanks, Rich.

4 MR. DANNER: Okay. Ron?

5 MR. BRADLEY: Ron Bradley, PECO. Yes,
6 that was a great conversation. And I appreciate
7 it. So, for me, that underscores the need for a
8 distribution center definition or a distribution
9 definition, distribution line definition, because
10 without that, you're left with the transmission
11 line definition that we have.

12 And you don't, in that example, you
13 don't, you basically check off number 2,
14 definitely operating not at a hoop stress of 20
15 percent SMYS. And you check off number 3, unless
16 Lorimor is a storage field, which it's not. It's
17 a community of 199 people.

18 And it sounds like the regulator there
19 said basically, well, prove that it's not a
20 distribution center. You got no way of telling
21 me it's otherwise. Therefore, you know, enter
22 into this set of new standards for these people.

1 So I get that. I definitely believe
2 we need to have a definition for distribution
3 center.

4 The only other thing I would comment
5 on relative to the, sort of backing up to the
6 transmission center, the added language that
7 connected in the transmission proposal. I
8 apologize for jumping a bit. But the added
9 language -- oh, it's up there -- or connected
10 series of pipelines, I haven't settled in my
11 head. But it feels like it could take you down a
12 path that's not intended in this case.

13 I don't have many situations where I
14 have transmission pipeline that goes in and out
15 of distribution kind of systems. My network is a
16 little bit different.

17 But I can imagine there being an area
18 where you could maybe call something that was
19 intended to be distribution transmission or not.
20 I'm not sure.

21 Steve, maybe you can clear it up for
22 me. Maybe I'm reading it wrong. The adder of

1 the or connected series of pipelines, I'm not 100
2 percent following it.

3 MR. McLAREN: This discussion came
4 about because of some enforcement actions in
5 Alaska and where the enforcement case ruling was
6 that this one line was not a transmission line
7 because it connected to another transmission
8 line, and where clearly in our case, in our
9 viewpoint was that these were all transmission
10 lines. And the ruling went against us.

11 We have looked at other cases like
12 that and through the history of the definition of
13 transmission line over the years. And this is,
14 what we came up with is seeming acceptable over
15 that history and to solve that point, that a
16 transmission line can, indeed, connect to another
17 transmission line. That is the intent. Thank
18 you.

19 MR. DANNER: Robert?

20 MR. HILL: Yes, Robert Hill, Brookings
21 County, South Dakota. I agree. I mean, we've
22 got a 42-inch pipe, and then we got a 10-inch,

1 another pipeline coming out to a big gas power
2 energy plant. And both of those are considered
3 transmission lines. So this language makes sense
4 to me at least.

5 MR. DANNER: Okay. Cheryl?

6 MS. CAMPBELL: So I'm probably going
7 to get everybody to cringe. But I'm going to go
8 back to this idea that everything's got to be in
9 one of three buckets, right?

10 So, I mean, if we can agree on what a
11 distribution is and we can -- well, maybe we
12 can't agree on what a gathering is. I mean, can
13 we just say --

14 (Laughter.)

15 MS. CAMPBELL: Instead of wordsmithing
16 connected lines, I mean, honestly, they have to
17 be one of those three buckets. Is there anything
18 else in the industry other than those three
19 buckets? I mean, you got to be a gathering line,
20 a transmission line, or a distribution line.

21 And if we can agree on sort of two out
22 of the three, then does not the third become

1 everything else, just to make it simple?

2 MR. DANNER: John's going to answer
3 that. John?

4 MR. AIREY: Let's make it four.
5 Production line.

6 MR. DANNER: Okay. We have more
7 buckets now. All right. Any other comments on
8 this language? Steve?

9 MR. ALLEN: Thank you. Steve Allen,
10 IURC. Some of the concerns expressed by the
11 public, taking the definition of transmission
12 line from operating at a hoop stress of 20
13 percent or more of SMYS to has an MAOP of 20
14 percent or more of SMYS. Humor me, and help me
15 to understand the difference, please, actually
16 why it was changed to MAOP.

17 MR. DANNER: Steve?

18 MR. NANNEY: Well, first of all, it's
19 like I think the public comment we got. You can
20 put pipe in. You can do a pressure test to
21 establish an MAOP. But you can operate it at a
22 pressure less than that. You can operate it at

1 80 percent of that. You can operate it at 50
2 percent of that. And that can be your operating
3 pressure.

4 The problem with it is is you can
5 raise that from time to time. You can go 20
6 years and be at that lower operating pressure and
7 then one day decide we're going to raise it 20
8 percent. And it could have been 20 years that
9 you haven't raised that.

10 So the thing of establishing MAOP
11 versus operating pressure, well, is it operating
12 pressure today? Is it operating pressure ten
13 years ago? Is it operating pressure ten years
14 from now? So that was the point in putting
15 something that we know what it sets up.

16 You can always say my MAOP is a number
17 less than that established. If you establish it
18 at 700 pounds, you can always establish it at a
19 number less than that.

20 Also, one reason that we also did it
21 was at the time we were writing the rulemaking we
22 have had the issue of the MAOP at San Bruno. And

1 so we were trying to make sure that we
2 established and we had a set MAOP, and we didn't
3 have where folks were raising or lowering it,
4 that the MAOP would be established.

5 So, with the issue that we had seen at
6 San Bruno on the seams, on the pressures there,
7 we had decided that we would be more specific in
8 making it MAOP versus operating pressure that was
9 not defined.

10 MR. DANNER: All right. Alan?

11 MR. MAYBERRY: Just a couple of
12 thoughts here. Well, first off, you know, I had
13 mentioned this. I think, you know, you could
14 guide us and tell us to consider, you know, the
15 language you have up here related to distribution
16 centers.

