



# RAILROAD COMMISSION OF TEXAS

## HEARINGS DIVISION

**OIL & GAS DOCKET NO. 01-0285614**

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**THE APPLICATION OF ACCESS MLP OPERATING LLC TO CONSTRUCT A SOUR GAS PIPELINE FACILITY, WHITETAIL DILLEY INTERCONNECT, ZAVALA COUNTY, TEXAS**

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**APPLICATION REVIEWED BY:** Paul Dubois – Technical Examiner

**DATE APPLICATION FILED:** October 8, 2013

**DATE REVIEWED:** December 23, 2013

### EXAMINER'S REPORT AND RECOMMENDATION

#### STATEMENT OF THE CASE

This is the unopposed application of Access MLP Operating LLC (Access) for Commission authority to construct and operate a hydrogen sulfide (H<sub>2</sub>S) gas pipeline in Zavala County, pursuant to Statewide Rules 36, 70 and 106. On October 9, 2013, Access notified the Zavala County Clerk and published notice of the application in *Zavala County Sentinel*, a newspaper of general circulation in Zavala County.

The Commission's Field Operations section has reviewed the application and has determined that the application complies with the applicable provisions of Statewide Rule 36. In addition, the Commission's Safety Division and Gas Services Division have reviewed the application and recommend approval. The examiner has also reviewed the application and recommends approval.

#### DISCUSSION OF THE EVIDENCE

Access proposes construction of a sour gas pipeline extension to transport sour gas from an existing gathering system to the Verheul Compressor Facility. The subject pipeline will be new construction. The pipeline will be 8 5/8 inches in diameter, 14 miles in length and will carry a maximum of 21 MMCFGPD containing 7,000 parts per million (ppm) of H<sub>2</sub>S. The maximum operating pressure will be 720 psig.

The pipeline is located off of FM 117 about 15 miles northeast of Crystal City. The 100 ppm radius of exposure ("ROE") is 2,301 feet and the 500 ppm ROE is 1,051 feet.

The pipeline will be constructed in a rural and sparsely populated area. There are no public structures and three private structures within the 100 ppm ROE, including two homes and a hunting camp. A portion of FM 1867 and S. Old Loma Vista Road are located within the ROEs.

The system will be equipped with low/high pressure emergency shutdown systems along the line, H<sub>2</sub>S monitors with high/low alarms set at 10 and 50 ppm, and all pipeline and compressor station operations will be remotely monitored 24 hours per day via a SCADA system.

The line will be constructed of API 5L X52 FBE steel pipe, which has been accepted for sour service. Access shall utilize proper NACE and API recommended materials for sour gas service as well as maintain a chemical treating program and cathodic protection system to help prevent corrosion of the pipe. The line will be buried a minimum of 4 f33t and will be properly marked with H<sub>2</sub>S and operator identification signs along the right of way and road crossings. Access will also provide public outreach to educate the public on H<sub>2</sub>S safety. A compliant Statewide Rule 36 Contingency Plan has been prepared and submitted for the new pipeline.

#### **FINDINGS OF FACT**

1. On October 8, 2013, Access filed an application for a permit to construct a hydrogen sulfide gas pipeline in Leon County.
2. Access published notice of the application in a newspaper of general circulation in Zavala County. The notice was published in *Zavala County Sentinel* on October 9, 2013. The application was filed with the Leon County Clerk on October 9, 2013.
  - a. Access proposes construction of a 14 mile pipeline connecting an existing gathering system to the Verheul Compressor Facility.
  - b. The pipeline will be 8 5/8 inches in diameter and 14 miles in length.
  - c. The pipeline will carry a maximum of 21 MMCFGPD containing 7,000 parts per million (ppm) of H<sub>2</sub>S.
  - d. The maximum operating pressure will be 720 psig.
3. The 100 ppm radius of exposure ("ROE") is 2,301 feet and the 500 ppm ROE is 1,051 feet. The pipeline will be constructed in a rural and sparsely populated area with no public structures located within the ROEs.

4. Two houses and a hunting camp, are located within the 100 ppm ROE.
5. Portions of two public roads (FM 1867 and S. Old Loma Vista Road) are located within the ROEs.
6. Pipeline materials and construction meet the NACE and API standards, as required by Statewide Rule 36 for hydrogen sulfide service.
7. The submitted contingency plan for the pipeline is in accordance and complies with the provisions of Statewide Rule 36(c)(9).
8. The pipeline will be constructed subject to Commission inspections for compliance with the appropriate Commission Rules pursuant to Statewide Rule 36.
9. The Commission's Field Operations Section, Pipeline Safety Division and Gas Services Division have reviewed the application and recommend approval.

