T-4 Permits and Pipeline Online Permitting System (POPS)

January 2020
To more thoroughly assess the public safety risk of gathering lines in Class 1 locations and rural areas, the Commission adopted pipeline safety rules amendments Dec. 17, 2019.

A Class 1 location is any location that has 10 or fewer buildings intended for human occupancy.

Important definition:
- 192.8 defines gathering lines.
- 192.5 defines class locations and a class location unit.
• Under the new rules, gathering line operators are required to:
  • take appropriate action to correct hazardous conditions that create a risk to public safety;
  • report incidents and accidents on gathering lines that result in a death or in-patient hospitalization; property damage of $50,000 or more; or estimated gas loss of three million cubic feet or more; or hazardous liquid release of 5 gallons or more
• Cooperate with the Commission during Commission investigations; and
• Submit a corrective action plan to the Commission to remediate an accident, incident or threat that creates a public safety risk or address a public safety complaint.
• This is a link to our rules: https://www.rrc.state.tx.us/pipeline-safety/rules/
• This is a link to the recent changes made: https://www.rrc.state.tx.us/general-counsel/rules/proposed-rules/
• Contact Pipeline Safety for any questions
3.70 Rule Changes (1 of 3)

- 16 TAC 3.70
3.70 Rule Changes (2 of 3)

• Removed lease boundaries as a criteria for permitting
• Defined production and flow lines compared to gathering
  – All gathering lines need a permit
• Reduced late fees for the mileage fee on operators with less than 50 miles
• Changed renewal dates based on the first letter of the operator’s name
• Beginning September 1, 2020, operators shall file their annual renewals determined by the first letter of the company name:
  • A-C will file in February
  • D-E will file in March
  • F-L will file in April
  • M-P will file in May
  • Q-T will file in June
  • U-Z & numerical values/symbols will file in July
• Fees are calculated by the mileage of the permit on December 31st of the prior year.

• The permit operator is responsible to pay the fees by April 1st.

• Fees are paid at the P-5 operator level.
Mileage Fee (2 of 2)

• Fees are broken into two groups
  • Group A
    – Includes regulated and inspected pipelines
    – $20 per mile
  • Group B
    – Includes pipelines that are not regulated but require a permit
    – $10 per mile
– Permit fees of $500 are assessed per permit
– Paid when new permits are submitted, on the operator's renewal month, or upon transfer, if the permit is not transfer/merged.
– Each operator has its own renewal month based on the first letter of the company’s name
– After the payment has been submitted you must return to application to complete the submittal.
• Getting an Admin and User account

• **Security Administration Designation (SAD) form**
  - [https://www.rrc.state.tx.us/media/6056/formsadp.pdf](https://www.rrc.state.tx.us/media/6056/formsadp.pdf)

• Email
  - rrconline-security@rrc.texas.gov

• Login
  - [https://webapps.rrc.state.tx.us/security/login.do](https://webapps.rrc.state.tx.us/security/login.do)
### Getting Into POPS (2 of 2)

**Pipeline Online Permitting System**

<table>
<thead>
<tr>
<th>Application ID</th>
<th>Permit Number</th>
<th>Permit Status</th>
<th>Filing Type</th>
<th>Filing Status</th>
<th>Operator Name</th>
<th>P-5 Number</th>
<th>Permit Type</th>
<th>Classification</th>
<th>Submission Date</th>
<th>Expiration Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1010010100</td>
<td>11000</td>
<td>Active</td>
<td>Renewal</td>
<td>Issued</td>
<td>R &amp; B LLC</td>
<td>9999999</td>
<td>Gas</td>
<td>Private</td>
<td>11/20/2018</td>
<td>11/20/2019</td>
</tr>
</tbody>
</table>

