

May 9, 1985

Mr. Dale Johansen
Assistant Director
Gas Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65101

Dear Mr. Johansen:

Many states in the Central Region have encountered problems regarding definitions pertaining to gathering lines. On April 11, 1985, a meeting was held in St. Joseph, Missouri, for all interested state enforcement people within the Central Region.

The purpose of this meeting was to provide comments to MTB personnel to apprise them of the problems encountered in the field and provide proposed guidelines for enforcement. Since the April meeting, it has come to my attention that the gathering line problem is not unique with the Central Region, but encompasses the entire country.

With this in mind, I am submitting to you the guidelines developed at the April meeting, anticipating that NAPSRS would assist in recommending clarity and action.

As you well know, the basic problem lies in defining where gathering ends and transmission begins. The following terms were defined at the April 11, 1985 meeting.

The gathering process terminates:

1. At the outlet of a processing plant.
2. At the outlet of a compressor station, if there is no upstream processing plant (this does not include compressor units at the well head to facilitate production and gathering).
3. At the point where two or more well lines converge.
4. At the point where there is a change in ownership of the pipeline.

If these guidelines should be adopted, the next question is when does this become effective? Can we enforce this policy back to 1970? This is a very real problem and one that needs to be answered.

I am enclosing all the information I have been able to assemble regarding gathering. I am respectfully requesting that NAPSRS pick up on this and request action from MTB.

Should you have any questions please do not hesitate to contact me.

Sincerely,

Edward J. Ondak, Chief,
Central Region, Pipeline Safety
Office of Operations & Enforcement