



Pipeline Safety Webinar

March 2021



Power Point Presentation



This presentation is available for download from the RRC website at <https://www.rrc.texas.gov/pipeline-safety/training/workshops-and-conferences/pipeline-safety-permitting-and-damage-prevention-webinar/>.



Pipeline Permitting Updates

3.70 Rule Changes (1 of 4)



- **16 TAC 3.70**

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=16&pt=1&ch=3&rl=70](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=16&pt=1&ch=3&rl=70)

3.70 Rule Changes (2 of 4)



- 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

3.70 Rule Changes (3 of 4)



Beginning
September 1, 2020

Annual Renewals for Pipeline Operators

Are due for companies beginning with

A-C
must file in
February

Are due for companies beginning with

D-E
must file in
March

Are due for companies beginning with

F-L
must file in
April

Are due for companies beginning with

M-P
must file in
May

Are due for companies beginning with

Q-T
must file in
June

Are due for companies beginning with

U-Z & 0-9
must file in
July



3.70 Rule Changes (4 of 4)



Mileage Late Fees for 50 Miles or Less

1-30 Days Late	31-60 Days Late	Greater than 60 Days Late
\$125	\$250	\$350

Mileage Late Fees for More Than 50 Miles

1-30 Days Late	31-60 Days Late	Greater than 60 Days Late
\$250	\$500	\$700

Mileage Fees



- 2021 Mileage Fees can be paid through the POPS system and are due April 1st.
- If you have past due mileage fees, please contact pops@rrc.texas.gov

The image displays two side-by-side screenshots of the RRC Online POPS system interface. Both screenshots show a navigation menu with the following sections: Menu, Home (with RRC Online link), Dashboard (with Dashboard link), Fees, Applications (with New Gas Permit and New Liquid Permit links), and Help (with User Guide and Pipeline Safety Reports links). In the left screenshot, the 'Fees' section is highlighted with a red rounded rectangle and contains a warning icon and the text 'Pay Pipeline Mileage Fees'. In the right screenshot, the 'Fees' section is also highlighted with a red rounded rectangle and contains an information icon and the text 'Mileage Fees are Paid in Full'.

Required Documents (1 of 4)



	Cover Letter	T-4B (transfer certification)	Non-Utility Certificate	Overview Map	Digital Shapefiles	Permit work for other permit(s)	New Construction Report
new permit, new pipeline	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
new permit, pipeline transferred from existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
total transfer (Operator Change)	required	required	may be required for Gas permits	not required	not required	required, within 30 days of transfer	not required
Total transfer/merge - full transfer into acquiring operator existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
partial transfer, to/from existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
Amend, adding/removing pipeline, to/from existing permit	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
renewal	required	n/a	not required	required	not required	n/a	not required
inactivate permit	required	n/a	not required	not required	not required	n/a	not required
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		H2S notices are for Oil & Gas Division; for more information contact Field Ops 512-463-6830

Required Documents (2 of 4)



	Cover Letter	T-4B (transfer certification)	Non-Utility Certificate	Overview Map	Digital Shapefiles	Permit work for other permit(s)	New Construction Report
new permit, new pipeline	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
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renewal	required	n/a	not required	required	not required	n/a	not required
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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		H2S notices are for Oil & Gas Division; for more information contact Field Ops 512-463-6830

Required Documents (3 of 4)



	Cover Letter	48 (transfer certification)	Non-Utility Certificate	Overview Map	Digital Shapefiles	Permit work for other permit(s)	New Construction Report
new permit, new pipeline	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
new permit, pipeline transferred from existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
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Required Documents (4 of 4)



- To view the Required Documents pdf, follow this link:
 - <https://rrc.texas.gov/media/5s2fl0ym/pipeline-permit-cheat-sheet.pdf>

Renewal Cover Letter (1 of 2)



Dear Permitting & Mapping Staff:

Re: T-4 Permit Number: #55555
Operator Name: ABC Pipeline Company
P5 Number: #111111

This application is to renew the above referenced permit. Details of the lines covered under this permit are:

Total Miles: 13.49 Riverside System

Please contact me at 654-001-0000 if you have questions or need additional information.

