

Title: Frequently Asked Questions (FAQs) for Types C and R Gas Gathering Pipelines from the Final Rule titled “Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-Pressure Lines, and Other Related Amendments,” Published November 15, 2021

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Summary:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) is issuing supplementary regulatory guidance in the form of frequently asked questions (FAQs). PHMSA provides FAQs to help the public understand how to best comply with regulations. Like all PHMSA guidance, FAQs are not substantive rules, do not have the force or effect of law, and do not create new legal obligations. An operator who can demonstrate compliance with the FAQs, however, is likely to be able to demonstrate compliance with the relevant regulations. If a pipeline operator chooses not to comply with the FAQs, the operator must be able to demonstrate that the operator’s conduct complies with the regulations.

Table of Contents

General.....3

- What is a gathering line?..... 3
- Who regulates gathering pipelines? 3
- Are all gas gathering lines regulated? 4

Regulatory Requirements4

- What are my reporting requirements for Type R lines?..... 4
- Are gathering lines operating at less than 0 psig considered Type R?..... 4
- Am I required to obtain an operator identification number (OPID) for reporting-regulated gas gathering lines (Type R)?..... 4
- Are individual service lines (i.e., farm taps) that are connected to a Type C gathering line subject to the requirements of § 192.740?..... 5
- What is a regulated onshore gathering line within the inlets of the Gulf of Mexico?..... 5

Design Requirements6

- Does an operator need to establish an MAOP for determining Type C lines? 6
- Can existing records be used to establish the MAOP of Type C gathering lines with an outside diameter greater than 12.75 inches instead of using the highest actual operating pressure to which the segment was subjected during the five years (60 months) preceding May 16, 2023, or five years (60 months) before first becoming subject to the rule, whichever is later?..... 6
- How do I calculate % SMYS if I don’t know material? How long can an operator report “unknown” for material?..... 7

Is overpressure protection required on my Type C gathering line?	7
Operation and Maintenance (O&M) Manual	7
Am I required to have an O&M manual under § 192.605 for my Type B and C gathering line?	7
Recordkeeping	8
Am I required to maintain records for my Type B and Type C gathering lines?.....	8
Can I file my type R annual report along with my other gathering lines?	8
Required Tasks.....	9
Do the requirements under § 192.9 require a class location study or survey for Type C gathering lines?	9
Are Type C plastic pipe gathering lines subject to the design, installation, construction, and initial inspection requirements in subparts B through G and J of part 192 applicable to transmission lines?.....	9
For pipe made with composite materials, is notification under §§ 192.9(h) and 192.18 required for replacement, relocation, or changes of 40 feet or less of composite pipe?	9
What are the requirements for composite Type C pipelines installed prior to the effective date of the rule?	10
Do I have to comply with all aspects of the “Public Awareness Programs for Pipeline Operators” from the first edition of API RP 1162 for my Type B and C gathering lines?	10
How do you calculate PIR if you are not obligated to establish an MAOP pursuant to § 192.9(e)(ii)? ..	10
Compressor Stations.....	11
Do the new Type C regulations apply to compressor stations or other facilities?	11
If the pipes entering and leaving a compressor station are regulated as Type C, how do I determine what requirements apply to the compressor station?	12
Operator Qualification	12
Am I required to have qualified staff per subpart N perform covered operations and maintenance tasks on my Type B or C gas gathering pipeline?.....	12

General

What is a gathering line?

Gathering lines transport gases and liquids from a production facility to a processing facility, refinery, or a transmission line. In the past, most gathering lines were built in minimally populated areas, used smaller-diameter pipelines that operated at lower pressures, and appeared to pose a much lower risk than for other types of pipelines. As our nation continues to grow, our populations are spreading to these once-rural locations, and an increased demand for natural resources means exploring alternate methods of producing raw materials that may come with greater risk. PHMSA issued a final rule in November 2021 (86 FR 63266) establishing gas gathering line regulations and applying existing pipeline safety regulations to a subset of gas gathering lines of increased diameter and pressure—often located in more populated areas—with safety and environmental risks commensurate with the risks posed by gas transmission pipelines long subject to PHMSA safety regulations.

Who regulates gathering pipelines?

