

## HEARINGS DIVISION

OIL & GAS DOCKET NO. 01-0287703

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THE APPLICATION OF ACCESS MLP OPERATING LLC TO CONSTRUCT A SOUR  
GAS PIPELINE FACILITY, FAUST INTERCONNECT, DIMMITT COUNTY, TEXAS

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APPLICATION REVIEWED BY: Paul Dubois – Technical Examiner

DATE APPLICATION FILED: February 25, 2014

DATE REVIEWED: April 22, 2014

### EXAMINER'S REPORT AND RECOMMENDATION

#### STATEMENT OF THE CASE

This is the unprotested 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 Dimmitt County, pursuant to Statewide Rules 36, 70 and 106. On February 19, 2014, Access published notice of the application in *Carrizo Springs Javelin*, a newspaper of general circulation in Dimmitt County. On February 26, 2014, Access notified the Dimmitt County Clerk and placed a copy of the application on file with the Clerk in Carrizo Springs.

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 Pipeline Safety Division has reviewed the application and recommends approval. The examiner has also reviewed the application and recommends approval.

#### DISCUSSION OF THE EVIDENCE

Access proposes to construct the Faust Interconnect as a sour gas pipeline extension to its existing Dilley Gas Gathering System (GGS). The proposed extension is in a rural part of Dimmitt County, south of Highway 85 and Thompson Road. The beginning point of the proposed extension is at 28° 33' 54" N, 99° 26' 15" W, and the end point is at 28° 34' 42" N, 99° 26' 40" W. The Faust Interconnect will run between the existing Faust and Anderson Stone laterals. The subject pipeline extension will be new construction. The pipeline will be 10 3/4 inches in diameter, 5,948 feet (1.126 miles) in length and will carry a maximum of 12.5 MMCFGPD containing up to 10,000 parts per million (ppm) of H<sub>2</sub>S. The maximum operating pressure will be 720 psig.

The 100 ppm radius of exposure ("ROE") is 2,068 feet and the 500 ppm ROE is 945 feet. The pipeline will be constructed in a rural and sparsely populated area. There are no public roads within the 100 ppm ROE; there are eight (8) deer stands within the 100 ppm and 500 ppm 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 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 feet 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 February 25, 2014, Access filed an application for a permit to construct a hydrogen sulfide gas pipeline in Dimmitt County.
2. On February 19, 2014, Access published notice of the application in *Carrizo Springs Javelin*, a newspaper of general circulation in Dimmitt County. On February 26, 2014, Access notified the Dimmitt County Clerk and placed a copy of the application on file with the Clerk in Carrizo Springs.
3. Access proposes construction of a 14 mile pipeline connecting an existing gathering system to the Verheul Compressor Facility.
  - a. The pipeline will be 10 3/4 inches in diameter and 1.126 miles in length.
  - b. The pipeline will carry a maximum of 12.5 MMCFGPD containing up to 10,000 parts per million (ppm) of H<sub>2</sub>S.
  - c. The maximum operating pressure will be 720 psig.
4. The 100 ppm radius of exposure ("ROE") is 2,068 feet and the 500 ppm ROE is 945 feet. The pipeline will be constructed in a rural and sparsely populated area with no public structures located within the ROEs.

5. Eight (8) deer stands are located within the 100 ppm ROE.
6. No public roads are located within the ROEs.
7. Pipeline materials and construction meet the NACE and API standards, as required by Statewide Rule 36 for hydrogen sulfide service.
8. The submitted contingency plan for the pipeline is in accordance and complies with the provisions of Statewide Rule 36(c)(9).
9. The pipeline will be constructed subject to Commission inspections for compliance with the appropriate Commission Rules pursuant to Statewide Rule 36.
10. The Commission's Field Operations Section and Pipeline Safety 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 Faust Interconnect hydrogen sulfide gas pipeline in Dimmitt County, as requested by Access MLP Operating LLC.