Sincerely,

John Doe
Operations Specialist

Renewal Cover Letter (2 of 2)



- Active miles under T4 permit
- T4 permit number
- Email pops@rrc.texas.gov if you have questions about your submission before submitting

Non Utility Certificate



- <https://www.rrc.texas.gov/media/otvb3r5f/non-utility-cert-2015.pdf>
- Certificate is needed for gas pipelines requesting the following status:
 - **Private operators who purchase gas, transport for a fee, or both.**

8.115 Construction Reporting



- PS-48 New Construction Report
 - <https://www.rrc.texas.gov/pipeline-safety/reports/new-pipeline-construction-reports/>



Required:

- Gathering (class 2 – 4) and transmission
 - 30 days prior for 1 mile or more
 - 60 days prior for 10 miles or more
- Distribution (monthly report)
 - Any new system
 - Any extension or replacement greater than 3 miles
- Breakout tanks
 - 30 days prior for new breakout tanks



Not Required:

- Gathering and transmission
 - Less than 1 mile
 - Class 1 gathering
- Distribution
 - Any extension or replacement less than 3 miles



- Please email completed PS-48's to:
 - POPS@rrc.texas.gov
- PS-48's expire after 8 months
 - One 6-month extension
- 16 TAC 3.36 and 3.106 (include a PS-79)
 - If you require additional information, please contact:
 - Tom.Fouts@rrc.texas.gov (North)
 - Wesley.Dresch@rrc.texas.gov (South)



Questions

Permit Actions



- New Permit
- Renewal
- Amendment
- Divesting Transfer
(total or partial)
- Acquiring Full Transfer
- Acquiring Transfer Merge
- Update Contacts
- Inactivate
- Reactivate


Actions


 Amend

 Renew

 Inactivate

 View

 Divesting Transfer

 Update Contacts

Transfer Merge




- When a full permit transfer is submitted:
 - The divesting operator submits using the Divesting Transfer action, which is approved or rejected by the RRC
- The acquiring operator has two options:
 - File an "Acquiring Full Transfer" on the acquired permit and keep the permit number
 - File a "Acquire Transfer Merge" and merge the transferred permit into an existing permit of the same type.


Keeping the Permit Number





- If the acquiring operator keeps the transferred permit, the expiration date will be moved to the acquiring operator's designated month.
- The renewal for the permit will be paid by the acquiring operator upon transfer of the permit if the date is moved to an earlier expiration date.
- If moved to a later date, it will be renewed in that month.

Actions

 View

 Permit History

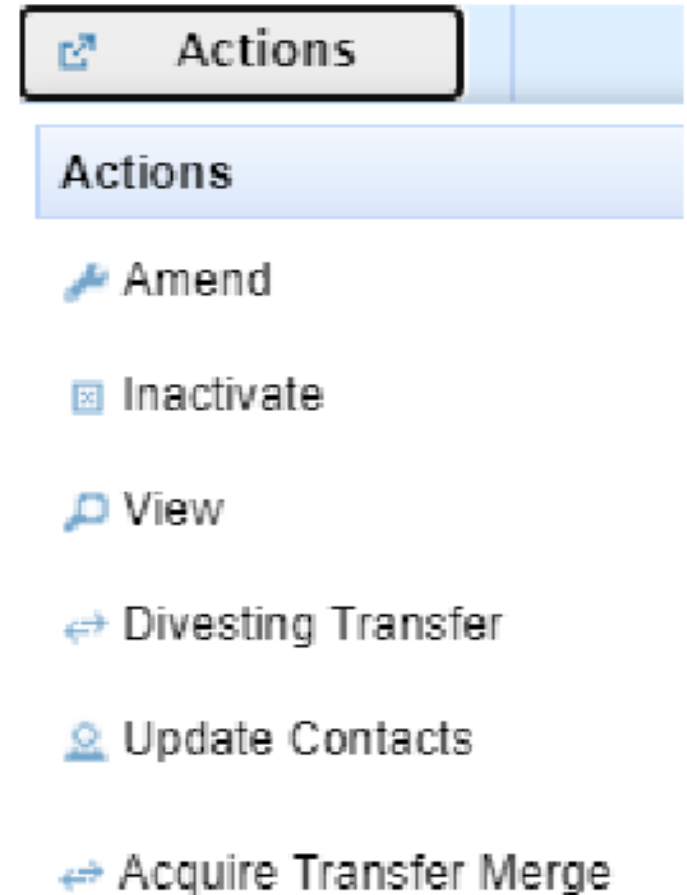
 Revoke

 Acquiring Full Transfer

Merging the Transferred Permit



- The acquiring operator merges the transferred permit into one of their existing permits.
- The acquiring operator will submit the "Acquire Transfer Merge" on an existing permit, not the transferred permit.