(Displaying 1 - 1 of 1)
## Required Documentation

<table>
<thead>
<tr>
<th></th>
<th>Cover Letter</th>
<th>T-4B (transfer certification)</th>
<th>Non-Utility Certificate</th>
<th>Overview Map</th>
<th>Digital Shapefiles</th>
<th>Permit work for other permit(s)</th>
<th>New Construction Report</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>new permit, new pipeline</strong></td>
<td>required</td>
<td>n/a</td>
<td>may be required for Gas permits</td>
<td>required</td>
<td>required</td>
<td>n/a</td>
<td>see 16 TAC § 8.115 for applicability</td>
</tr>
<tr>
<td><strong>new permit, pipeline transferred from existing permit</strong></td>
<td>required</td>
<td>required</td>
<td>may be required for Gas permits</td>
<td>required</td>
<td>required</td>
<td>required, within 30 days of transfer</td>
<td>not required</td>
</tr>
<tr>
<td><strong>total transfer (Operator Change)</strong></td>
<td>required</td>
<td>required</td>
<td>may be required for Gas permits</td>
<td>not required</td>
<td>not required</td>
<td>required, within 30 days of transfer</td>
<td>not required</td>
</tr>
<tr>
<td><strong>Total transfer/merge - full transfer into acquiring operator existing permit</strong></td>
<td>required</td>
<td>required</td>
<td>may be required for Gas permits</td>
<td>required</td>
<td>required</td>
<td>required, within 30 days of transfer</td>
<td>not required</td>
</tr>
<tr>
<td><strong>partial transfer, to/from existing permit</strong></td>
<td>required</td>
<td>required</td>
<td>may be required for Gas permits</td>
<td>required</td>
<td>required</td>
<td>required, within 30 days of transfer</td>
<td>not required</td>
</tr>
<tr>
<td><strong>Amend, adding/removing pipeline, to/from existing permit</strong></td>
<td>required</td>
<td>n/a</td>
<td>may be required for Gas permits</td>
<td>required</td>
<td>required</td>
<td>n/a</td>
<td>see 16 TAC § 8.115 for applicability</td>
</tr>
<tr>
<td><strong>renewal</strong></td>
<td>required</td>
<td>n/a</td>
<td>not required</td>
<td>required</td>
<td>not required</td>
<td>n/a</td>
<td>not required</td>
</tr>
<tr>
<td><strong>inactivate permit</strong></td>
<td>required</td>
<td>n/a</td>
<td>not required</td>
<td>not required</td>
<td>not required</td>
<td>n/a</td>
<td>not required</td>
</tr>
</tbody>
</table>

### Notes
- acquiring operator signs top of form, divesting operator signs bottom
- NUC is required for operators of private gas lines who may otherwise look like a Gas Utility
- 8.5” x 11” PDF
- [Check our mapping page for the requirements](https://example.com)
- H2S notices are for Oil & Gas Division; for more information contact Field Ops 512-463-6830
Permit Actions

- New Permit
- Renewal
- Amendment
- Full transfer divesting
- Full transfer acquiring
- Partial Transfer divesting
- Partial Transfer acquiring
- Transfer merge
- Inactivate
- Reactivate
New Gas Permit

• Requirements
  – Attachments:
    • Cover letter
    • Mapping files
    • Non-Utility certificate

  – Data entry:
    • Owner and economic operator
    • Classification/private or GU
    • Inter/intrastate status
    • PS-48 (NCR) info if applicable
    • New or transferred lines?
    • Contact information

  – Pay permit fee
New Liquid Permit

- Requirements
  - Attachments:
    - Cover letter
    - Mapping files
    - Sworn Statement

- Data entry:
  - Owner and economic operator
  - Classification/private or CC
  - Inter/intrastate status
  - PS-48 (NCR) info if applicable
  - New or transferred lines?
  - Contact information

- Pay permit fee
Renewal Process

• Cover letter stating the mileage covered under the permit including the system name, if available.
• Overview map of the entire permit
• No changes are allowed at renewal except to update contacts.
Renewal Facts

• Currently renewal dates are locked in place, the month and day do not change, only the year.

• Effective FY 2021 renewal by assigned month.

• Amendments DO NOT renew a permit. Renewals are a separate action.

