



Railroad Commission of Texas

Distribution Integrity Management / Facilities Replacement Program

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What is DIMP?



Distribution Integrity Management: is a written plan designed to help gas distribution companies identify, assess, and manage risks to their pipeline systems.

What is DIMP?



A requirement under 49 CFR §192.1003 that any gas distribution pipeline under Part 192 must have an integrity management program.

What is DIMP?



A requirement under 49 CFR §192.1005 that all gas distribution companies establish and maintain a Distribution Integrity Management Plan addressing pipeline integrity.

Elements of DIMP:



- Knowledge of the system - §192.1007(a)
- Identify Threats – §192.1007(b)
- Evaluate and Rank Risks – §192.1007(c)
- Identify and implement Measures to reduce the identified risks – §192.1007(d)
- Measure performance, monitor results and evaluate effectiveness – §192.1007(e)
- Periodically evaluate and improve the plan – §192.1007(f)
- Report results – §192.1007(g)



An operator must demonstrate an understanding of its distribution system.

- Pipeline characteristics – Type of pipe, steel, poly, etc.
- Operations and Maintenance history
- Environmental conditions
- Records – Operations, Maintenance, Construction, Leak Repairs and Leak History

Identify Threats – §192.1007(b)



What is a threat?

A threat is anything that can cause an unintended release of gas.



Primary Threats

- Corrosion
- Natural Forces
- Excavation Damage
- Other Outside Force Damage
- Materials or Welds
- Equipment Failure
- Incorrect Operation
- Other issues



An essential part of DIMP is risk evaluation. An operator must determine the relative importance of each threat and rank the risks.

- Rank all 8 threat categories.
- Subcategories – Example: Corrosion – External, Internal, and Atmospheric
- Subdivide the system – must have separate risk rankings for each subdivided system.

Implement Measures – §192.1007(d)



- Implement measures designed to reduce risk
- Includes Prevention, remediation, and mitigation.
- Increase frequency of leak surveys
- Correct cathodic protection deficiencies
- Relocate the pipe from high-risk locations
- Enhanced public awareness
- Improve procedures



Measure performance, monitor results, and evaluate effectiveness.

- Baseline for each performance measure
- Compare results with baseline and previous years
- Performance measures something that can be measured or tracked
- Number of excavation damages
- Total number of leaks eliminated or repaired



An operator must re-evaluate the DIMP program at least every five years.

- Review Written Plan - maintain records demonstrating the plan reviewed
- Review Plan Effectiveness – demonstrate that risks are being managed effectively
- Does the data support the performance measures?

Report Results – §192.1007(g)



An operator must report on an annual basis the four performance measures listed in §192.1007(e)(1)(i) through (e)(1)(iv).

- (i) # of hazardous leaks eliminated/repaired
- (ii) # of excavation damages
- (iii) # of excavation tickets
- (iv) Total # of leaks eliminated/repaired, categorized by cause



- An operator must keep records demonstrating compliance for at least 10 years.
- Document!
- Document!
- Document!



Distribution Facilities Replacement (TAC §8.209)

Distribution Facilities Replacement



- Risk-based program for the removal or replacement of distribution facilities
- Works in conjunction with DIMP to manage identified risks associated with the integrity of distribution facilities
- Requires a minimum of 8% annual replacement of facilities posing the greatest risk to the system.

Distribution Facilities Replacement



- Operators must file no later than March 15 of each year
- By System ID, a list of the steel service line or other facilities replaced during the prior calendar year
- The operators proposed a work plan for removal or replacement for the current calendar year

Distribution Facilities Replacement



- What if an operator has an all-poly distribution system and has no recorded leaks? Do they have to replace 8%?
- Submit to safety@rrc.texas.gov

- Simple Handy Risk Based IMP
- Created to help smaller operators create a DIMP
- If you use SHRIMP the procedures are generic
- Procedures to address TAC are not included

Common Violations – 49 CFR 192



- Baseline for each performance measure 192.1007(e)
 - Procedures for establishing baseline
 - Records of establishing baseline
- Periodic review 192.1007(f)
 - Not conducting periodic review within the allotted timeframe
 - No documentation of periodic evaluation

Common Violations – TAC



- Annual 8% replacement 8.209(h)
 - Not replacing steel service lines
 - Records indicating the operator did not meet minimum 8% replacement
- Not filing replacement plan 8.209(i)
 - Operator did not submit proposed plan by March 15



- **Natural Gas Distribution Infrastructure Safety and Modernization Grants passed in 2021**
- Municipal or community-owned systems
- \$200 million/year for five years
- Grant recipients have been awarded nearly \$800 million
- American Public Gas Association will help
 - An operator with fewer than 500 customers automatically becomes a member.



Questions?

Contact Information



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