

INSIGHTS

Final Gas Mega Rules Expected to be Issued in 2019

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By: [Catherine D. Little](#), [Annie Cook](#) and [Mandi Moroz](#)

The Gas Pipeline Advisory Committee (GPAC) convened in Washington D.C. at the end of March, 2018, to continue discussions from May and December 2017 regarding PHMSA's proposed gas and gathering pipeline mega rule ("Safety of Gas Transmission and Gathering Pipelines" [[PHMSA-1011-0023](#)]). The meetings included discussion and voting on a number of provisions concerning maximum allowable operating pressure (MAOP), integrity management, definitions and repair criteria. Most notably, PHMSA announced its intention to divide the original Notice of Proposed Rulemaking (NPRM) into three parts and issue three separate final rulemakings in 2019 [[PHMAS PowerPoint](#)]. PHMSA is currently projecting that these three rulemakings will be issued over the course of next year, with the first one focusing on outstanding congressional mandates, as follows::

Part I (expected issuance in March 2019) to address the expansion of risk assessment and MAOP requirements, including:

- 6-month grace period for 7-calendar year reassessment intervals;
- Consideration of seismicity for integrity management assessments (for both threats and preventative and maintenance measures)
- MAOP exceedance reporting
- Material verification, MAOP reconfirmation (for those with unknown MAOPs or incomplete records)
- Expansion of the risk assessment obligation to include areas in non-high consequence areas (HCAs) and moderate consequence areas (MCAs)
- Related records provisions

Part II (expected issuance in June 2019) to focus on the expansion of integrity management program regulations, including:

- Adjustments to repair criteria for pipelines in HCAs and non-HCAs

- Inspections following extreme weather and other events
- Safety features on in-line inspection launchers and receivers
- Management of change
- Corrosion control
- Other integrity management clarifications and increased assessment requirements

Part III (expected issuance in August 2019) to focus on expanding the regulation of gas gathering lines, including:

- Reporting requirements
- Safety regulations for gas gathering lines in Class I locations
- Definitions

The next GPAC meeting is scheduled for June 12-14, 2018, and it is expected to focus on the NPRM provisions concerning gas gathering pipelines. As noted in our [*prior post*](#), the advisory committee meetings are particularly informative to industry and other interested parties concerning the direction PHMSA will take with these final rules.