

**Pipeline Safety: Applying Safety Regulation to all Rural Onshore Hazardous Liquid Low-Stress Lines  
(Low Stress Phase 2) –  
Summary of Comments –November 15, 2010**

Comment	NPRM Language	PHMSA comment
<p>Scope is unclear. Clarify doesn't apply to gathering, production, or lines excluded in 195.1(b). (API-AOPL, IPAA)</p>	<p><b>195.1(a) Covered.</b> * * *</p> <p>(3) Except for a gathering line not covered by paragraph (a)(4) of this Section, any pipeline located in a rural or non-rural area of any diameter regardless of operating pressure;</p> <p>(4) Any of the following onshore gathering lines used for transportation of petroleum:</p> <p>(i) A pipeline located in a non-rural area;</p> <p>(ii) A regulated rural gathering line as provided in § 195.11; or</p> <p>(iii) A pipeline located in an inlet of the Gulf of Mexico as provided in § 195.413.</p> <p>(b) <i>Excepted.</i> This Part does not apply to any of the following: * * *</p> <p>(4) Transportation of petroleum through an onshore rural gathering line that does not meet the definition of a “regulated rural gathering line” as provided in § 195.11. This exception does not apply to gathering lines in the inlets of the Gulf of Mexico subject to § 195.413; * * *</p> <p>(8) Transportation of a hazardous liquid or carbon dioxide through onshore production (including flow lines), refining, or manufacturing facilities or storage or in-plant piping systems associated with such facilities;</p>	<p>Offshore production pipelines are similarly excluded by multiple exceptions in § 195.1(b).</p> <p>Onshore rural gathering lines not meeting criteria in 195.11 are “excepted” in both 195.1(a)(3) and (b)(4). Regulated rural gathering lines are defined in § 195.11(a) and subject to requirements in § 195.11(b) which are unchanged by this rulemaking</p>
<p>Objection to non-low-stress pipelines subject to USCG rules also being subject to 195. Change in Phase 1 was not “error” (API-AOPL, IPAA)</p>	<p><b>195.1(b) Excepted.</b> This Part does not apply to any of the following: * * *</p> <p>(3) Transportation of a hazardous liquid through any of the following low-stress pipelines:</p> <p>(i) A pipeline subject to safety regulations of the U.S. Coast Guard; * * *</p>	<p>Phase 1 NPRM and final rule (2008) contain no discussion describing a change to this exception. Discussion in those notices makes clear the change in regulatory language was unintended</p>

Comment	NPRM Language	PHMSA comment
Changes to USA boundaries that result in >1/2 mile separation should result in exclusion from IM requirements (API-AOPL)	<p><b>195.12(e) Changes in unusually sensitive areas.</b> * * *</p> <p>(2) If a change to the boundaries of a USA cause a Category 1 or Category 2 pipeline segment to no longer be within one-half mile of a USA, an operator must continue to comply with paragraph (c)(1)(iii) or paragraph (c)(2)(iii) of this section, as applicable, with respect to that segment unless the operator determines that a release from the pipeline could not affect the USA.</p>	Operator can always perform an analysis to show a segment could not affect the USA, in which case IM requirements no longer apply
Should include all rural low-stress gathering lines and gathering lines in Gulf of Mexico inlets (NTSB)	NA	Beyond scope of proposal
Exclude low-stress CO <sub>2</sub> lines (enhanced recovery and sequestration); risks are different (API-AOPL, IPAA)	NA	Such lines were not excluded in phase 1
Clarify interplant pipeline exclusion (API-AOPL)	<p>(b) <i>Excepted.</i> This Part does not apply to any of the following: * * *</p> <p>(3) Transportation of a hazardous liquid through any of the following low-stress pipelines: * * *</p> <p>(ii) A pipeline that serves refining, manufacturing, or truck, rail, or vessel terminal facilities, if the pipeline is less than one mile long (measured outside facility grounds) and does not cross an offshore area or a waterway currently used for commercial navigation;</p>	Unchanged from current regulations. Inter-plant piping that is part of a larger pipeline, some of which operates above 20% SMYS, does not meet definition in § 195.2 of “low-stress pipeline.”
Expressed concerns about the adequacy of the cost-benefit analysis (API-AOPL)	NA	