Both the Federal Government and states have jurisdiction over gathering lines. PHMSA regulates both gas gathering pipelines and hazardous liquid gathering pipelines. PHMSA establishes the minimum safety and reporting requirements for regulated gas and hazardous liquid gathering lines.

These FAQs are focused on safety and reporting requirements for Types C and R onshore gas gathering pipelines. In November 2021, PHMSA published a final rule (86 FR 63266), which expanded the scope of federally-regulated gas gathering lines; PHMSA subsequently published technical corrections to the final rule (87 FR 26296; 87 FR 35675).¹ Operators of gathering lines regulated by a state authority should consider the applicable state’s safety and reporting requirements that may apply to their gathering lines, as states may, in some circumstances, adopt additional or more stringent safety standards. In the federal regulations, a “pipeline” includes all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.

¹ As of the date of these FAQs, PHMSA has also issued a limited notice of its enforcement discretion regarding certain provisions of this rule. The notice of enforcement discretion is available on PHMSA’s website at <https://www.phmsa.dot.gov/regulatory-compliance/phmsa-guidance/notice-limited-enforcement-discretion-type-c-gas-gathering>.

Are all gas gathering lines regulated?

Yes, however not all gas gathering lines are subject to part 192. PHMSA introduced two new definitions in 49 CFR § 191.3 that are relevant to the regulatory status of onshore gas gathering lines: “regulated onshore gathering” and “reporting-regulated gathering.” Types A, B, and C gas gathering lines are onshore gas gathering lines subject to requirements under parts 191 and 192, so the gathering lines in these categories are defined as “regulated onshore gathering;” while Type R are subject to limited requirements under part 191 only and are called “reporting-regulated gathering.” Note that the classification (Types A, B, C, or R) for an onshore gas gathering line is determined in § 192.8. Offshore gathering lines are also subject to parts 191 and 192 requirements as specified in § 192.9.

Regulatory Requirements

What are my reporting requirements for Type R lines?

Incident reports under 49 CFR § 191.15 and annual reports under § 191.17 are required for all onshore gas gathering lines, including Type R gathering lines. Safety-related condition reports under § 191.23, however, are not required for any Type R gathering lines as well as certain Type C gathering lines that are not required to determine a maximum allowable operating pressure (MAOP) under § 192.619. Additionally, all onshore gathering lines, including Type R gathering lines, are required by § 191.5 to submit immediate notification of incidents and, under § 191.22, to meet applicable requirements to acquire an operator identification number (OPID). Operators should consider any applicable state reporting requirements that may apply.

Are gathering lines operating at less than 0 psig considered Type R?

Yes, incident reports and annual reports will now be required for all onshore gas gathering lines, including Type R gathering lines operated at less than 0 pounds per square inch gauge (psig). As stated in its preamble, the final rule revised § 191.1(b) to remove the exception to part 191 in § 191.1(b)(4) for unregulated, onshore gas gathering lines, including gathering lines that operate at less than 0 psig or are located within the inlets of the Gulf of Mexico.

Am I required to obtain an operator identification number (OPID) for reporting-regulated gas gathering lines (Type R)?

Yes, operators of all gas gathering lines, including Type R lines, must obtain an OPID under § 191.22(a). The final rule, in § 191.1(c)(2), excepts Type R gas gathering lines from OPID validation and notification requirements in § 191.22(b) and (c). However, the accident and incident form instructions require operators of all gas gathering lines, including Type R lines, to ensure the accuracy of any OPID information (e.g., primary entity, name) submitted to PHMSA in connection with an incident or annual report.

Are individual service lines (i.e., farm taps) that are connected to a Type C gathering line subject to the requirements of § 192.740?

Yes, although the term “farm tap” is not defined in part 192, the term is commonly used to describe the “individual service lines” referred to in § 192.740. Individual service lines connected to a Type A, B, or C gathering line are subject to part 192 requirements, including § 192.740; they are not gathering lines subject to the requirements of § 192.9. Because a farm tap providing gas to a single customer does not “transport gas from a current production facility to a transmission line or main” as described in the definition of a “gathering line” in § 192.3 and is not classified as a gathering line in the American Petroleum Institute (API) Recommended Practice (RP) 80 nor § 192.8(a), PHMSA does not consider a farm tap providing gas to a single customer to be a gathering line. Section 192.740 is a requirement for service lines; therefore, the requirements for gathering lines in § 192.9 are not relevant.