Merging the Transferred Permit (1 of 2)

Dashboard

(Displaying 1 - 2 of 2) 1 20

	Application ID	Permit Number	Permit Status	Filing Type	Filing Status	Operator Name	P-5 Number	Permit Type	Classification	Submission Date	Expiration Date
Actions	21588	06572	Transferred	Amendment	Issued	ASSENT ENERGY PARTNERS, LLC	035486	Gas	Private	08/17/2020	08/07/2020
Actions	21587	05381	Active	Full Transfer	Issued	ASSENT ENERGY PARTNERS, LLC	035486	Gas	Private	02/24/2021	02/28/2022

(Displaying 1 - 2 of 2) 1 20

- Actions
- Amend
- Inactivate
- View
- Divesting Transfer
- Update Contacts
- Acquire Transfer Merge



Merging the Transferred Permit (2 of 2)

Acquired Pipeline Transfer - Full Transfer Only

To select divesting permit numbers (from Form T-4B) to be merged with your existing permit, select the Effective Date of Transfer by Purchase Party, and then click on the permit.

Divesting Permit Nbr	Divesting Operator P5	Divesting Permit OperatorName	Divesting Operator Effective Date of Transfer	Effective Date of Transfer by Purchase Party	Pipeline Classification
6572	238730	EAGLE HYDROCARBONS INC.	06/30/2020	<input type="text"/>	Private

These permits will be merged with your existing permit.

Divesting Permit Nbr	Divesting Operator P5	Divesting Permit OperatorName	Divesting Operator Effective Date of Transfer	Effective Date of Transfer by Purchase Party	Pipeline Classification
No Merge Transfer List found.					

Next

To select divesting permit numbers (from Form T-4B) to be merged with your existing permit, select the Effective Date of Transfer by Purchase Party, and then click on the permit.

Divesting Permit Nbr	Divesting Operator P5	Divesting Permit OperatorName	Divesting Operator Effective Date of Transfer	Effective Date of Transfer by Purchase Party	Pipeline Classification
6572	238730	EAGLE HYDROCARBONS INC.	06/30/2020	<input type="text" value="06/30/2020"/>	Private

These permits will be merged with your existing permit.

Divesting Permit Nbr	Divesting Operator P5	Divesting Permit OperatorName	Divesting Operator Effective Date of Transfer	Effective Date of Transfer by Purchase Party	Pipeline Classification	
6572	238730	EAGLE HYDROCARBONS INC.	06/30/2020	06/30/2020	Private	<input type="button" value="Delete"/>

Next

Warning: No permits found for merge

Warning: The permit you have selected for Acquire Transfer Merge action can not be used to merge transferred permits into because there are no permits that meet the criteria for the merge with this permit. You must either select a different action for this permit or select a different permit for the Acquire Transfer Merge action.

[Back to Dashboard](#)

What can and cannot be combined



- Here is what can be combined:
 - Gathering and Transmission
 - H₂S with no H₂S
 - Lines not connected
 - Crude and Refined Products, all on the same is ok
- Here is what cannot be combined:
 - Gas and Liquids
 - Private lines and any Common Carrier (liquids) or Gas Utility (gas) lines
 - Different economic operators
 - Different owners
 - Interstate and Intrastate



Questions



Pipeline Mapping Updates

Mapping Presentation Overview



- New Transfer Merge function in POPS
- Most common shapefile submission errors
- How to file (most common applications)
- New resources

Transfer Merge (1 of 2)



- What is a Transfer Merge (TM)?
 - A new way to do a full transfer for the acquiring operator
 - Full Transfer vs. Transfer Merge

Transfer Merge (2 of 2)



Full Transfer

- Divesting side files first
- Pay renewal fee upon acquisition
- Can only acquire one permit at a time
- No mapping required for either side
- Divesting permit number transferred to acquiring operator

Transfer-Merge

- Divesting side files first
- No renewal fee upon acquisition
- Can acquire multiple permits at once
- Mapping required for acquiring side
- Divesting permit number becomes inactive and acquiring operator chooses keeper permit



