1st Edition

2011

Compendium of State Pipeline Safety Requirements & Initiatives Providing Increased Public Safety Levels compared to Code of Federal Regulations

National Association of Pipeline Safety Representatives

NAPSR

9/30/2011

National Association of Regulatory Utility Commissioners

FIRST EDITION
APPROVED BY NARUC EXECUTIVE COMMITTEE
OCT 28 2011

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APPROVED BY NAPSR BOARD SEPT 27 2011

Table of Contents

Foreword:

The National Association of Pipeline Safety Representatives (NAPSR) members represent the 48 contiguous states, Puerto Rico and the District of Columbia. Nearly 90% of the nation's 2.3 million miles of pipeline are subject to NAPSR's approximately 325 inspectors. This broad spectrum of entities incorporates multiple approaches and methods in achieving the ultimate common goals of ensuring pipeline safety for the public and providing increased educational awareness for all stakeholders.

NAPSR is comprised of dedicated individuals who believe that this nation's and in particular their respective region's pipeline system must be designed, operated and maintained at the highest safety levels. The National Association of Regulatory Utility Commissioners (NARUC) is the national association representing the state public service commissioners who regulate essential utility services such as electricity, natural gas, water, and telecommunications. Most NAPSR employees work for their state public service commissions.

Over 1,150 specific safety enhancements described in 22 categories ranging from enhanced reporting to record keeping to cathodic protection to design and installation requirements have been adopted by states to help enhance pipeline safety. Formalized pipeline replacement programs have been employed by many states to address the aging pipeline infrastructure. To date 45 states have at least one initiative above and beyond the minimum Code of Federal Regulations applying to one or more pipeline operators within their state. It is hoped this report will serve as a detailed resource for examining some of the pipeline safety best practices established by states.

The purpose of this report is to highlight the hundreds of areas where actions have been taken to improve pipeline safety improvements and to showcase the many different areas of focus. While many efforts are underway already, states continue to look for reasonable ways to enhance pipeline safety in their regions. The consequences for not maintaining continuous improvement are simply too high.

There are many reasons for having varying amounts of pipeline safety initiatives. Pipeline Safety does not lend itself to a one size fit all approach. Certain states may have a history of a specific problem or incident that prompted the initiation of rulemaking, law amendments or issuance of Commission orders. Pipeline operator's practices differ in regard to materials selected, methods of installation, operational and maintenance approaches. In some areas of the country there has been no need for specific initiatives within a state. In other areas of the country the landscape or geography has prompted specialized rules. Perhaps a material defect was found for a certain population of the pipelines, perhaps the public's demand and/or tolerances of more stringent rules is greater in certain areas in the country. Since circumstances differ across the country regarding pipeline oversight, the reader is cautioned to not use this report to compare one state's program against another which may result in erroneous conclusions.

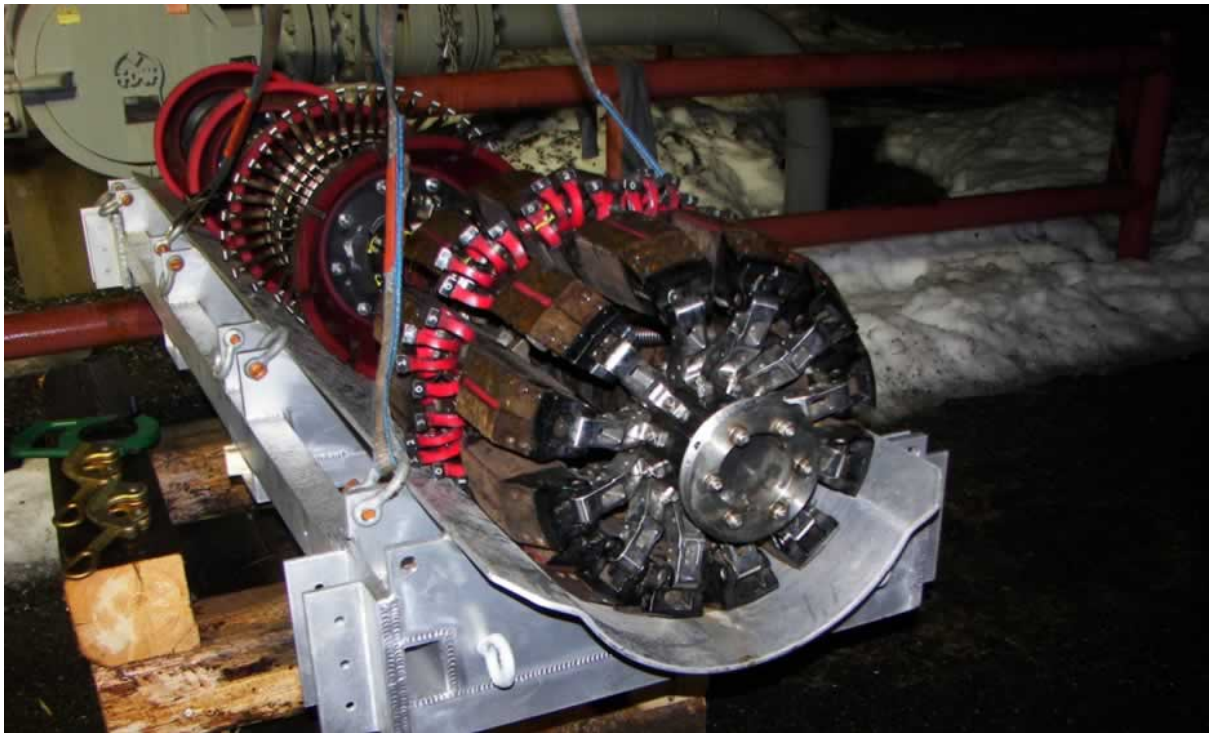
In addition to NAPSR, the NARUC Executive Committee have reviewed and endorsed this report and contributed through their individual submissions of comments and assistance with the publication of this compendium.

Future editions may include additional topics such as underground damage prevention initiatives, initiatives involving liquefied petroleum gas systems, and initiatives involving liquefied natural gas systems.

I wish to thank the many state program managers across the country who contributed to this effort and resulting compendium.

I would also recognize the efforts of G LeBlanc, D McKeen, and D Burnell of the New Hampshire Public Utilities Commission who assisted with the final review.

NAPSR
Editor and Vice Chair
Randy Knepper
Director of Safety
New Hampshire Public Utilities Commission
September 2011



Inline Inspection Device (Smart Pig) used for Integrity Assessments

About NAPSR

The National Association of Pipeline Safety Representatives is the national association representing the State pipeline safety inspectors in the contiguous United States as well as the District of Columbia and Puerto Rico. Through a unique partnership with the U.S. Department of Transportation, NAPSR members have oversight responsibilities for safe and reliable transportation of natural gas and hazardous liquids through pipelines. State pipeline safety personnel make up more than 75% of the State/federal inspection workforce. NAPSR provides these inspectors with a venue to share best practices, enhance communications with our federal counterparts, raise new issues, and influence policy. NAPSR is recognized by Congress, the courts, federal agencies, and the media as the national voice of the State pipeline safety community.

What We Do

NAPSR members have direct safety authority over more than 96% of regulated intrastate gas systems and 32% of hazardous liquid systems (*including carbon dioxide pipelines*) in the U.S. Most interstate pipeline inspectors are federal government employees focusing upon 12% of the gas infrastructure in the US while States monitor the remaining 88%. Recent statistics indicate that NAPSR members have safety authority of about 92% of the two million miles of gas distribution pipelines (pipelines serving retail consumers) in the country. In addition, NAPSR members oversee 49% of gas transmission pipelines for wholesale customers, and 34% of the hazardous liquid pipelines.

Pipeline safety inspectors have been partially funded by the federal government since the 1968 Pipeline Safety Act. Essentially, the U.S. Department of Transportation's Pipelines and Hazardous Materials Safety Administration has delegated pipeline safety inspection to the States and a result reimburses the States for a portion of their inspection program expenditures. This arrangement relies on those with the inherent geographic and local expertise in charge of the safe operation of the majority of the nation's pipeline system. This also means that a significant percentage of NAPSR member's funding depends upon the federal appropriations process.

How Pipeline Safety Programs Work

State pipeline inspectors are the "first line of defense" at the community level to enforce pipeline safety, enact and enable underground utility damage prevention, and promote public education and awareness campaigns regarding pipeline safety. The primary goals of State pipeline safety programs are to ensure safety and give the public confidence that the pipeline system is safe and reliable. Although all State programs certify to the Secretary of the U.S. Department of Transportation that they will adopt regulations that are at least as stringent as the Federal Pipeline Safety Regulations, most States have adopted more stringent safety regulations in which only states can enforce. This is a tremendous advantage since state

inspectors not only are employed by their respective state governmental agency but have the understanding, familiarity and concerns of the public that are impacted the most.

NAPSR members use a wide range of compliance methods as part of their regulatory oversight, including:

- Corrective action orders, which direct the operator to make specific safety related improvements;
- Civil penalties, such as monetary fines; and,
- Rate-of-return control, which ensures that the operating company and its shareholders, not consumers, bear the cost of improving their safety record

Enforcement actions vary from State-to-State, but generally, when a safety violation is discovered during an inspection, the State inspector will submit a report of the findings for follow-up actions. Depending on the State's laws, the agency will determine the severity of the violation and the next course of action.

District Regulating Station –Vault Type

Pipeline Safety FAQ

1. *Who has the primary oversight of our nation's pipeline system?*

A: The nation's pipeline safety programs are overseen by Congress and administered by the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA). However, PHMSA delegates the majority of these responsibilities for intrastate lines to the states. State pipeline safety personnel represent more than 75% of the State/federal inspection workforce, although State employees account for less than 40% of the federal pipeline safety budget. This means the bulk of the safety and inspection responsibility lies at the State level.

Under existing law, States opt into this relationship with PHMSA. If a State decides not to participate, PHMSA does the safety inspection on its own. At present, this only applies to Alaska and Hawaii.

States are allowed to adopt pipeline safety regulations that are stricter than federal government regulations, and the overwhelming majority of States do have more stringent requirements. These have been developed over the years based on specific results of State inspections, changing public priorities and to fulfill increased safety expectations of the local public.

2. *What Do State Pipeline Inspectors Do?*

A: The general responsibilities of a pipeline inspector include inspection of: safety records, facilities, construction, integrity management programs, other programs and investigation of accidents. As noted, most States go beyond the federal requirements and perform additional kinds of oversight. The goal of the State pipeline safety programs is to ensure the overall safety of the pipeline system for people, property, and the environment in their regions. A vigorous safety program is essential to provide the public faith that the pipeline system is safe, reliable, and affordable.

3. *How Do States Enforce Safety Regulations?*

A: If a safety inspector finds a violation during the inspection, the inspector will submit a report to the State agency, usually the public service commission. Depending on the State's laws, the agency will determine the severity of the violation and determine its next course of action. Generally, State agencies employ a wide range of compliance methods as part of their regulatory oversight, including:

- Corrective action orders, which direct the operator to make specific safety related improvements within a specified time frame;
- Civil penalties, such as monetary fines; and,

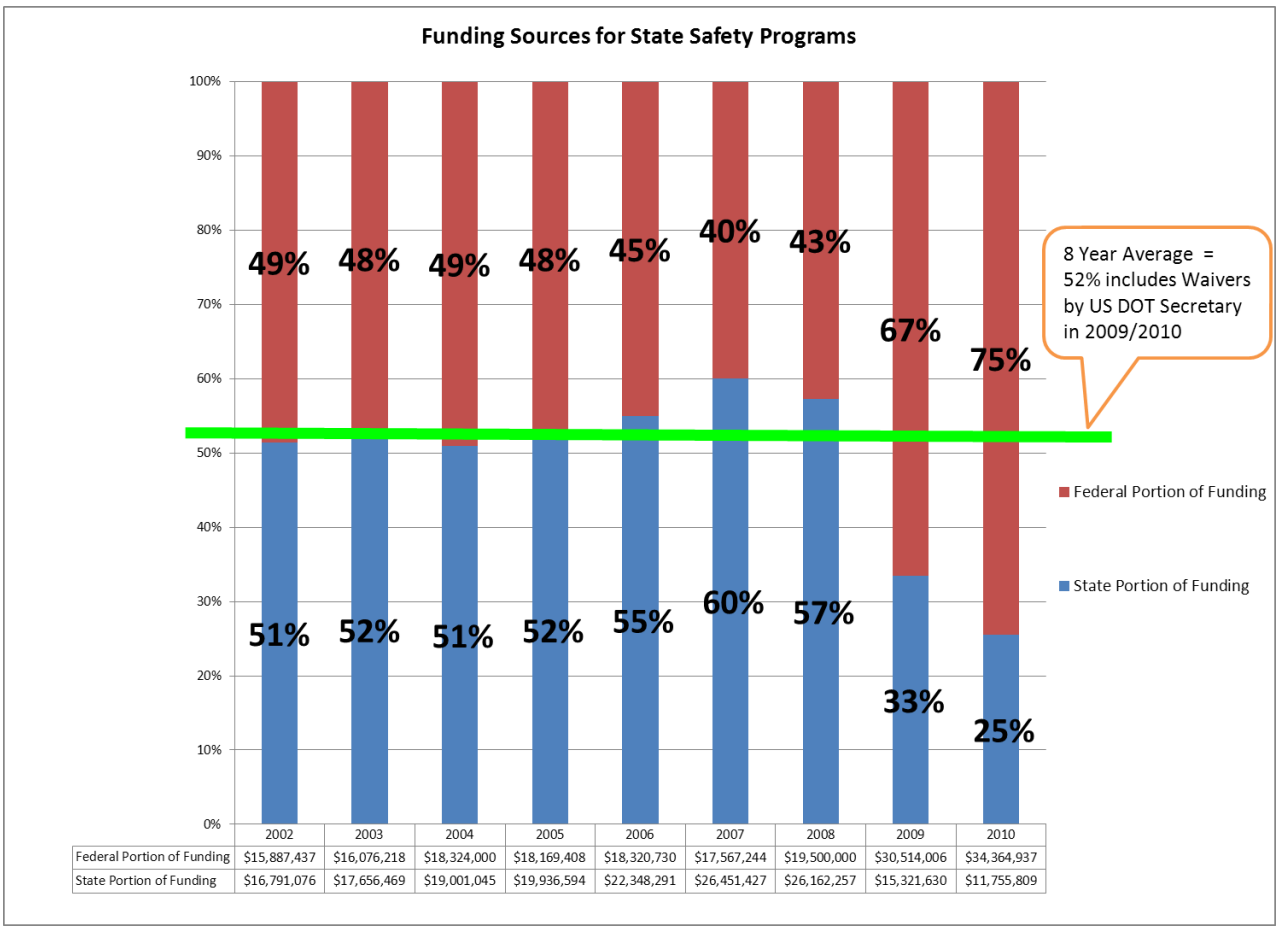
- Control of utility rates, which ensures that the utility company and its shareholders, not customers, bear the cost of improving their safety record.

4. How Does the State/Federal Relationship Work?

A: Under the Pipeline Safety Act, States must receive certification from PHMSA to assume pipeline safety responsibilities in their states. Certification is a "mutual agreement" between PHMSA and a State to take on this responsibility, and the State must agree to ensure its pipeline operators meet the federal agency's minimum pipeline safety standards. Once certified, the State is responsible for oversight of pipelines that do not cross State boundaries (intrastate pipelines). Arizona, California, Connecticut, Iowa, Michigan, Minnesota, New York, Ohio, Washington, Virginia and West Virginia also act as interstate agents. In this role, State personnel inspect interstate pipelines and submit reports to PHMSA which carries out compliance and enforcement action as necessary.

5. How Are State Pipeline Inspectors Funded?

A: State's pipeline safety programs are funded by (1) State funding which varies with mechanisms developed within each state legislature and (2) federal grants funded by Congress and administered by PHMSA. The President annually requests federal funding for state safety programs along with its own budget requests, which is sent to Congress for review and approval. Once approved, PHMSA annually allocates the money to individual state agencies based on budget submissions of the respective state agencies, which is usually in the form of reimbursements once actual costs are incurred. Under current law, States may potentially receive up to 80% of the expenditures for these programs. In reality, most appropriations have been between 45% and 50% on average. Appropriations in 2009 and 2010 raised the federal contribution level to over 60% but required waivers by the Secretary of Transportation to suspend the minimum State contributions required by the Pipeline Safety Act.



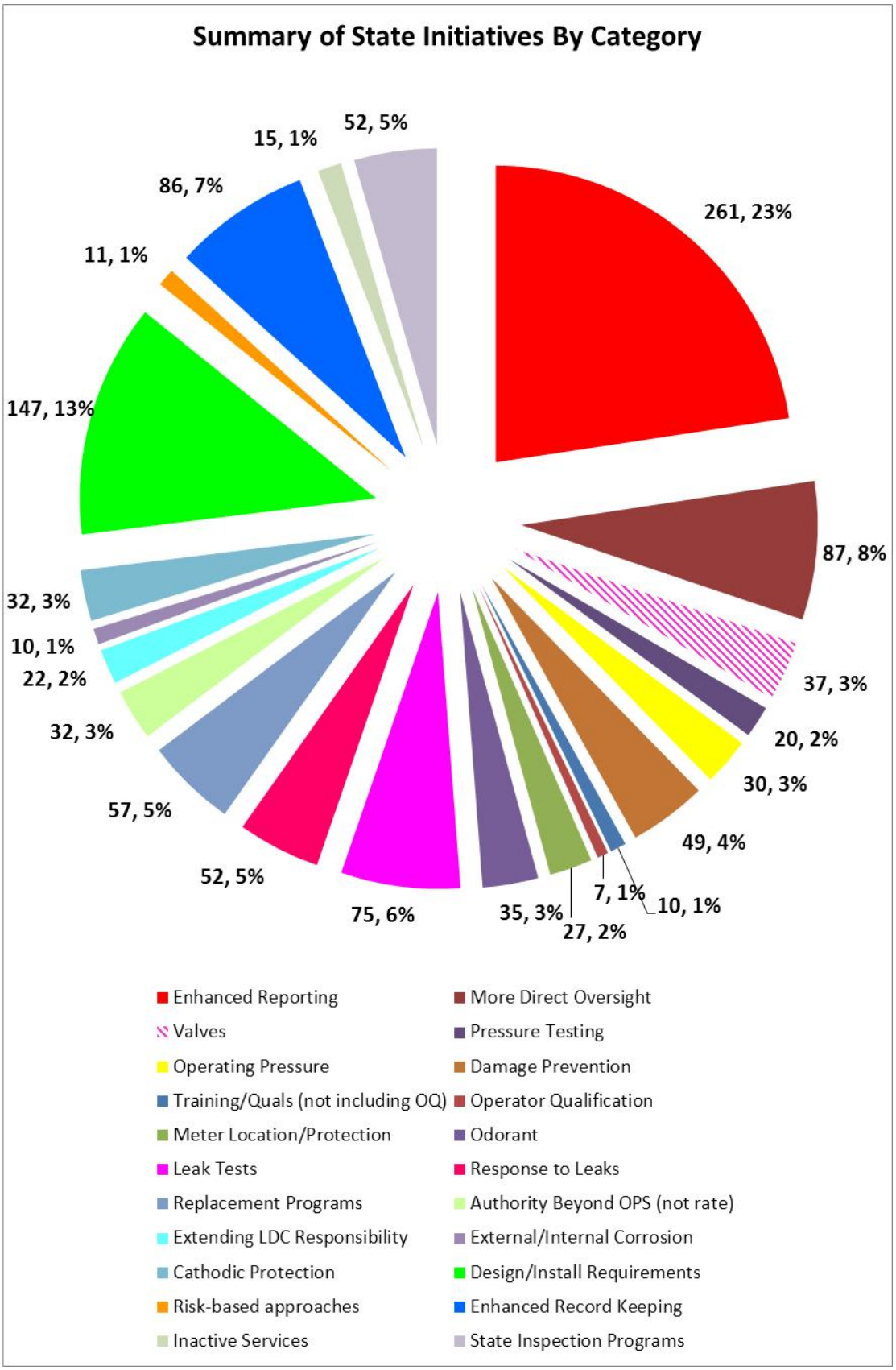
	2002	2003	2004	2005	2006	2007	2008	2009	2010
Federal Portion of Funding	$15,887,437	$16,076,218	$18,324,000	$18,169,408	$18,320,730	$17,567,244	$19,500,000	$30,514,006	$34,364,937
State Portion of Funding	$16,791,076	$17,656,469	$19,001,045	$19,936,594	$22,348,291	$26,451,427	$26,162,257	$15,321,630	$11,755,809

6. Would a uniform federal inspection policy for intrastate lines improve pipeline safety?

A: No it would actually decrease safety levels. Each State is different and has varied risks to its pipeline infrastructure that result from diverse geographic, economic, political, social and environmental factors. A one-size-fits-all policy for all intrastate pipeline systems would be counterproductive and will limit the State's ability to go beyond the current federal requirements. Most States can and do adopt pipeline safety regulations that are stricter than the federal regulation, and the overwhelming majority of States require more stringent requirements to satisfy specific local needs for public safety. By their very nature, State-specific regulations can only be enforced by State regulators and not by the federal regulators.

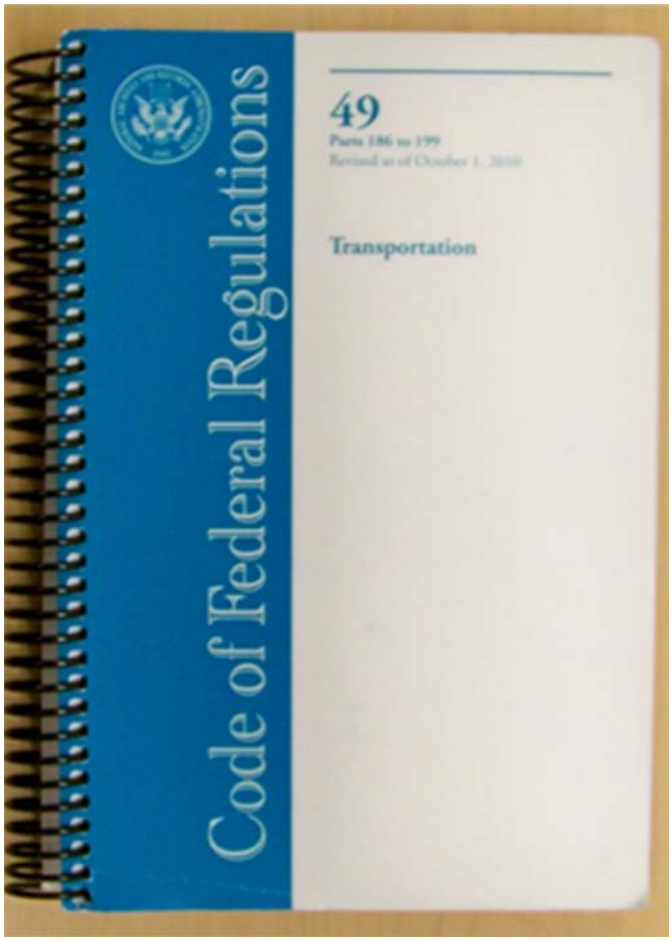
Safety Initiatives by Category:

	Category	Quantity of Initiatives that exceed the Code of Federal Regulations	Initiatives by Percentage
1	Enhanced Reporting	261	23%
2	More Direct Oversight	87	8%
3	Valves	37	3%
4	Pressure Testing	20	2%
5	Operating Pressure	30	3%
6	Damage Prevention	49	4%
7	Training/Quals (not including OQ)	10	1%
8	Operator Qualification	7	1%
9	Meter Location/Protection	27	2%
10	Odorant	35	3%
11	Leak Tests	75	6%
12	Response to Leaks	52	5%
13	Replacement Programs	57	5%
14	Authority Beyond OPS (not rate)	32	3%
15	Extending LDC Responsibility	22	2%
16	External/Internal Corrosion	10	1%
17	Cathodic Protection	32	3%
18	Design/Install Requirements	147	13%
19	Risk-based approaches	11	1%
20	Enhanced Record Keeping	86	7%
21	Inactive Services	15	1%
22	State Inspection Programs	52	5%
	TOTAL	1154	100%


Summary of State Initiatives By Category
261, 23%
87, 8%
37, 3%
20, 2%
30, 3%
49, 4%
10, 1%
7, 1%
27, 2%
35, 3%
75, 6%
52, 5%
57, 5%
32, 3%
22, 2%
10, 1%
32, 3%
147, 13%
11, 1%
86, 7%
15, 1%
52, 5%
Enhanced Reporting
More Direct Oversight
Valves
Pressure Testing
Operating Pressure
Damage Prevention
Training/Quals (not including OQ)
Operator Qualification
Meter Location/Protection
Odorant
Leak Tests
Response to Leaks
Replacement Programs
Authority Beyond OPS (not rate)
Extending LDC Responsibility
External/Internal Corrosion
Cathodic Protection
Design/Install Requirements
Risk-based approaches
Enhanced Record Keeping
Inactive Services
State Inspection Programs

Federal Regulations Reference Material

Title 49 Code of Federal Regulations		
Part 190 - Pipeline Safety Programs		
SubPart A	General.	Sections 1-11
SubPart B	Enforcement.	Sections 201-239
SubPart C	Procedures for Adoption of Rules.	Sections 301-349
Part 191 - Reports		
-	-	Sections 1-27
Part 192 - Transportation of Natural Gas		
SubPart A	General	Sections 1-16
SubPart B	Materials	Sections 51-65
SubPart C	Pipe Design	Sections 101-125
SubPart D	Design of Pipeline Components	Sections 141-203
SubPart E	Welding of Steel in Pipelines	Sections 221-245
SubPart F	Joining of Materials Other Than by Welding	Sections 271-287
SubPart G	General Construction Requirements for Transmission Lines and Mains	Sections 301-328
SubPart H	Customer Meters, Service Regulators, and Service Lines	Sections 351-383
SubPart I	Requirements for Corrosion Control	Sections 451-491
SubPart J	Test Requirements	Sections 501-517
SubPart K	Uprating	Sections 551-557
SubPart L	Operations	Sections 601-631
SubPart M	Maintenance	Sections 701-761
SubPart N	Qualification of Pipeline Personnel	Sections 801-809
SubPart O	Gas Transmission Pipeline Integrity Management	Sections 901-951
SubPart P	Distribution Integrity Management Program. (DIMP)	Sections 1001-1015
Appendix A	Reserved	-
Appendix B	Qualification of Pipe	-
Appendix C	Qualification of Welders for Low Stress Level Pipe	-
Appendix D	Criteria for Cathodic Protection and Determination of Measurements	-
Appendix E	Guidance on Determining High Consequence Areas and on Carrying Out Requirements in the Integrity Management Rule	-
Part 195 - Transportation of Hazardous Liquids by Pipelines		
SubPart A	General	Sections 0 - 12
SubPart B	Annual, Accident, and Safety-Relate	Sections 48 - 64
SubPart C	Design Requirements	Sections 100 - 134
SubPart D	Construction	Sections 200 - 266
SubPart E	Pressure Testing	Sections 300 - 310
SubPart F	Operation and Maintenance	Sections 400 - 452
SubPart G	Operator Qualification	Sections 501-509
SubPart H	Corrosion Control	Sections 551-589
Appendix A	Delineation Between Federal and State Jurisdiction	-
Appendix B	Risk-Based Alternative to Pressure Testing Older Hazardous Liquid and Carbon Dioxide Pipelines	-
Appendix C	Appendix C to Part 195-Guidance for Implementation of Integrity Management Program	-



Initiatives by State

Federal Regulation	# of References	Quantity States	States
Part 190.203	46	43	Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming
Part 190.221	4	4	Kansas, Maine, New Hampshire, Rhode Island
Part 190.237	1	1	Colorado
Part 191.1	10	4	Arkansas, Kentucky, New Jersey, North Carolina
Part 191.3	75	32	Arizona, California, Connecticut, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Minnesota, Mississippi, Nevada, New Hampshire, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, Wisconsin, Wyoming
Part 191.5	26	10	Arizona, Arkansas, Colorado, Connecticut, Louisiana, Michigan, Missouri, Nebraska, Tennessee, Washington
Part 191.7	2	2	Arkansas, Michigan
Part 191.9	9	5	Arizona, Connecticut, Georgia, Missouri, Washington
Part 191.11	12	8	Arizona, Connecticut, Indiana, Missouri, New Jersey, New Mexico, Virginia, Washington
Part 191.13	1	1	Washington
Part 191.15	9	3	Arizona, Missouri, Washington
Part 191.17	5	4	Arizona, Missouri, New Mexico, Washington
Part 191.22	1	1	Louisiana
Part 191.23	1	1	Oregon
Part 191.25	1	1	Indiana