17 I'm not so sure. You know, having
18 dealt with this issue and, you know,
19 interpretations related, you know, from the state
20 of New Mexico to eastern part of the U.S., I'm
21 not even sure this language here would really
22 address it the way you'd like for to put it to

1 bed.

2 I think there are a lot of nuances
3 here. And therefore, I'd say, well, just, you
4 know, have us consider this. We'll take it under
5 advisement and go from there.

6 But, and I think that's why we were
7 suggesting perhaps to just, let's park this and
8 deal with it at a later time outside of this rule
9 since the rule is mainly focused on transmission.

10 But I'm not so sure what you have
11 there will put, you know, will definitively take
12 every question out of, you know, what's a
13 distribution center and what's not.

14 MR. DANNER: All right. Cheryl, and
15 then Sara.

16 MS. CAMPBELL: So I understand where
17 you're coming from, Alan. I want to, I do want
18 to just vocalize support for number 4 up there
19 under transmission line, because I recognize that
20 it might make some people question why it has
21 been proposed. So I'd just like to vocalize it
22 so that people understand.

1 And I think that some operators have
2 lines that operate in a more urban or suburban
3 environment. And they meet -- nobody would say
4 that they're a transmission line, right? I mean,
5 they're clearly downstream of a distribution
6 center.

7 Yet, the number of people around them
8 would suggest that the risk profile is high,
9 right? So operators may choose to maintain those
10 lines as if, at a higher standard, right, the
11 higher transmission standard.

12 I think that voluntary designation
13 provides an operator with a way to say I
14 recognize the risk profile of this pipeline. And
15 I want to take care of it at this higher standard
16 and make sure that their state regulatory body
17 sees that, right, and they can have a good
18 conversation about that, and frankly, you know,
19 have a good financial conversation about that as
20 well.

21 So, again, I just wanted to vocalize
22 some support for that and explain why it's there.

1 It's not requiring anybody. It's just saying, if
2 you have a pipeline that you are very concerned
3 about and choose to designate it at a higher
4 level because of its risk profile, let's allow an
5 operator the ability to do that.

6 MR. DANNER: All right. Sara, and
7 then John.

8 MS. GOSMAN: So I want to support this
9 idea that we're going to make this definition
10 more stable by using MAOP, that I think the way
11 we want to treat definitions is to make sure they
12 don't change based on, you know, characteristics
13 today operationally versus tomorrow. And that
14 seems to me like a good approach.

15 In terms of defining distribution
16 center, I would feel more comfortable
17 recommending that PHMSA consider the definition
18 without giving them that specific industry
19 language here. And part of it is I'm a little
20 worried about the used primarily to deliver gas
21 to customers who purchase it for consumption as
22 opposed to those who purchase it for resale.

1 I just think there should be some
2 wordsmithing carefully about how this definition
3 might be constructed. And I think that's -- I
4 would prefer to defer to PHMSA on how they're
5 going to put together that language.

6 MR. DANNER: So, John, before I get to
7 you, just my comment on that is I think that
8 that's what this does. It does say include a
9 definition of distribution center and consider
10 revising the definition along the lines of what's
11 down at the bottom.

12 It might be a little prescriptive in
13 that it says, you know, revising it with that
14 definition. Maybe we just want to say taking
15 into account that definition.

16 All right. So, John?

17 MR. AIREY: I just wanted to ask
18 Cheryl a question, if she was focused on examples
19 such as the DJ Basin.

20 MS. CAMPBELL: No, I wasn't. It
21 wasn't the DJ Basin I was thinking specifically
22 of.

1 I was actually thinking about a
2 pipeline that we own in downtown St. Paul,
3 Minnesota that operates at a 300 pound MAOP and
4 about a 15 percent SMYS. So technically it's a
5 distribution line.

6 But I guarantee you that 2 or 300
7 pounds of blowing gas in an urban environment is
8 a really bad day. So we would prefer to ILI that
9 line.

10 MR. AIREY: I think the same issue has
11 arisen around Denver --

12 MR. DANNER: Yes, speak into the
13 microphone.

14 MR. AIREY: -- in an urban
15 environment. So I thought that's what you were
16 suggesting.

17 MS. CAMPBELL: I have several in
18 Denver that are just like that.

19 MR. AIREY: Yes. Okay.

20 MR. DANNER: All right. Thank you.
21 Rich?

22 MR. WORSINGER: Rich Worsinger, Rocky

1 Mount. Alan, you bring up a good point. I think
2 we see different comments around the room that we
3 all want to get this done. We see the value in
4 defining a distribution center. But we also
5 realize we need to get it right. And I think
6 we're close.

7 Do you think this would be enough time
8 from this meeting to the June meeting that we
9 can, PHMSA can come back to the committee with a
10 recommendation, recommended language that they're
11 comfortable with?

12 MR. AIREY: Well, here again, I'm not
13 too thrilled about coming back to the committee
14 to -- you know, I'd rather get the direction or
15 get the guidance, you know, say to consider and
16 that we would come back.

17 We could brief the committee at a
18 later date. But honestly, I really want to get
19 your guidance and keep moving on it. I prefer to
20 do that, you know.

21 MR. WORSINGER: You mean get our
22 guidance today?

1 MR. AIREY: Yes.

2 MR. WORSINGER: Got you.

3 MR. AIREY: Yes.

4 MR. DANNER: So, I mean, without
5 having another vote on it, though, would you be
6 willing to come and brief us on the language that
7 you've drafted?

8 Yes, go ahead, Steve. So, Alan?

9 MR. MAYBERRY: I mean, we're really
10 looking for guidance from the committee. And,
11 you know, we take that under advisement as we
12 develop the final rulemaking. But even if we
13 were to brief you, I mean, it could change even
14 beyond that point. It's just --

15 MR. DANNER: Of course.

16 MR. MAYBERRY: Yes, it's always
17 subject to change.

18 MR. DANNER: Well, yes, and I think
19 we're all cognizant of the fact that we are an
20 advisory committee. And then it's up to you to
21 accept, reject, or modify our advice.