Note that § 192.740(c) exempts from the scope of § 192.740 service lines that only serve engines that power irrigation pumps, service lines included in a distribution integrity management plan (DIMP), and service lines directly connected to production or gathering lines other than regulated gathering lines as determined in § 192.8. Type R gathering lines are not “regulated onshore gathering lines” under part 192, thus exempting individual service lines connected to Type R lines from § 192.740.

What is a regulated onshore gathering line within the inlets of the Gulf of Mexico?

A regulated onshore gathering line in § 192.8(c) includes a qualifying gathering line located within the inlets of the Gulf of Mexico in waters up to 15 feet deep. *See* 49 CFR 192.1(b)(4) and 192.3. If the pipeline is located in the Gulf of Mexico in waters greater than 15 feet, it is an offshore gathering line.

Section 192.3 defines the “Gulf of Mexico and its inlets” as “the waters from the mean high-water mark of the coast of the Gulf of Mexico and its inlets open to the sea (excluding rivers, tidal marshes, lakes, and canals) seaward to include the territorial sea and Outer Continental Shelf to a depth of 15 feet (4.6 meters), as measured from the mean low water.”

Design Requirements

Does an operator need to establish an MAOP for determining Type C lines?

No, an operator is not required to establish an MAOP prior to determining the endpoints of their Type C gathering lines. Section 192.8(c)(4) provides that gas gathering line operators may use either of two methods to identify whether a gathering line qualifies as a Type C line. First, an operator may use an MAOP calculated consistent with the methods at § 192.619(a) or (c)(1). Alternatively, as a substitute for MAOP, an operator may use the highest operating pressure to which the segment was subjected during the preceding five years.

Once an operator of a pipeline subject to § 192.619 establishes an MAOP, the pipeline must be operated at or below that limit. *See* 49 CFR 192.619(a). PHMSA encourages operators to determine and maintain a safe operating pressure with reasonable safety factors based on known design, material, testing records, and the operating and maintenance history of the pipeline regardless of whether establishing an MAOP is required for that segment.

Can existing records be used to establish the MAOP of Type C gathering lines with an outside diameter greater than 12.75 inches instead of using the highest actual operating pressure to which the segment was subjected during the five years (60 months) preceding May 16, 2023, or five years (60 months) before first becoming subject to the rule, whichever is later?

Yes, for Type C gathering lines existing on or before May 16, 2022. Type C gathering lines with an outside diameter greater than 12.75 inches are required to establish the MAOP of the pipeline and maintain records used to establish the MAOP for the life of the pipeline. *See* 49 CFR 192.9(e)(2)(ii). Those Type C gathering lines required to establish an MAOP must, per § 192.619(a)(3)(ii), operate at a pressure not to exceed the highest actual operating pressure to which the pipe segment was subjected during the previous five years, measured from 1) May 16, 2023, or 2) a later date when the line becomes a regulated gathering line. For those Type C gathering lines existing before May 16, 2022, § 192.619(c)(2) provides that if an operator cannot determine the actual operating pressure of the pipeline for the five years preceding May 16, 2023, the operator may establish MAOP using other criteria, with PHMSA notification in accordance with § 192.18. Under this process, the operator would propose an MAOP based on the information available about the pipeline, such as actual highest operating pressure, operational and maintenance history, pressure test records, and information about the design and material properties of the pipeline. The operator must notify PHMSA to avail itself of this provision. Section 192.619(c)(2) specifies the minimum information required to be submitted to PHMSA in the notification.

How do I calculate % SMYS if I don't know material? How long can an operator report "unknown" for material?

Section 192.107(b)(2) allows an operator to use a default specified minimum yield strength (SMYS) of 24,000 psi or less if the yield strength of a pipe is not known. Operators may report unknown material in their required reporting for an indefinite timeframe.

Is overpressure protection required on my Type C gathering line?

Yes, new, relocated, replaced, or otherwise changed Type C gathering lines, which are required to have overpressure protection as encompassed in the design, installation, construction, and initial inspection provisions, must comply with subparts B through G and J of part 192.