Federal Regulation	# of References	Quantity States	States
Part 192.1	6	5	Arkansas, Michigan, North Carolina, Tennessee, Texas
Part 192.3	8	7	Colorado, Florida, Illinois, Michigan, Missouri, Texas, Vermont
Part 192.5	2	2	Massachusetts, New Jersey
Part 192.7	2	2	North Carolina, South Carolina
Part 192.9	2	2	Colorado, Michigan
Part 192.14	1	1	Florida
Part 192.15	1	1	Missouri
Part 192.16	2	2	Missouri, New Jersey
Part 192.53	5	4	Arizona, Delaware, Missouri, Wisconsin
Part 192.55	2	2	Michigan, Wisconsin
Part 192.63	1	1	Arizona
Part 192.105	1	1	Michigan
Part 192.121	1	1	Maine
Part 192.125	1	1	Wisconsin
Part 192.144	3	3	District of Columbia, Pennsylvania, South Carolina
Part 192.145	1	1	Michigan
Part 192.150	1	1	New Jersey
Part 192.163	1	1	Michigan
Part 192.167	1	1	Michigan
Part 192.171	1	1	Wisconsin
Part 192.173	1	1	Wisconsin
Part 192.177	7	1	California
Part 192.179	3	3	Florida, Michigan, New Jersey
Part 192.181	14	9	Connecticut, Florida, Maine, Missouri, New Hampshire, New Jersey, New York, Washington, Wisconsin
Part 192.183	2	1	Wisconsin
Part 192.187	2	2	Michigan, Wisconsin
Part 192.189	1	1	Wisconsin
Part 192.195	1	1	Wisconsin
Part 192.197	12	6	Arkansas, Connecticut, Kentucky, Missouri, Pennsylvania, Wisconsin
Part 192.199	6	3	Missouri, New York, Wisconsin
Part 192.201	4	4	Alabama, District of Columbia, New York, Rhode Island
Part 192.203	1	1	Wisconsin
Part 192.221	1	1	New Jersey
Part 192.225	4	3	Arizona, Michigan, New Jersey
Part 192.227	4	4	Arizona, Florida, Michigan, New Jersey
Part 192.229	2	2	New Jersey, New York

Federal Regulation	# of References	Quantity States	States
Part 192.231	1	1	New Jersey
Part 192.233	1	1	New Jersey
Part 192.235	2	2	Michigan, New Jersey
Part 192.241	5	4	Arkansas, Michigan, New Jersey, New York
Part 192.243	4	3	Florida, Michigan, New Jersey
Part 192.245	2	2	New Jersey, Wisconsin
Part 192.271	4	2	Arkansas, Texas
Part 192.273	2	2	Michigan, Texas
Part 192.279	1	1	Wisconsin
Part 192.281	7	2	Arkansas, Florida
Part 192.285	1	1	Maine
Part 192.287	1	1	Maine
Part 192.301	5	2	Maine, New Jersey
Part 192.303	5	4	Arkansas, North Carolina, South Carolina, Texas
Part 192.305	35	24	Arizona, Colorado, Connecticut, District of Columbia, Florida, Kansas, Kentucky, Maine, Maryland, Massachusetts, Minnesota, Mississippi, New Hampshire, New Mexico, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Virginia, Washington, Wisconsin
Part 192.307	1	1	Wisconsin
Part 192.309	2	2	Michigan, Wisconsin
Part 192.317	3	2	Kansas, Minnesota
Part 192.319	8	6	Arizona, Iowa, Maine, Maryland, New Hampshire, Wisconsin
Part 192.321	8	5	Arizona, Arkansas, Florida, Oregon, Wisconsin
Part 192.323	3	2	Florida, Wisconsin
Part 192.325	13	11	Arizona, Connecticut, Maine, Michigan, New Hampshire, New Jersey, New York, Oregon, Virginia, Washington, Wisconsin
Part 192.327	9	5	Iowa, Maine, Michigan, New Jersey, New York
Part 192.351	3	2	Missouri, New Jersey
Part 192.353	17	10	Connecticut, Illinois, Maine, Michigan, New Hampshire, New Jersey, New York, Rhode Island, South Carolina, Washington
Part 192.355	7	6	Illinois, Indiana, Maine, Rhode Island, Virginia, Wisconsin
Part 192.357	7	7	Arizona, Arkansas, Florida, Idaho, Illinois, Indiana, Maryland
Part 192.359	1	1	New Jersey
Part 192.361	11	9	Arizona, Arkansas, Florida, Illinois, Iowa, Maine, Maryland, New Hampshire, Oregon

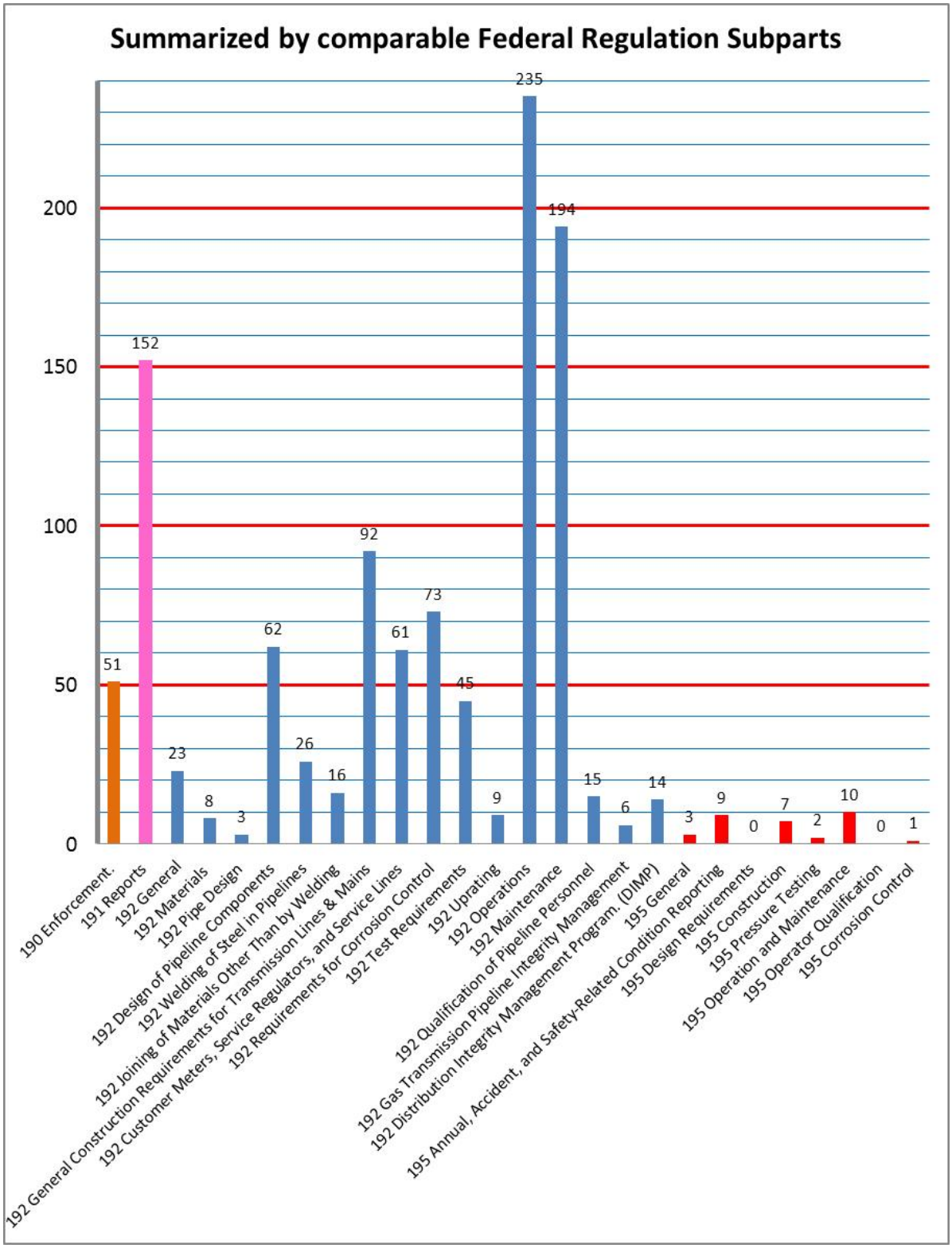
Federal Regulation	# of References	Quantity States	States
Part 192.365	6	6	Indiana, Massachusetts, Michigan, New Jersey, New York, Wisconsin
Part 192.367	3	2	Arkansas, Illinois
Part 192.371	2	2	Illinois, Wisconsin
Part 192.375	2	2	Illinois, Wisconsin
Part 192.377	1	1	Wisconsin
Part 192.379	1	1	Florida
Part 192.451	1	1	New Jersey
Part 192.453	1	1	Michigan
Part 192.455	3	3	Kansas, Tennessee, Texas
Part 192.457	3	2	Texas, Wisconsin
Part 192.463	7	2	Arizona, Florida,
Part 192.465	16	8	Florida, Kansas, Louisiana, Missouri, New York, Texas, Virginia, Washington
Part 192.467	1	1	New York
Part 192.469	1	1	Kansas
Part 192.475	2	2	Michigan, Texas
Part 192.477	1	1	Michigan
Part 192.479	2	2	Florida, Texas
Part 192.483	2	2	District of Columbia, New York
Part 192.485	1	1	Michigan
Part 192.487	10	8	Connecticut, Indiana, Kansas, Missouri, New Hampshire, Ohio, Oregon, Tennessee
Part 192.489	15	11	Connecticut, Indiana, Kansas, Maine, Minnesota, Missouri, New Hampshire, New Jersey, Ohio, Pennsylvania, Rhode Island, Tennessee
Part 192.491	7	6	Arkansas, District of Columbia, Florida, Kansas, Missouri, Washington
Part 192.501	3	1	New Jersey
Part 192.503	4	3	Indiana, New Hampshire, New Jersey
Part 192.505	5	4	Michigan, New Jersey, New York, Wisconsin
Part 192.507	2	1	New Jersey
Part 192.509	4	3	Kansas, Michigan, New Jersey
Part 192.511	9	6	Arkansas, Massachusetts, Michigan, New Jersey, New York, Wisconsin
Part 192.513	4	3	Massachusetts, Michigan, New Jersey
Part 192.515	3	2	New Jersey, New York
Part 192.517	11	7	Florida, Kansas, Michigan, Missouri, New Jersey, New York, Washington
Part 192.553	6	6	Kansas, Maine, Michigan, Missouri, New York, Washington
Part 192.555	3	2	Michigan, New York

Federal Regulation	# of References	Quantity States	States
Part 192.603	25	15	Alabama, Arizona, Arkansas, District of Columbia, Indiana, Kansas, Maine, Massachusetts, Michigan, Minnesota, New Hampshire, New Jersey, New Mexico, South Carolina, Virginia
Part 192.605	49	24	California, Colorado, Connecticut, District of Columbia, Florida, Idaho, Illinois, Iowa, Kentucky, Maine, Maryland, Michigan, Mississippi, New Mexico, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, Wisconsin, Wyoming
Part 192.609	1	1	New Jersey
Part 192.611	1	1	New Jersey
Part 192.613	6	4	Michigan, North Carolina, Texas, Wisconsin
Part 192.614	50	18	Connecticut, District of Columbia, Georgia, Illinois, Indiana, Iowa, Kansas, Maine, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, Oregon, Rhode Island, Virginia, Wisconsin
Part 192.615	35	19	Alabama, Arkansas, Connecticut, District of Columbia, Florida, Georgia, Indiana, Iowa, Kansas, Maine, Michigan, Minnesota, New Hampshire, New Jersey, New York, North Carolina, Rhode Island, Texas, Wisconsin
Part 192.616	9	7	District of Columbia, Georgia, Maine, Maryland, Michigan, Missouri, Virginia
Part 192.617	6	6	Arizona, Colorado, Kansas, North Carolina, Virginia, Washington
Part 192.621	5	4	Arkansas, Kentucky, Michigan, Wisconsin
Part 192.623	10	8	Arkansas, Illinois, Kansas, Kentucky, Mississippi, New Hampshire, Pennsylvania, Wisconsin
Part 192.625	37	16	Arkansas, Connecticut, Florida, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Missouri, New Jersey, New York, Texas, Washington
Part 192.629	2	2	Michigan, Wisconsin
Part 192.703	7	7	Connecticut, Georgia, Iowa, Kansas, Massachusetts, New Jersey, Ohio
Part 192.705	3	2	Michigan, New Jersey
Part 192.706	8	5	Arizona, Michigan, New Mexico, South Carolina, Washington
Part 192.707	3	3	Florida, Michigan, Wisconsin
Part 192.709	2	2	Missouri, Washington
Part 192.711	1	1	Michigan

Federal Regulation	# of References	Quantity States	States
Part 192.713	1	1	Wisconsin
Part 192.717	2	1	Michigan
Part 192.719	2	2	New Jersey, Wisconsin
Part 192.721	2	2	Kansas, Wisconsin
Part 192.723	89	26	Arkansas, California, Connecticut, Delaware, District of Columbia, Florida, Illinois, Indiana, Kansas, Kentucky, Maine, Maryland, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New Mexico, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, Washington, Wisconsin
Part 192.725	2	2	Missouri, New Jersey
Part 192.727	17	13	Arizona, Connecticut, District of Columbia, Florida, Maine, Massachusetts, New Hampshire, Pennsylvania, Rhode Island, South Carolina, Vermont, Virginia, Wisconsin
Part 192.731	2	1	Kentucky
Part 192.735	1	1	Wisconsin
Part 192.739	7	4	Arkansas, Connecticut, Florida, Michigan
Part 192.741	6	5	North Carolina, Rhode Island, South Carolina, Virginia, Wisconsin
Part 192.743	3	3	Kansas, New York, Wisconsin
Part 192.745	6	4	Michigan, New Jersey, New York, Washington
Part 192.747	17	9	Connecticut, Florida, Maine, Michigan, Missouri, New York, Vermont, Washington, Wisconsin
Part 192.751	2	2	Michigan, Wisconsin
Part 192.753	2	2	Michigan, Wisconsin
Part 192.755	9	7	Arkansas, Connecticut, Kansas, Massachusetts, Missouri, New Hampshire, Tennessee
Part 192.801	10	8	Florida, Illinois, Kansas, Maine, Mississippi, New Hampshire, Virginia, Washington
Part 192.803	1	1	Missouri
Part 192.805	4	2	Maine, Missouri
Part 192.901	1	1	Texas
Part 192.907	1	1	Maine
Part 192.947	4	1	New Jersey
Part 192.1001	1	1	Texas
Part 192.1007	13	4	Connecticut, Kansas, New Hampshire, Virginia
Part 195.1	1	1	Texas
Part 195.2	2	2	Arizona, Texas
Part 195.49	2	2	Arizona, New Mexico
Part 195.52	5	4	Arizona, California, Louisiana, Washington
Part 195.54	1	1	Arizona

Federal Regulation	# of References	Quantity States	States
Part 195.64	1	1	Louisiana
Part 195.204	1	1	Texas
Part 195.210	1	1	Arizona
Part 195.214	1	1	Arizona
Part 195.222	1	1	Arizona
Part 195.246	1	1	Arizona
Part 195.300	1	1	California
Part 195.303	1	1	Louisiana
Part 195.402	2	1	Arizona
Part 195.403	2	1	California
Part 195.440	2	1	California
Part 195.452	4	2	California, Texas
Part 195.571	1	1	Arizona

State Modifications of CFR Parts 190, 191, 192 &195



Alabama

Key Stats

State Agency	Alabama Public Service Commission
Division	Energy Division
Department	Gas Pipeline Safety Section
Web	http://www.psc.state.al.us/Energy/gps/gas_pipeline_safety_section.htm
Regulated Intrastate Pipeline Systems	99
Regulated Master Meter Operators	34
Regulated LNG Systems	5
Regulated Hazardous Liquid Systems	7
Regulated LPG Operators	1
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	5

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.603	Requires Annual filing of O&M Plans with Commission	AL PSC Order April 21 2004 D#17545 Appendix A Alabama Public Service Commission Rules And Regulations For Gas Pipeline Safety	Rule 2 and Rule 4
Enhanced Reporting	Part 192.615	Requires Annual filing of Emergency Plans with Commission	AL PSC Order April 21 2004 D#17545 Appendix A Alabama Public Service Commission Rules And Regulations For Gas Pipeline Safety	Rule 3 and Rule 4
More Direct Oversight	Part 192 305	Requires Reporting for Pipe Segments greater than 1000 feet	AL PSC Order April 21 2004 D#17545 Appendix A Alabama Public Service Commission Rules And Regulations For Gas Pipeline Safety	Rule 6

Alabama

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Operating Pressure	Part 192.201	Limits Over Pressuring Set Levels to < 21 in w.c	AL PSC Order April 21 2004 D#17545 Appendix A Alabama Public Service Commission Rules And Regulations For Gas Pipeline Safety	Rule G-5 (b)
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Alaska

Key Stats	
State Agency	
Division	
Department	
Web	
Regulated Intrastate Pipeline Systems	
Regulated Master Meter Operators	
Regulated LNG Systems	
Regulated Hazardous Liquid Systems	
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	

Applicable Requirement in CFR

Alaska has no state program. PHMSA- (Office of Pipeline Safety) retains federal oversight of all pipelines.

National Association of Pipeline Safety Representatives

Arizona

Key Stats	
State Agency	Arizona Corporation Commission (ACC)
Division	Safety
Department	Pipeline Safety Section
Web	http://www.azcc.gov/divisions/Safety/default.asp
Regulated Intrastate Pipeline Systems	15
Regulated Master Meter Operators	971
Regulated LNG Systems	2
Regulated LPG Operators	7
Regulated Hazardous Liquid Systems	3
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	39

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.305	Operators of a master meter system must file a notice of construction 30 days prior to commencement of construction	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-205 N Master Meter Systems Operators
Enhanced Reporting	Part 191.11	Operators of a master meter system will file an annual report with the ACC by April 15 for the preceding calendar year.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-205 Q Master Meter Systems Operators
Enhanced Reporting	Part 191.5	Telephonic reporting for gas pipeline at $5,000, also adds, explosion or fire not intentionally set by the	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and	R14-5-203 B Pipeline Incident Reports and Investigations

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		operator, Emergency transmission line shutdown, news media inquiry, overpressure of pipeline (defined), permanent or temporary discontinuance of gas service to a master meter system due to a failure of a leak test, adds emergency shutdown of an LNG storage facility.	Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	
Enhanced Reporting	Part 195.52	Telephonic reporting for liquid pipeline at $5,000, news media inquiry, release of 5 gallons if not due to pipeline maintenance,	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-203 B Pipeline Incident Reports and Investigations
Enhanced Reporting	Part 191.9 Part 191.15	Written reports for gas pipeline at $5,000, loss of consciousness, need for medical treatment requiring hospitalization, pipeline overpressure	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-203 B Pipeline Incident Reports and Investigations Construction and Safety Standards
Enhanced Reporting	Part 195.54	Written reports for liquid pipeline at $5,000, loss of consciousness, inability to leave the scene unassisted, need for medical treatment, disability which interferes with a person's normal daily activities beyond the date of the incident.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-203 C Pipeline Incident Reports and Investigations

Arizona

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.11 Part 191.17 Part 195.49	Requires annual reports to be filed with ACC by March 15, for the preceding calendar year.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-204 A Annual Reports
Enhanced Reporting	Part 192.603 Part 193.2503 Part 195.402	Operators must file O&M Plan including an Emergency Plan with ACC 30 days prior to placing a pipeline into operation and changes are to be filed within 30 days of effective date of change.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 D Construction and Safety Standards
More Direct Oversight	Part 192.7	Requires facilities handling hydrogen sulfide to use Standards: NACE Standard MR-0175-99 (1999 Revision) and API RP55 (1995 Edition)	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 E Construction and Safety Standards
More Direct Oversight	Part 191.3	Definition of Master Meter System – Where gas is provided to 2 or more buildings other than a single family residence.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-201 Definitions
More Direct Oversight	Part 191.3	Definition of Operator – A person who **owns** or operates a pipeline system or master meter	Arizona Administrative Code, Title 14 Public Service Corporations;	R14-5-201 Definitions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		system.	Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	
More Direct Oversight	Part 191.3 Part 195.2	Definition of Person – Replaces "State and Municipality" with "State or any Political Subdivision there-of".	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-201 Definitions
More Direct Oversight	Part 191.3	Definition of pipeline system – adds facilities "used by public service corporations through which natural gas , LNG, other gases or hazardous liquids " move in transportation. Deletes "valves and other appurtenance attached to pipe".	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-201 Definitions
More Direct Oversight	Part 191.3	Definition of State means the state of Arizona and all lands within its boundaries.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-201 Definitions
More Direct Oversight	Part 191.3	"Transportation of Gas" changed to "Transport or Transportation" – includes LNG or hazardous liquids by pipeline within the state.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation	R14-5-201 Definitions

Arizona

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Commission Transportation, Article 2 Pipeline Safety	
More Direct Oversight	Part 192.617 Part 195.402 Part 193.2515	Requires lab exam when investigating failures.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 S Construction and Safety Standards
Damage Prevention	Part 192.321	Operator will install at a minimum, a 14 gauge coated or corrosion resistant , electrically conductive wire as a means of locating the pipe. Tracer wire may not be wrapped around the pipe. Wire may be taped to the pipe provided the adhesive or attachment is not detrimental to the pipe wall.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 N Construction and Safety Standards
Response to Leaks	Part 192.706	Requires leak survey and grading per ASME Guide Appendix, 1983 except vegetation surveys. Master Meters must conduct leak surveys not to exceed 15 months	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 R Construction and Safety Standards R14-5-205 O Master Meter System Operators
Authority Beyond OPS		Noncompliance with rule by master meter operator constitutes grounds for termination of service, in case of an emergency the AZOPS	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation,	R14-5-205 A Master Meter Systems Operators

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		may give the public service corporation oral instructions to terminate service.	Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	
Cathodic Protection	Part 192.463a Part 193.2629 Part 195.571	Cathodic protection per Appendix D except section (I) items 2 and 3 not allowed.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 J Construction and Safety Standards
Design/Install Requirements	Part 195.246	Requires buried steel pipe to have bedding and shading	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 O Construction and Safety Standards
Design/Install Requirements	Part 192.321	Plastic pipe installed aboveground must be protected by a metal casing or equivalent and approved by the OPS, Temporary aboveground bypasses are permitted for up to 60 days provided the pipeline is protected and is under the direct supervision of the operator at all times.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 M Construction and Safety Standards
Design/Install Requirements	Part 192.319	Require 6 inches of sandy type soil surrounding the pipe.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation	R14-5-202 O Construction and Safety Standards

Arizona

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Commission Transportation, Article 2 Pipeline Safety	
Design/Install Requirements	Part 192.321c	Requires slack in plastic pipe to allow for thermal expansion and contraction.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 P Construction and Safety Standards
Design/Install Requirements	Part 192.357d	Requires 3 feet of clearance between regulator vents and a source of ignition or building opening after October 1, 2000.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 I Construction and Safety Standards
Design/Install Requirements	Part 192.361f Part 195.210	Operators will not construct any part of a hazardous liquid, LNG, natural gas or other gas pipeline system under a building.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 F Construction and Safety Standards
Design/Install Requirements	Part 192.325	Require 8 inches of clearance	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 G Construction and Safety Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Design/Install Requirements	Part 192.53	Do not allow installation of ABS or aluminum pipe.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 L Construction and Safety Standards
Design/Install Requirements	Part 192.63	Markings per ASTM 1995 only for areas where the service temperature is above 100 º F.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 P Construction and Safety Standards
Design/Install Requirements	Part 192.225 Part 192.227 Part 195.214 Part 195.222	Welding and welding procedure qualification is performed according to API 1104 only.	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety	R14-5-202 Q Construction and Safety Standards
Inactive Services	Part 192.727	Must abandon regulators, meters or regulation meter sets after 36 months out of service	Arizona Administrative Code, Title 14 Public Service Corporations; Corporations and Associations; Securities Regulation, Chapter 5 Corporation Commission Transportation, Article 2 Pipeline Safety Arizona Administrative Rule	R14-5-202 H Construction and Safety Standards

Arizona

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Arkansas

Key Stats	
State Agency	Arkansas Public Service Commission
Division	Gas and Water Utilities
Department	Pipeline Safety Office
Web	http://www.apscservices.info/PSOIndex.asp
Regulated Intrastate Pipeline Systems	28
Regulated Master Meter Operators	0
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	49

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.7	Requires each written report excepting "Safety Related Condition Report" be submitted in duplicate to the APSO	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 191.7 Addressee for Written reports
Enhanced Reporting	Part 191.5	Requires Incident Reports for outpatient treatment of bodily injury	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 191.5 Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 191.5	Requires Incident Reports at $5K level	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 191.5 Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 192.603	Requires filing of O&M Plans if changes occur with Arkansas Pipeline Safety Office within 20 days of enactment	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.17 Filing of Operation. Inspection and Maintenance Plan
Enhanced Reporting	Part 191.1	Expands reporting requirements to include any pipeline facility that contains 100 ppm of hydrogen sulfide	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 191.1 Scope

Arkansas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
More Direct Oversight	Part 192.1	Operators includes any pipeline facility that transports gas containing more than 100 ppm of hydrogen sulfide	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.1 What is the Scope of this Part?
More Direct Oversight	Part 192.241	Visual inspectors of welds must be previously designated in writing before welding occurs and deemed acceptable	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.241 (d) Inspection and Test of Welds
More Direct Oversight	Part 192.303	Application for Certificate of Convenience and Necessity filing requirements for new construction must meet AGPC	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.303 Compliance with Specifications or Standards
Operating Pressure	Part 192.197	Only during emergency conditions is maximum actual operating pressure and maximum allowable operating pressure allowed to be equivalent	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.197 Control of Pressure of Gas Delivered from High Pressure Distribution Systems
Operating Pressure	Part 192.739	More stringent requirements for regulators, i.e. Second stage regulator, clear vent stacks, guidance on block valves	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.739 (a) Pressure Limiting and Regulating Stations: Inspection and Testing
Training / Qualifications	Part 192.281	Restricts person making joints on plastic pipe to trained or experienced	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.281(a) Plastic Pipe
Training / Qualifications	Part 192.723	Leak Surveys must be performed by trained & qualified personnel in use of equipment and classification methodology. Maps need to accompany the leak survey	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723 (a) Distribution System: Leak Surveys and Procedures
Odorant	Part 192.625	Master meter operators must conduct periodic	Arkansas Docket Number 08-167-R,	AGPC 192.625 Odorization of Gas

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		sampling equivalent to distribution operators.	Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	
Odorant	Part 192.625	Defines periodic testing as not exceeding 3 months	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.625 Odorization of Gas
Odorant	Part 192.625	Odorant test locations must be at the furthest point from source	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.625 Odorization of Gas
Odorant	Part 192.625	Taps off Unodorized Transmission lines must be odorized	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.625 Odorization of Gas
Leak Tests	Part 192.511	10 psig Test requirement for service lines other than plastic that operate at less than 1 psig	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.511(b) Test Requirements for Service Lines
Leak Tests	Part 192.511	Test procedure must reasonably ensure discovery of leaks	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.511© Test Requirements for Service Lines
Leak Tests	Part 192.511	Specifies use of 100 psi gauge scale on service lines other than plastic that operate between 1 psig and 40 psig. Also applies to services greater than 40 psig.	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.511© AGPC 192.511(d) Test Requirements for Service Lines
Leak Tests	Part 192.723	Specifies equipment to be used for surveys to be FI units and CGI units	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723 (b)(1) Distribution System: Leak Surveys and Procedures
Leak Tests	Part 192.723	Leak tests outside business districts must be conducted on 3 year cycle (39 months not allowed) if unprotected bare steel and 5 year	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723(b)(2) Distribution System: Leak Surveys and Procedures

Arkansas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		cycle (63 months not allowed)		
Leak Tests	Part 192.723	Master Meter owned underground piping must be leak surveyed every 5 years	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723 (b) (2) Distribution System: Leak Surveys and Procedures
Response to Leaks	Part 192.723	Leak Classification System and Required timeline for Repairs	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723(e) Distribution Systems: Leakage Surveys and Procedures
Response to Leaks	Part 192.723	Guidelines and methodology for leak classification is specified and include at least 4 factors, proportion ,location, dispersion, evaluation	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723 (d) Distribution System: Leak Surveys and Procedures
Response to Leaks	Part 192.723	Requires prompt response to reported leaks with additional guidance for terminating gas upstream of customer service piping and allowance for customer to repair own service piping	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723 (f) Distribution System: Leak Surveys and Procedures
Response to Leaks	Part 192.723	Requires prompt response for any leak involving public authorities, police, fire.	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723(f) Distribution System: Leak Surveys and Procedures
Replacement Program	Part 192.755	Replacement Program for Cast Iron/Bare Steel Mains and Services	Arkansas Docket Number 00-353-U Order No. 3 dated 1/8/2003	Exhibit A Sections 1-10 Agreement
Design/Install Requirements	Part 192.197 Part 192.357	**All** Regulators including service regulators must be vented to outside of building regardless of location **(not just at customer meter sets**) Also applicable to those regulators	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.197 (b)(2) AGPC 192.197 (e) Control of Pressure of Gas Delivered from High Pressure Distribution Systems

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		referenced in Part 192.197 ©(3)		
Design/Install Requirements	Part 192.271	Requires threaded couplings meet AP5LB and use sealant and non power to tighten	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.271© Scope
Design/Install Requirements	Part 192.281	Plastic Pipe of different materials may not be joined with solvent cement and only with heat fusion or mechanical joining	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.281(a) AGPC 192.281(b)(1) Plastic Pipe
Design/Install Requirements	Part 192.281	Joints must be gas-tight and installed with material that will prevent tensile pull-outs	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.281(e)(1) Plastic Pipe
Design/Install Requirements	Part 192.281	Internal tubular stiffeners for plastic pipe must have lock inserts, serrations, or grip rings	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.281(e)(3) Plastic Pipe
Design/Install Requirements	Part 192.281	Internal stiffeners to be free of rough or sharp edges with smooth fit into pipe	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.281(e)(4) Plastic Pipe
Design/Install Requirements	Part 192.281	Internal stiffeners shall be flush with end of pipe and extend past compressed area	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.281(e)(5) Plastic Pipe
Design/Install Requirements	Part 192.303	Outlines special requirements for new construction by Master Meter operators to be reviewed by LDC prior to installation and operation	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.303 Compliance with Specifications or Standards
Design/Install Requirements	Part 192.321	More stringent requirements for qualifications of installers of plastic pipes	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.321(a) Installation of Plastic Pipe
Design/Install Requirements	Part 192.321	Specifically requires minimized stress from construction backfill,	Arkansas Docket Number 08-167-R, Order No. 3 adopting	AGPC 192.321(d) Installation of Plastic Pipe