22 So, but I think we are all interested

1 if there would be an opportunity where we could
2 provide additional feedback if the final language
3 might be improved.

4 So, all right. Steve?

5 MR. ALLEN: Steve Allen, IURC. So, if
6 we reverted back to the original definition of
7 distribution center that PHMSA came up with in
8 the initial Notice of Proposed Rulemaking, does
9 that make it any easier or -- I mean, I think
10 that the industry definition certainly has more
11 detail to it.

12 But at the same time, when you ask me
13 which one I like better, well, you know, the
14 initial language was a lot better than what we
15 had, which was nothing. And I think, as a state
16 regulator, I could probably do with either one.

17 So, if going back to the initial
18 language that you had out there and then
19 suggested to withdraw from the rule, if we
20 reverted back to that language, does that help
21 the committee get over this hurdle?

22 MR. DANNER: So I think what we've

1 done, though, is that there are now two
2 definitions with which they can draw from. And I
3 think that that's -- our guidance is basically,
4 okay, here are a couple definitions, do your
5 best. And then we asked would you be able to
6 share what you come up with. And I think the
7 answer to that is, no, we're going to, we'll
8 surprise you.

9 (Laughter.)

10 MR. DANNER: And trust us, right? So,
11 John is -- I don't know. We can, you know, we
12 can gang up on him in June if -- but are we
13 willing to move on today? Steve, and then Rich.

14 MR. ALLEN: Steve Allen, IURC. I
15 really would like to move forward on something to
16 provide them some guidance. And let's move on.

17 MR. DANNER: Okay. I think we have
18 provided them guidance. Do you agree? Okay.
19 Rich?

20 MR. WORSINGER: Rich Worsinger, Rocky
21 Mount. I guess my question, then, is how do we
22 put this in the form of a motion. Do we say

1 either do it, we like this one or they could use
2 that one or --

3 MR. DANNER: Well, the motion in front
4 of us simply says include a definition and
5 consider the following definition, which was
6 provided by industry.

7 So they have the benefit of that
8 definition now. They have the benefit of the
9 original NPRM. They have the additional benefit
10 of whatever else they want to come up. But I
11 think that that's the instruction we've given
12 them.

13 So, if -- I don't know that, unless we
14 want to come up with more precise language for
15 them, if we actually want to give them a proposed
16 definition and say this is it, I think we've
17 given them all the guidance that they're going to
18 get.

19 MR. WORSINGER: Alan, does that work
20 for you?

21 MR. MAYBERRY: I think so. I was just
22 going to suggest, I mean, outside of this one

1 issue, there's so much that there is consensus on
2 in this group.

3 And that's, and this one, like I had
4 mentioned, I'm not so sure what I see before, you
5 know, me here, the words there would really, we'd
6 still end up with -- you know, it wouldn't be as
7 definitive as a distribution operator might want
8 it to be.

9 Therefore, it might, you know, be best
10 to table it. But if you want us to consider it,
11 we would consider, you know, your advice.

12 MR. DANNER: Rich?

13 MR. WORSINGER: Rich Worsinger. Just
14 to add the comments, I know this is a very
15 important definition to industry, to AGA. And I
16 can tell you, it is probably the most important
17 item that we're talking about during these three
18 days to APGA.

19 MR. DANNER: So do you want us then to
20 come up with a definition and ask them to include
21 that definition, or are you okay -- I mean, it
22 looks like what we're going to get is going to be

1 some kind of a hybrid of these two definitions.

2 MR. WORSINGER: I think we've given
3 PHMSA our guidance. You know, Steve certainly
4 mentioned a lot. And I know AGA's reps have
5 mentioned. I've given it our thoughts. I see
6 Alan wants to get this done also. I think if we
7 have the recommendation up here and that's what
8 we pass on to PHMSA, I'm comfortable with that.

9 MR. DANNER: Okay. So is that the
10 will of the committee? We've got a proposal in
11 front of us on the left side up there. Is --
12 Ron?

13 MR. BRADLEY: Yes, I just wanted to --
14 thank you. Ron Bradley, PECO. I wanted to make
15 the same statement that -- so there is a
16 recommendation from industry on the board for
17 review. I'm fine with taking that forward for a
18 discussion. I mean, I'm fine with that being the
19 voting and the recommendation.

20 MR. DANNER: Okay. Any other
21 discussion on this before we take volunteers with
22 good eyesight to make a motion? All right. It

1 looks like we're ready for a motion. Who feels
2 comfortable reading it? Rich, thank you.

3 MR. WORSINGER: Voting language for --
4 Rich Worsinger, Rocky Mount.

5 Voting language for definitions 192.3.
6 The proposed rule, as published in the Federal
7 Register and the Draft Regulatory Evaluation with
8 regard to the proposed definitions for
9 transmission line and distribution center are
10 technically feasible, reasonable, cost effective,
11 and practicable if the following changes are
12 made. Revise the definition for transmission
13 line to read as follows.

14 Transmission line means a pipeline or
15 connected series of pipelines other than a
16 gathering line that, one, transports gas from a
17 gathering line or storage facility to a
18 distribution center, storage facility, or a large
19 volume customer that is not downstream from a
20 distribution center, two, has an MAOP of 20
21 percent or more of SMYS, three, transports gas
22 within a storage field, or four, is voluntarily

1 designated by the operator as a transmission
2 line.

3 Note, a large volume customer may
4 receive similar volumes of gas as a distribution
5 center. And it includes factories, power plants,
6 and institutional users of gas.