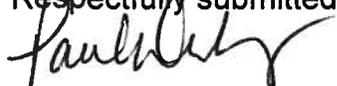
#### **CONCLUSIONS OF LAW**

1. Proper notice was timely given to all parties entitled to notice pursuant to applicable statutes and rules.
2. All things have occurred and have been accomplished to give the Commission jurisdiction in this case.
3. The application complies with Statewide Rules 36, 70 and 106.
4. Approving the application for a permit to construct and operate the proposed gas pipeline is consistent with the rules and safety standards adopted by the Commission.

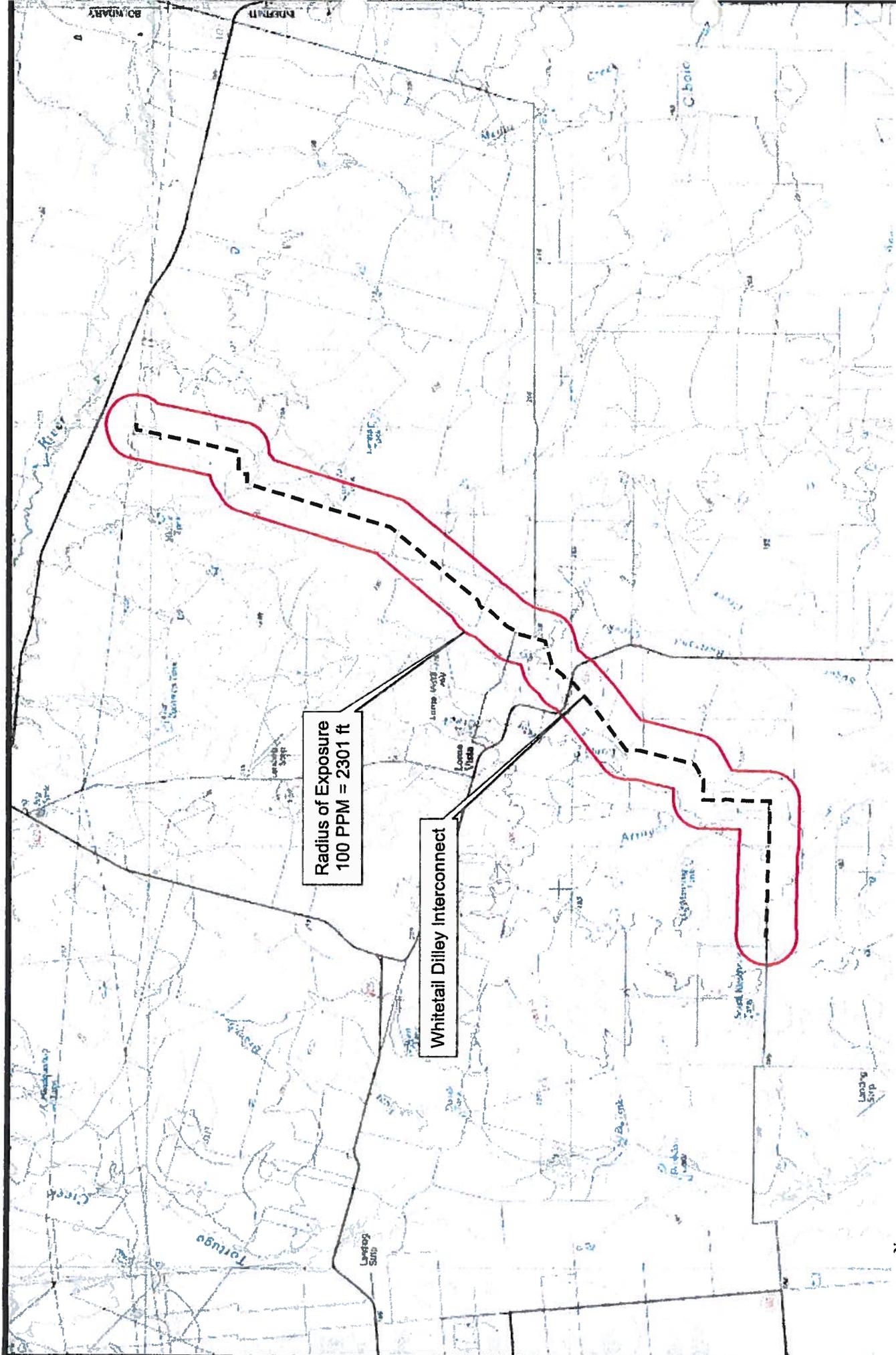
#### **EXAMINER'S RECOMMENDATION**

The examiner recommends that the Commission approve the application for authority pursuant to Statewide Rules 36, 70 and 106, to construct and operate the proposed Whitetail Dille Interconnect hydrogen sulfide gas pipeline in Zavala County, as requested by Access MLP Operating LLC.

Respectfully submitted,



Paul Dubois  
Technical Examiner



# WHITETAIL GGS

## Whitetail Dilley Interconnect TOPOGRAPHIC MAP

- Legend**
- - Whitetail Dilley Interconnect
  - ▭ 100 PPM Radius of Exposure