Arkansas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		thermal contraction, and external loading	Arkansas Gas Pipeline Code (AGPC)	
Design/Install Requirements	Part 192.361	Installers (external contractors) other than operators must certify piping is installed per code	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.361(h) Service Lines: Installation
Design/Install Requirements	Part 192.367	Requires plastic service lines connected to mains w/ mechanical joints be joined in accordance with 192.281(e)	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.367(b)(3) Service Lines General Requirements for Connections to Main Piping
Design/Install Requirements	Part 192.367	Added sleeve over tie-in shear point	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.367© Service Lines General Requirements for Connections to Main Piping
Enhanced Record Keeping	Part 192.491	Does not exempt locations of anodes installed after 1971 from mapping requirements	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.491(a) Corrosion Control Records
Enhanced Record Keeping	Part 192.491	Requires all corrosion control records be maintained for life of pipeline, not 5 years	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.491(b) Corrosion Control Records
Enhanced Record Keeping	Part 192.615	Requires maintenance of a current map of entire system	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.615 (d) Emergency Plans
Enhanced Record Keeping	Part 192.723	Leak Repair Records must be kept for life of service if corrosion leak. Leak Repair Records kept for 2 most recent leak surveys	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.723(g) Distribution System: Leak Surveys and Procedures
Enhanced Record Keeping	Part 192.615	Requires identification of all key valves which may be needed for safe operation	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.615 (d) Emergency Plans
Enhanced	Part 192.621	Maximum Allowable	Arkansas Docket	AGPC 192.621

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Record Keeping		Operating Pressure must be identified on all maps, drawings, regulator stations and other appropriate records	Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	Maximum Allowable Operating Pressure: High Pressure Distribution Systems
Enhanced Record Keeping	Part 192.623	Maximum Allowable Operating Pressure must be identified on all maps, drawings, regulator stations and other appropriate records	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.623 Maximum and Minimum Allowable Operating Pressure: Low Pressure Distribution Systems
Enhanced Record Keeping	Part 192.197	Maximum Actual Operating Pressure must be identified on all maps, drawings, regulator stations and other appropriate records	Arkansas Docket Number 08-167-R, Order No. 3 adopting Arkansas Gas Pipeline Code (AGPC)	AGPC 192.622 Maximum Actual Operating Pressure: High Pressure Distribution Systems
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

California

Key Stats	
State Agency	California Public Utilities Commission
Division	Consumer Protection and Safety Division
Department	Utilities Safety and Reliability Branch – Gas Section
Web	http://www.cpuc.ca.gov/puc/
Regulated Intrastate Pipeline Systems	9
Regulated Master Meter Operators	2,532 (Mobile Home Parks)s
Regulated LPG Operators	674
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	16

PLEASE NOTE: THE CALIFORNIA PUBLIC UTILITIES COMMISSION **DOES NOT OVERSEE SAFETY** OF HAZARDOUS LIQUID PIPELINES. THE OFFICE OF THE STATE FIRE MARSHAL OVERSEES HAZARDOUS LIQUID PIPELINES IN CALIFORNIA thus there are 2 sections for California

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires incidents to be reported that involve significant media coverage	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 122.2 Gas Incident Reports
Enhanced Reporting	Part 191.3	Requires quarterly reporting of all incidents involving escaping gas and exceeding $1,000 in property damage and incidents which included property damage between $0	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and	Section 122.2 Gas Incident Reports

		and $1,000, and involved fire, explosion, or underground dig-ins.	Distribution Piping Systems	
Leak Test	Part 192.723(b)(1)	A gas detector survey must be conducted in the vicinity of schools, hospitals, and churches at intervals not exceeding 15 months, but as least once every calendar year.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 143.1 Distribution Systems
Design/Install Requirement	Part 192.177	Electrical equipment and wiring installed at holders must conform to the National Electrical Code, NFPA-70, so far as that Code is applicable.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 182.2 Pipe-Type & Bottle-Type Holders: Design and Construction
Design/Install Requirement	Part 192.177	Any holder designed and constructed in accordance with the requirements for location class 1 or 2, but not 3, shall be installed at least 75 feet from a flammable building or adjoining property that may have a flammable building constructed thereon in the future, or from the nearest rail or a track on a railroad private right-of-way.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 182.3 Pipe-Type & Bottle-Type Holders: Design and Construction
Design/Install Requirement	Part 192.177	Each vent line that exhausts gas from a pressure relief valve or blowdown valve must extend to a location where the gas may be discharged without hazard.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering,	Section 182.4 Pipe-Type & Bottle-Type Holders: Design and Construction

			Transmission, and Distribution Piping Systems	
Design/Install Requirements	Part 192.177	A device which will maintain a continuous pressure record shall be installed at the inlet or outlet of each holder, except that where a group of holders are jointly connected and are all filled from the same gas source and all empty into a common line or system, only one device will be required. A pressure indicating device shall be installed on each container in the holder.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 182.5 Pipe-Type & Bottle-Type Holders: Design and Construction
Design/Install Requirement	Part 192.177	Each holder facility must have adequate fire-protection facilities.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 182.6 Pipe-Type & Bottle-Type Holders: Design and Construction
Design/Install Requirement	Part 192.177	Holders shall be provided with overpressure protection systems complying with the requirements of 192.195.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 182.7 Pipe-Type & Bottle-Type Holders: Design and Construction
Design/Install Requirement	Part 192.177	When a holder is constructed adjacent to any existing electric transmission line normally carrying voltages in excess of 50,000	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas	Section 182.8 Pipe-Type & Bottle-Type Holders: Design and Construction

		volts, the holder shall be located no nearer to the lines than the height of the poles carrying them.	Gathering, Transmission, and Distribution Piping Systems	
Response to Leaks	Part 192.605(b)(10)	All leaks of any consequence in gas pipeline, valves and equipment in the vicinity of a holder must be promptly repaired upon discovery, or as soon as practicable. All hazardous leaks must be remedied at once.	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 183.1 Pipe-Type & Bottle-Type Holders: Plan For Inspection and Testing
External/Internal Corrosion	Part 192.605(b)(10)	An internal and external inspection of high pressure holder required every 10 years by qualified inspectors with reports submitted to Commission	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 183.2 Pipe-Type & Bottle-Type Holders: Plan For Inspection and Testing
External/Internal Corrosion	Part 192.605(b)(10)	When impractical to enter holder corrosion inspection shall be completed with plugs/holes in shell. End closures shall be removed if entering for interior corrosion inspection	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 183.3 Pipe-Type & Bottle-Type Holders: Plan For Inspection and Testing
External/Internal Corrosion	Part 192.605(b)(10)	Calibration of ultrasonic testing equipment must be within .002 inch is required when NDT is method of inspection to measure wall thickness	CPUC General Order 112-E, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Section 183.4 Pipe-Type & Bottle-Type Holders: Plan For Inspection and Testing
External/Internal Corrosion	Part 192.605(b)(10)	If defective or hazardous condition	CPUC General Order 112-E, State of	Section 183.5 Pipe-Type & Bottle-

		found in holders they must be taken out of service or immediately repaired and confirmed by soil excavations at the soil/air interface vicinity to ensure no corrosion or leakage is present.	California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems	Type Holders: Plan For Inspection and Testing
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

PLEASE NOTE: THE CALIFORNIA PUBLIC UTILITIES COMMISSION **DOES NOT OVERSEE SAFETY** OF HAZARDOUS LIQUID PIPELINES. THE OFFICE OF THE STATE FIRE MARSHAL OVERSEES HAZARDOUS LIQUID PIPELINES IN CALIFORNIA thus there are 2 sections for California

California

Key Stats

State Agency	Office of the State Fire Marshal
Division	Pipeline Safety
Department	CalFire
Web	http://osfm.fire.ca.gov/pipeline/pipeline.php
Regulated Intrastate Systems	55 operators (4580 miles)
Regulated LPG Systems	0
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	55
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	10

PLEASE NOTE: THE OFFICE OF THE STATE FIRE MARSHAL **DOES NOT OVERSEE SAFETY** OF GAS PIPELINES. THE CALIFORNIA PUBLIC UTILITIES COMMISSION OVERSEES SAFETY OF GAS PIPELINES IN CALIFORNIA thus there are 2 separate state agencies for California pipelines.

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 195.403 Part 195.440	Every pipeline operator shall provide to the fire department having fire suppression responsibilities a map or suitable diagram showing the location of the pipeline, a description of all products transported within the pipeline, and a contingency plan for pipeline emergencies which shall include, but not be limited to any reasonable information which the State Fire Marshal may require.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51015.(a)
Enhanced Reporting	Part 195.52	Every rupture, explosion, or fire	California Government Code	Section 51018

California

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		involving a pipeline, including a pipeline system otherwise exempted by subdivision (a) of Section 51010.5, and including a pipeline undergoing testing, shall be immediately reported by the pipeline operator to the fire department having fire suppression responsibilities and to the Office of Emergency Services..	Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	
More Direct Oversight	Part 195.403 Part 195.440	Every pipeline operator shall offer to meet with the local fire department having fire suppression responsibilities at least once each calendar year to discuss and review contingency plans for pipeline emergencies.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51015.(c)
Pressure Testing	Part 195.300	All pressure tests must be witnessed by an independent testing firm.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51014.5
Pressure Testing	Part 195.452	Piping within a bulk loading facility to be tested every 5 years.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to	Section 51013.5(e)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	
Pressure Testing	Part 195.452	All pipelines shall be pressure tested or internally inspected every five years.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51013.5
Leak Tests	Part 195.452	Higher risk category for pipelines that experience a leak meeting defined criteria. Pipelines to be tested every 2 years until five years pass without another leak.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51013.5(f)
Design/ Install Requirements	None	No person, other than the pipeline operator, shall do any of the following with respect to any pipeline easement: (1) Build, erect, or create a structure or improvement within the pipeline easement or permit the building, erection, or creation thereof. (2) Build, erect, or create a structure, fence, wall, or obstruction adjacent to any pipeline easement which	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51014.6

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		would prevent complete and unimpaired surface access to the easement, or permit the building, erection, or creation thereof. (b) No shrubbery or shielding shall be installed on the pipeline easement which would impair aerial observation of the pipeline easement.		
State Program Inspections	None	The State Fire Marshal shall develop a comprehensive data base of pipeline information that can be utilized for emergency response and program operational purposes. The data base shall include information on pipeline location, age, reported leak incidences, and inspection history, and shall have the capability of mapping pipeline locations throughout the state.	California Government Code Title 5, Local Agencies. Division 1. Cities And Counties. Part 1. Powers and Duties Common to Cities and Counties, Chapter 5.5. The Elder California Pipeline Safety Act of 1981	Section 51015.(c)

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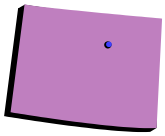
Colorado

Key Stats

State Agency	Colorado Public Utilities Commission
Division	Pipeline Safety
Department	Department of Regulatory Agencies
Web	http://www.dora.state.co.us/puc/pipesafetymain.htm
Regulated Intrastate Pipeline Systems	27
Regulated Master Meter Operators	23
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	11

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.3	Addition definitions for "Immediate Repair", "Major Project", "Roadway", "Production Facility	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4901 Gas Pipeline Safety General Provisions (Definitions)
Enhanced Reporting	Part 191.5	Telephonic Reporting of an Incident to Pipeline Safety Staff within 2 hours	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4911 Gas Pipeline Safety Filing Incident, Safety-Related Condition, Construction, Damage, and Annual Reports (Telephonic Notices)
Enhanced Reporting	Part 191.5	Telephonic Reporting to Pipeline Safety Staff of outages greater than 50 customers	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado*	PUC Rule 4911 Gas Pipeline Safety Filing Incident, Safety-Related Condition, Construction, Damage,



Colorado

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Regulations (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	and Annual Reports (Telephonic Notices)
Enhanced Reporting	Part 191.5	Telephonic Reporting within 2 hours to Pipeline Safety Staff if gas leak causes closure of a roadway or railroad	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4911 Gas Pipeline Safety Filing Incident, Safety-Related Condition, Construction, Damage, and Annual Reports (Telephonic Notices)
Enhanced Reporting	Part 191.5	Telephonic Reporting within 2 hours to Pipeline Safety Staff of emergency repairs of transmission line or gathering line if greater than 125 psig operating pressure	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4911 Gas Pipeline Safety Filing Incident, Safety-Related Condition, Construction, Damage, and Annual Reports (Telephonic Notices)
Enhanced Reporting	192.614	Damage Reporting annually to Pipeline Safety Staff for all local distribution operators serving more than 50,000 customers	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4916 Gas Pipeline Safety Filing Incident, Safety-Related Condition, Construction, Damage, and Annual Reports (Reporting of Pipeline Damage & Locating Information)
More Direct Oversight	Part 192.305	Construction Notification to Pipeline Safety Staff at least 20 days prior to the start of a Major Project	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas	PUC Rule 4917 Gas Pipeline Safety Filing Incident, Safety-Related Condition, Construction, Damage, and Annual Reports (Filing Notices of Major Project)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Utilities And Pipeline Operators	
More Direct Oversight	Part 192.605	Appropriate Action required by Operators after any Alert Bulletins are issued by PHMSA – OPS, NTSB	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4906 Gas Pipeline Safety General Provisions (Alert Notices)
More Direct Oversight	Part 190.237 Part 192.605 Part 192. 803 Part 192.617	Amendments of Operator Qualification Plans and Operator Operation and Maintenance Procedures required after any incident, emergency repair, a safety-related condition, or an abnormal operating condition	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4953 Gas Pipeline Safety Safety Standards for Gas Transportation by Pipeline and Gas Pipeline Systems (Procedural Updates)
Authority Beyond OPS	Part 192.9	Specific Requirements for Type A,B,C Gathering Pipelines	Colorado Department Of Regulatory Agencies, Public Utilities Commission, 4 *Code Of Colorado Regulations* (CCR) 723-4 Part 4 Rules Regulating Gas Utilities And Pipeline Operators	PUC Rule 4952 Gas Pipeline Safety Safety Standards for Gas Transportation by Pipeline and Gas Pipeline Systems (Gathering Pipeline)
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Connecticut

Key Stats	
State Agency	Department of Energy and Environmental Protection (DEEP)
Division	Public Utilities Regulatory Authority (PURA)
Department	Gas Pipeline Safety Unit (GPSU)
Web	http://www.ct.gov/dpuc/cwp/view.asp?a=3157&Q=411760&dpucNav=|
Regulated Intrastate Pipeline Systems	4
Regulated Master Meter Operators	0
Regulated LNG Systems	3
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	6
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	48

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3 Part 191.5 Part 191.9	Enhanced accident reporting including 1 hour notification requirement.	Regulations of Connecticut State Agencies	Sections 16-16-1 Sections 16-16-2 Sections 16-16-3 Sections 16-16-4
Enhanced Reporting	Part 191.11	Gas companies must file a comprehensive report on the condition of its underground facilities every 2 years to PURA and each municipality located within its service territory. Included shall be age and condition of facilities, major repairs made, replacement plans, new construction plans.	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-358 Underground gas facilities report Requirements
Enhanced Reporting	Part 192.605	Changes or Revisions to Operations plans, policies, procedures or standards	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	192.605(b)(9)	Monthly company safety index report	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.614	Monthly Third Party Excavation Inspections	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.614 Part	Monthly reporting of third party damage statistics	PURA Orders	Docket Nos. 09-09-08 and 10-12-02 (only

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
	192.1007(e)			most recent dockets shown)
Enhanced Reporting	Part 192.615	Emergency plans must be filed with PURA, Department of Emergency Management and Homeland Security and each municipality located within the service area of the public service company.	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-32(e) Emergency plans to be filed by public service companies, telecommunications companies and municipal utilities
Enhanced Reporting	Part 192.723	Monthly Leak Survey Progress Report	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.739	Monthly Regulator Station Inspection Progress Report	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.747	Monthly Emergency Valve Maintenance Progress Report	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.1007(e)	Monthly reporting of the number of outstanding Grade 2 and Grade 3 leaks	PURA Orders	Docket Nos. 09-09-08 and 10-12-02 (only most recent dockets shown)
Enhanced Reporting	Part 192.1007(e)	Monthly reporting of expenditures on cast iron and bare steel replacement programs	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.1007(e)	Semi-annual reporting of expenditures on cast iron and bare steel replacement programs	PURA Orders	Docket Nos. 09-09-08 and 10-12-02 (only most recent dockets shown)
Enhanced Reporting	Part 192.1007(e)	Monthly Grade 1, 2 & 3 Leaks Report	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	Part 192.1007(e)	Gas companies must report details of all Grade 1 and Grade 2 leaks on a monthly basis.	Regulations of Connecticut State Agencies	Section 16-11-12© Gas leaks
Enhanced Reporting	None	Annual Aging Workforce Succession Plan	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Enhanced Reporting	None	Gas companies shall furnish to PURA, at such times and in such form as PURA may require, the results of any required tests and summaries of any required records. Gas companies shall also furnish PURA with any information	Regulations of Connecticut State Agencies	Section 16-11-47 Reports to commission

Connecticut

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		concerning the gas company's facilities or operations which PURA may request and need for determining rates or judging the practices of the gas company.		
Enhanced Reporting	None	Public Service Companies must obtain PURA approval prior to any mergers.	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-43 Merger or sale of public service companies. Section 16-47 Holding companies. Approval of department re exercise of control
Enhanced Reporting	None	Public Service Companies must obtain PURA approval prior to selling, leasing, assigning, mortgaging, or otherwise disposing of any essential part of its franchise, plant, equipment or other property necessary or useful in the performance of its duty to the public.	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-43 Merger or sale of public service companies
More Direct Oversight	None	Notification of certain types of construction projects, modifications, pressure tests and daily crew locations	PURA Letter	(only most recent letter shown)
More Direct Oversight	Part 192.305	Monthly Company Inspections of Company Contractors	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
More Direct Oversight	Part 192.305 Part 192.605(b)(8)	Monthly Company Inspections of Company Crews	PURA Order	Docket No. 09-09-08 (only most recent docket shown)
Operating Pressure	Part 192.739	Monthly inspections of District regulator stations is required of operators.	Regulations of Connecticut State Agencies	Section 16-11-40(a)(3) Regulator stations
Damage Prevention	Part 192.614	Substantial additional damage prevention regulations	Connecticut General Statutes, Title 16, Public Service Companies and Regulations of Connecticut State Agencies	Sections 16-345 through 16-359 Excavation, Demolition or Discharge of Explosives Sections 16-345-1 through 16-345-9 Excavation Near

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
				Underground Utility Facilities
Damage Prevention	Part 192.614	Warning tape required	Regulations of Connecticut State Agencies	Section 16-345-3(f) Excavation Near Underground Utility Facilities
Damage Prevention	Part 192.614 Part 192.1007(e)	Monthly reporting of all third party damages and all violations of the underground damage prevention program	Regulations of Connecticut State Agencies	Sections 16-345-3(a)(3) and 16-345-(a)(4) Excavation Near Underground Utility Facilities
Meter Location/ Protection	Part 192.353	Gas meters shall be installed as near as practicable to the building.	Regulations of Connecticut State Agencies	Section 16-11-22© Meter location
Meter Location/ Protection	Part 191.3	No master meter systems can be created without PURA Approval	PURA Decision	Docket No. 06-09-01
Odorant	Part 192.625	Gas companies shall furnish monthly odorant reports to PURA	Regulations of Connecticut State Agencies	Section 16-11-17 Gas Companies Operating Within the State of Connecticut
Response to Leaks and Enhanced Reporting	Part 192.615	Gas odor complaint response times of 30 minutes during normal work hours and 45 minutes at all other times, including monthly reporting of response times	PURA Orders	Docket Nos. 09-09-08 and 10-12-02 (only most recent dockets shown)
Response to Leaks	Part 192.703	Maximum number of Class 2 leaks at the end of each calendar year	PURA Orders	Docket Nos. 09-09-08 and 10-12-02 (only most recent dockets shown)
Replacement Programs	Part 192.487 Part 192.489 Part 192.755 Part 192.1007	Target expenditure levels for cast iron and bare steel replacement programs	PURA Orders	Docket Nos. 08-12-06, 08-12-07 and 10-12-02 (only most recent dockets shown)
Authority Beyond OPS (not rate)	None	Authority to order reasonable improvements, repairs or alterations in such plant or equipment, or such changes in the manner of operation, as may be reasonably necessary in the public interest.	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-11
Authority Beyond OPS	None	GPSU participates in all rate cases	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-19

Connecticut

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Authority Beyond OPS (not rate)	None	Authority to assess civil penalties for failure to comply with any statute, regulation or department order (this is over and above our authority to assess civil penalties for failure to comply with the federal pipeline safety regulations).	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-41 Imposition of civil penalties by the department
Authority Beyond OPS (not rate)	None	Ability to terminate service due to hazardous condition on customer piping (Red Tag Policy).	Regulations of Connecticut State Agencies	Section 16-3-100(b)(1) Termination of Electric, Gas, Water, & Sewage Utility Service
Authority Beyond OPS (not rate)	None	Gas companies are required to test customer piping for gas leaks at time of turn on.	Regulations of Connecticut State Agencies	Section 16-11-31(b) Gas Companies operating within the State of CT
Design/Install Requirements	None	All service pressure regulators installed on the customer's premises shall be maintained in proper working order and shall be periodically inspected in place, preferably at the time of removal of the meter for periodic testing. The inspection shall consist of external examination of the regulator, its piping, seal, vent line and operating condition.	Regulations of Connecticut State Agencies	Section 16-11-41(a)(3) Gas Companies Operating Within the State of Connecticut
Design/Install Requirements	Subpart B	Use of materials other than steel must be approved by PURA and at pressures over 100 psi, only steel is allowed.	Regulations of Connecticut State Agencies	Section 16-11-42(b) Gas system construction and maintenance
Design/Install Requirements	Part 192.181(b)	District regulator station inlet shutoff valves must be located at certain distances from the station.	Regulations of Connecticut State Agencies	Section 16-11-40(d) Regulator stations
Design/Install Requirements	Part 192.197	Any customer's service being supplied through a customer service pressure regulator shall be protected by a suitable safety device to prevent the development of pressures in excess of two pounds per square inch gauge.	Regulations of Connecticut State Agencies	Section 16-11-41(a)(1) Service
Design/Install Requirements	Part 192.325	A minimum of 12 inches of clearance is required at	Regulations of Connecticut State	Section 16-11-42(i) Gas system

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		crossings of other utilities and no common trenches.	Agencies	construction and maintenance
Enhanced Record Keeping	Part 192.727	Utilities must maintain records of all abandoned underground facilities	Regulations of Connecticut State Agencies	Section 16-345-3(a)(8) Responsibilities of public utilities
State Inspection Program	None	Ability to hire outside consultants, as necessary. Affected company required to pay for all of the expenses.	Connecticut General Statutes, Title 16, Public Service Companies	Section 16-8 Examination of witnesses and documents. Hearing examiners. Management audits
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits.	None	Inspection Forms and Frequency Operator Inspections

Delaware

Key Stats	
State Agency	Department of State
Division	Public Service Commission
Department	
Web	http://www.depsc.delaware.gov
Regulated Intrastate Pipeline Systems	3
Regulated Master Meter Operators	10
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	13
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	4

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Response to Leaks	Part 192.723	Operators shall establish a Leak Classification and Action Criteria consistent with the Guide. Records must provide certain information and the steps taken in response to the leaks.	Delaware Administrative Code, Title 26 Public Utilities Commission, Gas Regulations § 8001 Rules to Establish an Intrastate Gas Pipeline Safety Program	2.6 Regulations
Design/Install Requirements	Part 192.53	No cast iron pipe 4" and smaller shall be installed in any pipeline facilities after 10/1/09	Delaware Administrative Code, Title 26 Public Utilities Commission, Gas Regulations § 8001 Rules to Establish an Intrastate Gas Pipeline Safety Program	2.7 Regulations
Enhanced Record Keeping	Part 192.723	Records of gas leak surveys shall be maintained for 7 years (minimum)	Delaware Administrative Code, Title 26 Public Utilities Commission, Gas Regulations § 8001 Rules to Establish an Intrastate	2.5 Regulations

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Gas Pipeline Safety Program	
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

TOC

District of Columbia

Key Stats	
State Agency	District of Columbia Public Service Commission
Division	Office of Deputy Executive Director for Regulatory Matters
Department	Office of Engineering and Pipeline Safety
Web	http://www.dcpsc.org/pipelinesafety/pipelinesafety.asp
Regulated Intrastate Pipeline Systems	1
Regulated Master Meter Operators	0
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	7

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5K level	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2306.2 Incident Reports And Safety-Related Condition Reports
Enhanced Reporting	Part 191.3	Requires Incident Notification within one hour	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2306.6 Incident Reports And Safety-Related Condition Reports
Enhanced Reporting	Part 192.603	Requires Annual filing of O&M Plans with Commission	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2307.1 Operation And Maintenance Plans
Enhanced Reporting	Part 192.615	Requires providing contact list for emergencies with Commission	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2308.1 Emergency Plans
More Direct Oversight	Part 192.616	A gas corporation shall provide notice to each	District of Columbia Municipal Regulations,	2304.1 Public Awareness

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		customer at least twice annually, informing the customer of the hazards of leaking gas and instructing the customer in the procedures to be followed in reporting gas leaks. A sample odor indicator shall be included in the twice annual notice.	Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	
More Direct Oversight	Part 192.605	Each gas corporation or small gas operator shall maintain at each job site all documentation of plastic pipe joining permits, all Operator Qualifications, up-to-date manuals and copies of procedures required to do the work.	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.2 Pipeline Location
More Direct Oversight	Part 192.305	Each gas corporation or small gas operator shall provide one (1) supervisor for no more than three (3) construction crews	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.2 Pipeline Location
Operating Pressure	Part 192.144	Tinned steel case meters shall be subjected to an internal pressure of at least two pounds (2 lb.) per square inch gauge (psig) when testing for leaks. Iron or aluminum case meters shall be tested at a pressure at least fifty percent (50%) above operating pressure	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2362.2 2362.3 Leak Tests
Operating Pressure	Part 192.201	The gas supplied by any gas corporation shall be maintained at a pressure of not less than three inches (3	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23,	2377.1 2377.2 Pressure Of Gas Supplied To Consumers

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		in.) or more than eight inches (8 in.) of water pressure. The daily variation in the low pressure network system, during any day at any gauge station, shall not exceed two and one-half inches (2 1/2 in.) of water pressure.	Natural Gas	
Damage Prevention	Part 192.614	When the open trenching method of pipeline construction is used, suitable identification tape shall be installed at a minimum of twelve inches (12 in.) above the top of the pipe and at least six inches (6 in.) below the final grade after completion of installation.	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.2 Pipeline Location
Leak Tests	Part 192.723	Place of public assembly must be leak surveyed annually using Flame Ionization or Combustible Gas Indicating equipment	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.1 Safety
Leak Tests	Part 192.723	Entire distribution system must be leak surveyed every three years	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.1 Safety
Leak Tests	Part 192.723	Leakage tests by HFI or by CGI and bar hole method shall be conducted within the immediate area of each new, repaired or replaced service line before being placed in service, but after backfilling and after a reasonable period of gas pressurizing;	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.1 Safety

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Authority Beyond OPS	None	A gas corporation or small gas operator shall respond within five (5) business days after receipt of a specific information request relating to a possible complaint, probable violation of gas safety regulation or gas incident report;	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2310.8 Investigations, Inspections, Specific Information Requests, And Warning Letters
Authority Beyond OPS	None	In the event of an emergency or safety hazard, the Commission shall take either of the following actions: Order service to the small gas operator interrupted; or Order the hazard remedied at the operator's expense.	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2320.2 Small Gas Operator
Cathodic Protection	Part 192.483	Whenever a steel pipe or tubing is used in the installation of a service line, it will be protected by the installation of anode and test station Installation of malleable fittings on a service line will require the installation of anode for cathodic protection;	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.1 Safety
Enhanced Record Keeping	Part 192.491	Leak Survey Records must be kept for life of the pipeline including location and date of leaks detected, severity of each leak; action taken to repair leaks;	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23, Natural Gas	2305.1 Safety
Inactive Services	Part 192.727	When any meter is inactive, whether installed in service or not, for a period of two (2) years or longer, it	District of Columbia Municipal Regulations, Title 15 Public Utilities and Cable Television, Chapter 23,	2351 General Gas Metering Provisions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		shall be tested, and adjusted if necessary, before being placed in service again	Natural Gas	
State Inspection Program	None	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Florida

Key Stats

State Agency	Public Service Commission
Division	Division of Safety, Reliability and Consumer Assistance
Department	Safety and Reliability
Web	www.Floridapsc.com
Regulated Intrastate Pipeline Systems	82
Regulated Master Meter Operators	9
Regulated LNG Systems	0
Regulated LPG Operators	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	54

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	None	Written Notice shall be given to the Commission of all major construction or alteration of pipeline facilities, stating the size, approximate location and contemplated time of construction. Notice is required when the pipeline involved is both at least 2 inches in diameter as well as 2,000 feet or more in length	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.082 Construction Notice
Enhanced Reporting	Part 191.3	Incidents reported at $10K threshold for property damage	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.084 (1) Notice of Accidents and Outages.
Enhanced Reporting	Part 191.3	Requires reporting of service interruptions of either 10 percent or more of its meters or 500 or more metersi	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.084 (3) Notice of Accidents and Outages.