#1. Shapefile does not contain all lines in permit

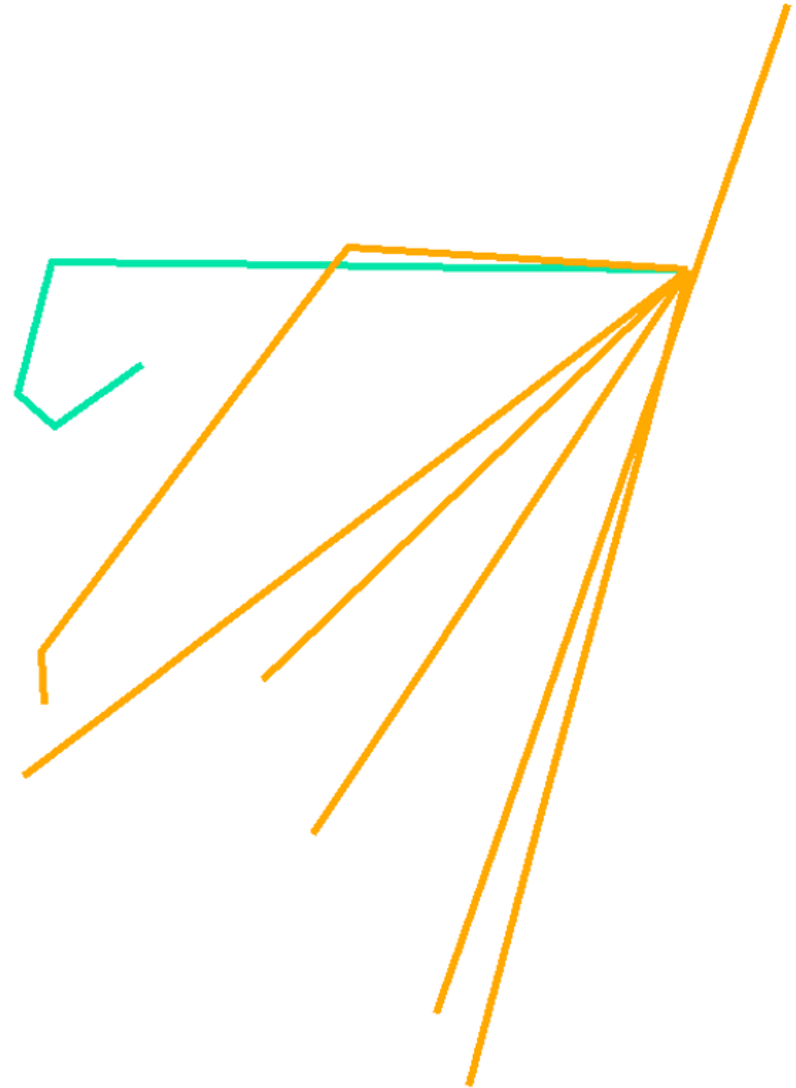
- Must contain new and existing lines
- Must include abandoned lines

Mistake #1 (2 of 2)





Overview Map

Permit 01234



T4 Amendment Code

-  No Change (NC)
-  Pipeline Addition (PA)



#2. Not enough information in the cover letter

Amendment cover letter must include:

1. The type of amendment(s)
2. The mileage associated with the amendment(s)
3. The new total active mileage



Poor Cover Letter

“We have some new line to report, and we are also removing some line. Please make the changes.”



Good Cover Letter

“We are amending permit 01234 to report 1.50 miles of newly built pipeline, and to report 6.50 miles of line that were abandoned in place.”

Active total before amendment: 10.00 miles

PA (pipeline addition): 1.50 miles

BP (abandon in place): 6.50 miles

Active total after amendment: 5.00 miles



#3. Using incorrect T4_AMD code

- We use a series of codes to describe amendments (i.e. PA, DP)
- Find the appropriate code by viewing the T4_AMD table in A Guide to Shapefile Submissions
- Codes must match between shapefile and cover letter

Mistake #3 (2 of 3)



Poor Cover Letter

For DP (“delete pipeline”)

“DP: We are removing 6.25 miles from our permit.”

Mistake #3 (3 of 3)



Good Cover Letter

For DP (“delete pipeline”)

“DP: We are removing 6.25 miles from our permit because it was physically removed from the ground.”

“DP: We are removing 6.25 miles from our permit because we have determined it should not be permitted by the RRC.”



