



Gas Gathering Rules - RRC Implementation

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July 2025



Agenda



- Gas Gathering Rule review
- RRC Implementation
 - Updates to State Rules
 - Type C inspections

Background



- Final Rule published 11/15/2021, effective 05/16/2022
- Identify Type C lines by 11/16/2022
- Comply with 192.9 by 11/16/2023
- File Annual Reports starting 03/2023 for CY2022 reports

Gas Gathering Types – 192.8



- All gas gathering lines are regulated by PHMSA.
- Types A & B – No changes
- Type C - Outside diameter \geq to 8.625 inches. MAOP \geq 20% SMYS (metallic) or MAOP $>$ 125 psig (nonmetallic), in Class 1 location.
- Type R - All other onshore gathering lines in Class 1 & 2 locations.

Gathering Lines Requirements



Applicable federal regulations per 49CFR 192.9

192 Regulated GG Miles (1 of 2)



Gas Gathering Total Miles



192 Regulated GG Miles (2 or 2)



Gas Gathering Pipeline Miles

Time run: 3/27/2025 2:27:23 PM

Data Source: US DOT Pipeline and Hazardous Materials Safety Administration

Portal Data as of 3/26/2025 9:48:35 PM

State: (All Column Values) **Fed/State:** (All Column Values) **Regulated By:** (All Column Values)

Calendar Year	INTERSTATE						INTRASTATE						Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count						
2024	70.5	34.8	2,078.1	4,585.2	6,768.6	34	8,108.3	4,471.4	89,949.8	406.8	102,936.3	482	8,178.8	4,506.2	92,027.9	4,992.0	109,704.9	504
2023	96.9	37.1	2,201.1	4,857.5	7,192.6	37	8,501.7	4,628.9	90,727.4	511.8	104,369.7	514	8,598.6	4,666.0	92,928.5	5,369.3	111,562.4	540
2022	87.7	39.9	2,016.8	4,989.4	7,133.9	40	8,110.0	4,622.7	91,991.2	516.9	105,240.9	504	8,197.8	4,662.6	94,008.0	5,506.4	112,374.8	533
2021	119.4	49.3	0.0	5,227.6	5,396.3	36	8,126.0	3,096.6	0.0	550.9	11,773.4	359	8,245.4	3,145.9	0.0	5,778.4	17,169.7	384
2020	131.0	73.1	0.0	5,394.6	5,598.7	38	8,279.3	3,127.8	0.0	556.0	11,963.1	370	8,410.3	3,200.9	0.0	5,950.5	17,561.8	398

Texas 192 Regulated GG Miles



Gas Gathering Pipeline Miles

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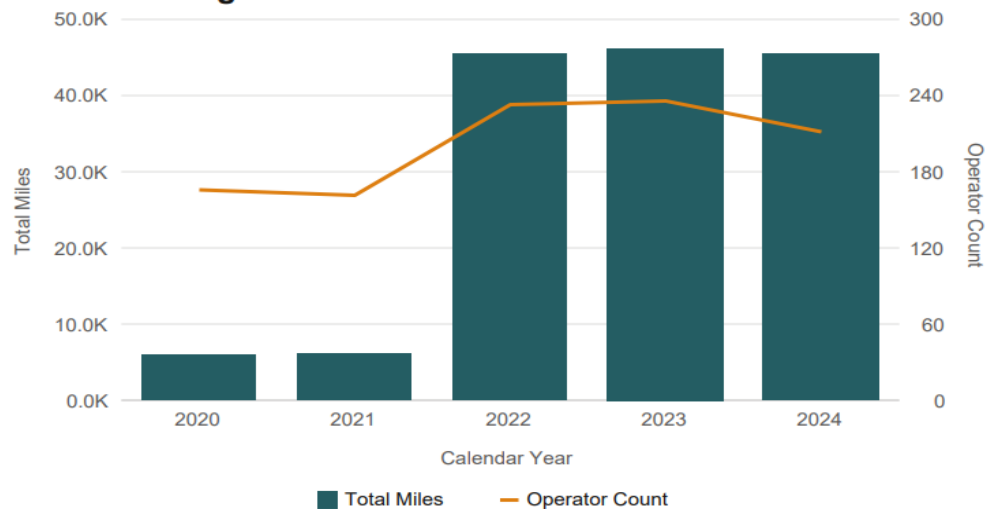
Data Source: US DOT Pipeline and Hazardous Materials Safety Administration

Portal Data as of 3/26/2025 9:48:35 PM

State: TEXAS **Fed/State:** (All Column Values) **Regulated By:** TX_RRC

Calendar Year	INTRASTATE						Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count	Type A Miles	Type B Miles	Type C Miles	Offshore Miles	Total Miles	Operator Count
2024	4,615.5	1,281.1	39,190.3	275.3	45,362.1	212	4,615.5	1,281.1	39,190.3	275.3	45,362.1	212
2023	4,815.4	1,345.9	39,632.6	323.2	46,117.1	235	4,815.4	1,345.9	39,632.6	323.2	46,117.1	235
2022	4,694.8	1,154.1	39,127.0	304.6	45,280.6	233	4,694.8	1,154.1	39,127.0	304.6	45,280.6	233
2021	4,854.3	944.4	0.0	349.3	6,148.1	162	4,854.3	944.4	0.0	349.3	6,148.1	162
2020	4,725.3	907.0	0.0	354.4	5,986.7	166	4,725.3	907.0	0.0	354.4	5,986.7	166