Florida

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.605	Requirement write and follow construction specifications for new construction, reconstruction or conversions	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.008 (1) New, Reconstructed or Converted Facilities 25-12.020 (1) Construction Specifications and Inspections.
More Direct Oversight	Part 192.3	Stricter Definition for Distribution System", "Low Pressure Distribution System", "Master Meter System"	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.004 Definitions
More Direct Oversight	Part 192.14	Conversion procedure required from non regulated to regulated	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.008 (2) New, Reconstructed or Converted Facilities
More Direct Oversight	Part 192.305	Contractor may not inspect own construction and installation of pipeline	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.030 (2) Construction Inspection
Valves	Part 192.181	Sets valve criteria for size of area, volume, pressure, population factors	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.022 (2) Requirements for Distribution System Valves
Valves	Part 192.179	Blowdown Valve requirements apply to mains **not just transmission pipeline**	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.022 (4) Requirements for Distribution System Valves
Valves	Part 192.747	Accessibility is required of all Distribution line valves	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.022 (5) Requirements for Distribution System Valves
Valves	Part 192.379	A valve on the service line must be either locked in the closed position or the service line plugged to prevent the flow of gas when the gas is interrupted intentionally or unintentionally.	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.044 Interruption of Gas Service

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Pressure Testing	Part 191.3	Requires Uprating Procedure to be approved 15 days prior to notice	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.083 Requalifying Maximum Allowable Operating Pressure
Damage Prevention	Part 192.321	Tracer wire must be coated **(no other means)**	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.021 (3) Use of Plastic Pipe
Operator Qualification	Part 192.801	Qualified Inspectors required for New Construction	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.020 (2) and (3) Construction Specifications and Inspections.
Odorant	Part 192.625	Any operator who receives gas directly from a transmission supplier and distributes gas in any system that serves more than 25 customers must odorize all gas transported	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.055 Odorization of Gas.
Odorant	Part 192.625	Odorant shall be sampled 12 times per year at intervals less than 45 days	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.055 Odorization of Gas.
Leak Tests	Part 192.615	A device capable of detecting the presence of gas shall be used to test the area of the reported leak to determine if a leak actually exists	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.042 Investigation of Gas Leak Reports.
Response to Leak	Part 192.723	Leak Classification system Requirements and Repair Times specified	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.040 Leak Surveys, Procedures and Classification
Response to Leak	Part 192.615	Requires 24/7 Dispatch for Emergencies	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.041 Receiving of Gas Leak and Emergency Reports
Authority Beyond OPS	None	Operator has fifteen days to respond in	Natural Gas Safety Rules of the Florida	25-12.0861 Response to

Florida

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		writing to Staff inquiries	Public Service Commission, Chapter 25-12	Commission Staff Inquiries.
Authority Beyond OPS	None	Customer Gas Piping must be tested prior to operator providing gas service	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.043 Gas Service
Cathodic Protection	Part 192.463	Appendix D – Cannot use E-log-I curve as method for criteria	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.052 (1) Criteria for Cathodic Protection of Buried or Submerged Steel, Cast Iron, and Ductile Iron Pipeline**.**
Cathodic Protection	Part 192.463	Appendix D I-A(1) shall be the only criterion acceptable for determination of the degree of cathodic protection of externally coated buried or coated submerged pipelines installed after June 1, 1975	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.052 (2) Criteria for Cathodic Protection of Buried or Submerged Steel, Cast Iron, and Ductile Iron Pipeline**.**
Cathodic Protection	Part 192.463	Appendix D – Application of Criterion I-A(2) shall be dependent upon the establishment of initial or unprotected pipe/soil potentials	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.052 (3) Criteria for Cathodic Protection of Buried or Submerged Steel, Cast Iron, and Ductile Iron Pipeline**.**
Cathodic Protection	Part 192.463	Appendix D – Application of Criterion I-A(5) is restricted to bare and essentially bare ineffectively coated metallic gas pipelines installed prior to July 31, 1971	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.052 (4) Criteria for Cathodic Protection of Buried or Submerged Steel, Cast Iron, and Ductile Iron Pipeline**.**
Cathodic Protection	Part 192.463	If gas leakage results from active corrosion of a pipeline, remedial action shall include application of cathodic protection to meet one of the criteria of this rule, as described in	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.052 (5) Criteria for Cathodic Protection of Buried or Submerged Steel, Cast Iron, and Ductile Iron Pipeline**.**

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		subsection (1), unless the pipeline is replaced with non-metallic pipe. Cathodic protection for these remedial applications must be tested at least once every calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of this rule.		
Cathodic Protection	Part 192.463	Each operator must take remedial action within three (3) months to correct or make substantial progress toward correction of any deficiencies indicated by monitoring	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.052 (6) Criteria for Cathodic Protection of Buried or Submerged Steel, Cast Iron, and Ductile Iron Pipeline**.**
Cathodic Protection	Part 192.465	The electrical survey requirement as referred to in Subpart I, Part 192, Title 49, CFR and these rules are intended to utilize the following surveys: (a) Pipe/Soil potential survey. (b) Soil resistivity survey.	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.053 (1) Cathodic Protection – Electrical Survey.
Cathodic Protection	Part 192.465	2)(a) A combination of the two surveys in (1) above is required on the initial electrical survey	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.053 (2) Cathodic Protection – Electrical Survey.
Cathodic Protection	Part 192.465	When areas of active corrosion have been established and the operator does not have adequate knowledge of electric current requirements for the system, then current	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.053 (3) Cathodic Protection – Electrical Survey

Florida

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		requirement tests shall be made to determine the degree of protective current required for cathodic protection.		
Cathodic Protection	Part 192.465	An electrical survey of an underground pipeline system may be considered impractical when obstructions such as concrete, asphalt, or other surface structures, lie in a position directly above the pipeline	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.053 (4) Cathodic Protection – Electrical Survey.
Cathodic Protection	Part 192.465	The placement of the reference half-cell in the immediate vicinity of galvanic anodes shall not be acceptable for electrical measurement used to determine the adequacy of cathodic protection.	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.054 Cathodic Protection – Location of Reference Half-Cell.
Design/Install Requirement	Part 192.281	Thermoset Plastics require protection from external damage	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.021 (2) Use of Plastic Pipe
Design/Install Requirement	Part 192.181	Upstream Valve must be 500 feet or less at a district regulator station	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.022 (1) Requirements for Distribution System Valves**.**
Design/Install Requirements	Part 192.361f	No portion of an operator's gas pipeline shall be installed under a portion of building, nor a building over a gas pipeline	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.024 Prohibition of Pipelines Under Buildings
Design/Install Requirements	Part 192.227	Welders must use API 1104 **(not ASME)**	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.027 (1) Welder Qualification

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Design/Install Requirements	Part 192.323	Casings prohibited on metallic pipelines	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.029 Limiting Use of Pipeline Casings**.**
Design/Install Requirements	Part 192.243	NDT or DT required at 2 locations every 5000 feet and segments greater than 2 inch diameter	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.030 (3) Construction Inspectio
Design/Install Requirement	Part 192.357	Gas service line valves at multi-service installations shall be plainly marked by a metal tag or other permanent means designating the building or part of the building being served	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.050 Facility Identification
Design/Install Requirement	Part 192.707	Each customer meter, gas regulating station, or any aboveground gas transporting facility shall be permanently marked to identify the operator's name and phone number	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.050 Facility Identification
Enhanced Record Keeping	Part 192.243 f	Maintain Welding Records for the life of the pipeline for welder name, inspector name,	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.030 (4) Construction Inspectio
Enhanced Record Keeping	Part 192.615	All Critical Valves must be identified on Maps and Records as well as tagged in field	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.022 (3) Requirements for Distribution System Valves
Enhanced Record Keeping	None	All records must be kept within the State of Florida	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.060 (2) General Records

Florida

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Record Keeping	Part 192.517	Lifetime record retention for strength testing	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.060 (3a) General Records
Enhanced Record Keeping	Part 192.723 Part 192.479 Part 192.491 Part 192.625 Part 192.739 Part 192.747	At least 2 cycles of intervals required for inspections or surveys for record retention	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.060 (3b) General Records
Enhanced Record Keeping	Part 192.605	System maps of each local operating area shall be prepared and on file in the operating company's respective local office. Such maps and related records shall readily identify the location and size of all system facilities and other information pertinent to the safe design of the system. These records shall be kept up to date.	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.061 System Maps.
Enhanced Record Keeping	Part 192.723	Records of gas leaks on the operator's system shall show as a minimum: (1) Address of suspected leak. (2) Date and time leak reported. (3) Description of leak reported. (4) Date and time operator personnel dispatched. (5) Date and time operator personnel arrived. (6) Date and time condition made safe. (7) Location of leak found. (8) Cause of leak	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.062 Leak Reports

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Inactive Services	Part 192.727	Inactive services must be retired after specified time frame.	Natural Gas Safety Rules of the Florida Public Service Commission, Chapter 25-12	25-12.045 Inactive Gas Service Lines
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Georgia

Key Stats

State Agency	Georgia Public Service Commission
Division	Facility Protection Unit
Department	Pipeline Safety Division
Web	http://www.psc.state.ga.us/facilitiesprotect/fp_pipesafe/fp_pipesafe.asp
Regulated Intrastate Pipeline Systems	96/85municipals/2 private/9 transmission
Regulated Master Meter Operators	140
Regulated LNG Systems	4
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	2
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	12

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3 Part 191.9	Lowers estimated property damage to $5,000 for incident reporting. Requires telephonic notification to Pipeline Safety Staff no later than 2 hours following an incident. Requires a written report to be filed with the Pipeline Safety Office within 30 days following a reportable incident.	Rules of the Georgia Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 1: Safe Installation And Operation Of Natural Gas Transmission And Distribution Systems	515-9-1-.06 Incident Notification
More Direct Oversight	Part 192 305	Requires weekly Reporting of construction activities for Commission inspections	Atlanta Gas Light files General Construction Reports Daily	
Response to Leaks	Part 192.703©	Establishes criteria for the grading of leaks, the actions required by each grade, and the time frame for repair	Rules of the Georgia Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and	515-9-1-.05 Leak Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Distribution Systems Sub Chapter 1: Safe Installation And Operation Of Natural Gas Transmission And Distribution Systems	
Replacement Program	Part 192.489	Requires Cast Iron/BS mains and services Accelerated Replacement Program with Rate Adder	Georgia Public Service Commission Order July 1998, Docket No 8516-U	
Damage Prevention	Part 192.614(b)	Requires that all Owners and/or Operators of a buried utility facility in Georgia shall be a member of the State-wide Utilities Protection Center. [Pipeline Operators do not have the option of having a written plan and being part of a different state one call center or inhouse call center]	Rules of the Georgia Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 3: Enforcement Procedures Governing Gas Pipeline Safety	515-9-3-.14 Utilities Protection Center 515-9-3-.15 Damage Prevention
		Also Requires that all Owners and/or Operators of a buried utility facility in Georgia shall comply in all respects of the Georgia Utility Facility Protection Act	Official Code of Georgia Annotated (O.C.G.A).Title 25 – Fire Protection and Safety, Chapter 9 Blasting or Excavation near Utility Facilities	§ 25-9-5. Cooperation with UPC; permanent markers for water and sewer facilities; point of contact list
Damage Prevention	Part 192.614(b)	Establishes standards for the marking and designation of buried facilities and the requirements for "white lining" proposed excavations	Rules of the Georgia Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 3 Enforcement Procedures Governing Gas Pipeline Safety	515-9-3-.14 Utilities Protection Center
Design/Install Requirements	Part 192.615(a)	Requires that each and every entity under the	Rules of the Georgia Public Service	515-9-5-.01 Emergency Procedures

Georgia

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		jurisdiction of the Commission establish procedures that its employees and agents shall follow in the event that a utility facility is damaged when blasting or excavating activities are performed.	Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 5: Procedures Required Under The Georgia Utility Facility Protection Act	
Damage Prevention	Part 192.614 Part192.617	Specifies that reasonable care shall also include but not be limited to compliance with the Common Ground Alliance Best Practices as well as the accurate location and marking of facilities in accordance with O.C.G.A. § 25-9-9(a) and the American Public Works Association ("APWA") color code in place at the time the location of the utility facility is designated. (O.C.G.A. § 25-9-7(a)(2)) / Specifies that "Evidence of the implementation and utilization of the Common Ground Alliance Best Practices by a facility owner and/or operator or a locator or an excavator at a hearing as prescribed by O.C.G.A. § 25-9-13(h)(7) shall be considered in the Commission's analysis of reasonable care." During the investigation of	Rules of the Georgia Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 6: Commission Recognized Best Practices	515-9-6-.01 Requirement to Use Reasonable Care and Commission Recognized Best Practices

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		failures		
Authority Beyond OPS	Part 192.614 Part 192.616	This rule establishes the requirements for marketers and poolers of deregulated gas operators to assist in the distribution of Public Awareness materials required to customers by the code.	Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 8: Natural Gas Pipeline Safety And Public Awareness Program	515-9-8-.01 Purpose
Extending LDC Responsibility	Part 192.615©	Requires that in counties where there is more than one operator, that they conduct their requirements under 192.615 jointly.	Public Service Commission, Chapter 515-9 Safe Installation and Operation of Natural Gas Transmission and Distribution Systems: Sub Chapter 7: Gas Safety In Georgia Counties	515-9-7-.02 Minimum Procedures for Handling Areas of Natural Gas Emergencies Occurring on the Facilities of Another Operator.
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Hawaii

Key Stats	
State Agency	
Division	
Department	
Web	
Regulated Intrastate Pipeline Systems	
Regulated Master Meter Operators	
Regulated LNG Systems	
Regulated Hazardous Liquid Systems	
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	

Applicable Requirement in CFR

Hawaii has no state program. PHMSA- (Office of Pipeline Safety) retains federal oversight of all pipelines.

National Association of Pipeline Safety Representatives

Idaho

Key Stats

State Agency	Idaho Public Utilities Commission
Division	Administration
Department	Pipeline Safety
Web	http://www.puc.idaho.gov/PIPELINES/PIPELINES.htm
Regulated Intrastate Pipeline Systems	5 (3 Intrastate Natural Gas Distribution Operators, 2 with Intrastate Transmission Lines)
Regulated Master Meter Operators	0
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	6

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Reporting for all serious damages and serious service interruptions	Idaho Administrative Code , for Public Utilities Commission (Agency 31) IDAPA 31.11.01 Safety and Accident Rules for Utilities Regulated by the IPUC	Rule 301.03 Major Service Interruptions or Damage to Natural Gas Pipelines
Extending LDC Responsibility	Part 192.357	The gas company shall inspect the customers installation before the connection of a meter to ascertain the installation conforms to the provisions of the NFPA Fuel Gas Code and Uniform Mechanical Code as adopted by the Commission If the installation on the customer's premises does not meet these requirements, the Company shall refuse to connect the meter and shall advise the	Idaho Administrative Code , for Public Utilities Commission (Agency 31) IDAPA 31.31.01 Gas Service Rules Rule – Construction, Operation and Maintenance of Facilities for Transmission and Distribution of Gas	Rule102 Inspection of Customers Facilities

Idaho

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		customer in writing the reasons for such refusal.		
Enhanced Record Keeping	Part 192.605	Requires Maps, plans and records to contain size, character, location, drip, street valve, district regulator & service connection served to be kept at the principal office and divisional offices within district.	Idaho Administrative Code , for Public Utilities Commission (Agency 31) IDAPA 31.31.01 Gas Service Rules- Construction, Operation and Maintenance of Facilities for Transmission and Distribution of Gas	Rule 101.01 Maps of Facilities
Enhanced Record Keeping	Part 192.605	Each division or district office shall have available information about the distribution system that will enable the local representatives at all times to furnish necessary information regarding rendering of service to existing and prospective customers.	Idaho Administrative Code , for Public Utilities Commission (Agency 31) IDAPA 31.31.01 Gas Service Rules- Construction, Operation and Maintenance of Facilities for Transmission and Distribution of Gas	Rule 101.02 Maps of Facilities
Enhanced Record Keeping	Part 192.605	Each gas manufacturing or mixing plant, compressor station and storage facility shall be provided with an accurate ground plan drawn to a suitable scale, showing the entire layout of the plant or station, the location, size, and character of plant, equipment, major pipelines, connections, valves, and other facilities used for the production and delivery of gas, all properly identified.	Idaho Administrative Code , for Public Utilities Commission (Agency 31) IDAPA 31.31.01 Gas Service Rules- Construction, Operation and Maintenance of Facilities for Transmission and Distribution of Gas	Rule 101.03 Maps of Facilities
State Inspection	Part 190.203	More Frequent	None	Inspection Forms and

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Program		Inspections/Contacts and Detailed Audits		Frequency Operator Inspections

Illinois

Key Stats	
State Agency	Illinois Commerce Commission
Division	Energy
Department	Pipeline Safety Program
Web	http://www.icc.illinois.gov/pipelinesafety/
Regulated Intrastate Pipeline Systems	107
Regulated Master Meter operators	12
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	10

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.605	Requires the operator to file the inspection and maintenance plan with the Commission.	Illinois Compiled Statutes, Chapter 220 Utilities, Subchapter 20 Illinois Gas Pipeline Safety Act, Section 5 (220 ILCS 20/5)	220 ILCS 20/5
Enhanced Reporting	Part 191.3	Commission must be notified if major interruption will extend more than 12 hours. An interruption is considered if system pressures drop more than 1.5 in w.c.	Title 83: Public Utilities , Chapter I: Illinois Commerce Commission Subchapter D: Gas Utilities ,Part 500 Standards Of Service For Gas Utilities	Section 500.160 Interruptions Of Service
Operating Pressure	Part 192.623	The pressure of gas supplied as measured at the outlet of any customer's meter, shall not be less than two inches nor more than 12 inches of water pressure except where greater pressure is specified and provided for in the contract between the utility and	Title 83: Public Utilities Chapter I: Illinois Commerce Commission Subchapter D: Gas Utilities Part 500 Standards Of Service For Gas Utilities	Section 500.260 Pressure Regulation

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		the customer		
Training/ Qualifications	Part 192.801	Requires each natural gas system operator to develop training procedures which will assure that its field employees engaged in construction, operation, inspection and maintenance of the gas system are properly trained.	Title 83: Public Utilities , Chapter I: Illinois Commerce Commission Subchapter D: Gas Utilities ,Part 520 Training Programs for Natural Gas Operating Personnel	Section 520.10 Training Procedures
Meter Location/ Protection	Part 192.353 Part 192.355	Meters shall be located on the customer's premises as near as practical to the point of entrance of gas service into customer's building or utilization area. Said location shall be accessible and provide reasonable protection for the meter from accidental damage or hazardous operation. Meters shall not be installed in sleeping rooms, small unventilated areas or in locations where the installation, reading and removal of the meter may prove difficult or hazardous. Out-of-doors meters may not be installed in front of a residential dwelling except with the consent of the customer.	Title 83: Public Utilities, Chapter I: Illinois Commerce Commission Subchapter D: Gas Utilities ,Part 500 Standards Of Service For Gas Utilities	Section 500.170 Location Of Service Meters
Leak Tests	Part 192.357	At the time of installation each meter shall be checked for proper mechanical condition and suitability of location. Service pipes and meter connections	Title 83: Public Utilities Chapter I: Illinois Commerce Commission Subchapter D: Gas Utilities Part 500 Standards Of Service For Gas Utilities	Section 500.170 Location of Service Meters

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		shall be tested for leaks and general fitness. The utility may refuse to install a meter or to serve a customer if, in its judgment, the customer's installation of piping or gas-burning equipment is hazardous		
Replacement Program	Part 192.367	Service Pipes replaced because of low pressure or water in system shall be at least 1 inch diameter and installed in manner to prevent freezing	Title 83: Public Utilities Chapter I: Illinois Commerce Commission Subchapter D: Gas Utilities, Part 500 Standards Of Service For Gas Utilities	Section 500.340 Maintenance And Replacement Of Service Pipes
Extended LDC Responsibility	Part 192.361 Part 192.371 Part 192.375 Part 192.723 Part 192.614 Subpart I	"Pipeline facilities" also includes new and existing pipes and lines and any other equipment, facility, or structure, except customer-owned branch lines connected to the primary fuel lines, used to convey gas from a gas main to the outside wall of residential premises, and any person who provides gas service directly to its residential customer through these facilities shall be deemed to operate such pipeline facilities for purposes of this Act irrespective of the ownership of the facilities or the location of the facilities with respect to the meter, except that a person who provides gas service to a "master meter	Illinois Compiled Statutes, Chapter 220 Utilities, Subchapter 20 Illinois Gas Pipeline Safety Act Section 2 (220 ILCS 20/2.04)	220 ILCS 20/2.04 Pipeline Facilities

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		system", as that term is defined at 49 C.F.R. Section 191.3, shall not be deemed to operate any facilities downstream of the master meter.		
Extending LDC Responsibility	Part 192.3	"Transportation of gas" also includes the conveyance of gas from a gas main through the primary fuel line to the outside wall of residential premises. If the gas meter is placed within 3 feet of the structure, the utility's responsibility shall end at the outlet side of the meter.	Illinois Compiled Statutes, Chapter 220 Utilities, Subchapter 20 Illinois Gas Pipeline Safety Act, Section 2 (220 ILCS 20/2.03)	(220 ILCS 20/2.03) Transportation of Gas
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Indiana

Key Stats

State Agency	Indiana Utility Regulatory Commission
Division	Pipeline Safety Division
Department	
Web	http://www.in.gov/iurc/2335.htm
Regulated Intrastate Pipeline Systems	50 operators, 122 inspection units
Regulated Master Meter Operators	44 operators, 94 inspection units
Regulated LNG Systems	4 separate plants owned by 3 operators
Regulated Hazardous Liquid Systems	1
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	21

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.25	Safety Related Condition Reports required to be sent to the Pipeline Safety Division	Indiana Administrative Code Title 170 Indiana Utility Regulatory Commission , Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-4 Reports to the division
Enhanced Reporting	Part 191.11	Master meter operators required to submit annual reports to the Pipeline Safety Division for leak surveys and results, cathodic protection surveys and results, valve inspections and results	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-4 Reports to the division
Enhanced Reporting	Part 192.603	O&M Procedures required to be sent to	Indiana Administrative Code, Title 170	170 IAC 5-3-2 Federal regulations;

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		the Pipeline Safety Division	Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	revision
Enhanced Reporting	Part 192.615	Emergency Response Procedures required to be sent to the Pipeline Safety Division	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 Federal regulations; revision
Enhanced Reporting	Part 191.3	Unintentional Interruptions of greater than 100 customers requires telephonic notification to the Pipeline Safety Division	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-4 (d) Reports to the division
Enhanced Reporting	Part 191	Written report must be filed upon request of IURC	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide	170 IAC 5-3

Indiana

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Fluids, and Related Pipeline Facilities	
Enhanced Reporting	None	Specific requirements for reporting capital projects to IURC including transmission projects, any cast iron bare steel replacement, gas, distribution centers serving more than 1,000 customers, any haz liquid project, any CO2 project, any replacement project involving 12 city blocks or 250 services and greater	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3 4(e) Reports to the division
Valves	Part 192.365	Service shut-off valve criteria – must have valve outside structure	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (3) Federal regulations; revision
Pressure Testing	Part 192.503	No pressure testing against a live valve (pressurized gas supply on other side of valve)	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (5) Federal regulations; revision
Damage Prevention	Part 192.614	IURC now has enforcement authority in some cases of excavation damage to a pipeline	Indiana Code Title 8 Utilities & Transportation, Article 1 Utilities Generally, Chapter 26 Damage to	IC 8-1-26-25 Penalties under IC 8-1-22.5 for pipeline operators

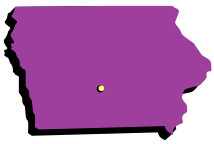
Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Underground Utilities	
Meter Location / Protection	Part 192.355 Advisory Bulletins ADB 11-02 (FR 7238) ADB 97-01 ADB 93-01 ADB 08-03 (FR 12796)	Customer meters must be protected from snow, ice damage	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (2) Federal regulations; revision
Leak Tests	Part 192.723	Annual leak surveys for high occupancy buildings	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (12) Federal regulations; revision
Leak Tests	Part 192.357	Residential customer piping must be pressure tight at time of startup or turn on	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (2) Federal regulations; revision
Leak Tests	Part 192.723	Leak response requirements	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the	170 IAC 5-3

Indiana

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	
Response to Leaks	Part 192.723	Classification requirements for discovered or reported leaks	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (12) Federal regulations; revision
Replacement Programs	Part 192.487 Part 192.489	Cast iron / bare steel replacement program under rate relief	IURC Order Cause No 43298 dated February 13, 2008	IURC Cause No. 43298
Replacement Programs	Part 192.487 Part 192.489	29 private, municipal distribution operators have replaced all bare steel and cast iron pipe in their systems		
Authority Beyond OPS	None	Authority to order change in public interest	Indiana Code Title 8 Utilities & Transportation, Article 1 Utilities Generally, Chapter 22.5 Gas Pipeline Safety	IC 8-1-22.5- Powers and Duties
Extending LDC Responsibility	Part 192.723	Maintenance responsibility for some buried customer service lines	Indiana Administrative Code, Title 170 Indiana Utility Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	170 IAC 5-3-2 (12) Federal regulations; revision
Enhanced Record Keeping	Part 192.603	Detailed mapping requirements are specified including:	Indiana Administrative Code, Title 170 Indiana Utility	170 IAC 5-3-2 (10) Federal regulations; revision

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Main, sizes, materials, pressures, emergency valve locations, rectifiers, regulator stations, critical bonds	Regulatory Commission, Article 5 Gas Utilities, Rule 3 Minimum Safety Standards for the Transportation of Gas, Hazardous Liquids, Carbon Dioxide Fluids, and Related Pipeline Facilities	
State Inspection Programs	Part 190.203	Inspections focused on risk	Certification	Division Inspection Plan
State Inspection Programs	Part 190.203	More frequent inspections / contact	Certification	Division Inspection Plan

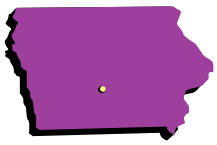


Iowa

Key Stats	
State Agency	Iowa Utilities Board
Division	
Department	Safety & Engineering
Web	http://iub.iowa.gov/
Regulated Intrastate Pipeline Systems	105 (Operators with both transmission and distribution systems are counted in both categories as required in PHMSA Certification Attachment 1.)
Regulated Master Meter Operators	0
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	10

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires incident reports for $15K property damage	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities	199 IAC 19.17(1)b Incident Notification and Reports
Enhanced Reporting	Part 191.3	Requires reports for loss of service of 50 customers or more	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities	199 IAC 19.17(1)d Incident Notification and Reports
Odorant	Part 192.625	Requires prompt remedial action if odor readings are below minimum requirement	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities e	199 IAC 19.8(5) Safety
Response To Leaks	Part 192.615	A report of a gas leak must be treated as an emergency requiring immediate response and written into O&M Plan	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities e	199 IAC 19.8(4) Safety
Response to Leaks	Part 192.615	Gas leak reports must be responded to within one hour	Order	Enforcement action for unacceptable response times
Design/Install Requirements	Part 192.327	48” of cover in tilled agricultural land	Iowa Administrative Code, Title 199	199 IAC 10.12(3) Standards for



Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Utilities Division Chapter 10 Intrastate Gas and Underground Storage	Construction, Operation and Maintenance
Design/Install Requirements	Part 192.361	Requires 12" separation between buried gas and electric service lines	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities e	199 IAC 19.8(6) Safety
Design/Install Requirements	Part 192.319	Requires agricultural land and drainage be restored after pipeline construction	Iowa Administrative Code, Title 199 Utilities Division Chapter 9 Restoration of Agricultural Lands during and after Pipeline Construction	199 IAC 9.1 – 9.7 Multiple sections
Leak Tests	Part 192.605	No flow test at meter required when turning on gas service to customer	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities e	199 IAC 19.8(3) Safety
Response To Leaks	Part 192.615	A report of a gas leak must be treated as an emergency requiring immediate response and written into O&M Plan	Iowa Administrative Code, Title 199 Utilities Division Chapter 19 Gas Utilities e	199 IAC 19.8(4) Safety
Response to Leaks	Part 192.615	Gas leak reports must be responded to within one hour	Order	Enforcement action for unacceptable response times
Replacement Program	Part 192.703(b)	All Century plastic pipe – known to have become dangerously brittle – to be removed/ replaced.	State of Iowa, Department of Commerce, Utilities Board Feb 15, 2000 Order Terminating Reporting Requirements Docket #INU-95-2	Item 2 Investigation following incident with multiple fatalities
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Kansas

State Page Last Revised: Sept. 2011

TOC

Kansas

Key Stats

State Agency	Kansas Corporation Commission
Division	Division of Utilities
Department	Pipeline Safety Section
Web	http://www.kcc.state.ks.us/pipeline/index.htm
Regulated Intrastate Pipeline Systems	127 (includes 6 Gathering/38 Transmission/58 Municipal/10 Private)
Regulated Master Meter Operators	15
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	47

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.603	Requires Annual filing of O&M Plans with Commission	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(w) Minimum Pipeline Safety Standards
Enhanced Reporting	Part 192.615	Requires Annual filing of Emergency Plans with Commission	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(w) 82-11-4-(y) Minimum Pipeline Safety Standards
Enhanced Reporting	Part 192.614 Part 191.3	Requires filing of damage resulting from 3rd party excavation with Commission	KS Administrative Regulations, Agency 82, KCC, Article 82-14 The Kansas Underground Utility Damage Prevention Act	82-14-3 (m) Operator Requirements
Enhanced Reporting	Part 192.305	Requires Annual Report of Project Additions, Extensions, Improvements to Capital of Gas Utility	Kansas Statutes Annotated (KSA) Chapter 66 Public Utilities, Article 21: Rural Kansas Self-Help Gas Act, Statutes 66 -2101 through 66-2106	KSA 66-2103 Existing gas service utility to develop plans to provide gas; failure to provide or nonacceptance of plan