#4. Mileage discrepancy between shapefile and cover letter

- My review includes comparing shapefile and cover letter mileage
- I calculate your shapefile mileage using Texas Statewide Mapping System as a projected coordinate system
- I compare this number to your cover letter



#5. Shapefile attribute table is missing fields

- 15 required fields
- 17 required fields (if liquid and 6-8")
 - SMYS and USA

More reasons for rejection (1 of 2)



- Character limit / data type
- Lowercase letters in attribute table
- Combination of liquid and gas
- Combination of interstate / intrastate

More reasons for rejection (2 of 2)



- Invalid projection
 - NAD 1927 or NAD 1983 (unprojected)
- Invalid characters in shapefile name
 - Valid: letters, numbers, underscores
 - Amendment_01234.dbf
 - Invalid: spaces, periods, special characters
 - A.B.C. Pipeline Company @ 01234.dbf



Questions

How to file...



How to file...

- Transfer Merge (TM)
- Partial Transfer (PT)
- Partial Merge (PM)
- Merge Permit (MP)
- Amendment with multiple T4_AMD codes



Transfer Merge (TM): Acquire a full permit from another operator, then add lines to existing permit



How to file a Transfer Merge (2 of 3)

Rattlesnake Operators



Acquiring permit: Any Rattlesnake permit

Divesting permit:
01111



Eagle Operators

Divesting permit:
02222



Javelina Operators

Divesting permit:
03333




Gator Operators


How to file a Transfer Merge (3 of 3)





- **Application type:** Acquire Transfer Merge
- **Required attachments**
 - Shapefile
 - Cover letter
 - Overview map
 - T4-B (transfer form)


Actions


 Amend

 Inactivate



 View

 Divesting Transfer

 Update Contacts

 Permit History

 Revoke

  Acquire Transfer Merge



Divesting Partial Transfer (PT): Send some lines in your permit to another operator

How to file a Divesting Partial Transfer (2 of 6)



Divesting Permit

How to file a Divesting Partial Transfer (3 of 6)