7 Include a definition for distribution
8 center and consider revising the definition per
9 the definition provided by the industry and read
10 aloud by Member Allen during the meeting on March
11 27, 2018 as follows.

12 Distribution center means the initial
13 point where gas enters piping used primarily to
14 deliver gas to customers who purchase it for
15 consumption as opposed to customers who purchase
16 it for resale, for example, one, at a metering
17 location, two, a pressure reduction location, or
18 three, where there is a reduction in the volume
19 of gas such as a lateral off a transmission line.

20 MR. DANNER: All right. Is there a
21 second?

22 MR. ALLEN: Steve Allen, IURC. I

1 second.

2 MR. DANNER: Okay. Any further
3 discussion on this before we go to a roll call?

4 All right, Cheryl, let's go to roll call.

5 (Off-microphone comment.)

6 PARTICIPANT: Aye.

7 MS. WHETSEL: Dave Danner?

8 MR. DANNER: Aye.

9 MS. WHETSEL: Diane Burman?

10 MS. BURMAN: Aye.

11 MS. WHETSEL: Sara Longan?

12 MS. LONGAN: Aye.

13 MS. WHETSEL: Terry Turpin?

14 MR. TURPIN: Aye.

15 MS. WHETSEL: Cheryl Campbell?

16 MS. CAMPBELL: Aye.

17 MS. WHETSEL: Andy Drake?

18 MR. DRAKE: Aye.

19 (Off-microphone comment.)

20 PARTICIPANT: Aye.

21 (Off-microphone comment.)

22 PARTICIPANT: Aye.

1 (Off-microphone comment.)

2 PARTICIPANT: Aye.

3 MS. WHETSEL: Motion passes.

4 MR. DANNER: All right. Motion
5 passes. It is 4:22. We're going to move ahead
6 into repair criteria. So I will --

7 (Off-microphone comment.)

8 MR. DANNER: All right. I don't think
9 we're going to finish repair criteria today. But
10 we'll get started.

11 MR. NANNEY: We're at slide, we should
12 be at slide 137. And we're going to go through
13 slide 164. And then we will turn it back over to
14 the Chairman. So --

15 Again, some of this, when we had our
16 last meeting, we reviewed this. But we are going
17 to highlight it again this afternoon. Then we'll
18 get into more criteria when we start back on
19 Wednesday morning.

20 The repair criteria revisions are in
21 Section 711, 713, and under the IM section 933.
22 And again, what PHMSA was, the issue we were

1 trying to do was greater assurance is needed,
2 that injurious anomalies are repaired before they
3 can grow to the sizes leading to leaks or
4 ruptures.

5 PHMSA proposed to modify the repair
6 criteria to include additional anomalies under
7 both the immediate and one year conditions for
8 HCAs to include criteria for cracks in response
9 to NTSB recommendation on hazardous liquid lines,
10 apply the HCA criteria to non-HCAs with a tiered
11 response time for non-immediate conditions.

12 Defects requiring a one year response in HCAs
13 would require a two year response in non-HCAs.

14 We were looking at adding definitions
15 for significant stress corrosion cracking in the
16 pipe body, seam cracking in the weld seam,
17 wrinkle bend, and hard spot.

18 And the basis, again, was inspection
19 experience identified weaknesses and repair
20 decisions in response to ILI data. Some
21 injurious anomalies and defects are not
22 identified and remediated in a timely manner.

1 Again, going to slide 139, what was
2 the proposed repair criteria. If you look at
3 this slide, everything on the left-hand side in
4 the dark blue was existing anomaly criteria. And
5 you can see here it was for HCAs only.

6 And that was a predicted failure
7 pressure, a PFP, less than or equal to 1.1 times
8 MAOP was an immediate. A dent with metal loss,
9 cracking, or a stress riser was immediate. And
10 any other anomaly requiring immediate action was
11 an immediate.

12 And then there was a section that we
13 had no requirements that you'll see now we were
14 proposing in the notice requirements.

15 The anomaly type over to the right-
16 hand side in the orange color was the PFP less
17 than, equal to 1.1 times the MAOP. It would be
18 the same for HCAs, new for a non-HCA. It would
19 be immediate. A dent with a metal loss,
20 cracking, or a stress riser would be an
21 immediate. Any other anomaly requiring immediate
22 action would be immediate.

1 A metal loss greater than 80 percent
2 of the wall thickness, a metal loss affecting
3 weld seams, as you can see the type, would be
4 immediate, and then stress corrosion, cracking,
5 and selective seam weld corrosion.

6 Going to slide 140, some other
7 proposed criteria we had. Again, what was
8 existing is on the left-hand side. A smooth dent
9 greater than six percent, in other words, a top
10 side dent was one year. A dent with greater than
11 two percent at the weld was one year.

12 What we were proposing for HCAs and
13 non-HCAs, which are on the right-hand side, would
14 be a smooth dent greater than six percent. A top
15 side dent would be the same as now, one year for
16 HCA, two years new for a non-HCA. A dent greater
17 than two percent at the weld would be the same,
18 one year for an HCA, which is what it is now, two
19 years, which would be new, for a non-HCA.

20 The predicted failure pressure less
21 than or equal to 1.1 times a Class 1, 1.39 Class
22 2, 1.67 Class 3, and 2 Class 4, again, would be

1 one year, which is new, for an HCA, two year new
2 for a non-HCA.

3 General corrosion would be greater
4 than 50 percent wall loss, one year for, which is
5 new, for an HCA and two years for a non-HCA.
6 Metal loss greater than 50 percent at a crossing
7 where there's a circumferential girth weld, et
8 cetera, one year for HCA, two years for non-HCAs.
9 A gouge or groove greater than 12-1/2 percent,
10 one year for HCA, two years for a non-HCA.