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
More Direct Oversight	Part 192 305	Requires 10 day advance notice of construction activities > 500 ft for small operators and >1, 000 ft for large operators for Commission inspections	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-7-(d) Construction Notices
More Direct Oversight	Part 192 305	Requires small operators to provide notice if consultants are used for routine maintenance activities	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-7-© Small Gas Operators
More Direct Oversight	Part 192 305	Requires inspection of outside construction crews (quality assurance control)	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(x) Minimum Pipeline Safety Standards
Pressure Testing	Part 192.509	Requires Steel Mains that operate > 1psig to be tested to minimum of 100 psig (not 90 psig)	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (p) Minimum Pipeline Safety Standards
Pressure Testing	Part 192.553	Requires Uprating of MAOP to be checked with FI unit within 8 hours of each interval	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (v) Minimum Pipeline Safety Standards
Damage Prevention	Part 192.614 Part 190.221	States Commission Pipeline Safety Division is enforcement authority for all underground damage prevention rules of KS	KS Administrative Regulations, Agency 82, KCC, Article 82-14 Kansas Underground Utility Damage Prevention Act	82-14-6 Enforcement Procedures
Damage Prevention	Part 192.614	Embedded throughout the Commission rules for underground utility damage prevention are standards that simulate many CGA Best Practices	KS Administrative Regulations, Agency 82, KCC, Article 82-14 The Kansas Underground Utility Damage Prevention Act	82-14-1 82-14-2 82-14-3 82-14-4 82-14-5 82-14-6 (Multiple Section Titles)
Training/ Qualifications	Part 192.801	Requires Operator Training if Vegetation Surveying as a method of Leak Surveying	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (dd) Minimum Pipeline Safety Standards

Kansas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Odorant	Part 192.625	All Service Calls to perform sniff test if entering a building	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (aa) Minimum Pipeline Safety Standards
Odorant	Part 192.625	Requires Monthly Sampling (not periodic)	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (aa) Minimum Pipeline Safety Standards
Odorant	Part 192.625	Requires Odorant to be injected at concentration of 0.5 to 1.25 pound per million cf. and requires the use of an odorometer for farm tap installations off unodorized transmission pipelines	KCC Order Aug 06 1999 D# OO-PNTG-086MIS	Paragraph 5 of Order
Leak Tests	Part 192.723	Requires continuous sampling technology	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (dd) Minimum Pipeline Safety Standards
Leak Tests	Part 192.723	Leak Surveys on Mains Frequency is annually (not 3 years) For non business areas and unprotected steel in class 2,3,4	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (dd) Minimum Pipeline Safety Standards
Leak Tests	Part 192.723	Leak Surveys on Mains Frequency is 3 years (not 5 years) For non business areas and unprotected steel in class 1 or cast iron or PVC	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (dd) Minimum Pipeline Safety Standards
Leak Tests	Part 192.723	Leak Surveys on Services. Frequency is annually (not 3 years) For non business areas and protected bare steel	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (dd) Minimum Pipeline Safety Standards
Leak Tests	Part 192.723	Leak Surveys on Services Frequency is 3 years (not 5 years) For non business areas and unprotected steel in	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (dd) Minimum Pipeline Safety Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		class 1 or cast iron or PVC		
Leak Tests	Part 192.723	Requires weekly leak monitoring during frost conditions (winter)	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (aa) Minimum Pipeline Safety Standards
Leak Tests	Part 192.721	Requires distribution mains/feeders to be patrolled at specified intervals for areas where no anticipated movement or external loading	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (y) 82-11-4 (cc) Minimum Pipeline Safety Standards
Response to Leaks	Part 192.723	Leak Classification System and Required timeline for Repairs	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (y) 82-11-4 (bb) Minimum Pipeline Safety Standards
Response to Leaks	Part 192.615	Response Times to Leaks/Odor Complaints within 2 hours including classification	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety KCC Order Oct 16, 1997 D#97-WSRG-486-MER	82-11-4 (bb) Minimum Pipeline Safety Standards Stipulation Section 18
Replacement Program	Part 192.755	Collect a coupon each time cast iron piping is leaking from the body of a pipe joint. Conduct laboratory analysis on all coupons to determine the percentage of graphitization; Replace at least one city block (approximately 500 feet) within 120 days of the operator's knowledge of the laboratory test results, each time the results show graphitization equal to or greater than set values based on diameter of the pipe;	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(ee)(6) Minimum Pipeline Safety Standards

Kansas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Retain all sampling records for the life of the facility, but not less than five years.		
Replacement Program	Part 192.755	Requires replacement of Cast Iron by 2013 for pipe less than 3 inches in diameter	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(ee) (6) Minimum Pipeline Safety Standards
Replacement Program	Part 192.489	Requires entire distribution system to be replaced by 2007	KCC Order Aug 30 2007 D# 06-LYOP-641-SHO	Stipulation 5.c Stipulation 5.d
Replacement Program	Part 192.487	Requires Bare Steel Services Replacement Program within 18 months if areas of system contain existing leaks +repaired leaks + replaced service lines due to corrosion leaks =25% of quantity of unprotected bare steel services	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(i) Minimum Pipeline Safety Standards
Replacement Program	Part 192.623	Requires Operator Remediation of Valid Pressure Complaints (too low/too high)	KCC Order April 6,2007, D# 06-ATMG-945-COM	Addressed insufficient supply of gas customer complaint resulting in low pressure
Replacement Program	NONE	Replacing customer-owned yard lines and private lines from master meters; (repiped over 200 mobile home parks	KCC Order January 2, 2001, D# 01-KGSG-429-ACT	$10 million Plan for Rectification of Customer-Owned Gas Distribution Systems of Mobile Home Courts
Authority Beyond OPS	None Applicable	Pipeline Safety Division Routinely Participates with Gas Division on Rate Cases and files Witness Testimony	KS Administrative Regulations, Agency 82, KCC, Article 82-01 Rules of Practice and Procedure	82-01-204 (q) Definitions
Extending LDC Responsibility	Part 192.703	Requires all operators to provide maintenance of buried piping between meter and building wall.	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-8-(a) –(f) Customer Installations Location and Monitoring Responsibility
Cathodic Protection	Part 192.469	All unprotected bare steel service lines must have close interval survey conducted	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas	82-11-4 (i) Minimum Pipeline Safety Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Pipeline Safety	
Cathodic Protection	Part 192.455	Eliminates exceptions for non corrosive environments and requires all new steel to be installed with cathodic protection	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (k) Minimum Pipeline Safety Standards
Cathodic Protection	Part 192.465	Short sections <100 feet or cathodically protected services must be cathodically tested within 3 year period **(not 10 year period)**	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (i) 82-11-4 (m) Minimum Pipeline Safety Standards
Cathodic Protection	Part 192.465	Limits prompt response for correcting cathodic protection deficiencies found during electrical tests to less than 30 days	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (n) Minimum Pipeline Safety Standards
Cathodic Protection	Part 192.465	Limits areas impractical to electrical survey to only: Wall to wall pavement; Pipelines in common trench with other utilities, areas of stray current; paved areas using a perimeter 2 feet less than actual	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (p) Minimum Pipeline Safety Standards
Design/Install Requirements	Part 192.317	Above ground transmission pipeline is prohibited for new installations and for existing class 2,3,4 locations	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (g) 82-11-4 (h) Minimum Pipeline Safety Standards
Risk Based Approach	Part 192.1007	Requires Annual Evaluation of Threats/Risks	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(i) Minimum Pipeline Safety Standards
Enhanced Record Keeping	Part 192.743	Requires regulator and relief valve capacity and calculations for all over pressure devices regardless of testing, or ownership or operations	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(x) Minimum Pipeline Safety Standards
Enhanced Record Keeping	Part 192.723	Requires leaks survey records to be kept a minimum of 6 years	KS Administrative Regulations, Agency 82, KCC, Article 82-	82-11-4-(dd) Minimum Pipeline Safety Standards

Kansas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			11 Natural Gas Pipeline Safety	
Enhanced Record Keeping	Part 192.625	Requires odorometer and sniff test records to be kept a minimum of 2 years	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(aa) Minimum Pipeline Safety Standards
Enhanced Record Keeping	Part 192.491	Requires records **and** maps of corrosion control systems and cathodic protection facilities	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(q) Minimum Pipeline Safety Standards
Enhanced Record Keeping	Part 192.617	Leaks are defined as failures and require investigation of each leak and record of each failure (leak)	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4 (z) Minimum Pipeline Safety Standards
Enhanced Record Keeping	Part 192.517	Requires test date and description of facilities tested for establishing strength test	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(t) Minimum Pipeline Safety Standards
Enhanced Record Keeping	Part 192.517	Requires all test records to be kept for the life of the pipeline for **all** pipelines	KS Administrative Regulations, Agency 82, KCC, Article 82-11 Natural Gas Pipeline Safety	82-11-4-(u) Minimum Pipeline Safety Standards
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Kentucky

Key Stats

State Agency	Kentucky Public Service Commission
Division	Energy and Environment Cabinet/Engineering Division
Department	Gas Pipeline Safety Branch
Web	http://www.psc.ky.gov
Regulated Intrastate Pipeline Systems	113
Regulated Master Meter Operators	111
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	19

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $25K level	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Pipeline Safety; Report of Leaks	807 KAR 5:027 Section 3(d) Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 191.3	Requires reporting of outages to 40 or more customer for 4 hours or more	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Pipeline Safety; Report of Leaks	807 KAR 5:027 Section 3(e) Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 191.3	Requires reporting of taking any segment of pipeline or main out of service (except when	Kentucky Administrative Regulations, Title 807 Energy and	807 KAR 5:027 Section 3(b) Telephonic Notice of Certain Incidents

		planned or routine maintenance)	Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Pipeline Safety; Report of Leaks	
Enhanced Reporting	Part 191.3	Requires reporting of incident that results in gas ignition (except when planned or routine maintenance)	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Pipeline Safety; Report of Leaks	807 KAR 5:027 Section 3© Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 191.3	Requires reporting of loss of a sizable amount of gas	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Pipeline Safety; Report of Leaks	807 KAR 5:027 Section 3(f) Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 191.3	Requires utility to keep a complete record of all interruptions, utility must notify commission of major interruptions as soon as utility is aware, and utility must complete a report once restoration of service is complete.	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 13 Operations Subsection (16) Continuity of Service
Enhanced Reporting	Part 191.1	Allows no more than a trace of hydrogen sulfide in gas supplied to customers, does not allow for any impurities in gas which may cause excessive corrosion or harmful fumes when burned, requires testing for the presence of hydrogen sulfide (when necessary) as well as properly recording and filing the results,	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 15 Purity of Gas

		requires manufactured and mixed gas to be tested at least once each month		
More Direct Oversight	Part 192.305	Requires 30 day advance notice of construction activities subjected to pressure in excess of 100 psig (or 20% SYMS)	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 7(3)(a) General Construction Requirements for Transmission Lines and Mains
More Direct Oversight	Part 192.305	Requires report to be filed with commission certifying maximum pressure as well as construction and testing. Must also file within 60 days results of all tests made.	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 7(3)(b) General Construction Requirements for Transmission Lines and Mains
Operating Pressure	Part 192.623	Requires gas pressures to be maintained +/- 50% at the outlet of meter to provide safe an efficient utilization of gas	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 13 Operations Subsection (15) Allowable variations of standard service pressure
Operating Pressure	Part 192.621	Requires all utilities to adopt and maintain a standard pressure	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 13 Operations Subsection (14) Standard Pressure
Odorant	Part 192.625(f)	Specifies sampling intervals (separately odorized systems w/10 or fewer customers shall be sampled at least once each 95 days, systems w/more than 10 customers shall be sampled at least once each week	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 13 Operations Subsection (17)(g)(3) and (4) Odorization of Gas

Response to Leaks	Part 192.723	Leaks detected shall be graded 1, 2, or 3.	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service s	807 KAR 5:022 Section 14 Maintenance Subsection (13) Distribution Systems Leakage Surveys and Procedures
External/ Internal Corrosion	Part 192.605(b)(10)	Each utility having a pipe-type or bottle-type holder shall establish a plan for systematic, routine inspection and testing of these facilities	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 14 Maintenance Subsection (20) Pipe-type and bottle-type holders: plan for inspection and testing
Design/Install Requirements	Part 192.731	Each utility shall establish starting, operating, and shutdown procedures for gas compressor units	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service s	807 KAR 5:022 Section 14 Maintenance Subsection (16) Compressor Stations: procedures for gas compressor units
Design/ Install Requirements	Part 192.731	Each utility shall establish procedures for maintaining compressor stations, including provision for isolating units or sections of pipe and for purging before returning to service	Kentucky Administrative Regulations, Title 807 Energy and Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	807 KAR 5:022 Section 14 Maintenance Subsection (18) Compressor Stations: isolation of equipment for maintenance or alterations
Design/Install Requirements	Part 192.197	Construction and installation of farm taps shall conform to such standards of safety, location, and convenience as may be prescribed by the commission and shall be under the supervision of the PSC	Kentucky Revised Statutes Chapter 278 Oil and Gas Pipelines Section 485	KRS 278.485(3) Gas pipeline company to furnish gas – When – Rates – Duty of person applying for gas service and gas pipeline company – Abandonment of gas wells – Discontinuance of service – Right to tap a gathering line
Enhanced Record Keeping	Part 192.605	Prescribes minimum requirements for measurement of gas, accuracy of measuring	Kentucky Administrative Regulations, Title 807 Energy and	807 KAR 5:022 Section 8. Gas Measurement

		instruments (meters), meter testing facilities, and periodic testing of meters.	Environmental Cabinet Public Service Commission, Chapter 5 Utilities, Gas Safety and Service	
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Louisiana

Key Stats

State Agency	Louisiana Department of Natural Resources
Division	Office of Conservation / Pipeline Division
Department	Pipeline Safety Section
Web	http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=144
Regulated Intrastate Pipeline Systems	204 Operators
Regulated Master Meter Operators	106 Operators
Regulated LNG Systems	0 Operators
Regulated Hazardous Liquid Systems	53 Operators
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	8

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.5(a)	Telephonic report within 2 hours of discovery	Louisiana Administrative Code Title 43 Natural Resources, Part XIII, Office of Conservation Pipeline Safety, Subpart 2 Transportation of Natural Gas and Other Gas by Pipeline, Chapter 3 Annual Reports, Incident Reports and Safety Related Condition Reports	§305.A Telephonic Notice of Certain Incidents
Enhanced Reporting	Part 195.52(a)	Telephonic report within 2 hours of discovery for hazardous liquids	Louisiana Administrative Code Title 33 Environmental Quality, Part V Hazardous Waste and Hazardous Materials Chapter 30	.30127.A
Enhanced Reporting	Part 191.22©	Construction of 1-mile or greater; 48-hour prior to construction	Louisiana Administrative Code Title 43 Natural Resources, Part XIII,	§1705. B Inspection: General

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Office of Conservation Pipeline Safety, Subpart 2 Transportation of Natural Gas and Other Gas by Pipeline, Chapter 17 General Construction Requirements for Transmission Lines and Mains	
Enhanced Reporting	Part 195.64©	Hazardous Liquid Construction of any length; 7-days prior to construction	Louisiana Administrative Code Title 33 Environmental Quality, Part V Hazardous Waste and Hazardous Materials Chapter	§30204.B
Pressure Testing	Part 195.303	Risk Based alternative to pressure testing of older hazardous liquid pipelines not adopted	N/A	N/A
Odorant	Part 192.625(e)	Odorizer and test point requirements	Louisiana Administrative Code Title 43 Natural Resources, Part XIII, Office of Conservation Pipeline Safety, Subpart 2 Transportation of Natural Gas and Other Gas by Pipeline, Chapter 27. Operations	§2725. H Odorization of Gas
Odorant	Part 192.625(f)	Quarterly sampling and records	Louisiana Administrative Code Title 43 Natural Resources, Part XIII, Office of Conservation Pipeline Safety, Subpart 2 Transportation of Natural Gas and Other Gas by Pipeline, Chapter 27. Operations	§2725. I Odorization of Gas
Cathodic Protection	Part 192.465(d)	Remedial action completed within 90-days from date deficiency discovered	Louisiana Administrative Code Title 43 Natural Resources, Part XIII,	§2117. D External Corrosion Control: Monitoring

Louisiana

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Office of Conservation Pipeline Safety, Subpart 2 Transportation of Natural Gas and Other Gas by Pipeline, Chapter 21. Requirements for Corrosion Control	

Maine

Key Stats

State Agency	Maine Public Utilities Commission
Division	Gas Division
Department	Natural Gas and Propane Safety
Web	http://www.maine.gov/mpuc/natural_gas/natural_gas_safety/index.html
Regulated Intrastate Pipeline Systems	3
Regulated Master Meter Operators	
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	76

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Notification within 1 hour	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§4 (A) Emergency Notification
Enhanced Reporting	Part 192.614 Part 191.3	Requires filing of damage resulting from 3rd party excavation with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§3 (A) (1) (d) Participation in Underground Utility Damage Prevention Program
Enhanced Reporting	Part 191.3	Requires Reports of all building evacuations involving gas	Maine 65-407 Public Utilities Commission Rules, Part 1 Procedural Rules, Chapter 130 Safety and Accident Reporting Requirements	Rule§3 (1) Reporting
Enhanced Reporting	Part 191.3	Requires Reports of all outages greater than 500 customers or 1% of system customers	Maine 65-407 Public Utilities Commission Rules, Part 1 Procedural Rules, Chapter 130 Safety and Accident Reporting Requirements	Rule§3 (1) Reporting

Maine

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Reports of all interruptions greater than 0.5 hr affecting other utilities critical facilities	Maine 65-407 Public Utilities Commission Rules, Part 1 Procedural Rules, Chapter 130 Safety and Accident Reporting Requirements	Rule§3 (1) Reporting
Enhanced Reporting	Part 192.723	Requires Monthly Status Reports of Leaks	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (G) Installation and Maintenance Standards
Enhanced Reporting	Part 191.3	Requires Reports of all outages greater than 20 customers	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (A) Installation and Maintenance Standards
Enhanced Reporting	Part 192.603	Requires Annual Performance Measure Reporting of: Damages/Mile Leaks/Mile by Material Tickets/Mile Damages per 1K Tickets	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (F) (2) Installation and Maintenance Standards
Enhanced Reporting	Part 192.603	Requires Annual filing of O&M Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.615	Requires Annual filing of Emergency Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.805	Requires Annual filing of Operator Qualification Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.616	Requires Annual filing of Public Awareness Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.614	Requires Annual filing of Damage Prevention Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.305	Requires Annual filing of Quality Assurance/Control Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.907	Requires Annual filing of Integrity Management Plans with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.301	Requires Annual filing of Construction Standard with Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 © Installation and Maintenance Standards
Enhanced Reporting	Part 192.615	Requires Monthly Reporting of Response Times to Emergency/Odor Complaints /Leaks	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (E) (3) Installation and Maintenance Standards
Enhanced Reporting	Advisory Bulletins 99-02 (FR 12212) 02-07 (FR 70806) 08-02 (FR 51303)	Requires Annual filing of failures for Plastic with Maine PUC and AGA Plastic Ad Hoc Committee	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (B) Installation and Maintenance Standards
Enhanced Reporting	NONE	Requires Annual Reporting of total Operational and Maintenance Activity Hours	Order	
Enhanced Reporting	Part 192.615	Response Times to Emergency/Leaks/Odor Complaints/Evacuations	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (D) (6) Installation and Maintenance Standards
Enhanced Reporting	Part 192.319	Requires Commission Approval of any Interstate Transmission Pipeline Engineering Design including submission of plans 30 days prior to construction with chosen route	Maine Revised Statutes Annotated Title 35-A, Public Utilities Part 4 G, Chapter 45 Nat Gas Pipeline Utilities	§4510 Submission of Plans to Commission §4511 Submission of Maps to Commission
More Direct Oversight	Part 192 605	Requires quality assurance and quality control program be incorporated into O&M	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (A) (1-4) Installation and Maintenance Standards
More Direct Oversight	Part 192 305	Requires inspection of outside construction crews	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (A) (1-5) Installation and Maintenance Standards
More Direct Oversight	Part 192 305	Requires weekly Reporting of construction activities for Commission	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (I) Installation and Maintenance Standards

Maine

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		inspections		
Valves	Part 192.181	Sets Criteria for Critical Valves limits and maximum number of downstream customers affected (500 customers or 8 hour max relight)	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (2) Installation and Maintenance Standards
Valves	Part 192.747	Non Critical Valves must be operated within 5 years or recorded as inoperable	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (2) Installation and Maintenance Standards
Valves	Part 192.747	Critical Valves must be accessible at all times	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (2) Installation and Maintenance Standards
Valves	Part 192.747	Non Critical & Critical Valve Boxes must be accessible at all times (not paved over)	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (3) Installation and Maintenance Standards
Valves	Part 192.747	Valve Boxes shall not transmit external loads to the main or service	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (2) Installation and Maintenance Standards
Pressure Test	Part 192.553	Requires Uprating Plan to be filed with the Commission at least 30 days prior to Uprate	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (J) Installation and Maintenance Standards
Damage Prevention	Part 192.614 Part 190.221	States Commission Safety Division is enforcement authority for all underground damage prevention rules of ME	Maine 65-407 Public Utilities Commission Rules, Part 8 Multi Utility, Chapter 895	Rule§7 (B) Commission Activities
Damage Prevention	Part 192.801 Part 192.614	Requires locators be trained and knowledgeable of ME Damage Prevention Regulations and CGA Best Practices	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§3 (B) (1) Participation in Underground Utility Damage Prevention Program
Damage Prevention	Part 192.319 Part 192.614	Requires procedure for trenchless technology installations in accordance with GPTC Appendix G-192-6	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§3 (D) (1) Participation in Underground Utility Damage Prevention Program
Damage Prevention	Part 192.801 Part 192.614	Requires locators to be trained in trench less technology installations	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas	Rule§3 (D) (3) Participation in Underground Utility

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		and monitoring techniques	Utilities, Chapter 420	Damage Prevention Program
Damage Prevention	Part 192.614	Tracer wire to be 12 gauge coated, not in contact with pipe unless trenchless technology used and	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (1) Installation and Maintenance Standards
Damage Prevention	Part 192.614	6 inch wide Warning Tape required 12 inches below surface for traditional construction installation techniques	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (1) Installation and Maintenance Standards
Training/ Qualifications	Part 192.285	Annual Requalification required for Plastic pipe joining	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (2) Installation and Maintenance Standards
Meter Location/ Protection	Part 192.353	Master Meters not allowed after Jan 1 2012 unless operated and maintained by LDC	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (B) (1) Installation and Maintenance Standards
Meter Location/ Protection	Part 192.353	Customer Meters must be located at Building wall or Structure (inside or out)	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (B) (1) Installation and Maintenance Standards
Meter Location/ Protection	Part 192.355 Advisory Bulletins 11-02 (FR 7238) 97-01 93-01 08-03 (FR 12796)	Customers meters must be protected from snow and ice damage	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (B) (3) Installation and Maintenance Standards
Meter Location/ Protection	Part 192.361	Service Lines must be **maintained, repaired, leak tested** by the operator	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (4) Installation and Maintenance Standards
Odorant	Part 192.625	Requires Monthly Sampling (not periodic)	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (H) (3) Installation and Maintenance Standards
Leak Tests	Part 192.723	Requires repeated leak surveys during Dec 1 to April 30 at least every 30 days on Cast Iron	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 © (1) Installation and Maintenance Standards
Leak Tests	Part 192.723	Business Districts is defined in ME	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§2 (B) Definitions
Leak Tests	Part 192.723	Services for Public Buildings need leak	Maine 65-407 Public Utilities Commission	Rule§6 © (1) Installation and

Maine

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		surveyed inside and out each year between Mar 1 through Dec 1	Rules, Part 4 Gas Utilities, Chapter 420	Maintenance Standards
Leak Tests	Part 192.723	Requires leak surveys performed annually on all mains	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 © (1) Installation and Maintenance Standards
Leak Tests	Part 192.605	Calibrated Instrument used must be used to check for leak survey	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 © (2) Installation and Maintenance Standards
Response to Leaks	Part 192.723	Leak Classification System and Required timeline for Repairs [Class 2 Leaks repaired within 30 days or resurveyed until repaired. Class 3 Leaks repaired within 24 months or resurveyed every 6 months until repaired]	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (D) (1) Installation and Maintenance Standards
Response to Leaks	Part 192.723	Upgrading and Down Grading restrictions of Leak Survey Results	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (D) (7-8) Installation and Maintenance Standards
Response to Leaks	Part 192.723	Class I Leaks must be reported to local FD immediately	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (D) (1) Installation and Maintenance Standards
Response to Leaks	Part 192.723	After all leaks are repaired, post leak survey and inspection required	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (D) (6) Installation and Maintenance Standards
Replacement Programs	Part 192.489	Requires Cast Iron/BS mains and services Accelerated Replacement Program with Rate Adder	Maine PUC Order July 30, 2010 D# 2008-151	Entire Order is Applicable
Replacement Programs	Part 192.353	Relocates Existing Inside Meter to Outside Meter Location	Maine PUC Order July 30, 2010 D# 2008-151	Entire Order is Applicable
Authority Beyond OPS	Part 192.605	Operating must have procedure for Red Tagging Appliance and observing unsafe conditions in connection or	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (B) (5) Installation and Maintenance Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		reconnection of service		
Authority Beyond OPS	None Applicable	Safety Department Routinely Participates with Gas Division on Rate Cases and files Witness Testimony	Maine 65-407 Public Utilities Commission Rules, Part 1 Procedural Rules, Chapter 110 Rules of Practice and Procedure	PART 5 Rulemaking Rule §503 Hearings
Extending LDC Responsibility	Part 192.616	Public Awareness Plan must include customer notification of responsibility to maintain customer piping in accordance with NFPA 54	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (B) (5) Installation and Maintenance Standards
Design Install Requirements	Part 192.181	Regulator Stations required to have inlet and outlet valves maintained and operable	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (4) Installation and Maintenance Standards
Design Install Requirements	Part 192.181	Regulator Stations required to have inlet and outlet valves at specified distance from station for those less than or greater than 100 psig	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (D) (4) Installation and Maintenance Standards
Design/Install Requirements	Part 192.325	Requires 12 inches of clearance from any underground structure	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (4) Installation and Maintenance Standards
Design/Install Requirements	Part 192.287	Joiner cannot inspect own joints for Plastic Pipe joining	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (2) Installation and Maintenance Standards
Design/Install Requirements	Part 192.121	Only design factor of .32 is allowed for plastic including PA 11 (not .40)	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (2) Installation and Maintenance Standards
Design/Install Requirements	Part 192.325	Requires underground structure crossings to be over rather than under if a leak can migrate into space	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (4) Installation and Maintenance Standards
Design/Install Requirements	Part 192.361	Interstate Pipelines including service lines must be 24 inches deep	Maine Revised Statutes Annotated Title 35-A, Public Utilities Part 4 G, Chapter 45 Nat Gas	§4506.1 Construction Requirements

Maine

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Pipeline Utilities	
Design/Install Requirements	Part 192.327	Mains in public ROW must have cover of at least 36 inches with limited exceptions	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (3) Installation and Maintenance Standards
Design/Install Requirements	Part 192.361	Services in public ROW must have cover of at least 30 inches and 24 inches on private property with limited exceptions	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 © (4) Installation and Maintenance Standards
Design/Install Requirements	Part 192.353	Service regulators must not be directly buried	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§5 (B) (4) Installation and Maintenance Standards
Enhanced Record Keeping	Part 192.605	Requires records of GPS coordinates of exposed pipe, newly installed pipe after Jan 1 2012, including street valve, service connection and all critical valves regardless of exposure	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§3 © (1-3) Participation in Underground Utility Damage Prevention Program Rule§5 (D) (1) Installation and Maintenance Standards
Enhanced Record Keeping	Part 192.727 Part 192. 605	Requires recording locations of abandon mains and service on maps and records	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (B) (4-5) Installation and Maintenance Standards
Enhanced Record Keeping	Part 192.723 Part 192. 605	Requires maintaining leak progression maps and records including location, material, type of joint and cause	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (E) Installation and Maintenance Standards
Enhanced Record Keeping	Part 192. 605	Requires maintaining all records for the life of the pipeline facilities	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (A) Installation and Maintenance Standards
Enhanced Record Keeping	Part 192.625	Requires Odorant Testing to include: volume of gas odorized, brand of odorometer, location of odorometer, amount of odorant added	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (H)(2) Installation and Maintenance Standards
Record Keeping	Part 192.805 Part 192.603	Requires Operator Qualification Plans Integrated with O&M and Emergency Plan	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§7 (D) (3) Installation and Maintenance Standards

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		and cross referencing		
Inactive Services	Part 192.727	Inactive Service must be cutoff if older than 2 years of inactive service for CI/BS mains and 5 years if Coated Steel or Plastic mains. BS stubs shall be cutoff immediately or no later than 6 months.	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (B) (1-3) Installation and Maintenance Standards
Inactive Services	Part 192.727	Inactive Service must be cutoff if building to be demolished.	Maine 65-407 Public Utilities Commission Rules, Part 4 Gas Utilities, Chapter 420	Rule§6 (B) (6) Installation and Maintenance Standards
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

TOC

Maryland

Key Stats	
State Agency	Public Service Commission of Maryland
Division	Engineering Division
Department	
Web	http://webapp.psc.state.md.us/Intanet/home.cfm
Regulated Intrastate Pipeline Systems	14 (7 Private Distribution,6 Intrastate Transmission,1 Municipality)
Regulated Master Meter Operators	53
Regulated LNG Systems	1
Regulated LPG Operators	14
Regulated Hazardous Liquid Systems	3
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	11