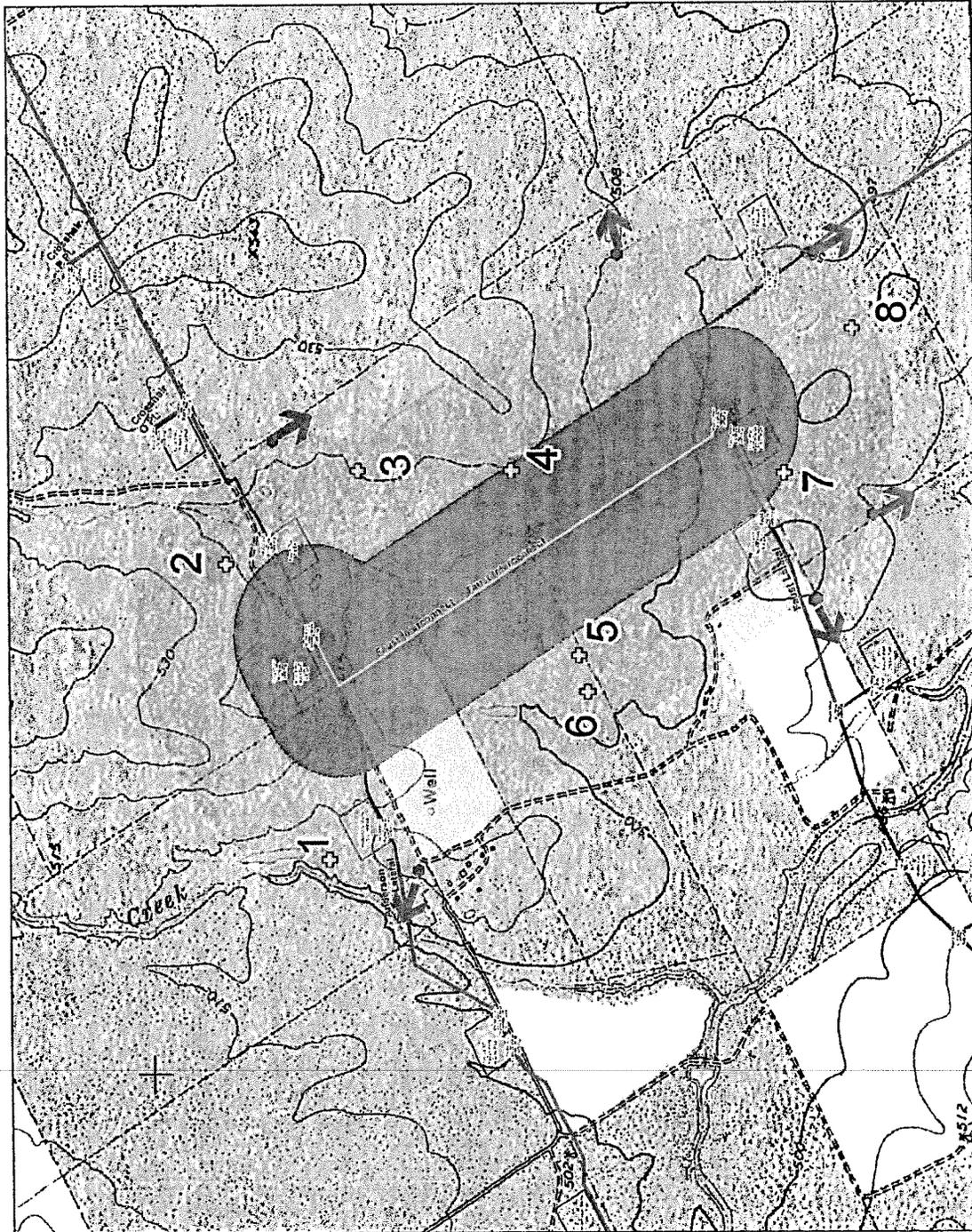
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Respectfully submitted,



Paul Dubois  
Technical Examiner

# Topographical Map



**Faust Interconnect**  
 H2S Permitting  
 GGS: Dilley Rich GGS  
 Revised Date: 2/11/2014  
 Created By: *agm/whb*

Legend	
↑	ESCAPE ROUTE
—	PUBLIC ROAD
⊕	ROAD BLOCK
⊕	DEER STAND
⊕	SHED/STRUCTURE
⊕	HOUSE
▒	500 ppm
░	100 ppm

0 100 200  
 Feet

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