11 MR. McLAREN: You said 1.1 for Class
12 1 --

13 MR. NANNEY: Okay.

14 MR. McLAREN: -- instead of 1.25.

15 MR. NANNEY: Okay. Any indication of
16 crack or crack-like defect that is not an
17 immediate condition, one year new for HCA, two
18 years new for a non-HCA.

19 And going back, Chris said that on the
20 PFP for Class 1 I said 1.1. It should be less
21 than or equal to 1.25.

22 Going to slide 141, again, on what was

1 existing versus proposed, you can see here
2 everything on the denting, a bottom side dent
3 greater than six percent was monitored for HCAs
4 only.

5 A top side dent greater than six
6 percent with an analysis of critical strain
7 levels not exceeded was a monitored condition.
8 And dent greater than two percent out of weld
9 where analysis demonstrates critical strain
10 levels not exceeded was a monitored.

11 And you can see over on the right-hand
12 side the new criteria would be the same as it's
13 been for HCAs, new requirements for non-HCAs at
14 the two year type limit.

15 And then down below on two percent at
16 the dent, same for HCAs, but not applicable for
17 non-HCAs.

18 Going to slide 142, the public
19 committee comments on the repair criteria, some
20 of it that we heard during our March 2nd
21 conference meeting was revise the rule to provide
22 separate requirements for ILI anomaly response

1 and repair, in other words, remediation.

2 And PHMSA's reply there was the long-
3 standing integrity management rule allows
4 operators up to 180 days for completion of the
5 ILI assessment to perform any analysis needed to
6 declare discovery of defects based upon ILI
7 anomalies identified.

8 The IM rule also requires prompt
9 repair of discovered defects on a defined
10 schedule based on the severity of the discovered
11 defect. And last, PHMSA believes 180 days is
12 adequate timeframe for the initial response to
13 ILI results.

14 Slide 143, some other public committee
15 comments that we heard on March 2nd on the repair
16 criteria is revise the rule to provide separate
17 requirements for ILI anomaly response and repair
18 or remediation.

19 And again, PHMSA's comment there is,
20 in the proposed rule, PHMSA had proposed to
21 revise the IM rule to allow operators to submit a
22 notification to PHMSA when more 180 days is

1 needed for initial response. The same standard
2 would apply in non-HCAs, except for a
3 notification would not be required.

4 And the last comment is once the as-
5 called defect has been declared to be an
6 immediate or one year or two year discovery, the
7 defect must be presumed to require repair based
8 on the best available information and analysis of
9 the ILI data.

10 Slide 144, again, this is public
11 committee comments on the repair criteria from
12 our March 2, 2018 meeting. Revise the rule to
13 provide separate requirements for ILI anomaly
14 response and repair or remediation.

15 And PHMSA, again, continued is at the
16 time of discovery the operator must schedule the
17 anomaly for excavation and repair. Also a
18 pressure reduction is put in place for immediate
19 conditions by the operator.

20 The rule allows operators to
21 recharacterize the defect as one that does not
22 require repair based on in-the-ditch direct

1 measures or measurements.

2 And lastly, revising the rule language
3 to address response and repair in different
4 paragraphs would not alter the timeline for
5 discovery, excavation, and repair. And this
6 approach has been in place since inception of the
7 IM rule in 2003.

8 Slide 145, again, public committee
9 comments on repair criteria from our March 2,
10 2018 meeting is, the comment was allow sound
11 engineering judgment or conservative assumptions.

12 Requiring Section 607 to verify
13 information without TVC records for all repairs
14 and pressure reductions is impractical. TVC
15 records are appropriate for MAOP reconfirmation,
16 but not for repair response decision making.

17 PHMSA's response, determination of
18 predicted failure pressure, PFP, in response to
19 detection of pipeline defects is closely related
20 to MAOP. If pipe could fail at pressures below
21 or near MAOP, the operational MAOP safety limit
22 to protect the pipeline is compromised.

1 The Act Section 23 requirement is to
2 verify records was broader. The purpose of the
3 verification shall be to ensure the records
4 accurately reflect the physical and operational
5 characteristics of the pipelines.

6 Going to slide 146 and just repeating
7 PHMSA's response is calculation of PFP should be
8 based on known physical characteristics that are
9 substantiated and documented on TVC records.

10 However, the intent of the proposed
11 rule is to allow operators to conservatively use
12 material strength for Class A pipe, which is a
13 30,000 psi SMYS if SMYS is unknown.

14 PHMSA also recognizes that in cases
15 where TVC records are not available operators
16 must have a basis for grading the ILI logs.
17 PHMSA suggests allowing operators to use the
18 information upon which the current MAOP is based
19 upon properties can be verified using the
20 material documentation process specified in
21 Section 607.

22 slide 147, again, this is a public

1 committee comment on repair criteria on our March
2 2, 2018 meeting. Use of class location safety
3 factors for calculation of a short-term pressure
4 reduction as a safety precaution in response to
5 an immediate condition is too conservative.

6 PHMSA's response, PHMSA suggests
7 modifying Section 713(d)(2) to strike the phrase
8 the lower of. The effect would be that operators
9 would not always be required to use the class
10 location factors when --

11 (Technical interference.)

12 MR. NANNEY: Hello? Now it came back
13 on. Okay.

14 Our operators may choose to use either
15 the calculated safe operating pressure based on
16 class location, 80 percent of the operating
17 pressure at the time of the discovery, or 1.1
18 times the predicted failure pressure based upon
19 situational safety impacts to the public and
20 operator personnel.

21 Going to slide 148, and this is
22 comments on specific repair criteria for dents.

1 Slide 149, and again, this is public
2 committee comments on repair criteria on dents
3 from March 2, 2018. PHMSA should allow operators
4 to use ECA, engineering critical analysis or
5 assessment, to evaluate dents.