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.605	Requires a contact list to be filed in connection with general management duties, customer relations, engineering operations, meter test and repairs, safety, and emergencies during non-office hours.	Code of Maryland Regulations (COMAR) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 3 Records and Reports	COMAR 20.55.03.02F Information to be Filed
More Direct Oversight	Part 192.305	Requires a construction notice to be filed for certain types of construction projects.	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 3 Records and Report	COMAR 20.55.03.02J Information to be Filed COMAR 20.56.01.09G (Propane)
Damage Prevention	Part 192.319	Requires identification tape to be installed at a minimum of 12” above the top of the	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle	COMAR 20.55.09.07C(2) Pipeline Location COMAR 20.56.01.08[a](2)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		pipe.	55 Service Supplied by Gas Companies, Chapter 9 Safety	(Propane)
Meter Location/Protection	Part 192.357	Requires that residential meters be placed as close to the exterior building wall as possible.	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 9 Safety	COMAR 20.55.09.07D(1) Pipeline Location COMAR 20.56.01.08B(1) (Propane)
Meter Location/Protection	Part 192.361	Gas service may not be provided to new or renewed service lines if there is any underground pipeline after the meter, unless the pipeline carries gas only to gas utilization equipment located outdoors.	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 9 Safety	COMAR 20.55.09.07D(2) Pipeline Location COMAR 20.56.01.08B(2) (Propane)
Odorant	Part 192.625(a)	Requires that odorants level throughout the entire company distribution system shall be sufficient so that gas is detectable at 1/10th of the LEL	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 9 Safety	COMAR 20.55.09.06A Odorization
Leak Test	Part 192.723	Requires service lines to place of public assembly to be leak surveyed at least once each calendar year, but with intervals not exceeding 15 months.	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 9 Safety	COMAR 20.55.09.05B(2) Gas Leakage Surveys COMAR 20.56.01.07A(1) (Propane)
Leak Test	Part 192.723	Requires that when a service utility person enters a customer's premises for the purpose of inspecting or servicing any gas equipment (excluding meter reading), a leakage survey shall be conducted at	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 9 Safety	COMAR 20.55.09.05C(2) Gas Leakage Surveys

Maryland

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		appropriate locations.		
Leak Test	Part 192.723	Spells out the acceptable types of equipment to be used to perform a leakage survey.	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 9 Safety	COMAR 20.55.09.05A Gas Leakage Surveys COMAR 20.56.01.07B(2) (Propane)
Extending LDC Responsibility	Part 192.616	Requires the LDC to send a notice, twice a year, informing the customer of the hazards of gas and instructing him/her of the procedures for reporting gas leaks.	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 4 Customer Relations	COMAR 20.55.04.01F Information for Customers
Enhanced Record Keeping	Part 192.605	Requires that the utility keep certain records with regards to meter reading and meter inventory (manufacturer, number, type, capacity, multiplier, constants, pressure rating, and compensated index w/associated pressure).	Code of Maryland Regulations (COMAR)) Title 20 Public Service Commission, Subtitle 55 Service Supplied by Gas Companies, Chapter 5 Metering Requirements – General, Chapter 6 Metering Test Facilities & Equipment, Chapter 7 Metering Tests	COMAR 20.55.05 Metering Requirements – General COMAR 20.55.06 Metering Test Facilities and Equipment COMAR 20.55.07 Metering Tests COMAR 0.56.02.05B (Propane)
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Massachusetts

Key Stats	
State Agency	Massachusetts Department of Public Utilities
Division	Pipeline Engineering & Safety Division
Department	
Web	http://www.mass.gov/dpu/pipelineengineeringandsafetydivision
Regulated Intrastate Pipeline Systems	11
Regulated Master Meter Operators	0
Regulated LNG Systems	19
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	11

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.305	Minimum of 3 construction projects per yr must be given 48 hours notice, 25% of projects >2500 ft require 48 hours notice, all projects > 5000 ft require 48 hours notice	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 101 General Requirements	101.04 Notice of Proposed Construction
Valves	Part 192.365	All high pressure service lines >2 inch diameter including all service lines to public buildings must have a buried valve near the curb.	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 101 General Requirements	101.06 (14) Additional Rules or Modifications
Pressure Testing	Part 192.511 Part 192.513	All service lines must be tested to at least 90 psig.	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 101 General Requirements	101.06 (17) 101.06 (18) Additional Rules or Modifications
Odorant	Part 192.625	Gas must be odorized so that it can smelled at .15% gas-in-air	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 101 General Requirements	101.06 (20) Additional Rules or Modifications

Massachusetts

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Replacement Program	Part 192.755	Cast Iron replacement Program Required	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 113 Operation, Maintenance, Replacement and Abandonment of Cast Iron Pipelines	113.05 Replacement and Abandonment Program and Procedures
Replacement Program	Part 192.755	Encroached Cast Iron replaced immediately	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 113 Operation, Maintenance, Replacement and Abandonment of Cast Iron Pipelines	113.06 Replacement of Cast Iron Pipe at Trench Crossings 113.07 Replacement of Cast Iron Pipe Adjacent to Parallel Excavations
Design/Install Requirement	Part 192.305 Part 192.603 Part 192.703	Mains with MAOP >200 psig must meet enhanced design, construction and maintenance requirements	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 109 Design, Construction, Operation and Maintenance of Intrastate Pipelines Operating in Excess of 200 PSIG	109.01 – 109.13 All Sections applicable
Design/Install Requirement	Part 192.5	All pipelines anywhere in the state must meet Class 3 or 4 requirements	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 101 General Requirements	101.06 (4) Additional Rules or Modifications
Inactive Services	Part 192.727	Inactive services must be abandoned within 5 years; 10 yrs. For services installed after 1971.	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 107 Abandonment of Gas Service Lines and Leakage Survey Procedures	107.05 Abandonment of Service Lines
Inactive Services	Part 192.727	Inactive services must be cut off at the main, purged, and the ends must be plugged.	220 Department of Public Utilities, Code of Massachusetts Regulations , Title 107 Abandonment of Gas Service Lines and Leakage Survey	107.03 Definitions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Procedure	
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

TOC

Michigan

Key Stats

State Agency	Michigan Public Service Commission
Division	Operations & Wholesale Markets
Department	Gas Operations
Web	MPSC – Natural Gas
Regulated Intrastate Pipeline Systems	47 (9 – Private, 3 – LPG, 1 – Co-op, 33 – Transmission, & 1 – Gathering)
Regulated Master Meter Operators	0 (None in state)
Regulated LNG Systems	0 (None in state)
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	75

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.5	Reports of Incidents: Telephonic Notice to the Commission of property damage of $10K, media coverage, and loss of gas to more than 100 customers	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20503 Reports Of Incidents; Telephonic Notice To The Commission
Enhanced Reporting	Part 191.5	Telephonic Notice to the Commission of Sour Gas Leak within 8 hours	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20424 Telephonic Notice To The Commission Of Sour Gas Leak. (Sour Gas)
Enhanced Reporting	Part 191.7	Simultaneous State reporting Address for Written Reports required by §191.9, §191.11, §191.13, §191.15, §191.17, §191.23	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20504 Address For Written Reports
Enhanced Reporting	Part 192.605	Operations and maintenance plan required in 49 CFR 192.605 shall be filed with the commission	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20319 Filing Of Operation And Maintenance Plan With Commission Required
More Direct Oversight	Part 192.605	Operators of sour gas pipelines must address all issues involved	Section 2 of 1969 PA 165, Michigan Compiled Law	R 460.20419 Sour Gas Pipeline Operating And

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		with operating sour gas pipelines in operations and maintenance plan required by 49 CFR §192.605	483.152	Maintenance Plan; Contents. (Sour Gas)
More Direct Oversight	Part 192.3	Additional Definitions; Commission, Corrosion, Customer, Hoop stress, Leak, Leakage survey, Pressure, Sour gas, System, Vault	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20102 Definitions
More Direct Oversight	Part 192.615	An operator of a sour gas pipeline must address public and employee safety and ways to minimize danger in their emergency procedures	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20422 Emergency procedures. (Sour Gas)
More Direct Oversight	Part 192.616	Operators of sour gas pipelines must provide continuing education to help excavators, general public, and government organizations recognize sour gas pipeline emergencies, and what action to take in case of an emergency	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20423 Sour gas education programs. (Sour Gas)
Valves	Part 192.145	Valves used in sour gas systems must meet requirements in the National Association of Corrosion Engineers International Standard NACE MR0175/ISO 15156, 2004-2007	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20405 Valves; Qualification For Sour Gas Service. (Sour Gas)
Valves	Part 192.365	Prescribes where valve for service line is required and location of valve	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20309 Service lines; valve location
Valves	Part 192.745	Each valve in a sour gas pipeline that may potentially be used in an emergency situation shall be inspected and	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20431 Valve Maintenance; Sour Gas Pipelines. (Sour Gas)

Michigan

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		partially operated at intervals of 7.5 months or less and twice a calendar year		
Valves	Part 192.747	An operator shall partially operate a valve that may be necessary for the safe operation of a distribution system at intervals of 15 months or less but at least once a calendar year	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20329 Valve Maintenance; Distribution Systems.
Valves	Part 192.179	Requires placement of sectionalizing block valves in sour gas	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20407 Sectionalizing block valves. (Sour Gas)
Pressure Testing	Part 192.513	Pressure tests shall last at least 1 hour	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20313 Strength test requirements; plastic pipelines
Pressure Testing	Part 192.505	All sour gas pipelines must be pressure tested to at least twice their MAOP for at least 8 hours	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20412 Strength test requirements. (Sour Gas)
Pressure Testing	Part 192.509	Adds requirement that mains to be operated above 60 psi gage require a pressure test of 1.5 times the proposed MAOP	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20311 Test requirements for pipelines operating below 100 psig
Operating Pressure	Part 192.621	Unreinforced bell and spigot joint cast iron pipe may be operated at a maximum pressure of 10 psi	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20322 Maximum Allowable Operating Pressure Of Pipeline Containing Cast-Iron Pipe
Operating Pressure	Part 192.739	Pressure limiting or pressure relief devices shall be tagged to indicate the MAOP of the facilities being protected, and the set pressure, or make information available at each location	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20328 Pressure-Limiting And Pressure-Regulating Stations; Inspection And Testing
Operating	Part 192.739	Pressure limiting or	Section 2 of 1969 PA	R 460.20430

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Pressure		regulating devices used in the transportation of sour gas shall be inspected at intervals of 7.5 months or less and at least twice a calendar year	165, Michigan Compiled Law 483.152	Inspection Of Pressure-Limiting And Pressure-Regulating Stations. (Sour Gas)
Damage Prevention	Part 192.614	When an operator is made aware of a "One Call" notification involving their sour gas pipeline, operator must monitor the excavation with onsite personnel	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20421 Damage Prevention Program. (Sour Gas)
Damage Prevention	Part 192.707	Sour gas pipelines shall have line markers placed so that at least one is visible from any location on the pipeline and shall indicate that sour gas is present in the pipeline	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20427 Line markers for sour gas pipelines. (Sour Gas)
Damage Prevention	Part 192.327	Sour gas pipelines shall have a warning tape installed 12" or more above the pipeline	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20414 Cover. (Sour Gas)
Training and Qualifications	Part 192.605	Operators of sour gas pipelines must file plans and procedures to address safety concerns regarding abnormal operating procedures	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20420 Safety Procedures For Abnormal Operating Conditions. (Sour Gas)
Meter Location/ Protection	Part 192.353	Customer meters and regulators outside unless impractical and meet certain location conditions	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20308 Customer meters and regulators; location.
Leak Tests	Part 192.511	Leak tests performed on services must last 10 minutes	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20312 Leak test requirements; service lines.
Leak Tests	Part 192.553	Leaks detected during uprating operations shall be exposed, monitored and repaired	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20315 Leaks occurring during uprating; repairs and monitoring required.

Michigan

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		if new pressure exceeds 10 psi		
Leak Tests	Part 192.555	A leak test is to be performed before any segment of steel pipeline is subjected to an operating pressure that produces a hoop stress of 30% or more of specified minimum yield strength	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20316 Leakage survey required in addition to requirements in 49 C.F.R. § 192.555(b)(2).
Leak Tests	Part 192.706	Operators of sour gas pipelines shall perform leakage surveys on their sour gas pipelines at least twice each calendar year at intervals of 7.5 months or less	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20426 Leakage surveys. (Sour Gas)
Leak Tests	Part 192.705	Operators shall patrol all transmission lines that are operating at 40% or greater of specified minimum yield strength at intervals of less than 6 weeks and not less than 12 times each calendar year	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20325 Transmission line patrolling.
Leak Tests	Part 192.705	Operators shall patrol all sour gas pipelines at intervals of less than 6 weeks and not less than 12 times each calendar year	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20425 Sour gas pipeline patrolling. (Sour Gas)
Leak Tests	Part 192.603	Gas service shall not be established until a leak survey is performed.	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20318 Gas leak investigation; establishment of service; customer leak complaint records.
Response to Leaks	Part 192.557	All leaks found in survey performed according to 49 CFR §192.557(b)(2) must be repaired	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20317 Provisions of 49 C.F.R. § 192.557(b)(2) superseded by leakage survey and repair requirement
Response to	Part 192.603	Operators are to	Section 2 of 1969 PA	R 460.20318

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Leaks		investigate every gas leak report received as soon as possible and repair the situation.	165, Michigan Compiled Law 483.152	Gas leak investigation; establishment of service; customer leak complaint records.
Response to Leaks	Part 192.717	Disallows welding of steel plate over corrosion pitted area as described in 49 CFR §192.717(b)(3)	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20326 Transmission lines; permanent field repair of leaks.
Response to Leaks	Part 192.723	Operator must evaluate leaks to determine which should be: fixed immediately, fixed within one year, or monitored	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20327 Distribution system; leakage surveys and procedures.
Replacement Program	Part 192.753	Cast iron pipe with caulked bell and spigot joints that is subject to pressures greater than or equal to 10 psi must be sealed with a mechanical leak clamp or an equivalent method not reducing the flexibility of the joint, permanently bonds with the surface of the joint, and complies with strength, environmental, and chemical properties outlined in 49 CFR §192.53 and 49 CFR §192.143	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20331 Caulked bell and spigot joints
Replacement Program	Part 192.485	Each segment of pipeline with a resulting wall thickness less than that required by its MAOP due to corrosion must be replaced	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20418 Remedial measures. (Sour Gas)
Replacement Program	Part 192.309	In repairing a sour gas pipeline, full cylindrical sections of pipe are to be removed and replaced	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20411Repair of steel pipe. (Sour Gas)
Replacement	Part 192.717	In repairing a sour gas	Section 2 of 1969 PA	R 460.20429Repair of

Michigan

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Program		pipeline, full cylindrical sections of pipe are to be removed and replaced	165, Michigan Compiled Law 483.152	steel pipe. (Sour Gas)
Replacement Program	Part 192.711	Temporary repairs on sour gas pipelines are not allowed. A damaged pipeline shall be taken out of repair until a permanent repair can be made	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20428 Prohibition on temporary repairs. (Sour Gas)
Replacement Programs	Part 192.613	Main replacement program, eliminate pending corrosion work orders, remediate pending leaks, and move inside meters outside	Orders U-15985 Section 10.A dated June 6, 2010, U-16407 dated September 13, 2011, and U-16451 dated September 13, 2011	Section X. Other Issues, Subsection A., Pipeline and System Safety Concerns Entire Order 10 year meter move
Replacement Programs	Part 192.613	Main replacement program for cast iron and unprotected steel	Order U-16169 dated January 6, 2011	Main replacement Program Rider
Authority Beyond OPS	Part 192.167	In the event of an emergency shutdown, all sour gas released from sour gas pipeline facilities shall be flared to minimize danger	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20406 Compressor station; emergency shutdown. (Sour Gas)
Authority Beyond OPS	Part 192.1	Scope; Conversion of Existing Pipeline to Sour Gas Service	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20401 Scope; conversion of existing pipeline to sour gas service. (Sour Gas)
Authority Beyond OPS	Part 192.9	Gives Authority to Regulate Corporations Transporting or Selling Natural Gas and orders specifically require pipelines built, including gathering lines, to be designed and constructed in accordance with the safety standards	1929 PA 9, Michigan Compiled Law 483 and related Orders	Orders authorizing the construction of pipelines
External/ Internal Corrosion	Part 192.475	Requires analysis of corrosive effects of sour gas before transporting	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20416 Internal corrosion control; generally. (Sour Gas)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
External/ Internal Corrosion	Part 192.477	Requires internal corrosion monitoring intervals of sour gas systems 4 times per year initially until sufficient monitoring schedule is developed	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20417 Internal corrosion control; monitoring. (Sour Gas)
Design/Install Requirement	Part 192.751	Prior to welding near or in a vault, pit or other area containing gas facilities, an operator must check for the presence of a combustible gas mixture.	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20330 Prevention of accidental ignition.
Design/Install Requirements	Part 192.739	Any fenced area containing a meter or regulator station shall have an alternate means of exit in case of emergency	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20324 Fenced areas; alternate means of exit.
Design/Install Requirements	Part 192.55	Materials for Pipe and Components used in sour gas systems must meet requirements in the National Association of Corrosion Engineers International Standard NACE MR0175/ISO 15156, 2004-2007	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20402 Materials for pipe and components; requirements. (Sour Gas)
Design/Install Requirements	Part 192.105	Steel Pipe Design Formula; Sour Gas pipeline must design factor of 0.40 (Class 4)	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20403 Steel pipe; design formula. (Sour Gas)
Design/Install Requirements	Part 192.163	Operators must identify all emergency valves and controls by signs. Fuel gas lines must have master shutoff valves located outside of a building, and have pressure limiting devices as to limit pressure to 10% over MAOP.	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20302 Compressor station piping.
Design/Install	Part 192.187	Underground vaults	Section 2 of 1969 PA	R 460.20303

Michigan

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Requirements		are to be fitted with ventilation ducts that prevent foreign matter from entering the duct	165, Michigan Compiled Law 483.152	Vault and pit sealing, venting, and ventilation
Design/Install Requirements	Part 192.225	Welder must be qualified under section IX of the ASME boiler and pressure vessel code, or section 5 of API Standard 1104, and Appendix B of API Standard 1104 and must be present on the jobsite	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20304 Welding procedures
Design/Install Requirements	Part 192.225	Sour gas welding procedures shall conform to NACE MR0175/ISO 15156, 2004-2007	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20408 Qualification of welding procedures. (Sour Gas)
Design/Install Requirements	Part 192.235	Preheating temperature required in procedures must be maintained throughout welding of pipe	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20307 Welding preheating
Design/Install Requirements	Part 192.241	100% of girth butt welds used in sour gas pipelines must be nondestructively tested	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20409 Inspection and testing of welds. (Sour Gas)
Design/Install Requirements	Part 192.243	Regulating stations, measuring stations and compressor stations must have 100% of butt welds nondestructively tested	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20306 Nondestructive testing
Design/Install Requirements	Part 192.273	Threaded joints disallowed in sour gas pipelines	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20410 Threaded joints. (Sour Gas)
Design/Install Requirements	Part 192.325	Sour gas pipelines shall maintain 48” clearance from all other underground structures or shall be protected from damage if clearance is not attainable	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20413 Underground clearances. (Sour Gas)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Design/Install Requirements	Part 192.327	Sour gas pipelines shall maintain 48" of cover	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20414 Cover. (Sour Gas)
Design/Install Requirements	Part 192.327	Sour gas pipelines shall avoid Class 3 and 4 locations and avoid using road rights of way	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20415 Pipeline location. (Sour Gas)
Design/Install Requirements	Part 192.453	Prohibits use of galvanized or aluminum pipe	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20310 Galvanized or aluminum pipe prohibited for direct burial or submerged use
Design/Install Requirements	Part 192.629	Operators of sour gas pipelines must have a plan in place to address safety concerns involved with purging or blowing down a sour gas pipeline. Only qualified personnel shall perform the written procedures.	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20404 Purging of sour gas pipelines; plan; personnel. (Sour Gas)
Enhanced Record Keeping	Part 192.517	Class location and proposed MAOP at time of test must also be recorded and retained as part of test records	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20314 Test records
Enhanced Record Keeping	Part 192.603	Records shall be kept as to leak complaints and remediation of leaks	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20318 Gas leak investigation; establishment of service; customer leak complaint records.
Enhanced Record Keeping	Part 192.227	Requires all welding qualifications to be available on jobsite	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20305 Welder qualification records
Enhanced Record Keeping	Part 192.625	An operator required to odorize a pipeline must establish and maintain records to show compliance with the requirements of 49 CFR §192.625,	Section 2 of 1969 PA 165, Michigan Compiled Law 483.152	R 460.20323 Odorization of gas; records maintenance

Michigan

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		including the quantity of odorant used and sampling of Odorization		
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Minnesota

Key Stats

State Agency	Department of Public Safety
Division	Office of Pipeline Safety
Department	Department of Public Safety
Web	https://dps.mn.gov/divisions/ops/pages/default.aspx
Regulated Intrastate Pipeline Systems	64
Regulated Master Meter Operators	1
Regulated LNG Systems	2
Regulated Hazardous Liquid Systems	3
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.5	Incident reporting criteria requires two hour notification	Minnesota Statutes Chapter 299F Fire Marshal , Section 63	299F.63 (1)(b) Records, Reports, Inspections
Enhanced Reporting	Part 191.5	Incident reporting criteria – significant media coverage is considered in the reportable event policy	Minnesota Statutes Chapter 299F Fire Marshal , Section 63	299F.63 (1)(b) Records, Reports, Inspections
Enhanced Reporting	Part 191.5	Expanded reporting criteria includes any fire not caused by operator	Minnesota Statutes Chapter 299F Fire Marshal , Section 63	299F.63 (1)(b) Records, Reports, Inspections
Enhanced Reporting	Part 191.3 Part 192.614	Additional reporting requirements for MN OPS that are non-incident including: 3rd party damage reporting, building evacuations, status of condition of pipe and shared with municipalities served (pressure test results after reportable incident),	Minnesota Statutes 299F Section 63 Minnesota Administrative Rules 7530.1500 Testing and Test Results	Reportable event policy and Alert Notice AL-04-2010 Reporting of Gas Pipeline Leaks Caused by Excavation
Enhanced Reporting	Part 191.3	Requires giving notice to the MN OPS and	Minnesota Administrative Rules	7530.1500 Testing and Test

		affected municipality of any pressure tests 48 hours prior to test	Chapter 7530 Pipeline Safety Enforcement and Sanctions	Results Subpart 2 Notice
Enhanced Reporting	Part 191.3	Require reports of outages of > 50 customers	Minnesota Statutes Chapter 299F Fire Marshal , Section 63	299F.63 (1)(b) Records, Reports, Inspections
Enhanced Reporting		Cast Iron/BS Replacement Reporting	Minnesota Statutes Chapter 299F Fire Marshal , Section 63	Survey Of Cast Iron Management And Replacement Program
Enhanced Reporting		Plastic pipe inventory,	MN OPS written Policy for all Operators	
Enhanced Reporting	Part 192.603	Electronic Access to MN OPS of most current O&M, Procedures, Operator Qualification Plan	Minnesota Statutes Chapter 299F Fire Marshal , Section 59 & Section 62	299F.59 Compliance With Standards. 299F.62 Plan To Operate And Maintain Gas Pipeline.
Enhanced Reporting	Part 192.603	Operation & Maintenance Plans must be filed/approved with MNOPS	Minnesota Statutes Chapter 299F Fire Marshal , Section 59 & Section 62	299F.59 Compliance With Standards. 299F.62 Plan To Operate And Maintain Gas Pipeline
Enhanced Reporting	Part 192.615	Emergency Response Plans must be filed/approved with MNOPS	Minnesota Statutes Chapter 299F Fire Marshal , Section 59 & Section 62	299F.59 Compliance With Standards. 299F.62 Plan To Operate And Maintain Gas Pipeline
Enhanced Reporting	Part 192.603	Construction Standards must be filed/approved with MNOPS	Minnesota Statutes Chapter 299F Fire Marshal , Section 59 & Section 62	299F.59 Compliance With Standards. 299F.62 Plan To Operate And Maintain Gas Pipeline
Enhanced Reporting	Part 192.615	Provide Contact List for emergencies to Safety Inspectors,	Inspection protocol	Operator contacts maintained in OPS System
Enhanced Reporting	Part 192.615	Reporting of Response Times Emergency/Odor Complaints/Leaks	Policy	Emergency response reporting form
Enhanced Reporting	None	Requires notification of change of ownership, merger, acquisition	Policy	All pipeline operators must set up an account with meters and miles reported
Enhanced Reporting	Part 192.305	Projects, Extensions, Improvements to Capital of Gas Utility	Policy	Operators file reports of construction activities

More Direct Oversight	Part 192.305	More direct oversight of construction activities (or reports to allow same)	Policy	Operators file reports of construction activities
More Direct Oversight	Part 192.237 Part 192.605 Part 192.617 Part 192.803	Amendments of OQ, O&M plans required after incidents	Minnesota Statutes Chapter 299F Fire Marshal , Section 59 & Section 62	Inadequate procedures must be amended
More Direct Oversight	None	Advisory Bulletins must be incorporated into action plans	Enforcement Policy	
Valves	Part 192.745	Periodic service must include partial stroke	Enforcement Policy	
Design/Install Requirements	Part 192.616	Minimum Model Setback Ordinance for local municipalities established for pipelines installed after 1991 that limits building within any pipeline easement	Minnesota Administrative Rules Chapter 7530 Pipeline Safety Enforcement	7535.0500 Model Setback Ordinance Subpart 3
Damage Prevention	Part 192.614	Enhanced damage prevention requirements as pipeline operators can only be member of single or specified One Call Ctr,	Minnesota Administrative Rules Chapter 7560 Excavation Notice System	7560.0300 Operator participates and shares costs
Damage Prevention	Part 192.614 Part 190.201	MNOPS enforces one call laws	Minnesota Administrative Rules Chapter 7560 Excavation Notice System	7560.040 Citations. MNOPS enforces one call laws
Damage Prevention	Part 192.614	7 methods specified for operators Preventing Sewer Service Lateral Cross Bores	MN OPS Alert Notice AL-01-2010, May 2010	Written Directive to All Operators
Meter Location /Protection	Part 192.317	MNOPS specification for Vehicle Impact Protection for meters	Alert Notice AL-02-2010 April 15, 2011	Written Directive to All Operators
Meter Location /Protection	Part 192.317	Customer Meters must be protected from snow and ice damage	Enforcement Policy	Written Directive to All Operators
Response to Leaks	Part 192.723	classification/repair rqmts for leaks	Alert Notice-MNOPS AL–05-2010 to Natural Gas Pipeline Operators Gas Emergency Response Guidance for Excavation Related	Pending at time of publication

			Leaks	
Response to Leaks	Part 192.615	Specified Time Frame to respond to reports of leaks	Pending –Alert Notice-MNOPS AL–05-2010 to Natural Gas Pipeline Operators Gas Emergency Response Guidance for Excavation Related Leaks	
Replacement Program	Part 192.489	CI/bare steel/copper replacement program (no rate adder)	Compliance Order	Substantial reductions in all legacy pipelines
Replacement Program	Part 192.703(b)	Plastic replacement program – response to issues regarding Century Pipe replacement program and mechanical fitting replacement program	Compliance Order	See MNOPS for detail
Replacement Program	Part 192.489	Entire Cast Iron replacement completed for two operators		Will only be one operator with CI within the next year.
Replacement Program	Part 192.353	Relocate/Replace Inside Meters to Outside Meters	Compliance Orders	Associated with failure to have readily accessible shut off valve
Risk Based Approaches	Part 192.614 Part 192.1007	Inline inspections required to reveal cross bore of sewer laterals		Alert Notice AL-01-2010
State Inspection Program	None	State to maintain GIS database of pipeline operators	Minnesota Statutes Chapter 299F Fire Marshal , Section 59	Commissioner's duties and powers
State Inspection Program	Part 190.203	Inspections focused by risk	Program Plan – OPS System	Risk based inspection plan
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Mississippi

Key Stats	
State Agency	Mississippi Public Service Commission
Division	Pipeline Safety Division
Department	
Web	http://www.psc.state.ms.us/pipeline/pipeline.html
Regulated Intrastate Pipeline Systems	79
Regulated Master Meter Operators	39
Regulated LNG Systems	0
Regulated LPG Operators	0
Regulated Hazardous Liquid Systems	9
Regulated Gathering Lines	1
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	6

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Each utility shall maintain or have available a record of interruptions of service affecting a major division of its system in this state, including a statement of the time, duration and cause of the interruption. The Commission shall be notified within 4 hours of major interruptions.	Title 39, Part III Rules And Regulations Governing Public Utility Service, Subpart 1: General Rules**,** Chapter 05: Continuity of Service Rule 5.	100. Record Of Interruptions 110. Report To Commission
Enhanced Reporting	Part 192.305	All construction projects > $8K must notify Commission in writing and at least 48 hours in advance prior to construction date	Title 39, Part III Rules And Regulations Governing Public Utility Service, Subpart 4: Special Rules –Gas**,** Chapter 57.1: Reporting of Construction Work Rule 57.1	100
Operating Pressure	Part 192.623	Gas pressure supplied at the point of delivery shall not drop below one-half of normal	Title 39, Part III Rules And Regulations Governing Public Utility Service,	105 Variation

		pressure or exceed twice the normal pressure	Subpart 4: Special Rules –Gas**,** Chapter 52: Pressure Rule 52.	
Training	Part 192.801	For Operators serving less than 20K customers and master meter operators: shall have either 121 hours of training or 136 hours of training with specified minimum classroom requirements and continuing educational requirements	Title 39, Part III Rules And Regulations Governing Public Utility Service, Subpart 4: Special Rules –Gas**,** Chapter 57.2: Natural Gas Qualification Program Purpose and Applicability, Rule 57.2	105 Operator Qualifications:
Enhanced Record Keeping	Part 192.605	Each utility shall keep and maintain reasonably adequate maps, plans, and records of its distributing system, showing the size, character, and location of each main or district regulator, street valve and drip. The utility shall endeavor to keep its records complete by making entries whenever its operations disclose the location of facilities not already accurately recorded.	Title 39, Part III Rules And Regulations Governing Public Utility Service, Subpart 1: General Rules**,** Chapter 04: System Operation and Records Rule 4.	115 Maps
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Missouri