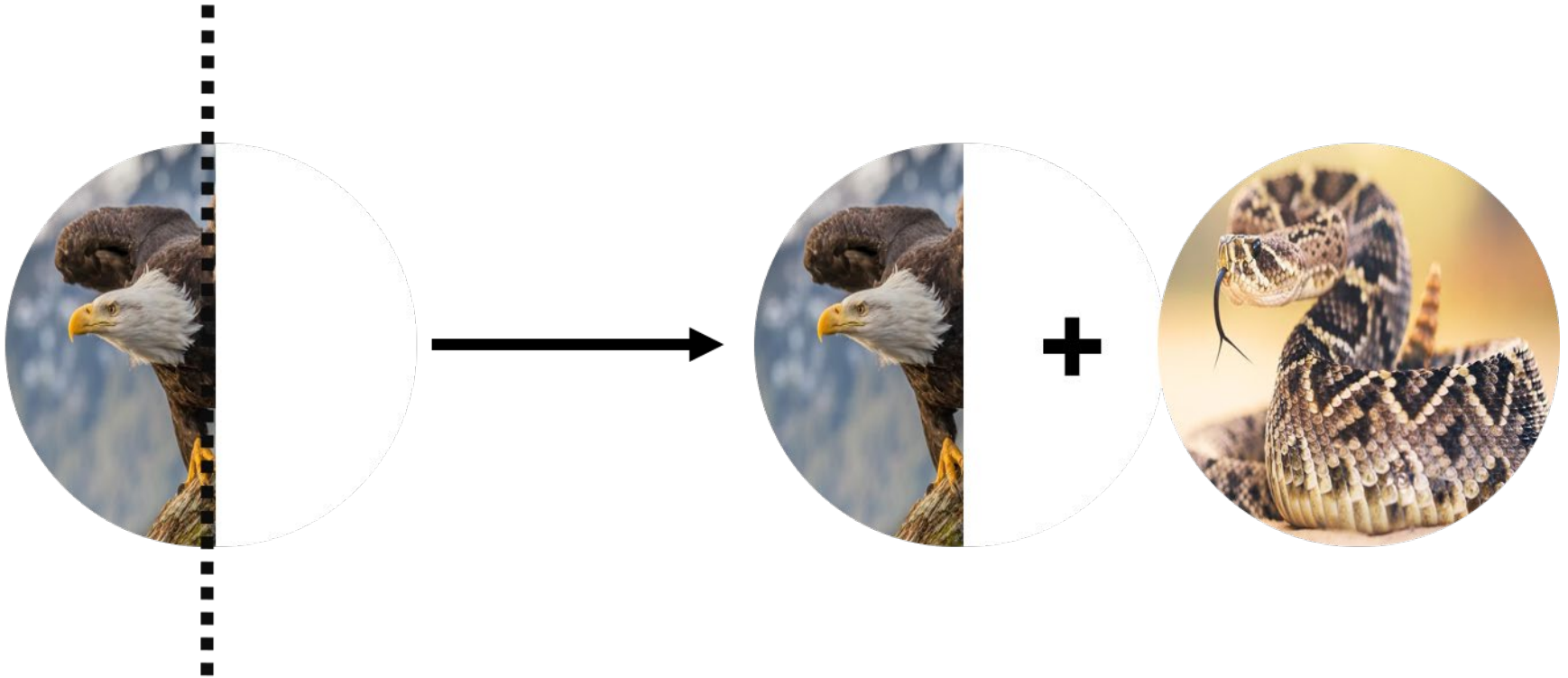
Divesting Permit

How to file a Divesting Partial Transfer (4 of 6)



Divesting Permit

How to file a Divesting Partial Transfer (5 of 6)



Divesting Permit

Acquiring Permit



- **Application type:** Divesting Transfer
- **Required attachments**
 - Shapefile, cover letter, overview map, T4-B
- **Comments**
 - With PT, either side can go first
 - Must file within 30 days of “effective transfer date”
 - Show all lines
 - Make sure both sides report consistent information



Actions

- Amend
- Inactivate
- View
- Divesting Transfer
- Update Contacts
- Permit History
- Revoke
- Acquire Transfer Merge



Acquiring Partial Transfer (PT): Add some lines to your permit from another operator

How to file an Acquiring Partial Transfer (2 of 6)



Divesting Permit

How to file an Acquiring Partial Transfer (3 of 6)