6 PHMSA's response, the original repair
7 criteria for dents were developed in the early
8 2000 timeframe for both hazardous liquid and gas
9 integrity management rules. Both in-line
10 inspection technology and analytical techniques
11 to assess dents have advanced significantly since
12 that time.

13 PHMSA has gained confidence in
14 applying ECA techniques to analyze dent defects
15 through recent application of dent ECA and
16 special permits.

17 Consistent with applying proven
18 analytical techniques to evaluate corrosion metal
19 loss and cracking defects, PHMSA suggests
20 including a dent ECA procedure in the final rule
21 as shown on the next slide.

22 Slide 150, and again, this is PHMSA's

1 response on ECA for denting.

2 PHMSA, the summary of the suggested
3 ECA for denting. First of all is evaluate the
4 potential threats for the pipe segment in the
5 vicinity of the dent, including movement,
6 loading, and cathodic protection, two, review the
7 high resolution MFL and high resolution
8 deformation in-line inspection data for damage in
9 the dent area in any associated weld region,
10 three, perform pipeline curvature-based strain
11 analysis using recent high resolution deformation
12 inspection data and compare dent profile between
13 the recent and past high resolution deformation
14 inspections to identify significant changes in
15 dent depth and shape.

16 Slide 151, and this is continuing, is
17 identify and quantify loads acting on the dent
18 for a basis of the ECA, evaluate strain level
19 associated with dent in any welds using finite
20 element analysis, and calculate the plastic
21 strain limit damage factors to infer the
22 possibility of a crack, and last, estimate the

1 fatigue life of the dent using FEA with the
2 operational pressure data in different fatigue
3 life prediction models, which must have a
4 reassessment safety factor of at least 2.

5 And the last slide on this -- I think
6 I said lastly on the slide before. But it is
7 PHMSA suggests that operators be allowed, but not
8 required, to use ECA analysis for the following
9 dent-related repair criteria.

10 First would be a dent with indication
11 of metal loss, cracking, or a stress riser,
12 smooth top side dent greater than 6 percent
13 diameter, or a 1/2-inch deep for a diameter of
14 less than 12 inch, a dent greater than 2 --

15 (Technical interference.)

16 MR. NANNEY: Now it's back on. Okay.
17 A dent greater than 2 percent in diameter, or a
18 1/4-inch deep for diameters less than 12 inch
19 that affects pipe curvature at a girth weld or a
20 seam weld.

21 And again, dents analyzed by ECA but
22 shown not to exceed critical strain levels would

1 be included in the repair criteria as monitored
2 conditions.

3 slide 153, again, this is public
4 committee comments on the repair criteria from
5 our March 2, 2018 meeting. And again, the
6 comment was repair criteria for dents with metal
7 loss should distinguish between top side and
8 bottom side dents similar to the repair criteria
9 for smooth dents.

10 PHMSA, the dent with metal loss
11 criterion was part of the original integrity
12 management rule in 2003.

13 PHMSA recognizes that top side dents
14 represent the need for more urgent response than
15 bottom dents. Some existing HCA dent repair
16 criteria already make this distinction. PHMSA
17 suggests applying this concept to dents with
18 metal loss in non-HCA areas similar to smooth
19 dents.

20 Going over to slide 154, and again,
21 it's continuing from the slide before comments.
22 Also, to reduce unnecessary excavation, PHMSA

1 suggests revising the immediate condition as
2 follows, number one, allowing engineering
3 critical assessment, in other words, ECA, to
4 analyze the dent anomalies with indications of
5 metal loss, cracking, or a stress riser and
6 prioritize repair criteria as follows.

7 An immediate would be top side defects
8 that exceed the critical strain levels. Two year
9 would be bottom side that exceed critical strain
10 levels. And monitored would be defects that do
11 not exceed critical strain levels.

12 Slide 155, again, this is from our
13 public committee comments on repair criteria from
14 the March 2, 2018 meeting. The comment was
15 industry commented that the proposed criterion of
16 a gouge or groove greater than 12-1/2 percent of
17 nominal wall thickness is duplicative and
18 addressed by dent with metal loss and cracking
19 criteria.

20 And PHMSA, PHMSA acknowledges that the
21 proposed criteria using engineering critical
22 assessment to analyze dents and cracks would

1 adequately address gouges and grooves and
2 suggests deleting this repair criterion on that
3 basis.

4 Slide 156, I think that was -- I was
5 going to 164, wasn't I? Okay.

6 Now we'll go and talk about repair
7 criteria for cracks. And this is slide 157. And
8 again, this is from public committee comments on
9 repair criteria from our March 2, 2018 meeting.

10 And the comment was delete the
11 definitions of significant crack defects and use
12 the alternative cracking criterion exclusively
13 that was proposed by PHMSA at the March 2, 2018
14 meeting, which is much more practical.

15 PHMSA's comment, PHMSA agrees that
16 having the originally proposed definition and an
17 alternative repair criteria could be confusing.

18 To address crack defects, PHMSA
19 suggests, number one, delete the two definitions,
20 significant stress corrosion cracking and
21 significant seam cracks, and drop the suggestion
22 to define significant selective seam weld

1 corrosion, second, consolidate all cracking
2 related repair criterion to a single repair
3 criterion that applies to any crack-like defect.

4 Slide 158, again, this is committee
5 comments on repair criterion from our March 2,
6 2018 meeting on cracking. And the last item
7 there was utilize the alternative criterion PHMSA
8 introduced at the March 2, 2018 meeting, which
9 would allow ECA analysis of crack defects.

10 Slide 159 --

11 (Technical interference.)

12 MR. NANNEY: Is it working now? Yes.

13 Okay.

14 The comment was industry commented
15 that PHMSA proposed criteria for immediate repair
16 of crack defects was too conservative and
17 suggested 70 percent crack depth or predicted
18 failure pressure of less than 1.1 times MAOP.