Gas Gathering Total Miles



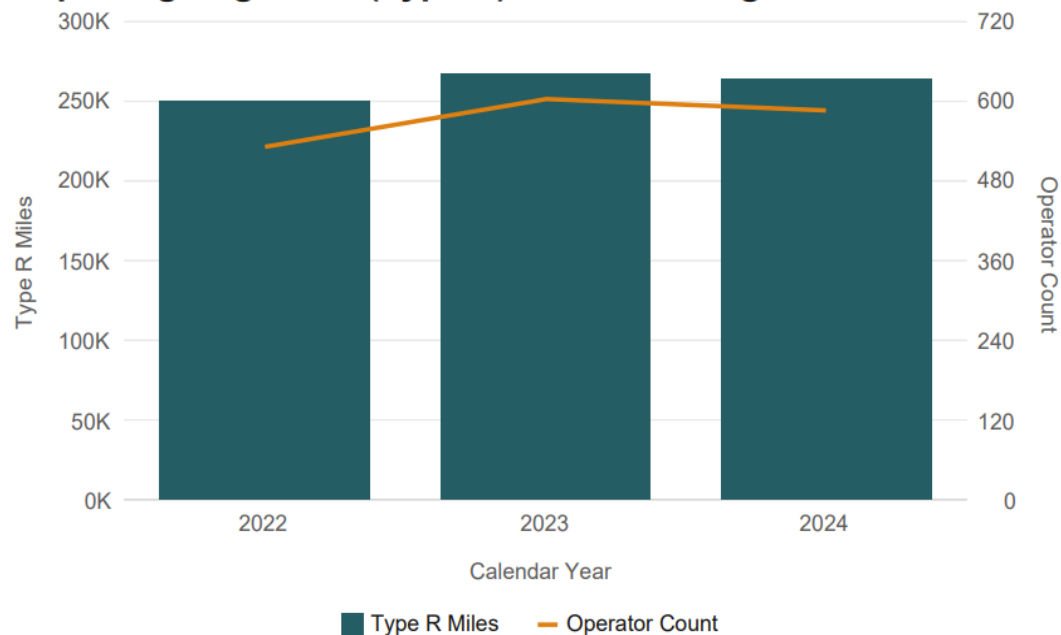
Type R Miles



State: (All Column Values) **Fed/State:** (All Column Values) **Regulated By:** (All Column Values)

Calendar Year			INTERSTATE		INTRASTATE		Type R Miles	Operator Count
	Type R Miles	Operator Count	Type R Miles	Operator Count	Type R Miles	Operator Count		
2024		1	4,321	23	259,542	571	263,863	585
2023		1	4,158	21	262,528	588	266,685	602
2022			4,026	24	244,956	517	248,982	532

Reporting Regulated (Type R) Gas Gathering



Texas Type R Miles



Pipeline Infrastructure - Reporting Regulated (Type R) Gas Gathering

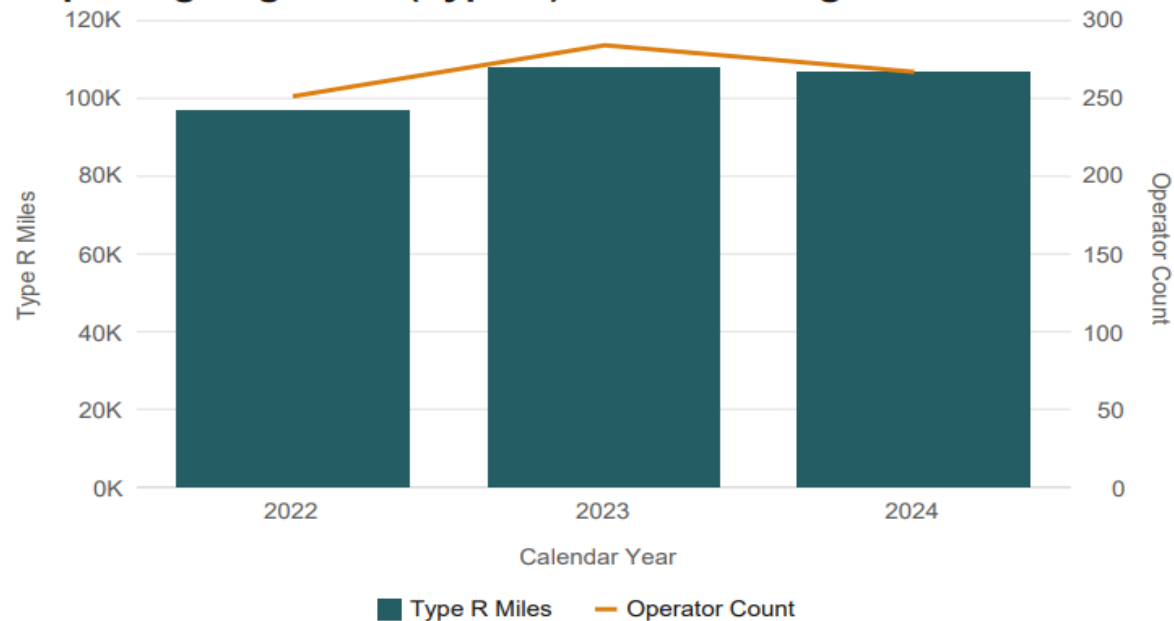
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Portal - Data as of 3/26/2025 9:48:35 PM