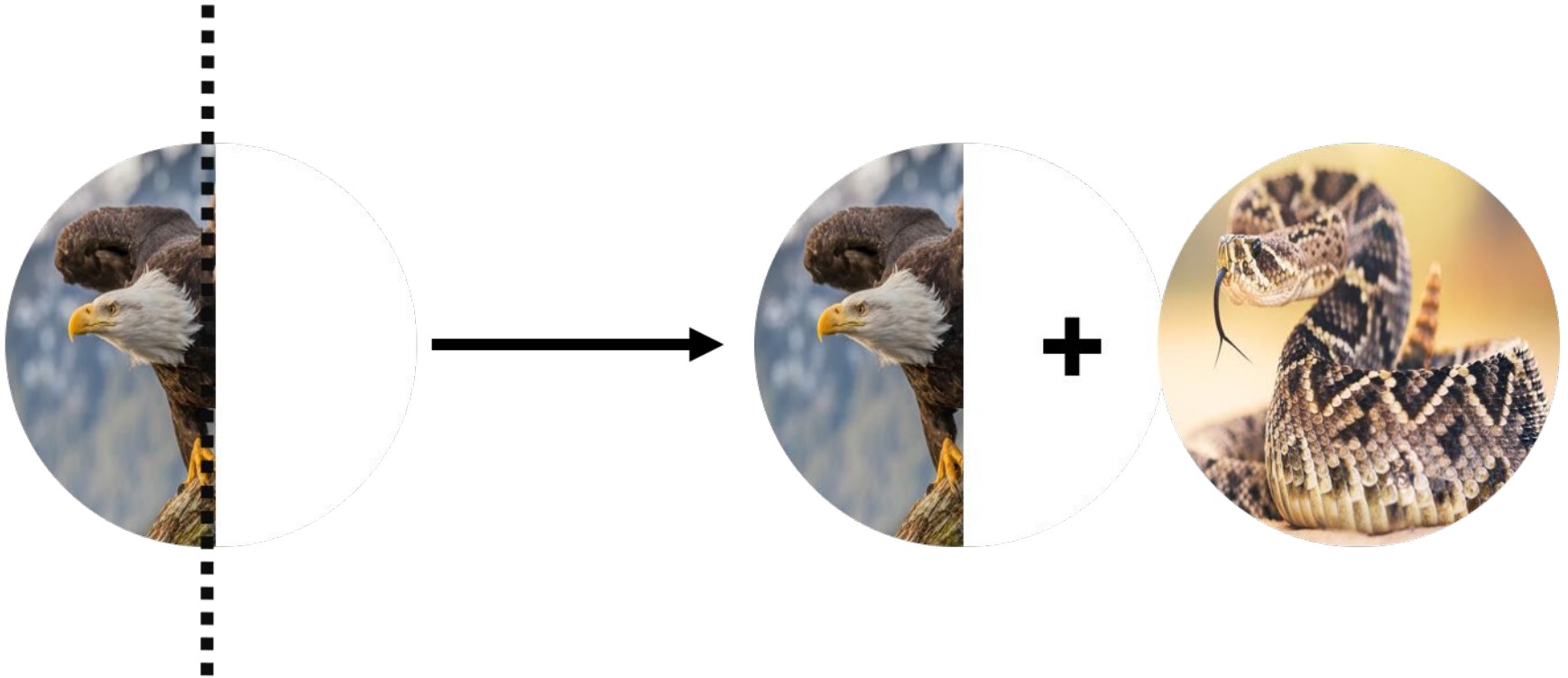
Divesting Permit

How to file an Acquiring Partial Transfer (4 of 6)



Divesting Permit


How to file an Acquiring Partial Transfer (5 of 6)











Divesting Permit

Acquiring Permit



- **Application type:**
Amendment 
- **Required attachments**
 - Shapefile, cover letter, overview map, T4-B (transfer form)
- **Comments**
 - With PT, either side can go first
 - Must file 30 days after approval of divesting side (will receive a letter)
 - Show all lines
 - Make sure both sides report consistent information

Actions

-  Amend
-  Inactivate
-  View
-  Divesting Transfer
-  Update Contacts
-  Permit History
-  Revoke
-  Acquire Transfer Merge

How to file a Partial Merge (1 of 6)



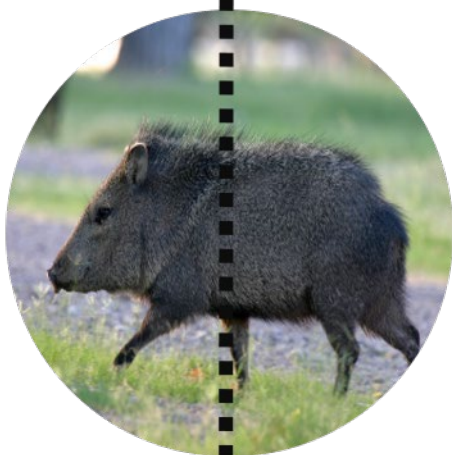
Partial Merge (PM): Move a portion of lines to another permit, same operator

How to file a Partial Merge (2 of 6)



Divesting Permit

How to file a Partial Merge (3 of 6)