19 PHMSA, based on the proposed immediate
20 repair criteria for cracks, successful
21 application of comparable criteria and special
22 permits, PHMSA believes 70 percent and 1.1 times

1 MAOP does not provide an adequate safety margin.

2 Our ILI tools for detection of cracks
3 do not have the precision needed to allow
4 through-wall cracks slightly, in other words,
5 less than 70 percent or a calculated PFP slightly
6 greater than 1.1 times MAOP, to be treated as a
7 one year HCA or as a two year non-HCA condition.

8 Cracks can grow very rapidly. And
9 last, material properties can have a dramatic
10 effect on safe pressures as illustrated on the
11 next slide, slide 160.

12 And the thing there, this is based
13 upon, just showing if you had a 70 percent pipe
14 seam crack, and again, you are operating in a
15 Class 3 area, what it would look like based upon
16 the criteria we were talking about earlier, the
17 one-foot pound or four-foot pounds or, as PHMSA
18 had in black, an alternative of two-foot pounds.

19 And you can see from the blue line to
20 the black line to the red line what that shows
21 you as far as pressures underneath your MAOP of
22 676, which is shown by the red line. And this is

1 a 70 percent crack.

2 And again, the next is showing the
3 same criteria if it wasn't in the pipe seam or
4 pipe seam weld. It was in the pipe body.

5 Going to the next slide, which is
6 slide 162, again, this is public committee
7 comments on repair criteria from our March 2,
8 2018 meeting. Industry commented that PHMSA's
9 proposed criteria for immediate repair of crack-
10 like defects was too conservative and suggested
11 70 percent crack depth or predicted failure
12 pressure of less than 1.1 times MAOP.

13 PHMSA, based on successful application
14 of comparable cracking criteria, PHMSA suggests
15 the following crack criterion for an immediate
16 condition, a crack depth plus metal loss greater
17 than 50 percent of the pipe wall thickness, or
18 crack depth plus corrosion is greater than the
19 inspection tool's maximum measurable depth, or
20 the crack anomaly is determined to have or will
21 have prior to the next assessment a predicted
22 failure pressure determined in accordance with

1 the ECA fracture mechanics procedure that is less
2 than 125 percent of the MAOP.

3 Slide 163, again, this is public
4 committee comments on repair criterion from the
5 March 2, 2018 meeting. Industry commented that
6 PHMSA's proposed criteria for a one year or two
7 year repair for crack-like defects was too
8 conservative and suggested 50 percent crack depth
9 or predicted failure pressure of less than 1.25
10 times MAOP.

11 PHMSA, based on successful application
12 of comparable cracking type criteria, PHMSA
13 suggests the following crack criterion for one
14 year, two year conditions, one, a crack depth
15 plus metal loss greater than 50 percent of the
16 pipe wall thickness, or the crack anomaly is
17 determined to have or will have prior to the next
18 assessment a predicted failure pressure
19 determined in accordance with the ECA fracture
20 mechanics procedure that is less than 1.39 MAOP
21 for Class 1 locations or 1.5 times MAOP for Class
22 2, 3, and 4 locations as appropriate.

1 slide 164, Chairman.

2 MR. DANNER: So Alan has stepped out.
3 I don't know if he wanted to keep going through
4 corrosive metal loss. But it is 10 minutes to
5 5:00. This might be --

6 PARTICIPANT: There's about 15 more
7 slides. So --

8 MR. DANNER: There's about 15 more
9 slides? Then why don't we proceed.

10 MR. McLAREN: These are the comments
11 on the specific -- I'm Chris McLaren with PHMSA -
12 - specific repair criteria for corrosion metal
13 loss.

14 Committee comments from the March 2nd
15 teleconference meeting we had was with the new
16 repair criteria in 192.713 for corrosion defects,
17 the corrosion repair requirements in 192.485(c)
18 are duplicative, have the potential to create
19 confusion, and should be deleted.

20 PHMSA's response is that the long-
21 standing corrosion repair requirements are needed
22 to address the repair corrosion defects on all

1 transmission lines.

2 The new repair requirements proposed
3 in the NPRM have limited applicability. For
4 instance, 192.711 and 713 only apply to
5 transmission lines greater than 40 percent SMYS.
6 And 192.933 only applies to high consequence
7 areas.

8 PHMSA suggests retaining the corrosion
9 repair requirements in 485 as proposed in the
10 NPRM. However, PHMSA would also suggest
11 including reference to 192.712 for evaluating
12 corrosion in proximity to cracks or crack-like
13 defects and for operators to make and retain
14 records.

15 An additional committee comment was
16 that the proposed criteria of corrosion greater
17 than 50 percent of wall thickness is redundant to
18 other repair criteria for evaluating corrosion
19 metal loss defects using acceptable analysis
20 techniques, for instance, B31G and RSTRENG.

21 PHMSA acknowledges that corrosion
22 metal loss is addressed in other criteria within

1 the one year HCA and two year non-HCA repair
2 criteria proposed and suggests deleting this
3 criterion based on retention of the one year and
4 two year repair criterion for corrosion metal
5 loss, which will be addressed later.

6 Industry commented that the proposed
7 criterion below is too conservative and
8 duplicative of other corrosion repair criteria.

9 That example is the predicted metal
10 loss greater than 50 percent of nominal wall that
11 is located at a crossing of another pipeline or
12 is in an area with widespread circumferential
13 corrosion or is in an area that could affect the
14 girth weld.

15 PHMSA believes that this criteria is
16 appropriate for a one year HCA and two year non-
17 HCA condition because the circumstances described
18 represent higher risk.

19 Crossings with other pipelines are
20 locations at which corrosion can grow faster than
21 expected. Deep corrosion in an area of
22 widespread corrosion is indicative of an active,

1 significant corrosion growth mechanism. And
2 corrosion affecting a girth weld weakens the
3 weld.