Overpressure protection regulations that apply to the pipeline may vary and may include §§ 192.143, 192.169, 192.195, among other regulatory requirements. These overpressure protection requirements would not apply, however, to pipeline segments 40 feet or less in length that are replaced, relocated, or changed on a pipeline existing on or before May 16, 2022. *See* 49 CFR 192.9(f)(2).

In addition, certain Type C gathering lines are required to establish an MAOP in accordance with § 192.9(e)(2)(ii). For those lines that are required to establish their MAOP, exceeding that established MAOP (plus the margin or build-up) must be reported as a safety-related condition under § 191.23(a)(6) and (b)(1).

Operators of existing gathering lines that became regulated as Type C lines as a result of the 2021 final rule are not required to retroactively comply with the design, construction, initial inspection, or initial testing requirements of part 192—including overpressure protection requirements at §§ 192.143, 192.169, 192.195. They are, however, required to prevent and to report MAOP exceedances if required to establish an MAOP pursuant to § 192.9(e)(2).

Operation and Maintenance (O&M) Manual

Am I required to have an O&M manual under § 192.605 for my Type B and C gathering line?

No, there is no explicit regulatory requirement for operators of Type B or C gathering lines to have § 192.605-compliant O&M manuals. Nevertheless, operators of all regulated gas gathering lines, including Types B and C gathering lines, are required to follow the statutory requirement of 49 U.S.C. 60108(a), which requires that "[e]ach person owning or operating a gas pipeline facility. . . shall carry out a current written plan (including any changes) for inspection and maintenance of each facility used in the transportation and owned or operated by the person. A copy of the plan shall be kept at any office of the person the Secretary of Transportation considers appropriate. The Secretary also may require a person owning or operating a pipeline facility subject to this chapter to file a plan for inspection and maintenance for approval."

In addition, operators of Types B and Type C gathering lines are required to comply with other regulatory provisions that require specific written plans, programs, and procedures. For example, Types B and C gathering lines are required to comply with public education program

requirements in § 192.616(a), which states that “each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute’s (API) Recommended Practice (RP) 1162.”² Therefore, an operator of a Type B or Type C gathering line must have a written public education program even though they do not fall under the more general requirement in § 192.605 to have an O&M manual.

Recordkeeping

Am I required to maintain records for my Type B and Type C gathering lines?

Yes, where specified or necessary to evidence compliance with a regulation. In general, a person owning or operating a gas pipeline facility is required to maintain records, make reports, and provide information to PHMSA upon request in accordance with 49 U.S.C. 60117(c). Owners and operators must make and maintain records in accordance with the requirements prescribed in 49 CFR parts 191 and 192 to enable PHMSA to verify that the owner or operator is complying with those requirements. Certain records are maintained for a specific length of time while others are required to be maintained for the life of the pipeline. PHMSA uses these records to verify compliance with regulated safety standards and to inform the Agency on possible safety risks.

For example, the final rule adds a new requirement in § 192.8(b) to specify that all onshore gas gathering line operators must maintain records documenting the methodology used to determine the beginning and endpoints of segments determined to be gas gathering lines. In addition, § 192.9(e)(2)(ii) requires operators of Type C lines greater than 12.75 inches in outside diameter to maintain records used to establish the MAOP for the life of the pipeline. Furthermore, operators of Type B and certain Type C gathering lines are required to comply with the corrosion control requirements of subpart I, including § 192.491, which provides specific corrosion control record keeping requirements that operators must comply with. *See* 49 CFR 192.452(b)-(c).

Finally, where a regulatory requirement does not have an explicit records retention requirement, records nonetheless may be necessary to show compliance with the pipeline safety regulations during an inspection.

Can I file my type R annual report along with my other gathering lines?

Annual reports for Types A, B, C, and offshore gathering lines (along with appropriate transmission lines) can be filed with a single annual report on DOT Form PHMSA F7100.2-1. Type R annual reports are required to be filed using DOT Form PHMSA F7100.2-3, available on PHMSA’s website at <https://www.phmsa.dot.gov/forms/operator-reports-submitted-phmsa-forms-and-instructions>.