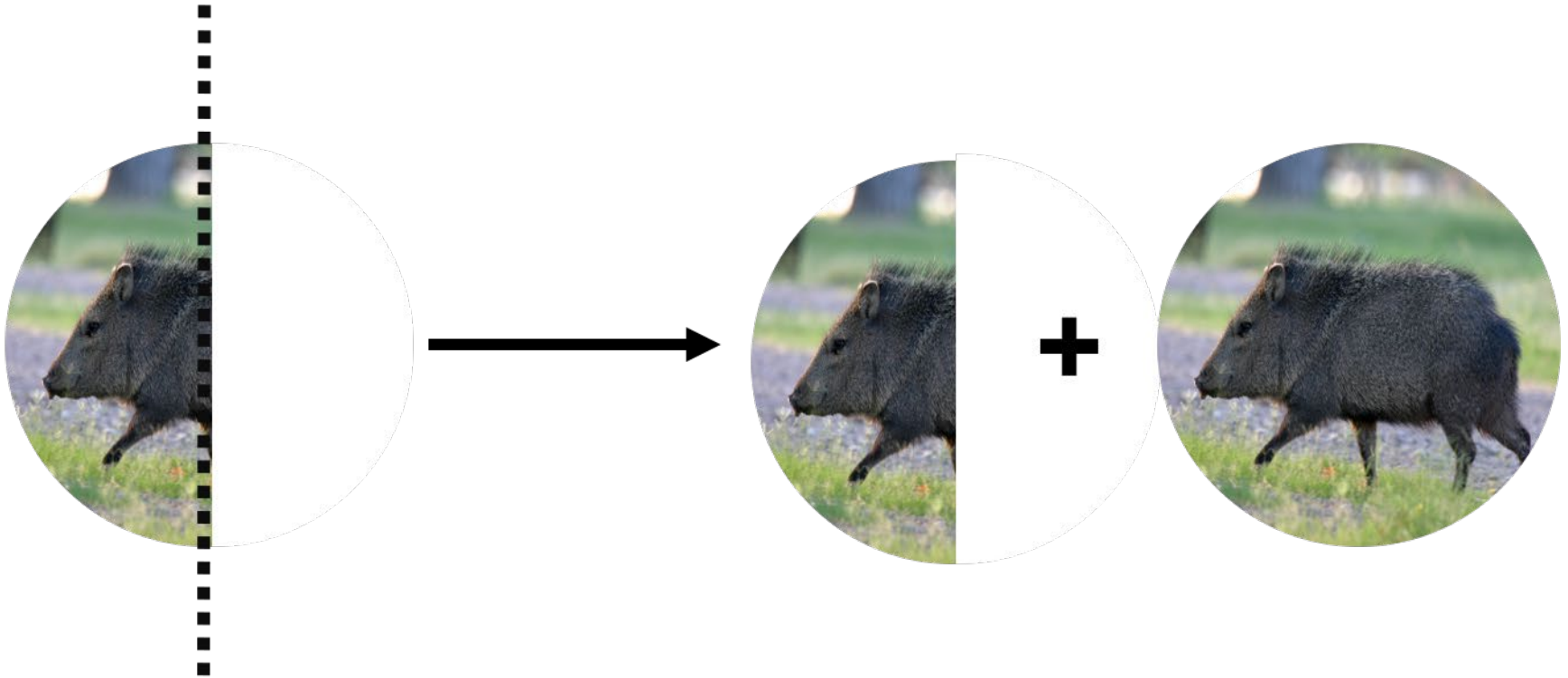
Divesting Permit

How to file a Partial Merge (4 of 6)



Divesting Permit

How to file a Partial Merge (5 of 6)



Divesting Permit

Acquiring Permit

How to file a Partial Merge (6 of 6)



- **Application type:** Two amendments
- **Required attachments**
 - Shapefile, cover letter, overview map
- **Comments**
 - Like a PT, but you have to do both parts
 - Can it be combined?



Actions

- Amend
- Inactivate
- View
- Divesting Transfer
- Update Contacts
- Permit History
- Revoke
- Acquire Transfer Merge

Can it be combined in a permit?



Can be combined:

- Gathering and transmission
- Disconnected lines

Cannot be combined:

- Gas and liquid
- Interstate and intrastate
- Private and gas utility / common carrier
- Different economic operators
- Pipeline owner is different from pipeline operator

For more information, see Pipeline Safety FAQ:

<https://rrc.texas.gov/about-us/faqs/pipeline-safety-faqs/pipeline-permitting-and-mapping/>



Merge Permit (MP): Consolidate multiple permits, same operator

How to file a Merge Permit (2 of 5)



Inactivated Permits

How to file a Merge Permit (3 of 5)



Inactivated Permits


Acquiring Permit


How to file a Merge Permit (4 of 5)




Application type:
Amendment + Inactivate


Actions


 Amend


 Inactivate


 View

 Divesting Transfer

 Update Contacts

 Permit History

 Revoke

 Acquire Transfer Merge

How to file a Merge Permit (5 of 5)



- **Required attachments (amendment):**
 - Shapefile, cover letter, overview map
- **Required attachments (inactivate)**
 - Cover letter
- **Comments**
 - File inactivate and amendment at same time
 - Can it be combined?

How to file multiple T4_AMD codes



Description: multiple changes to report; for example, new pipeline + abandoned pipeline + deleted pipeline + acquire partial transfer

- **Application type:** Amendment
- **Attachments:** depends
- **Comments:** cannot process multiple T4_AMD codes on a Divesting Transfer; DP



– Pipeline Permitting General Contact

- 512-463-6802
- POPS@rrc.texas.gov

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- Andy.Martinec@rrc.texas.gov

Resources



- **Pipeline Fees:** <https://rrc.texas.gov/pipeline-safety/pipeline-fees/>
- **Permitting and Mapping:** <https://rrc.texas.gov/pipeline-safety/permitting-and-mapping/>
- **PS-48 Reports:** <https://rrc.texas.gov/pipeline-safety/reports/new-pipeline-construction-reports/>
- **Required Permit Documents:** <https://rrc.texas.gov/media/5s2f10ym/pipeline-permit-cheat-sheet.pdf>
- **How to create POPS filer accounts:** <https://rrc.texas.gov/forms/online-filing-at-rrc/maintaining-filer-accounts/>



Questions



Evaluation

- Please complete the evaluation available on the RRC website at <https://www.rrc.texas.gov/pipeline-safety/training/workshops-and-conferences/pipeline-safety-permitting-and-damage-prevention-webinar/>.

Archive Video

- A link to the archive video of the webcast will be available on the same webpage.