

Distribution Integrity Management Program



Oklahoma Gas Association
September 2009



U.S. Department
of Transportation

Pipeline and
Hazardous Materials
Safety Administration

Required Elements

Element	“Commercial” Operators	Master Meter / LPG
Written Program	Required	Simple (checklist)
Know system	Relevant factors	Location/material
Identify threats	Thorough analysis	Checklist approach
Analyze risk	Required	Not required
Mitigate risk	Required	Required
Performance Measures	7 plus threat- specific	Leaks by cause
Review/revised	Required	Required
Report Perf Measures	4 measures	Not required



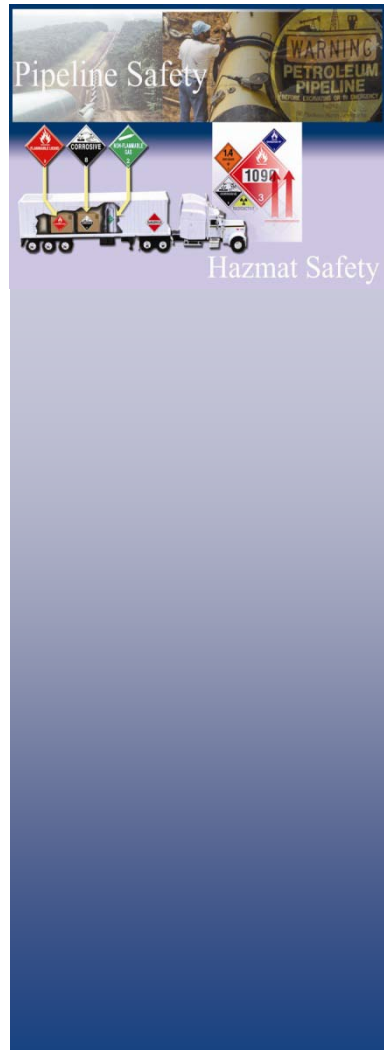


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Guidance – Overview

- Larger operators want choices; Smaller operators require clarity - not choices
- GPTC asked to develop guidance describing candidate approaches to implement such a regulation
- GPTC Guidance for large operators received public comments in July '08.
- APGA, with PHMSA funding, is developing a model DIMP plan (SHRIMP) for the small operators
- PHMSA proposed a simple guidance for Master Meter and LPG operators





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Excess Flow Valves

PIPES Act 2006

- Mandatory installation of excess flow valves on new and replaced services (after June 1, 2008) on single residential user if—
 - Pressure > 10 psig throughout the year
 - Prior experience with contaminants in gas stream... not to install
 - Interference with required operation & maintenance Activities, (e.g. purging liquids through lines)... not to install
 - commercially available meeting performance standards



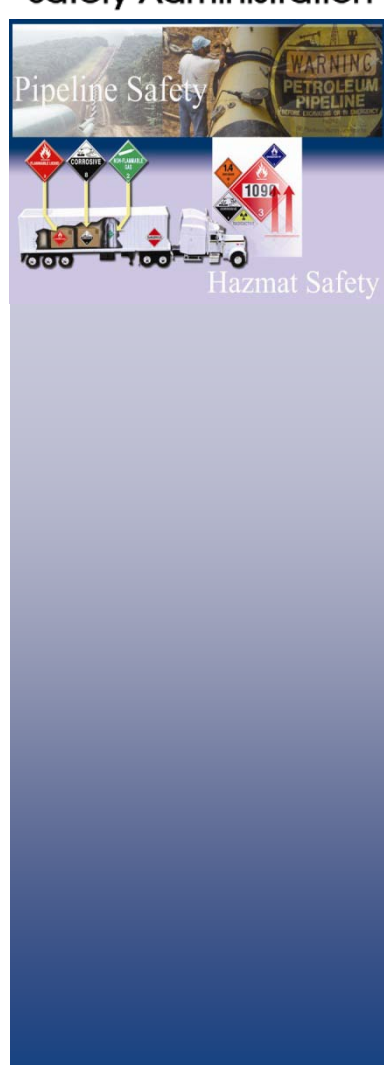


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Performance Measures

- Needed to evaluate effectiveness
- Seven measures required for all (except Master Meter/LPG)
 - (i) Number of hazardous leaks eliminated or repaired (by cause)
 - (ii) Number of excavation damages;
 - (iii) Number of excavation tickets
 - (iv) Number of EFVs installed;
 - (v) Total number of leaks eliminated or repaired (by cause)
 - (vi) Number of hazardous leaks eliminated or repaired (by material)
 - (vii) Additional measures to evaluate effectiveness in controlling each identified threat





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Additional Issues

- Allowing alternate time intervals for certain requirements currently in Part 192 (1017)
- Consideration of compression coupling failures in the threat analysis (1007(b); 1009)
- Plastic Pipe failure reporting (1009)
- DIMP programs to include a Prevention Through People (PTP) component (1007(d))



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Major Comments & TPSSC Recommendations



1. Documentation and Recordkeeping (Keep only important documents & for 10 yrs)
2. Reporting Plastic Pipe Failures (Report only Mech. Couplings failures)
3. PTP (Remove)
4. Low Stress transmission lines (<30%) (Future Consideration)
5. Definition of "Damage" (Revise per DIRT)
6. Time to Implement DIMP (18 months okay)
7. Alternative Intervals for current inspection periods (Keep)
8. Limited Requirements for MM and LPG operators (Risk Ranking required)
9. EFVs (Require for MM and LPG if they qualify)



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What Will Happen Next?

- Final rule by November 2009
- GPTC guidelines –available after the final rule
- ‘SHRIMP’ guidance available after the final rule
- Revise annual reporting forms, develop inspection forms and guidelines, FAQs and criteria for accepting alternative inspection intervals

Questions?? Really!