• Interstate permits do not have a renewal fee.

• If a permit is due in less than a month, then prioritize renewing your permit before making an amendment.
Amendment (1 of 3)

- The Amend action is for any high-level changes to the permit such as
  - Classification (Common Carrier/Gas Utility/Private)
  - Owner and Economic Operator changes
  - Interstate/Intrastate designation
  - H2S values

- The Amend action is for any changes made to the pipeline system such as
  - Added lines (PA) or merged permits (MP)
  - Abandoned/removed lines (BP and DP)
  - Other modification to the pipeline attributes (Diameter, Class Location, Line Function (OM and FC))
Amendment (2 of 3)

• The Amend action is used by the acquiring operator to complete total and partial transfers between operators
• The Divesting operator can only do a divesting transfer if it is a total transfer
• The Acquiring operator can do other Amend functions at the same time they complete a transfer.
• Mapping (digital shape files and overview) is required IF the changes being made are to a required mapping attribute.

• The Amend action does NOT change the expiration date of a permit. The Amend action does not RENEW a permit.
Inactivate

- Attach a cover letter describing the status of the pipeline including the request to inactivate the permit.
- Cannot inactivate if delinquent on fees
Reactivate

- Can only be used on inactive permits
- Select Reactivate action
- Attach a cover letter and select submit
Merging Permits

• Two step process
  – **Amend** the permit that is being kept showing what the permit will look like after the merge is complete
  – **Inactivate** the permits that are being merged into the permit that is being kept

• Both the actions must be submitted at the same time.
Full Transfer Divesting

- Divesting operator submits Divesting Transfer action
- RRC staff reviews and approves the transfer
- The amendment is submitted with original permit number
- Both submissions must include:
  - Cover letter
  - T-4B
  - Sworn statement of classification
• Acquiring operator submits permit amendment.
• The amendment is submitted with original permit number
• Both submissions must include:
  — Cover letter
  — T-4B
  — Sworn statement of classification
Full Transfer Merge

- RRC staff reviews and approves the transfer
- Acquiring operator submits permit transfer merge action.
- The transfer merge is submitted on the acquiring operator’s existing permit
- The submission must include:
  - Cover letter
  - T-4B
  - Mapping/ overview map
  - Sworn statement of classification
Partial Transfer Divesting

- The amendment must be submitted and include the following:
  - Cover letter
  - T-4B
  - Overview map
  - Digital Shape files
Partial Transfer Acquiring

• An amendment or new permit application must be submitted and include the following:
  – Cover letter
  – T-4B
  – Overview map
  – Digital Shape files

• The permit applicant will pay a new permit fee if they are not adding the transferred lines to an existing permit.
GIS Shape files

• 4 file types needed
  – .shx
  – .shp
  – .dbf
  – .prj

• Make sure all the required attributes are fill out
  – The most recent list of the required attributes can be found at
    https://www.rrc.state.tx.us/media/47982/tpmsattributesdefinitionsandvalidcodes.pdf
Resources

- Pipeline Fees Page
  - https://www.rrc.state.tx.us/pipeline-safety/pipeline-fees/
- POPS User Guide
  - https://www.rrc.state.tx.us/media/32799/pops-user-guide.pdf
- Mapping Information
  - https://www.rrc.state.tx.us/pipeline-safety/mapping/
- Permitting Information
  - https://www.rrc.state.tx.us/pipeline-safety/permitting/
Contact information

– Pipeline Permitting General number
  • 512-463-6802

– Ryan Hejl
  • 512-463-3863
  • Ryan.Hejl@rrc.texas.gov

– Bruce Waterman
  • 512-463-3046
  • Bruce.Waterman@rrc.texas.gov

– Karley Bisbano
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  • Karley.Bisbano@rrc.texas.gov
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  • Alex.Martinez@rrc.texas.gov

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– Lori Mireles-Oviedo
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  • Lori.Mireles-Oviedo@rrc.texas.gov
Questions