Key Stats	
State Agency	Missouri Public Service Commission
Division	Utility Operations
Department	Energy – Gas Safety/Engineering
Web	http://psc.mo.gov/
Regulated Intrastate Pipeline Systems	65 (11 Private/41 Municipals/12 Intrastate Transmission
Regulated Master Meter Operators	15
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	48

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.5	Require notification of incidents within 2 hrs.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR240-40.020(4) Incident, Annual and Safety-Related Condition Reporting Requirements
Enhanced Reporting	Part 191.5	Require notification if damages $10,000.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR240-40.020(4) Incident, Annual and Safety-Related Condition Reporting Requirements
Enhanced Reporting	Part 191.9 Part 191.11 Part 191.15 Part 191.17	Incident and Annual Reports (transmission and distribution) must be submitted to MOPSC.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR240-40.020(6), (7), (9), and (10) Incident, Annual and Safety-Related Condition Reporting Requirements

Enhanced Reporting	Part 191.11	State Report…number of odor calls, active leaks (by class), repaired leaks (by class, by material, and by cause), and classification of 3rd party damages	Agreement	
Enhanced Reporting	Part 192.15	Require filing of all required programs with Commission	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR 240-40.030(1)(J) Safety Standards—Transportation of Gas by Pipeline – General
More Direct Oversight	Part 192.3	Additional/expanded definitions for "low pressure distribution system", "hoop stress", "fuel lines", "feeder lines", "CGI reading", "sustained reading", "follow up inspection" "high pressure distribution system" "Reading", "Transportation of Gas", "Tunnel", "Vault", "Yard Line"	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR 240-40.030(1)(B) Safety Standards—Transportation of Gas by Pipeline – General
Valves	Part192.181	Distribution valves spaced to provide isolation zones sized so operator can relight in 8 hours	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(4)(V) Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline Components
Valves	Part 192.199	Additional requirements for unauthorized operation of valves	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(4)(EE)8. Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline Components
Valves	Part 192.747	Feeder line and distribution valves	Missouri Code of State Regulations, Title 4	40.030(13)(V) Safety Standards—

		must be checked for **accessibility** annually and partially operated every other year.	Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	Transportation of Gas by Pipeline - Maintenance
Pressure Testing	Part 192.553	Pressure to which pipeline is raised during uprating is the "test pressure" that must be divided by the appropriate factors in 192.619(a)(2)	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(11)(B)5. Safety Standards—Transportation of Gas by Pipeline - Uprating
Operating Pressure	Part 192.197	If distribution pressure > 14" WC, service regulator must have relief or OPP device capable of limiting pressure to "max. safe value" to customer.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(4)(DD)1. Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline Components
Operating Pressure	Part 192.197	If service regulator and monitor regulator used, must install device to indicate failure of service regulator and must be monitored	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(4)(DD)2. Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline Components
Operator Qualifications	Part 192.803(b)	"Evaluation" consists of **training and** examination	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(12)(D)2. Safety Standards—Transportation of Gas by Pipeline - Operations
Operator Qualifications s	Part 192.805	Additional knowledge and skills required.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and	40.030(12)(D)4. Safety Standards—Transportation of Gas by Pipeline - Operations

			Gas Safety Standards	
Operator Qualifications	Part 192.805	Additional requirements for trainers/evaluators	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(12)(D)5., 6. and 7. Safety Standards—Transportation of Gas by Pipeline - Operations
Damage Prevention	Part 192.614	Notification of public along a pipeline and excavators must be at least semi-annual	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR 240-40.030(1)(I) Safety Standards—Transportation of Gas by Pipeline – General
Meter Location/ Protection	Part 192.351	Service lines installed to building and owned, operated, and maintained by the operator.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(8)(B) Safety Standards—Transportation of Gas by Pipeline - Customer Meters, Service Regulators and Service Lines.
Odorant	Part 192.625	Natural gas in <u>all</u> intrastate transmission, distribution, and feeder lines must be odorized.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(12)(P) Safety Standards—Transportation of Gas by Pipeline - Operations
Odorant	Part 192.625	<u>Monthly</u> odor intensity test required.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(12)(P) Safety Standards—Transportation of Gas by Pipeline - Operations
Odorant	Part 192.625	<u>Yearly</u> checks at individually odorized service lines.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division	40.030(12)(P) Safety Standards—Transportation of Gas by Pipeline - Operations

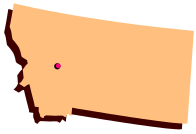
			240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	
Leak Tests	Part 192.3	Definition of feeder line (distribution) created (>100 psig) requiring additional leak surveys.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR 240-40.030(1)(B) Safety Standards—Transportation of Gas by Pipeline - General
Leak Tests	Part 192.723	Annual leak survey for unprotected steel pipelines, 3-year leak survey for all other pipelines including service lines, and 3-year leak survey for buried fuel lines	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(13)(M)2.B Safety Standards—Transportation of Gas by Pipeline - Maintenance
Leak Tests	Part 192.725	If service line disconnected for the main/transmission line due to 3rd party damage, line must be leak tested from disconnection to main/transmission line.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(13)(M)2.B Safety Standards—Transportation of Gas by Pipeline - Maintenance
Leak Tests	Part `92.725	Leak Tests must ensure discovery of leaks	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(14)(B)2 & 3 Safety Standards—Transportation of Gas by Pipeline – Maintenance
Response to Leaks	Part 192.723	Extensive regulations for investigation [(14)(B)], classification (Classes 1-4) [(14)(C)], monitoring [(14)(C)] and scheduling repairs [(14)(C)], and follow-up leak survey after repairs (Class 1 and 2 Leaks) [(14)(C)] of	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4CSR 240-40.030(14) Safety Standards—Transportation of Gas by Pipeline – Gas Leaks

		classified leaks.		
Response to Leaks	Part 192.723	Restrictions on downgrading leak classifications, requirement for follow-up investigation for Class 1 and Class 2 repairs. Requires recheck repair of Class 2 leaks in 15 days.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4CSR 240-40.030(14) © for downgrading 4CSR 240-40.030(14) (B)(5) for follow ups 4CSR 240-40.030(14) ©(2) for CL 2 rechecks Safety Standards—Transportation of Gas by Pipeline – Gas Leaks
Replacement Programs	Part 192.755	When CI is disturbed or a nearby excavation places CI in angle of repose, the CI must be replaced.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(13)(Z) Safety Standards—Transportation of Gas by Pipeline – Maintenance
Replacement Programs	Part 192.487 Part 192.489	Extensive requirements for replacement of unprotected steel service lines and yard lines…annual leak surveys and 10% replacement –cast iron mains and service lines…develop prioritized replacement program (approved by Commission) based on factors in regulation-replacement/CP of unprotected steel transmission lines, feeder lines and mains…annual survey and develop prioritized replacement program (approved by Commission) based on factors in regulation.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4CSR 240-40.030(15) Safety Standards—Transportation of Gas by Pipeline – Replacement Programs
Replacement Program	Advisory Bulletins 99-02 (FR 12212) 02-07 (FR 70806) 08-02 (FR 51303)	Required replacement of Aldyl A plastic for vintages upto and including 1985for an operator based on incident investigation	Missouri Public Service Commission Order 5/28/2010 referencing Docket No. GS-2005-0257	Joint Recommendation of Replacement by Staff and Operator dated 5/18/2010

		and leakage rates		
Replacement Program	Part 192.489 Part 192.487	Operators have replaced or eliminated all Cast Iron and Unprotected Steel from pipeline systems	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4CSR 240-40.030(15) Safety Standards—Transportation of Gas by Pipeline – Operations
Extended LDC Responsibility	Part 192.616	Public notified semi-annually. Customers notified by mail semi-annually. Message on customer bill 9 times/year	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(12)(K) Safety Standards—Transportation of Gas by Pipeline - Operations
Extending LDC Responsibility	Part 192.517	When gas turned on…Test required for new cust.-owned fuel line -tested for leakage at delivery pressure-visual inspection of cust. piping and equipment	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(12)(S) Safety Standards—Transportation of Gas by Pipeline - Operations
Extending LDC Responsibility	Part 192.16	Also requires customer notification when moving from one operating area to another (same company)	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(1)(L) Safety Standards—Transportation of Gas by Pipeline - General
Authority Beyond				
Cathodic Protection	Part 192.465	Short sections monitored **20% per year** (instead of 10%).	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(9)(I)1. Safety Standards—Transportation of Gas by Pipeline - Requirements for Corrosion Control
Cathodic Protection	Part 192.465	Corrective measures completed in 6 months.	Missouri Code of State Regulations, Title 4 Rules of Dept of	40.030(9)(I)4. Safety Standards—Transportation of Gas

			Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	by Pipeline - Requirements for Corrosion Control
Cathodic Protection	Part 192-Appendix D	Specific requirements to **adequately compensate** (not just "consider") for voltage (IR) drops. Must… -take reading when current interrupted on impressed system -disconnect anodes to take reading or take reading at location out of the direct influence of the anodes.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	4 CSR 240-40.030 Appendix D Safety Standards—Transportation of Gas by Pipeline - Criteria for Cathodic Protection and Determination of Measurements
Design/Install Requirements	Part 192.53	Only steel and PE piping can be used for construction.	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(1)(J) Safety Standards—Transportation of Gas by Pipeline - General
Design/Install Requirements	Part 192.181	Inlet and **outlet** valve required at regulator station	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(4)(V) Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline Components
Design/Install Requirements	Part 192.199	Adequate Over Pressure Protection **at** each town border station and district regulator station regardless of installation date	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(4)(EE)9. Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline Components
Design/Install Requirements	Part 192.199	If regulator and monitor regulator used, must install device to indicate failure of operating regulator and	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division	40.030(4)(EE)10. Safety Standards—Transportation of Gas by Pipeline - Design of Pipeline

		must be monitored	240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	Components
Enhanced Record Keeping	Part 192.709	For feeder lines, mains, and service lines, each operator shall maintain **detailed** records pertaining to each original leak report, leak investigation, leak classification , leak surveys, line patrols for not less than **six (6) years**; and must be able to have sufficient detail to correspond to annual DOT reports. **(Not just transmission lines)**	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(13)(F)2. Safety Standards—Transportation of Gas by Pipeline - Maintenance
Enhanced Record Keeping	Part 192.491	Corrosion Control records – operator must develop and maintain maps showing specific CP facilities	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(9)(I). Safety Standards—Transportation of Gas by Pipeline - Criteria for Cathodic Protection and Determination of Measurement
Enhanced Record Keeping	Part 192.517	Retain Strength Test records for service lines similar to main requirements	Missouri Code of State Regulations, Title 4 Rules of Dept of Economic Development, Division 240 Public Service Commission, Chapter 40 Gas Utilities and Gas Safety Standards	40.030(10)(I). Safety Standards—Transportation of Gas by Pipeline - Test Requirements
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections



Montana

Key Stats	
State Agency	Montana Public Service Commission
Division	Regulatory
Department	Public Service Regulation
Web	http://psc.mt.gov/pipeline/
Regulated Intrastate Pipeline Systems	10 (6 distribution + 4 intrastate)
Regulated Master Meter Operators	7
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	0
Regulated LPG Systems	7
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	0

Applicable Requirement in CFR

There are no safety initiatives in Montana that are more stringent than Federal Regulations. The Montana Administrative Rule 38.5.2202 incorporates by reference the federal pipeline safety regulations only.

Nebraska

Key Stats	
State Agency	Nebraska State Fire Marshal
Division	Fuels / Pipeline Safety
Department	
Web	http://www.sfm.ne.gov/programs-services/fuels/pipeline/index.html
Regulated Intrastate Pipeline Systems	
Regulated Master Meter Operators	
Regulated LNG Systems	
Regulated Hazardous Liquid Systems	
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.5	Require notification of incidents within 2 hrs.	Title 155 State Fire Marshal	Chapter 1 Regulations Pursuant to the NE Natural Gas pipeline safety Act of 1969; section 002; Neb. Rev. Stat. 81-542 to 81-550 (1996)
Enhanced Reporting	Part 191.5	Reportable incident includes “Any failure which results in the explosion or ignition of natural gas.”	Title 155 State Fire Marshal	Chapter 1 Regulations Pursuant to the NE Natural Gas pipeline safety Act of 1969; section 002.01Aiii; Neb. Rev. Stat. 81-542 to 81-550 (1996)
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Nevada

Key Stats	
State Agency	Public Utilities Commission of Nevada
Division	Engineering Division
Department	Gas Pipeline Safety
Web	http://pucweb1.state.nv.us/pucn/GasHomePage.aspx
Regulated Intrastate Pipeline Systems	2
Regulated Master Meter Operators	0
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	3

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5K property damage level	Nevada Administrative Code, Chapter 704, Regulation of Public Utilities Generally, Subchapter: Accident Reports	NAC 704.230 Definitions.
Replacement Program	None	Requires accelerated plastic replacement program for older vintage pipelines in commercial Las Vegas district	Nevada Public Utilities Commission Order dated Sept 7 2011, Docket No 11-03029	Attachment 1
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

New Hampshire

Key Stats

State Agency	New Hampshire Public Utilities Commission
Division	Safety Division
Department	Safety
Web	http://www.puc.nh.gov/Safety/safety.htm
Regulated Intrastate Pipeline Systems	4
Regulated Master Meter Operators	4
Regulated LNG Systems	3
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	48
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	44

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5K level	New Hampshire Code of Administrative Rules, Chapter Puc 500 Rules For Gas Service, Part Puc 504 Quality of Gas Service	Rule 504.05 (a) (1) Emergency Notifications
Enhanced Reporting	Part 191.3	Requires Reports of all building evacuations involving gas	New Hampshire Code of Administrative Rules, Chapter Puc 500 Rules For Gas Service, Part Puc 504 Quality of Gas Service	Rule 504.05 (a) (1) Emergency Notifications
Enhanced Reporting	Part 192.614 Part 191.3	Requires filing of damage resulting from 3rd party excavation with Commission	New Hampshire Code of Administrative Rules, Chapter Puc 800 Underground Utility Damage Prevention Program, Part Puc 804 Duties of Operators	Rule§ 804.01(a) Reporting Requirements For Operators Of Underground Facilities
Enhanced Reporting	Part 191.3	Requires Reports of all outages greater than 50 customer hours	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 504 Quality of Gas Service	Rule 504.05 (a) (4) Emergency Notifications

New Hampshire

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Reports of all unplanned interruptions	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 504 Quality of Gas Service	Rule 504.05 (a) (4) Emergency Notifications
Enhanced Reporting	Part 192.723	Requires Monthly Status Reports of Leaks	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 509 Forms to be Filed by All Utilities	Rule 509.15 Status of Leaks
Enhanced Reporting	Part 192.603	Requires electronic access of latest O&M Plans for Commission	NH PUC Order July 12 2007 Order # 24777 D# DG 06-006-10707	Section C (7) (m)
Enhanced Reporting	Part 192.603	Requires Annual filing of O&M Plans with Commission	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (q) (3) Operations & Maintenance
Enhanced Reporting	Part 192.615	Requires Annual filing of Emergency Plans with Commission	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (q) (3) Operations & Maintenance
Enhanced Reporting	Part 192.615	Requires Monthly Reporting of Response Times to Emergency/Odor Complaints /Leaks	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (n) Article VI, 6.6
Enhanced Reporting	Advisory Bulletins 99-02 (FR 12212) 02-07 (FR 70806) 08-02 (FR 51303)	Requires Annual filing of failures for Plastic Aldyl A	NH PUC Order July 12 2007 Order # 24777 D# DG 06-007	Section C (7) (e)
Enhanced Reporting	NONE	Requires Annual Reporting of total Operational and Maintenance Activity Hours	NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Article VI, 6.2
Enhanced Reporting	Part 192.623	Requires Commission Notification of Pressure	New Hampshire Code of Administrative	Rule 504.03 (d) Pressure

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Complaints (too low/too high)	Rules Chapter Puc 500 Rules For Gas Service, Part Puc 504 Quality of Gas Service	Requirements
Enhanced Reporting	Part 192.305	Requires Annual Report of Project Additions, Extensions, Improvements to Capital of Gas Utility	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 509 Forms to be Filed by All Utilities	Rule 509.11 Capital Improvements
More Direct Oversight	Part 192 305	Requires weekly Reporting of construction activities for Commission inspections	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (g) Article VI, 6.7
More Direct Oversight	Part 192 305	Limits span of control for oversight of outside construction crews	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (g) Article VI, 6.8
More Direct Oversight	Part 192 305	Requires inspection of outside construction crews by the pipeline operator	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (q) (5) Operations & Maintenance
Valves	Part 192.181	Sets Criteria for Valves limits and maximum number of downstream customers affected	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (c) Article VI, 6.3
Operating Pressure	Part 192.623	Limits pressures at outlet of meter to minimum of 4 in w.c. and maximum of 13.5 in w.c.	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 504 Quality of Gas Service	Rule 504.03 (a) Pressure Requirements
Damage Prevention	Part 192.614 Part 190.221	States Commission Safety Division is enforcement authority for all underground damage prevention rules of NH	New Hampshire Code of Administrative Rules Chapter Puc 800 Underground Utility Damage Prevention Program, Part Puc 807	Rule 807.01 to Rule 807.07 Enforcement Authority

New Hampshire

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Enforcement Procedures NH RSA 374.55	
Damage Prevention	Part 192.614	Limits Marking and Locator Duties to only In house Personnel (No outside Contractors are permitted)	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (i) Article VI, 6.5
Damage Prevention	Part 192.801 Part 192.614	Requires locators be trained to NULCA or equivalent and knowledgeable of NH Damage Prevention Regulations	New Hampshire Code of Administrative Rules, Chapter Puc 800 Underground Utility Damage Prevention Program, Part Puc 804 Duties of Operators	Rule 804.03 (a) Rule 804.03 (b) Training of Locators
Operator Qualifications	Part 192.801	Requires Operator Qualifications for New Construction	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.01 (c) (2) Pressure Requirements
Meter Location/ Protection	Part 192.353	Customer Meters must be located at Building wall or Structure	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (a) Article VI, 6.1
Meter Location/ Protection	Part 192.361	Service Lines must be **owned** by the operator	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (a) Article VI, 6.1
Leak Tests	Part 192.723	Requires repeated leak surveys during frost conditions (winter)	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 508 Safety, Accident and Leakage Requirements	Rule 508.04 (d) Leakage Surveys
Leak Tests	Part 192.723	Business Districts is defined in NH	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service,	Rule 508.04 (b) Leakage Surveys

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Part Puc 508 Safety, Accident and Leakage Requirements	
Leak Tests	Part 192.723	Services for Public Buildings need leak surveyed inside and out each year between Mar 1 through Dec 1	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 508 Safety, Accident and Leakage Requirements	Rule 508.04 (g) Leakage Surveys
Leak Tests	Part 192. 721	Bridges must be leak surveyed 3 times per year	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 508 Safety, Accident and Leakage Requirements	Rule 508.04 (f) Leakage Surveys
Response to Leaks	Part 192.723	Leak Classification System and Required timeline for Repairs	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 508 Safety, Accident and Leakage Requirements	Rule 508.04 (i) Leakage Surveys
Response to Leaks	Part 192.615	Prescribes Standards for Response Times to Emergency/Leaks/Odor Complaints/Evacuations	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107 NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Section C (7) (n) Article VI, 6.6
Replacement Program	Part 192.755	Requires replacement of Cast Iron when encroached upon by outside construction activities	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107	Section C (7) (b)
Replacement Program	Part 192.489	Requires Cast Iron/BS mains and services Accelerated Replacement Program with Rate Adder	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107	Section C (5)
Replacement Program	Part 192.487	Requires Bare Steel mains and services Accelerated Replacement Program with No Rate Adder	NH PUC Order Oct 10 2008 Order # 24906 D# DG 08-048	Article VI, 6.4
Authority Beyond OPS	None Applicable	Safety Routinely Participates with Gas Division on Rate Cases	New Hampshire Code of Administrative Rules Chapter Puc 200	Rule 203.01 through Rule 204.24

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		and files Witness Testimony	Procedural Rules, Part Puc 203 Adjudicative Proceedings	
Design/Install Requirements	Part 192.325	Requires 12 inches of clearance from any underground structure	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (d) Construction & Maintenance
Design/Install Requirements	Part 192.319	Main Location Restriction of 40 feet from Buildings if Operating Pressure is greater than 200 psig	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (b) Rule 506.02(c) Construction & Maintenance
Design/Install Requirements	Part 192.319	Requires Commission Approval of any Rail Xing or Highway Xing if Operating Pressure is greater than 200 psig	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (c) Construction & Maintenance
Risk Based Approach	Part 192.1007	Requires Annual Evaluation of Threats/Risks	NH PUC Order July 12 2007 Order # 24777 D# DG 06-107	Section C (7) (b)
Enhanced Record Keeping	Part 192.503	Requires recording test pressure and duration of test and keeping records	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (o) Construction & Maintenance
Enhanced Record Keeping	Part 192.727	Requires recording locations of abandon mains on maps after Feb 2005	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (j) Construction & Maintenance
Inactive Services	Part 192.727	Inactive Service must be cutoff if older than 2 years of inactive service for CI/BS mains and 10 years if Coated Steel or Plastic mains	New Hampshire Code of Administrative Rules Chapter Puc 500 Rules For Gas Service, Part Puc 506 Equipment and Facilities	Rule 506.02 (q) (3) Construction & Maintenance

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

TOC

New Jersey

Key Stats

State Agency	New Jersey Board of Public Utilities
Division	Reliability & Security
Department	Pipeline Safety
Web	http://www.bpu.state.nj.us/bpu/divisions/reliability/
Regulated Intrastate Pipeline Systems	4
Regulated Master Meter Operators	38
Regulated LNG Systems	5
Regulated Hazardous Liquid Systems	n/a
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	50

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.1	Requires Incident Reports at $5K level	New Jersey Administrative Code Title 14 Public Utilities Chapter 3 All Utilities Sub Chapter 6 Records and Reporting (NJ A.C.)	§ 14:3-6.4 (b) Accidents-initial reporting
Enhanced Reporting	Part 191.1	Requires reporting of suspicious acts	New Jersey Administrative Code Title 14 Public Utilities Chapter 3 All Utilities Sub Chapter 6 Records and Reporting (NJ A.C.)	§ 14:3-6.6 Reporting Suspicious Acts
Enhanced Reporting	Part 191.1	Requires reporting service interruptions of 2 hrs or more affecting 100 or more customers	New Jersey Administrative Code Title 14 Public Utilities Chapter 3 All Utilities Sub Chapter 3 Service (NJ A.C.)	§ 14:3-3.7 Interruptions of Service
Enhanced Reporting	Part 191.11	Requires annual leak status report	New Jersey Administrative Code Title 14 Public Utilities	§ 14:7-1.26 Operator Reporting Requirements

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	
Enhanced Reporting	Part 192.603	Requires O&M manual to be filed	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.23 Review of Operating and Maintenance Standards
Enhanced Reporting	Part 192.615	Requires emergency response plans to be Filed for Transmission Lines	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.10 (d) Valve Assessment and Emergency Closure Plan – Transmission Pipelines
Enhanced Reporting	Part 191.1	Requires qtly reporting of leaks or other conditions that may affect safety or operations	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of	§ 14:7-1.20 (f) Monthly Inspection Patrols and Leak Detection Surveys

New Jersey

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	
Enhanced Reporting	Part 191.1	Requires report of pipeline specs for projects in excess of 125 psig p	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.18 Proposed Construction
More Direct Oversight	Part 192.501 Part 192.503 Part 192.505 Part 192.507 Part 192.509 Part 192.511 Part 192.513 Part 192.515 Part 192.517	Requires report 1 month after pressure test certifying that the pipeline meets federal code	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.14 (f) Pressure Testing
More Direct Oversight	Part 192.501	Requires notification at least 3 business days prior to pressure testing of any gas transmission pipeline	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.14 Pressure Testing
More Direct	Part 192.301	Requires quality	New Jersey	§ 14:7-1.24

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Oversight		assurance/quality control audits and records of work for both employees and contractors	Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	Oversight of Construction Activity
More Direct Oversight	Part 192.301	Requires construction activity inspections of contractors at least once each work day	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.24(b) Oversight of Construction Activity
More Direct Oversight	Part 192.301	Requires any construction work performed by contractors to be inspected by the utility	New Jersey Administrative Code Title 14 Public Utilities Chapter 3 All Utilities Sub Chapter 2 Plant (NJ A.C.)	§ 14:3-2.2 Inspection of Work Performed by Contractors
Valves	Part 192.179 Part 192.615 Part 192.745	Requires each valve to be assessed individually. Lists 11 factors to classify valves. Calls for annual updates to the plan and annual requirements of emergency valve closure drill	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.10 Valve Assessment and Emergency Closure Plan – Transmission Pipelines

New Jersey

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Valves	Part 192.365	Requires existing service lines with no valves to have valves installed when repairs are made that require excavation	New Jersey Administrative Code Title 14 Public Utilities Chapter 6 Gas Service Sub Chapter 2 Plant (NJ A.C.)	§ 14:6-2.4 Service Line Valves
Pressure Tests	Part 192.501 Part 192.503 Part 192.505 Part 192.507 Part 192.509 Part 192.511 Part 192.513 Part 192.515 Part 192.517 Part 192.719 Part 192.725	Requires test pressure for transmission pipelines be maintained wherever possible for a period of 24hrs	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.14 Pressure Testing
Operating Pressure	Part 192.359	Requires pressure variations within 24 hr period not to exceed 50% above or below utilization pressures	New Jersey Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service Sub Chapter 3 Service (NJ A.C.)	§ 14:6-3.4 Pressure Requirements
Damage Prevention	Part 192.614	Requires on-site inspection for transmission pipelines immediately prior to and during excavation or backfilling & documentation of its inspection oversight	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.22 Damage Prevention
Damage Prevention	Part 192.614	Requires yellow subsurface warning tape above transmission or distribution pipeline whenever the pipeline is installed, repaired or replaced	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction	§ 14:7-1.11 (f) Installation of Pipe

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	
Damage Prevention	Part 192 .614	Requires pipes less than 16 inches in diameter to be installed with one 6-inch wide tape and pipes of 16 inches or more installed with one 12-inch wide tape or two 6-inch wide tapes installed side by side	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.11 (f) Installation of Pipe
Damage Prevention	Part 192 .321	Requires #12 tracer wire for direct burial & # 10 wire for boring or drilling	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.11 (e) Installation of Pipe
Damage Prevention	Part 192.614	Establishes the Underground Facility Protection Act. Designates NJBPU to enforce regulations and impose penalties	New Jersey Statute Title 48 Public Utilities, Chapter 48:2-73, Underground Facility Protection Act	Section 1-19
Training	Part 192.181	Requires training of all operator-qualified employees on procedures to reduce or stop flow of gas during an emergency. Only operator-qualified employees are allowed to perform these procedures.	New Jersey Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service , Sub Chapter 2 Plant (NJ A.C.)	§ 14:6-2.5 Emergency Shutdown
Meter	Part 192.353	Requires adequate	New Jersey	§ 14:6-7.3

New Jersey

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Location/ Protection		protection for high pressure meters located three feet or less from a vehicle zone and not protected by an EFV	Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service , Sub Chapter 7 Protecting High Pressure Gas Meters from Vehicular & Other Damage (NJ A.C.)	New Residential Construction
Meter Location/ Protection	Part 192.351	Does not allow a gas meter to remain in service for a period longer than 10 years	New Jersey Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service , Sub Chapter 4 Meters (NJ A.C.)	§ 14:6-4.2 Periodic Meter Testing
Meter Location/ Protection	Part 192.351	No gas utility in this State shall provide gas service to a newly developed master meter system after	New Jersey Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service , Sub Chapter 6 Master Meters Systems (NJ A.C.)	§ 14:6-6.3 Service to Master Meter Systems
Odorant	Part 192.625	Requires odorant testing as frequently as necessary, but not less than once every 30 days	New Jersey Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service , Sub Chapter 3 Service (NJ A.C.)	§ 14:6-3.7 Odorization
Odorant	Part 192.625	Requires gas having an insufficient odor of its own to be odorized with a suitable odorant	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.16 Odorization
Odorant	Part 192.625	Requires odorant equipment to provide a uniform level of odor in the gas.	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7	§ 14:7-1.16(e) Odorization

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	
Odorant	Part 192.625 Part 191.1	Requires operator to immediately report any indication of insufficient levels of odorant to NJBPU.	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.16 (d) Odorization
Leak Tests	Part 192. 723	Requires leak detection equipment that is at least as reliable and sensitive as flame ionization	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.20 (c) Monthly Inspection Patrols and Leak Detection Surveys
Response to Leaks	Part 192.703	Requires Prompt investigation of each reported or suspected gas leak	New Jersey Administrative Code Title 14 Public Utilities Chapter 6 Gas Service Sub Chapter 2 Plant (NJ A.C.)	§ 14:6-2.3 Inspection of Property
Response to Leaks	Part 192.705	Requires inspection program with inspection patrols at least once per month in Class 3 and Class 4 locations	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines	§ 14:7-1.20 (a) Monthly Inspection Patrols and Leak Detection Surveys

