Description	The purpose of this procedure is to determine if a pipeline is a transmission line or a regulated onshore gathering line.
Regulatory Applicability	☒ Regulated Transmission Pipelines ☒ Regulated Gathering Pipelines (Type A) ☒ Regulated Gathering Pipelines (Type B) ☒ Regulated Gathering Pipelines (Type C) ☒ Reportable Gathering Pipelines (Type R) ☒ Regulated Distribution Pipelines
Frequency	As needed

Reference

49 CFR 191.1	*Scope*
49 CFR 191.8	*Definitions*
49 CFR 191.15	*Incident Reporting*
49 CFR 191.17	*Annual Reporting*
49 CFR 191.23	*Safety Related Conditions*
49 CFR 192.3	*Definitions*
49 CFR 192.8	*How are Onshore Gathering Lines and Regulated Onshore Gathering Lines Determined?*
49 CFR 192.9	*What Requirements Apply to Gathering Lines?*
49 CFR 192.13	*What General Requirements Apply to Pipelines Regulated Under This Part?*
49 CFR 192.18	*How to notify PHMSA*
49 CFR 192.150	*Passage of internal inspection devices*
49 CFR 192 452	*Converted pipelines and regulated onshore gathering lines*
49 CFR 192.619	*MAOP*

Forms / Record Retention	Life of the Pipeline
Related Specifications	None
OQ Covered Task	None

Procedure Steps

1. Review the previous jurisdictional determinations to ensure that the system type is aligned with CFR 192.8, or for newly constructed system, or systems that have a change in operations or a change in class location by conducting the following steps:
2. Determine if the use of the pipeline is consistent with the definitions of a gathering pipeline (Type A, Type B Type C or Type R), Transmission Pipeline or a Distribution System. If there is any question(s) in determining type of pipeline, contact the compliance department.
    a) For WTG, a gathering pipeline is a pipeline transporting “unprocessed” gas from the producer to 1) processing plant, 2) distribution system or 3) a transmission system. The starting point is the downstream valve on the custody transfer point. The end point of gathering is the downstream valve for custody transfer point to one of the afore mention locations.
        i) Definitions for different types of gathering pipelines:
            (1) Type A: a metallic system which the MAOP produces a hoop stress of 20% or more of SMYS in a class 2, 3 or 4 location or a non-metallic system with an MAOP greater than 125 psig in a class 2, 3 or 4 location.
            (2) Type B: a metallic system which the MAOP produces a hoop stress of less than 20% of SMYS in a class 2, 3 or 4 location or a non-metallic system with an MAOP equal to or less than 125 psig in a class 2, 3 or 4 location.
            (3) Type C: a metallic system with an OD equal to or greater than 8.625” with an MAOP which produces a hoop stress of 20% of SMYS or greater in a class 1 location or a non-metallic system and the MAOP is greater than 125 psig in a class 1 location.
            (4) Type R: all other onshore gathering lines in a class 1 location.
    b) For WTG, a transmission pipeline is a pipeline transporting “processed” gas. The starting point of the pipeline is the downstream valve of the custody transfer meter from gathering. The end point of transmission is the downstream valve for custody transfer measurement to 1) a distribution system, 2) another transmission system 3) a large volume customer which can not be served by a distribution system
    c) For WTG, a distribution system is a pipeline other than a gathering or transmission line which does not exceed 20% SMYS. The starting point of distribution is the downstream valve of the custody transfer meter. The end point is the downstream valve of the customer’s meter.
3. Conduct a class location survey per WTG’s O&M P-192.5
4. Calculate the stress level (if stress level is unknown, stress level must be determined following CFR 192 subsection C)
5. For gathering lines determined applicable regulations/procedures that are required to be followed for each type of gathering. Develop schedule for compliance tasks and implement:

Requirements	Gathering Type R	Gathering Type C	Gathering Type B	Gathering Type A
OPID	Required	Required	Required	Required
Reporting requirements found in CFR 191 (Incident Reporting 191.15, Annual Reporting 191.17 [1] & Safe Related Conditions Reporting 191.25)	Required *Note Type R gathering lines are not required to report safety related condition	Required	Required	Required
192.8 9(b) Determine & maintain for life of pipeline the methodology the starting and end point of each gathering system	Required	Required	Required	Required
192.9(e)(1)(i) - Implement construction requirements for new/replaced/relocated/changed gathering lines following the 192 for Transmission Lines	NA	Required	Required	Required
192.9(e)(1)(ii) -Adopt corrosion control measures for steel pipe in accordance with 192, subpart I for transmission lines	NA	Required	Required	Required
192.9(e)(1)(iii) -Adopt damage prevention measures in accordance with 196.614	NA	Required	Required	Required

192.9 (e)(1)(iv) -Develop and implement emergency plans according to 192.615	NA	Required	Required	Required
192.9(e)(1)(v) -Adopt public awareness programs in accordance with 192.616	NA	Required but there are **Exceptions** see footnote [2]	Required	Required
192.9(1)(vi) - Install and maintain line markers according to 192.707 transmission	NA	Required but there are **Exceptions** see footnote [2]	Required	Required
192.9(e)(1)(vii) -Conduct leak surveys in accordance with 192.706, using leak detection equipment and repair discovered leaks in accordance with 192.703(c)	NA	Required but there are **Exceptions** see footnote [2]	Required	Required
192.9(e)(2) -Establish MAOP in accordance with 192.619	NA	Required but there are **Exceptions** see footnote[3]	Required	Required
192.610 Applicable Block valve spacing and RMV valves 192.179(e), 192.179(f), and 192.634	NA	NA	NA	Required
All other regulations within CFR 192 except 192.150, 192.285(e), 192.483, 192.506, 192.607,192.619(e), 192.624, 192.710, 192.712, and subpart O (transmission integrity management)	NA	NA	NA	Required

[1] Annual Report to commence for CY 2022, reporting date no later than 3/15/2023

[2] Two methods to determine exceptions Method 1 no BIO or other impacted site within the PIR (0.73 safety factor must be used in the calculation) Method 2 No BIO or impacted site within the class 1 location

[3] Not required for pipeline that are =/< 16"

6. Document finding on WTG F-192.8