State: TEXAS Fed/State: (All Column Values) Regulated By: (All Column Values)

Calendar Year	INTERSTATE		INTRASTATE		Type R Miles	Operator Count
	Type R Miles	Operator Count	Type R Miles	Operator Count		
2024	306	6	106,154	264	106,460	267
2023	313	6	107,135	280	107,448	284
2022	298	5	96,588	248	96,885	251

Reporting Regulated (Type R) Gas Gathering



Adoption of Federal Regulations



- State Agency is required to adopt Federal pipeline safety regulations.
- Regulations should be adopted within 24 months of the effective date or two general sessions of the State Legislature.

State Participation Requirements



With PHMSA certification, participating agency may adopt additional or more stringent standards for intrastate pipeline facilities provided such standards are compatible with Federal regulations

Rule Updates - §8.110



- The Commission adopts amendments in §8.110 to incorporate new terms "Type C" and "Type R", consistent with federal rules.
- Investigation required for Type C and R lines for all incidents & accidents.

Rule Updates - §8.1(a)(1)(B)



- §8.1(a)(1)(B) - The Commission adopts amendments to §8.1(a)(1)(B) to clarify the requirements for gas production lines located in populated areas.
- These production pipelines and production facilities shall be subject to 49 CFR §192.8(c) in determining if these pipelines and facilities are Type A or Type B and are subject to the rules in 49 CFR §192.9 for Type A or Type B pipelines.

§8.1(a)(1)(D)



- The Commission adopts an amendment in §8.1(a)(1)(D) to clarify that all offshore pipelines (both production and gathering) located in Texas waters shall follow 49 CFR 192 and 49 CFR 195.

T-4 Permits – 3.70(r)



Beginning December 9, 2024, operators shall comply with the following:

- (1) All gas permits shall be amended to include all gas gathering pipelines defined as Type A, Type B, Type C, or Type R in 49 CFR §192.8
- (2) A gas permit will not be eligible for renewal if the permit has not been amended by March 31, 2025, in accordance with paragraph (1) of this subsection

FAQ 9 – Reporting



What are my reporting requirements for Type R lines?

- Incidents & Annual reports required for all.
- SRC not required for Type R and certain Type C
- Immediate notification of incidents required for all.
- OPID required for all.
- Consider any applicable state reporting requirements.

FAQ 28 – Failure Investigation



Do Type C gathering line operators have to comply with § 192.617 (Failure Investigation) requirements described in § 192.615 (Emergency Plans)?

- No
- Type C gathering line operators are required to complete incident reports (form PHMSA F 7100.2) under § 191.15, and an operator may need to conduct a failure investigation to determine apparent cause and gather other information required by the incident report form

FAQ 32 – Compressor Stations



Do the new Type C regulations apply to compressor stations or other facilities?

- Yes
- A qualifying station or compressor unit would be included and subject to the same regulatory requirements as a gathering line under § 192.9

FAQ 34 – Operator Qualification



Am I required to have qualified staff per subpart N perform covered operations and maintenance tasks on my Type B or C gas gathering line?

- No
- Compliance with the requirements in subpart N of part 192 is not required for Types B or C gathering lines.

GG Inspection Checklist (1 of 2)



- Same format as other RRC standard comprehensive checklist.
- Includes separate worksheets for Type A, Type B & Type C lines
- Programs & Reporting section, Records Review & field inspection.

GG Inspection Checklist (2 of 2)



- Determination using API RP 80 per 192.8(a) limitations
- Records documenting methodology for beginning and endpoints per 192.8(b)
- Records establishing pipe type per 192.8(c)

Documentation of Gathering Classification



- 192.8 (b) require that documentation includes the determination of “production” versus “gathering”.

Conclusion



- Ensure compliance with all applicable Federal & State rules.
- Update permits and keep all necessary documentation.

Contacts



- Gathering inspection and general rule questions – safety@rrc.texas.gov
- T4 permits and shapefiles inquiries - RRC Permitting at pops@rrc.texas.gov

QUESTIONS