4 Industry made the comments related to
5 the proposed criteria of corrosion metal loss
6 affecting a detected longitudinal seam. If that
7 seam was formed by a direct current or low
8 frequency or high frequency electric resistance
9 welding or by electric flash welding, the
10 criteria should not apply to high frequency ERW.

11 The next or B, the criterion should
12 clarify that the corrosion preferentially affects
13 the long seam. And PHMSA should allow
14 engineering critical assessment to analyze such
15 defects to avoid unnecessary excavations.

16 PHMSA's response is on the next slide.
17 And we suggest allowing, but not requiring, ECA
18 analysis for the evaluation of corrosion metal
19 loss affecting the long seam in 192.712. If the
20 predicted failure pressure is less than 1.25
21 times the MAOP, the anomaly would be an immediate
22 condition.

1 Scheduled conditions would be based
2 upon being less than the reciprocal of class
3 location design factor.

4 And PHMSA suggests inserting the word
5 preferentially to assure that this criterion
6 would not be applied to small corrosion pits near
7 long seam. It would only apply to corrosion
8 along the seam that could lead to slotting-type
9 crack-like defects.

10 Additional public comments in the
11 teleconference public meeting on March 2nd, a
12 comment was to the use of class location safety
13 factors for a one year HCA and two year non-HCA
14 repair criteria is inconsistent with B31.8S,
15 Figure 4.

16 PHMSA's response is that the goal is
17 to reduce the rate of immediate repair condition.
18 PHMSA suggests replacing reliance on Figure 4
19 with class location based safety factors for one
20 year conditions and two years conditions.

21 B31.8S, Section 7, Figure 4 allows
22 operators to not repair selected anomalies until

1 the defect has grown to a level of an immediate
2 indication. Indications in the scheduled group
3 are suitable for continued operation without
4 immediate response provided they do not grow to
5 the critical dimensions prior to the scheduled
6 response is a quote out of, referring to Figure
7 4.

8 By not repairing anomalies until they
9 grow to critical dimensions for an immediate
10 condition, many anomalies could grow until they
11 use up much of the safety margin and become
12 immediate condition.

13 PHMSA believes that this is a
14 contributing factor in explaining why the
15 immediate repair rate has not dropped after
16 completion of the baseline assessments and its
17 scheduled assessments are allowed to grow until
18 they become immediate conditions. This is
19 illustrated on the slides that follow.

20 This is B31.8S, Figure 4, showing
21 timing for scheduled responses for time-dependent
22 threats, for operators implementing a

1 prescriptive integrity management plan.

2 You can see that that seven-year
3 reassessment interval shows that, for that
4 predicted failure pressure ratio how anomalies
5 can grow to 1.1 for varying, for Class 1, and
6 then Class 3 and 4 in the above 50 percent line.

7 Do we need any additional explanation
8 at this time? All right.

9 PHMSA, in the Notice of Proposed
10 Rulemaking, proposed criterias that would require
11 an operator upon running an ILI tool or other
12 assessment technology to assure that anomalies
13 are repaired before they grow to an immediate
14 condition prior to the next assessment.

15 This is, for instance, if the metal
16 loss severity or predicted failure pressure for a
17 Class 1 would be 1.25 times MAOP, and that would
18 be a one year in an HCA or two years in a non-
19 HCA. And that would -- likewise, as you go down,
20 a 1.39 for a Class 2, 1.67 for a Class 3, and 2.0
21 for a Class 4.

22 By having these as scheduled

1 conditions, they should be able to be addressed
2 in a more suitable manner without getting so
3 close to the ultimate safety margin.

4 The table on the right provides the
5 response time from Figure 4 showing that these
6 varied response times often occur before the next
7 assessment such that the anomalies at those
8 predicted failure pressures are not assessed
9 until the next assessment.

10 This is a graph showing our gas
11 transmission incident history from 2004 to 2017.
12 While leaks have increased and is, of course, the
13 larger number in the green line above, it is
14 really the failures per 10,000 miles of HCAs in
15 the blue line and the significant incidents per
16 10,000 miles of HCA miles which would be the most
17 telling, showing that that incident rate is not
18 coming down and that those failures per miles of
19 HCA continue to have rates that increase and/or
20 stay at a higher rate, whereas that rate should
21 be coming down if we were repairing those
22 anomalies more rapidly in our opinion.

1 This graph shows the, is sort of a
2 broken graph because that's the nature of data is
3 data comes into us. And so it's important to
4 look at the immediate repairs. And the dash line
5 provides more of a two-year running average. And
6 those immediate repairs performed total by, on
7 transmission lines has sort of started to drop.
8 And that's the data. It can be good or bad.

9 PHMSA has also noted that the trend in
10 immediate repairs, red, has not decreased
11 commensurate with the conclusion of the baseline
12 assessment, blue, at the end of 2012.

13 It would have been more predictable to
14 have seen those baseline assessments result in
15 more immediate repairs and that we would
16 subsequently during reassessment hope not to find
17 as many immediate repairs, as is this case we
18 were finding many times on the baseline
19 assessments indicating that more remediation
20 would be preferable.

21 Stop here? Thank you.

22 MR. DANNER: All right. We've had a

1 good presentation on repair criteria for dents
2 and cracks and corrosion.

3 We will pick it up in the morning.
4 And we'll go through the proposed repair
5 criteria. And then we'll take public comment and
6 have discussion and see if we can get through to
7 the end of the agenda.

8 So we are in recess till tomorrow
9 morning at 8:30.

10 (Whereupon, the above-entitled matter
11 went off the record at 5:00 p.m.)

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Before: US DOT

Date: 03-27-18

Place: Arlington, VA

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