



September 10, 2025

Office of Pipeline Safety (PHP-30)
PHMSA
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590-0001

Subject: Roeslein & Associates ("Roeslein") Request for Written Regulatory Interpretation

Roeslein, pursuant to an agreement with Roeslein Alternative Energy Services, LLC, operates three pipelines in Missouri carrying gas from renewable natural gas conditioning facilities to various interstate transmission and high-pressure distribution pipelines. These pipelines are known as the Somerset pipeline, the Nevada pipeline, and the White Tail pipeline.

When these pipelines were installed, the original classification was as Intrastate Transmission for the Somerset and White Tail pipelines, and Type B Regulated Gathering for the Nevada pipeline. However, upon further review, Roeslein believes that the proper classification should be Type R Gathering. The pipeline diameters and operating pressures meet the criteria for Type R Gathering in 49 CFR Part 192.8.

The beginning of gathering on each of these pipelines will be the outlet of the first gas treatment facility, located at the furthest downstream point of the production area. The production area for these RNG systems consists of the lagoon or tank-style digesters, the pipelines to bring the biogas to that first gas treatment facility, and that gas treatment facility itself. The biogas consists of approximately 60% methane and 40%CO₂ with up to 6000 ppm of H₂S, all saturated with water vapor. The gas treatment facility removes most of the CO₂, H₂S and water, which is consistent with the definition of gas treatment facilities in API RP-80 Section 2.4.2. This facility does not meet the definition of a gas processing plant in Section 2.4.1 since no natural gas liquids are extracted. The endpoint of gathering should be determined by an analysis of the decision tree in Figure A-1 in API RP-80, 2000 edition. For each of these three pipelines, the endpoint of gathering should be as indicated in the following individual descriptions:

- 1) The **Somerset pipeline** carries gas from the Monarch Biogas Somerset and Locust Ridge RNG treatment facilities to a facility located adjacent to the interconnect with the TCE interstate transmission pipeline located north of Mercer, MO. The Somerset pipeline is a 6" SDR 11 HDPE pipeline with a maximum allowable operating pressure of 125 psig and an actual operating pressure of 100 psig. This pipeline has a length of 26 miles. The facility adjacent to the TCE pipeline consists of a dryer to lower the water content of the gas to meet the TCE pipeline gas quality specification and a compressor to raise the pressure of the gas to the pressure of the TCE line, approximately 1000 psig.



Since the compressor is further downstream, Roeslein believes that 192.8 (a)(4) should determine the endpoint of gathering.

- 2) The **Nevada pipeline** carries gas from the Monarch Biogas Nevada RNG treatment facilities to a facility located adjacent to the interconnect with the Spire Missouri Inc. high pressure distribution pipeline located west of Stockton, MO. The Nevada pipeline is a 6" HDPE SDR 11 pipeline with a maximum allowable operating pressure of 125 psig and an actual operating pressure of 100 psig. This pipeline has a length of 8 miles. The facility adjacent to the Spire pipeline consists of a dryer to lower the water content of the gas to meet the Spire gas quality specification and a compressor to raise the pressure of the gas to the pressure of the Spire line, approximately 170 psig. Since the compressor is further downstream, Roeslein believes that 192.8 (a)(4) should determine the endpoint of gathering.
- 3) The **White Tail pipeline** carries gas from the Monarch Biogas White Tail RNG treatment facilities to a facility located adjacent to the interconnect with the TCE interstate transmission pipeline located north of Unionville, MO. The White Tail pipeline is a 4" steel pipeline constructed of Sched 40 X52 grade steel, with a MAOP of 1000 psig. This MAOP calculates to less than 20% SMYS. The White Tail pipeline has a length of 4 miles. The facility adjacent to the TCE pipeline consists of only a dryer to lower the water content of the gas to meet the TCE pipeline gas quality specification. 49CFR Part 192.8 does not reference API RP-80 Section 2.2(a)(1)(B), but Roeslein believes that the dryer constitutes the furthestmost downstream gas treatment facility and as such should determine the endpoint of gathering. If this determination is not correct, then the fact that the White Tail line is only 4 miles in length should allow it to be considered "gathering" under the "incidental gathering" definition.

One potential objection to the Roeslein conclusions regarding these determinations of the endpoint of gathering is the statement in 192.8(a)(2) that gathering may not extend beyond the first gas processing plant. 49 CFR Part 192 does not define "gas processing plant" or "gas treatment facility", but API RP-80 does include the following definitions of both these terms:

2.4.1 natural gas processing plant: A natural gas processing operation, other than production processing, operated for the purpose of commercially extracting natural gas liquids from the gas stream.

2.4.2 gathering line gas treatment facility: One or a series of gas treatment operations, other than production treatment, operated for the purpose of removing impurities (e.g., water, solids, basic sediment and water, sulfur compounds, carbon dioxide, etc.).

Treatment of biogas to produce renewable natural gas consists of removal of carbon dioxide, hydrogen sulfide and water, which matches the definition for a gas treatment facility rather than a gas processing plant. The biological production of methane does not produce any longer-chain hydrocarbons such as ethane or propane, so no



hydrocarbon liquids are present to extract. With regard to gas treatment facilities considered as end points to gathering, the text in API RP-80 Section 2.2(a)(1)(B) sets the furthestmost downstream gas treatment facility as a potential endpoint to gathering, rather than using the more restrictive language for gas processing plants.

Based on the information gathered, Roeslein requests that the pipelines listed above be designated as Type R Gathering lines, rather than Intrastate Transmission lines.

We trust our proposal is clear and welcome the opportunity to review it with your team in detail. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

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