² API, Recommended Practice 1162, “Public Awareness Programs for Pipeline Operators,” (1st Ed. Dec. 2003) (“API RP 1162”).

Required Tasks

Do the requirements under § 192.9 require a class location study or survey for Type C gathering lines?

No, operators of Type C gathering lines are not required to comply with the requirements of § 192.609. However, operators of Type C gathering lines are required to understand the area in which their pipelines are located. Section 192.9 at subparagraphs (g)(3) and (g)(5) require operators of Type C (as well as Type R) gathering lines to be aware of information that may lead to a class location change, such as dwelling density and MAOP increases. Section 192.452(c) similarly contains requirements for operators of Type C gathering lines to be aware of information that may lead to a class location change. Additionally, certain regulatory requirements, such as leakage surveys and other inspections, require operators to periodically access the pipeline right-of-way where changes in class location would be apparent.

Are Type C plastic pipe gathering lines subject to the design, installation, construction, and initial inspection requirements in subparts B through G and J of part 192 applicable to transmission lines?

Yes, § 192.9(e)(1)(i) requires operators of all Type C gathering lines installed after May 16, 2022, to follow the design, installation, construction, and initial inspection requirements in subparts B through G and J of part 192 applicable to transmission lines (although compliance with §§ 192.67, 192.127, 192.179(e), 192.179(f), 192.205, 192.227(c), 192.285(e), 192.506, 192.634, and 192.636 is not required). This includes all Type C plastic pipe that is new, replaced, or otherwise changed after May 16, 2022.

Type C plastic pipes with an outside diameter greater than 12.75 inches have additional requirements. Section 192.9(e)(2) specifies that those larger diameter plastic pipes must comply with all the requirements of § 192.9(e)(1) and establish an MAOP, among other requirements.

For pipe made with composite materials, is notification under §§ 192.9(h) and 192.18 required for replacement, relocation, or changes of 40 feet or less of composite pipe?

It depends on the installation date of the pipeline and the material used in the replacement. For all Type C gathering pipelines (including composite pipelines) installed prior to May 16, 2022, notification to PHMSA is not required for “pipeline segments 40 feet or less in length that are replaced, relocated, or changed,” per § 192.9(f)(2). *See* 86 FR at 63289.

In addition, the final rule also allows the future use of composite pipe material on Type C gathering lines in certain circumstances, subject to PHMSA notification pursuant to § 192.18 of the replacement, relocation, or other significant change to the pipe. *See* 86 FR at 63289. That notification is required regardless of pipe segment length. In other words, replacement or other significant change of a pipe segment on a Type C gathering line that was installed after May 16, 2022, using composite material requires a notification to PHMSA under §§ 192.9(h) and 192.18 regardless of the segment length. An operator may consider including in its initial §§ 192.9(h)

and 192.18 notification its proposed procedures for future replacement or other significant change on all segments.

If an operator discovers a condition that requires immediate replacement, operators should describe all urgent conditions in their § 192.18 notification or conduct the repair using materials authorized under part 192, such as steel. Alternatively, they may describe those urgent conditions in their request for a state waiver per 49 U.S.C. 60118(e) or request an emergency special permit under § 190.341.

What are the requirements for composite Type C pipelines installed prior to the effective date of the rule?

Composite pipelines that were installed and in operation prior to the effective date of the final rule, May 16, 2022, are not subject to the initial design, installation, construction, nor inspection in accordance with the requirements in subparts B through G and J of part 192 applicable to transmission lines. As stated in the preamble to the final rule, “operators may continue to use composite pipe [or materials] installed on or before the effective date of the rule; no notification under §§ 192.9(h) and 192.18 would be required in those circumstances.” *See* 87 FR at 63285. However, operators of all Type C gathering lines—including composite Type C pipelines installed and in operation prior to May 16, 2022—must comply with all other applicable Type C requirements by the relevant compliance deadlines. Section § 192.9(h) governs use of composite materials for Type C gathering lines installed after May 16, 2022.

Do I have to comply with all aspects of the “Public Awareness Programs for Pipeline Operators” from the first edition of API RP 1162 for my Type B and C gathering lines?

Yes, operators of Types A, B, and C gathering lines must comply with all requirements of API RP 1162 applicable to gathering lines. *See* § 192.616. For Type B gathering lines, § 192.9(d)(5) requires operators to “establish a public education program under § 192.616.” For Type C gathering lines, § 192.9(e)(1)(v) requires operators to “develop and implement a written public awareness program under § 192.616.” And Type A gathering lines must comply with all part 192 requirements applicable to transmission lines, including § 192.616. As of the date of this FAQ, § 192.616 follows the recommendations of the first edition of API RP 1162, which is incorporated by reference in § 192.616.

How do you calculate PIR if you are not obligated to establish an MAOP pursuant to § 192.9(e)(ii)?

The MAOP of a pipeline is an input to the threshold determination that a facility is a Type C gathering line. When no MAOP has previously been calculated for a given gas gathering line and the operator is not obliged to establish an MAOP pursuant to § 192.9(e)(2)(ii), an operator may make that threshold determination using one of two methods. First, the operator may calculate an MAOP consistent with the methods at § 192.619(a) or (c)(1). Alternatively, as a substitute for MAOP, an operator may use the highest operating pressure to which the segment was subjected during the preceding five years. *See* 49 CFR 192.8(c)(4). PHMSA clarified this method for

operators without an available MAOP in a technical correction to the final rule, which was issued May 4, 2022 (87 FR 26296).

That pressure value may also be used to inform whether a Type C gathering line of 16 inches in diameter or less might be exempt from certain regulatory requirements under § 192.9(f)(1), because MAOP is an input in forming the potential impact radius (PIR) and potential impact circle pursuant to § 192.903. (Note that the PIR calculation for gathering lines requires the use of a 0.73 gas factor). *See* § 192.9(f)(1). For this determination under § 192.9(f)(1), an operator calculates the potential impact circle using their MAOP, or “[i]f the gathering line segment does not have an established MAOP or other records necessary to perform the PIR calculation, the operator may perform the same determination on a class location unit (*see* § 192.5) basis rather than a potential impact circle basis.” *See* 86 FR at 63283; § 192.9(f)(1)(ii). The class location unit method for applying these exceptions is also used in API RP 1182 and provides a simpler, more conservative method for determining the applicability of the § 192.9(f) exception for operators that choose not to perform a PIR analysis or lack records of the parameters necessary to calculate the PIR.³

A class location unit is one mile in length and extends 220 yards on either side of the centerline of a pipeline, using a “sliding mile” approach. *See* 49 CFR 192.5. The class location unit moves along the pipeline, and if the sliding mile contains a building intended for human occupancy or other impacted site at any point during the mile’s movement, then the exception in paragraph (f) does not apply for the entire mile of pipeline contained within the sliding mile.

Compressor Stations

Do the new Type C regulations apply to compressor stations or other facilities?

Yes, per § 192.3 a gathering line is defined as “a pipeline that transports gas from a current production facility to a transmission line or main.” A pipeline is further defined as “all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.” Thus, a qualifying station or compressor unit would be included and subject to the same regulatory requirements as a gathering line under § 192.9.

³ API, Recommended Practice 1182, “Construction, Operation, and Maintenance of Large Diameter Rural Gas Gathering Lines,” (1st Ed. Mar. 2020) (“API RP 1182”).

If the pipes entering and leaving a compressor station are regulated as Type C, how do I determine what requirements apply to the compressor station?

The classification of the compressor station must be determined in accordance with § 192.8 and API RP 80.⁴ Compressor stations classified as being Type C must follow the requirements as outlined in § 192.9(e). For new, replaced, relocated, or otherwise changed Type C compressor stations, this includes design requirements specific to compressor stations found in §§ 192.163 through 192.173.

Operator Qualification

Am I required to have qualified staff per subpart N perform covered operations and maintenance tasks on my Type B or C gas gathering pipeline?

While PHMSA believes a prudent operator of a facility that transports hazardous commodities will ensure that operations and maintenance personnel are adequately trained and capable of safely performing their assigned tasks, compliance with the requirements in subpart N of part 192 is not required for Types B or C gathering lines.

⁴ API, Recommended Practice 80, “Guidelines for the Definition of Onshore Gas Gathering Lines,” (1st Ed. Apr. 2000) (“API RP 80”).