New Jersey

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	
Replacement Program	Part 192. 703	Requires replacement of bare and coated cathodically unprotected steel services in an area where 20 % or more of the services have exhibited leaks.	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines, Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.20 (d) Monthly Inspection Patrols and Leak Detection Surveys
Replacement Program	Part 192.489	Approval to accelerate infrastructure improvement projects including main replacements.	New Jersey Board of Public Utilities, Docket No. EO09010049, Order 1/28/2009 I/M/O the Proceeding for Infrastructure Investment and a Cost Recovery Mechanism for All Gas and Electric Utilities	Entire Order
Replacement Program	Part 192.489	Approval to accelerate infrastructure improvement projects with an emphasis on CI and bare steel replacements	New Jersey Board of Public Utilities, Docket No. EO09010049, Order 1/28/2009 I/M/O the Proceeding for Infrastructure Investment and a Cost Recovery Mechanism for All Gas and Electric Utilities	Entire Order
Extending LDC responsibility	Part 192.16	Requires customer notification periodically, but no less than once a year, by way of bill inserts and other effective	New Jersey Administrative Code Title 14 Public Utilities, Chapter 6 Gas Service, Sub	§ 14:6-3.8 Customer Information

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		methods	Chapter 3 Service (NJ A.C.)	
Cathodic Protection	Part 192.723	Requires more frequent surveys on bare steel based on leak history, leaks discovered by the public, and operating pressure	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.20 (b) Monthly Inspection Patrols and Leak Detection Surveys
Design/Install Requirements	Part 192.301 Part 192.150	Requires approval of new pipelines in excess of 250 psig within 100 feet of any building intended for human occupancy	New Jersey Administrative Code Title 14 Public Utilities Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.4 Proscribed Areas
Design/ Install Requirements	Part 192.5 Part 192.609 Part 192.611	Requires all pipelines constructed in NJ after March 2, 2009, to meet the design standards for Class 4 pipeline location	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.3 Classification of pipeline locations
Design/ Install Requirements	Part 192.221 Part 192.225 Part 192.227 Part 192.229 Part 192.231 Part 192.233	Requires oversight of field welding on pipelines operating in excess of 250 psig by qualified inspectors, and a copy of the welding procedures	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1	§ 14:7-1.6 Quality Control of Field Welding

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
	Part 192.235 Part 192.241 Part 192.243 Part 192.245	readily available at the job site	Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	
Design/ Install Requirements	Part 192.451	Requires periodic inspection and calibration of all equipment, including, but not limited to, equipment used for cathodic protection, pipe jeeping, leak detection, plastic fusion, and pressure testing. Inspection stickers shall be attached to all equipment	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.24 (e) Oversight of Construction Activity
Design/ Install Requirements	Part 192.327	Requires transmission pipelines to be installed with a cover of at least 48 inches above the top of the pipe	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.12(c) Minimum Cover over Natural Gas Pipelines
Design/Install Requirements	Part 192.327	Requires mains to be installed with a cover of at least 30 inch above the top of the pipe	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines, Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.12(a) Minimum Cover over Natural Gas Pipelines
Design/Install	Part 192.327	Requires services to be	New Jersey	§ 14:7-1.12(d)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Requirements		installed with a cover of at least 18 inch above the top of the pipe	Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	Minimum Cover over Natural Gas Pipelines
Design/Install Requirements	Part 192.325	Requires all gas pipelines to be installed with at least 12 inches separation from any other subsurface structure or facility	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.11 Installation of Pipe
Enhanced Record Keeping	Part 192.947	Requires the utility to retain records of pressure test in N.J.C.A 14:7-1.14 & 14:7-1.26 for the life of the gas service	New Jersey Administrative Code Title 14 Public Utilities Chapter 6 Gas Service Sub Chapter 7 Protecting High Pressure Distribution Natural Gas Meters from Vehicular and Other Damage (NJ A.C.)	§ 14:6-7.9 (c) Inspections and Record Keeping
Enhanced Record Keeping	Part 192.947	Requires the utility to retain records of leak detection surveys and replacements in14:7-1.20(d) for the life of the gas service	New Jersey Administrative Code Title 14 Public Utilities Chapter 6 Gas Service , Sub Chapter 7 Protecting High Pressure Distribution Natural Gas Meters from Vehicular and Other Damage (NJ A.C.)	§ 14:6-7.9 (c) Inspections and Record Keeping

New Jersey

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Record Keeping	Part 192.947	Requires the utility to retain records of public outreach meetings in 14:7-1.21(b) for the life of the gas service	New Jersey Administrative Code Title 14 Public Utilities Chapter 6 Gas Service, Sub Chapter 7 Protecting High Pressure Distribution Natural Gas Meters from Vehicular and Other Damage (NJ A.C.)	§ 14:6-7.9 (c) Inspections and Record Keeping
Enhanced Record Keeping	Part 192.947	Requires the utility to retain records of equipment, inspected and calibrated as described in 14:7-1.24(e) for the life of the gas service	New Jersey Administrative Code Title 14 Public Utilities Chapter 6 Gas Service, Sub Chapter 7 Protecting High Pressure Distribution Natural Gas Meters from Vehicular and Other Damage (NJ A.C.)	§ 14:6-7.9 (c) Inspections and Record Keeping
State Inspection Program	Part 190.203	Requires regulatory oversight of various construction activities in excess of federal code.	New Jersey Administrative Code Title 14 Public Utilities, Chapter 7 Natural Gas Pipelines Sub Chapter 1 Construction Operation and Maintenance of Transmission and Distribution Natural Gas Pipelines (NJ A.C.)	§ 14:7-1.24 Oversight of Construction Activity

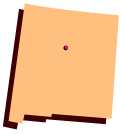
New Mexico

Key Stats

State Agency	Public Regulation Commission
Division	Transportation
Department	Pipeline Safety Bureau (PSB)
Web	http://www.nmprc.state.nm.us/psb.htm
Regulated Intrastate Pipeline Systems	100
Regulated Master Meter Operators	258
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	14
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	8

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5,000 level	NM Administrative Code Title 18 Transportation & Highways, Chapter 60 Pipeline Construction and Maintenance, Part 2 Pipeline Safety General Provisions	18.60.2.8(B) Adoption of Portions of the Code of Federal Regulations
Enhanced Reporting	Part 191.11 Part 191.17	Requires a list of master meter customers, submitted annually by March 15th	NM Administrative Code Title 18 Transportation & Highways, Chapter 60 Pipeline Construction and Maintenance, Part 2 Pipeline Safety General Provisions	18.60.2.10 Reports of Master Meters
Enhanced Reporting	Part 192.603 Part 192.605	Requires the filing of O&M plan with PSB. Any changes to the manual must be submitted within 20 days of change being made	NM Administrative Code Title 18 Transportation & Highways, Chapter 60 Pipeline Construction and Maintenance, Part 2 Pipeline Safety General Provisions	18.60.2.11 Operation and Maintenance Manual
Enhanced Reporting	Part 191.11 Part 191.17	Requires filing of RSPA F 7100.1-1 with PSB by March 15.	NM Administrative Code Title 18 Transportation &	18.60.3.8 Information Required from Operators of Gas



New Mexico

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Establishes other information that needs to be included with annual report.	Highways, Chapter 60 Pipeline Construction and Maintenance, Part 3 Annual Pipeline Safety Fees	Pipelines
Enhanced Reporting	Part 195.49	Requires filing of RSPA F 7000.1-1 with PSB by June 15. Establishes other information that needs to be reported to PSB by March 15.	NM Administrative Code Title 18 Transportation & Highways, Chapter 60 Pipeline Construction and Maintenance, Part 3 Annual Pipeline Safety Fees	18.60.3.10 Information Required from Operators of Hazardous Liquid and Carbon Dioxide Pipelines
More Direct Oversight	Part 192.305	Notice of Intent to Construct required to be filed with Transportation Director if project has value of $50,000 or more	NM Administrative Code Title 18 Transportation & Highways, Chapter 60 Pipeline Construction and Maintenance, Part 2 Pipeline Safety General Provisions	18.60.2.9 Notice of Intent to Construct
Response to Leaks	Part 192.706 Part 192.723	Requires immediate classification leaks upon discovery.	NM Administrative Code Title 18 Transportation & Highways, Chapter 60 Pipeline Construction and Maintenance, Part 2 Pipeline Safety General Provisions	18.60.2.12 Classification and Repair of Leaks
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits Establishes inspection frequency based on risk score.	New Mexico PRC Pipeline Safety Bureau Written Policy	Policy 10-002 Inspection Forms and Frequency Operator Inspections

New York

Key Stats

State Agency	New York State Department of Public Service
Division	Office of Electric, Gas & Water
Department	Safety Section
Web	http://www.dps.state.ny.us/
Regulated Intrastate Pipeline Systems	97
Regulated Master Meter Operators	0
Regulated LNG Systems	3
Regulated Hazardous Liquid Systems	5
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Report all incidents where gas facilities may be involved and media events	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.801(a) Reports of Accidents
Enhanced Reporting	Part 191.3	Carbon Monoxide incidents	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.801(b)&(c) Reports of Accidents
Enhanced Reporting	Part191.3	Immediately report Major Interruptions of Service	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter	§255.823. Interruptions of service.

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			C Safety, Part 255 Transmission and Distribution of Gas	
Enhanced Reporting	Part 191.3	Weekly report any interruption of service	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter A Service, Part 232 Notice of Interruption of Service	§232.1 Definition of interruption of service. §232.2 Report of interruption of service §232.3 Time of filing
Enhanced Reporting	Part 192.605	O&M Plan must be filed with DPS	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.603(b) General Provisions
Response to Leaks	Part 192.615	Monthly reports of response time to leaks and emergencies	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.825(d) Logging and analysis of gas emergency reports
Enhanced Reporting	Part 192.505	Notification of pressure tests >125 psig	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	255.505(h)-(i) Strength test requirements for steel pipelines to operate at 125 psig or more
More Direct Oversight	Part 192.353	Prior notification of construction of mains >125 psig Construction	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume	§255.302 Notification Requirement

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	
Valves	Part192.363	Special requirement for Service Line valves >60 psig	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.363(d) Service lines: valve requirements
Valves	Part 192.365	Conditions when service line valve MUST be located outside the building.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.365(b) Service lines: location of valves
Valves	Part192.745	Emergency valves for transmission lines must be checked for external leakage during inspection	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.745(c) Valve maintenance: transmission lines
Valves	Part 192.747	Emergency valves for distribution pipelines must be checked for external leakage during inspection	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.747(d) Valve maintenance: distribution systems
Valves	None	Requires annual inspection of buried service line valves for	16 (NYCRR) New York Compilation of Rules and Regulations,	§255.748 Valve maintenance: service line valves

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Buildings of Public Assembly including checks for external leakage.	Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.365(b)(2) Service lines: location of valves
Pressure Testing	Part 192.515	Not limited to pipe tests where hoop stress exceeds 50% SMYS.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.515(a) Environmental protection and safety requirements
Pressure Testing	Part 192.555	Covers upgrading to transmission pressure - defined as 125 psig or above as an uprating requirement	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.555(a) Upgrading to a pressure of 125 psig or more in steel pipelines.
Pressure Testing	Part 192.555	Additional inspection/testing requirements prior to uprating pressure above previously established MAOP.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.555(b)(3) §255.555(b)(4) §255.555(b)(5) §255.555(b)(6) Upgrading to a pressure of 125 psig or more in steel pipelines.
Pressure Testing	Part 192.511	Prescribes more stringent pressure test requirements for service lines at 1.5X MAOP including limits and specified duration for various diameters and operating pressures.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.511(c) §255.511(f) §255.511(f)(1) §255.511(f)(2) §255.511(f)(3) §255.511(g)(1) §255.511(g)(2) §255.511(g)(3) Test requirements for service lines

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Operating Pressure	Part192.169	Pressure relief valve requirement and location for positive-displacement transmission compressor.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	255.169(c) Compressor stations: pressure limiting devices
Operating Pressure	Part192.619	Limit equal to 60% of mill test pressure for furnace butt welded steel pipe and 85% of highest test pressure for all other steel pipe whether by mill test or by post installation test	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	255.619(a)(4) 255.619(a)(5) Maximum allowable operating pressure: steel or plastic pipelines
Operating Pressure	Part192.623	Requires operating range of low pressure (LP) systems to be within 4 and 12 inches water column. Maximum daily pressure variation shall not exceed a total range of 50 percent of the maximum gauge pressure experienced during the day at any point in the low pressure distribution system, as measured at the consumer's end of the service line. Protection against pressure buildup of 2 psig.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	255.623(c) 255.623(d) Maximum and minimum allowable operating pressure: low-pressure distribution systems
Operating Pressure	Part192.197	Requires regulator with internal relief valve. For service line operating at 125 psig or more be equipped with either an excess	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter	255.197(a)(7) 255.197(c)(5) Control of the pressure of gas delivered from high pressure distribution systems

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		flow valve or must have the first stage regulator located at least 50 feet from the building or, if 50 feet cannot be attained without entering the roadway, located at the property line.	C Safety, Part 255 Transmission and Distribution of Gas	
Operating Pressure	Part 192.201	Relief valves or other pressure limiting devices with a capacity to limit the maximum pressure in the main to 2 PSIG on low pressure distribution systems.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	255.201(d) Required capacity of pressure relieving and limiting stations
Damage Prevention	Part 192.614	Operators must meet targets of damages per 1000 One Call tickets	Rate Case Performance Metric – LDC Specific	**CASE** 09-G-0589 08-G-1398 09-G-0795 06-G-1185 06-G-1186 07-G-0141 08-G-0609 09-G-0716 09-G-0718
Meter Location/ Protection	Part 192.353	Physical protection from damage Requires service regulator on new and replacement service lines, except for replacements by insertion, to be installed outside of the building. Specific requirements for installing a new gas service for which gas pressure regulating and associated gas cleaning equipment and appurtenances is required for a building	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.353(b) §255.353(e) Customer meters and regulators: location

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		of public assembly, or apartment building, or building within an apartment, industrial or commercial complex.		
Meter Location/ Protection	Part 192.353	Implied as section requires each service regulator on new and replacement service lines, except for replacements by insertion, to be installed outside of the building, unless it is impractical or unsafe.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.353(b) Customer meters and regulators: location
Odorant	Part 192.625	All gas transported in **transmission lines**, and distribution mains operating at **125 PSIG and above** must be odorized so that it is readily detectable at all gas concentrations of **one fifth of the lower explosive limit and above.** All gas transported in **distribution mains, and service laterals** is to be adequately odorized so that it is readily detectable at all gas concentrations of **one tenth of the lower explosive limit and above.**	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.625(a) §255.625(b) Odorization of gas
Odorant	Part 192.605	Requirement for procedures to correct, within specified timeframes, deficiencies found during any inspections, evaluations, reviews, etc. required by this Part	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.605(f) Essentials of operating and maintenance plan

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Leak Tests	Part 192.465	Allows operator to utilize leakage survey in lieu of electrical survey to determine areas of active corrosion.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.465(f) External corrosion control: monitoring. §255.723(b) Distribution systems: leakage surveys and procedures
Response To Leaks	Part 192.553	Each hazardous leak detected must be repaired before a further pressure increase is made. All leaks must be repaired as soon as possible following completion of the upgrading.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.553(c) General requirements
Response to Leaks	Part 192.703	Prescribes requirement for leak classification system and remedial action including investigation, monitoring and repairs.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.805 Leaks: general. §255.807 Leaks: records. §255.809 Leaks: instrument sensitivity verification. §255.811 Leaks: type 1 classification. §255.813 Leaks: type 2A classification. §255.815 Leaks: type 2 classification. §255.817 Leaks: type 3 classification. §255.819 Leaks: follow-up inspection. §255.821 Leaks: nonreportable reading.
Response to Leaks	Part 192.703	Any notification of a gas leak or gas odor, or any notification of	16 (NYCRR) New York Compilation of Rules and Regulations,	§255.805(a) Leaks: General

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		damage to facilities by contractors or other outside sources shall constitute the need for prompt action.	Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	
Response to Leaks	None	Prescribes Year End Leak Backlog Targets	Rate Case Performance Metric – LDC Specific	Rate Case Performance Metric – LDC Specific **CASE** 09-G-0589 08-G-1398 09-G-0795 06-G-1185 06-G-1186 07-G-0141 08-G-0609 09-G-0716 09-G-0718 08-G-1137
Response to Leaks	None	Prescribes actions necessary prior to downgrading or upgrading existing leaks.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.805(g) §255.805(h) Leaks: General
Response to Leaks	None	Requires follow-up inspection at least 14 days after but within 30 days of a leak repair to validate said repair.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.819 Leaks: follow-up inspection
Replacement Program	None	Various Rate Case Driven Performance Metric Programs for accelerated replacement of leak prone pipe with and without specific rate relief. Majority of	Rate Case Performance Metric – LDC Specific	Rate Case Performance Metric – LDC Specific **CASE** 09-G-0589 08-G-1398 09-G-0795

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		LDC's utilizing risk based programs.		06-G-1185 06-G-1186 07-G-0141 08-G-0609 09-G-0716 09-G-0718 08-G-1137
Replacement Program	None	Requires replacement of cast iron under certain encroachment conditions.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.756 Replacement of exposed or undermined cast iron piping §255.757 Replacement of cast iron mains paralleling excavations
Replacement Program	Part 192.614	Requirements for the replacement, venting and/or surveillance of small diameter cast iron main encroached by undermine or parallel excavation.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.756 Replacement of exposed or undermined cast iron piping §255.757 Replacement of cast iron mains paralleling excavations
Authority Beyond OPS	None	Requirements for issuance of Warning Tags.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 261 Piping Beyond the Meter	§261.51 Warning Tag Procedure §261.55 Warning Tag Inspection
Extended LDC Responsibility	None	Requirements for O&M of piping beyond outlet of customer meter. Procedures required to comply with the provisions of the leakage survey, carbon monoxide, and warning tag sections of NYCRR Part 261.	216 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 261 Piping Beyond the Meter	§261.15(a) Operation and Maintenance Plan

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Extended LDC Responsibility	None	Whenever the operator performs a leakage survey, as required by sections 255.706 or 255.723 of NYCRR Part 255, said survey is to include all known underground gas piping beyond the outlet of the customers' meter,	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 261 Piping Beyond the Meter	§261.17 Preservation of records §255.706 Transmission lines: leakage surveys §255.723 Distribution systems: leakage surveys and procedures
Extended LDC Responsibility		Operator owns service line regardless of meter location		
Cathodic Protection	Part 192.483	Operator must complete action to reestablish cathodic protection to the required level prior to the next annual testing or within one calendar year. For areas of active corrosion operator shall provide cathodic within one calendar year or replace the section of pipeline within two calendar years.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.483(d) §255.483(e) Remedial measures: general
Cathodic Protection	Part 192.467	Additional requirements limiting step and touch voltages to 15 V for pipelines constructed after December 1, 1993, and are located parallel and in close proximity to or crosses underneath an overhead high-voltage (69 kV or higher) electric transmission facility,	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.467(g) External corrosion control: electrical isolation
Design/Install Requirements	Part 192.199	Requirement for 50’ separation between regulators and/or OP devices for new 2 stage regulator installations and/or existing above ground stations	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter	255.199(b) Requirements for design of pressure relief and limiting devices

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		supplying low pressure pipelines.	C Safety, Part 255 Transmission and Distribution of Gas	
Design/Install Requirements	Part 192.229	Specified welding standards Requirement for qualified welder not limited to pipelines operating at or above 20% SMYS	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.229(c) Limitations on welders
Design/Install Requirements	Part 192.241	Requires that butt welds on each pipeline with a nominal diameter **greater than 2 inches and operating at 125 PSIG or more MUST be nondestructively** tested in accordance with section 255.243.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.241(b) Inspection and test of welds
Design/Install Requirements	Part 192.241	Requirement for qualified welding inspector on pipelines to be operated at 125 PSIG or more. Restricts welder from inspecting his/her own welds for the purpose of determining the acceptability of the welds as required by section 255.241	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.244 Welding inspector
Design/Install Requirements	Part192.59	Prohibits use of **used plastic** in new or replacement installations. This does not prohibit the reactivation of a plastic pipeline.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.59(c) Plastic Pipe
Design/Install Requirements	Part 192.327	Pipe which is installed in areas actively cultivated for	16 (NYCRR) New York Compilation of Rules and Regulations,	§255.327(e) Cover

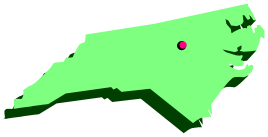
Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		commercial farm purposes in at least two out of the last five years, as identified by the farmland operator, shall be installed with a minimum cover of 40 inches.	Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	
Design/Install Requirements	Part 192.325	Prescribes requirements for at least 12 inches of clearance from any other underground structure not associated with the transmission line but **allows a minimum of 2 inches** if this clearance cannot be attained provided the transmission line is protected from damage that might result from the proximity of the other structure. The same minimum is prescribed for distribution mains; however initial clearance requires at least 6 inches.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.325(a) §255.325(b) Underground clearance
Design/Install Requirements	Part 192.325	Requires same aforementioned clearance and/or protection for plastic transmission or distribution mains.	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.325(c) Underground clearance
Design/Install Requirements	Part192.703	Example: The provisions of: sections 255.705, 255.706, 255.709, 255.711, 255.713, 255.715, 255.717, and 255.719 shall pertain, as applicable, to all transmission lines, and	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and	§255.703(c) General

New York

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		all distribution mains operating at 125 PSIG or more in Class 3 and 4 locations. With exception of IMP.	Distribution of Gas	
Design/Install Requirements	Part 192.181	Requirement for an inlet an outlet valve for distribution regulator stations at distance of at least 50' but no more than 1000'	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.181(b) §255.181(c) Distribution line valves
Enhanced Record Keeping	Part 192.743	Requirement for annual review of the required capacity and comparison with relieving capacity of the installed equipment for the operating conditions under which it works.	16 (NYCRR) New York Compilation of Rules and Regulations, V Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.743(c) Pressure-limiting and -regulating stations: testing relief device
Enhanced Record Keeping	Part 192.517	Requirement to retain all test records **for life of pipeline**. Lifetime Records Requirement for strength Testing	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.517 Records
Enhanced Record Keeping	Part 192.745	Emergency valve location for transmission line must be designated on records	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.745(b) Valve maintenance: transmission lines
Enhanced Record Keeping	Part 192.747	Emergency valve location for distribution lines must be	16 (NYCRR) New York Compilation of Rules and Regulations,	§255.747(c) Valve maintenance: distribution systems

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		designated on records	Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	
Inactive Services	None.	Prescribes 6 year limit for inactive services at which time cut-off at main is required. (Deadline Requirement)	16 (NYCRR) New York Compilation of Rules and Regulations, Title 16 Public Service Commission, Volume B Chapter 3 Gas Utilities, Sub Chapter C Safety, Part 255 Transmission and Distribution of Gas	§255.726(c) Inactive Service Lines
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections



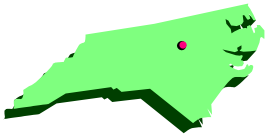
North Carolina

Key Stats	
State Agency	North Carolina Utilities Commission
Division	
Department	Natural Gas Pipeline Safety Section
Web	http://www.ncuc.commerce.state.nc.us/industries/naturalgas/pipelinesafety.htm
Regulated Intrastate Pipeline Systems	76
Regulated Master Meter Operators	5
Regulated LNG Systems	3
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	17

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.1	Requires Incident Reports at $5K level	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas Article 8 Safety	Rule R6-41 (b) Gas leaks and annual reports.
Enhanced Reporting	Part 191.1	Requires monthly reporting service interruptions affecting 50 or more customers and remediation methods to prevent reoccurrence	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas Article 2 Records and Reports	Rule R6-5. Data to be filed with the Commission
Enhanced Reporting	Part 192.605 Part 192.615 Part 191.3	File contact Information for a. General management duties. b. Customer relations (complaints). c. Engineering operations. d. Meter tests and repairs. e. Emergencies during	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas Article 2 Records and Reports	Rule R6-5. Data to be filed with the Commission

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		non office hours		
Enhanced Reporting	Part 191.3	Each gas utility shall file annually an updated map of operating area and facilities	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 2 Records and Report	Rule R6-5(4) Data to be filed with the Commission
Enhanced Reporting	Part 192.305	A copy of the utility's construction and operational budget filed annually	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 2 Records and Report	Rule R6-5(4) Data to be filed with the Commission
More Direct Oversight	Part 192 305	Requires 30 day advance notice of construction activities involving pipelines greater than 100 psig for Commission inspections , 24 hrs prior to pressure testing and 60 day post operation a certifying report	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 2 Records and Reports	Rule R6-5 Data to be filed with the Commission
More Direct Oversight	Part 192.617	Each utility shall give reasonable assistance to the Commission in the investigation of accidents and in the determination of preventing accidents and maintain summary of reportable accidents.	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 8 Safety.	Rule R6-38(b, c) Protective Measures.
Training/ Qualifications	Part 192.605(b)(9)	Each utility shall adopt a safety program and require employees to use safe methods, appropriate tools and be instructed on hazards of electrical shock, asphyxiation, drowning and methods of artificial respiration.	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 8 Safety	Rule R6-39(a) Safety Program.
Response to Leaks	Part 192.615	All gas leaks are considered emergencies and require emergency response	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 8 Safety	Rule R6-41 (a) Gas leaks and annual reports

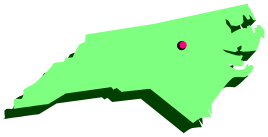


North Carolina

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Authority Beyond OPS	Part 192.605	Customer Piping must be Pressure Tested and Leak Tested in Conformance with NFPA 54 before gas is turned on	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 8 Safety	Rule R6-40 Customers Piping
Authority Beyond OPS	Part 192.1	Safety rules apply to both intrastate and certain interstate natural gas companies.	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 1, General	Rule R6-1 Application of Rules.
Design/Install Requirements	Part 192.7 Part 192.303 Part 192.305	Construct, install, maintain, operate per "Good Engineering" defined by incorporating following standards: 1) Latest edition of NFPA 54, 2) "Standard Methods of Gas Testing", Circular No. 48, National Bureau of Standards, 1961 or American Meter Handbook E-4 3) "Testing Large Capacity Rotary Gas Meters", Research Paper No. 1741, National Bureau of Standards Journal of Research, September, 1946. 4) "Orifice Metering of Natural Gas", Report No.3 of the AGA Gas Measurement Committee 5) Reports prepared by the Practical Methods Committee of the Appalachian Gas	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 5 Engineering	Rule R6-20. Requirement for good engineering practice

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Measurement Short Course, West Virginia University, as follows: Report No.1, "Method of Testing Large Capacity Displacement Meters". Report No.2, "Testing Orifice Meters". Report No.3, "Designing and Installing Measuring and Regulating Stations". Report No.4, "Useful Tables for Gas Men". Report No.5, "Prover Room Practices		
Design/Install Requirements	Part 192.741	Each utility must have accurate pressure and flow measuring equipment and keep calibration certificates including a dead weight tester	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 7 Standards of Quality Service	Rule R6-33 Standards for Pressure Measurements
Risk Based Approaches	Part 192.613	Each utility must adopt a program of inspection of its gas plant in order to determine the necessity for replacement and repair.	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 5 Engineering	Rule R6-24 Inspection of Gas Plant.
Enhanced Record Keeping	Part 191.3	All records required by rules shall be kept within state and available for examination and follow NARUC retention policies	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 2 Records and Reports	Rule R6-3 Location of Records Rule R6-4 Retention of Records



North Carolina

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Record Keeping	Part 192.741	Pressure Recording Records shall be kept for 2 years	North Carolina Utilities Commission Rules and Regulations Chapter 6 Natural Gas, Article 7 Standards of Quality Service	Rule R6-32 Pressure Surveys and Records
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

National Association of Pipeline Safety Representatives

North Dakota

Key Stats	
State Agency	North Dakota Public Service Commission
Division	Gas Pipeline Safety
Department	Compliance and Competitive Markets Division
Web	http://psc.nd.gov/
Regulated Intrastate Pipeline Systems	9
Regulated Master Meter Operators	2
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	0

Applicable Requirement in CFR

There are no safety initiatives in North Dakota that are more stringent than Federal Regulations.

The North Dakota Codified Laws in chapter *49-02-01.2. Pipeline safety - Public service commission jurisdiction – Hazardous Facility orders*. state:

The commission, by rule, may establish and enforce minimum safety standards for the design, construction, and operation of gas distribution facilities and intrastate pipeline facilities used for the distribution and intrastate transportation of gas, liquefied natural gas, or hazardous liquids, regardless of whether they are owned or operated by a public utility, in order to ensure the reasonable safety thereof. Any rule issued under this section affecting the design, installation, construction, initial inspection, and initial testing is not applicable to pipeline facilities in existence on the date such rule is adopted. **Such rules may not be more stringent** than the corresponding federal regulations applicable to interstate pipelines and related facilities.

Ohio

Key Stats

State Agency	Ohio Public Utilities Commission
Division	Service Monitoring and Enforcement
Department	Gas Pipeline Safety Section
Web	www.puco.ohio.gov
Regulated Intrastate Pipeline Systems	103
Regulated Master Meter Operators	36
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	8

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires reports of outages for >100 customers for >2 hours	Ohio Administrative Code , Chapter 4901:1 Utilities, Section 1-16, Gas Pipeline Safety	4901:1-16-05 Notice and reports of service failures and incidents; twenty-four hour contacts; one-call participation; post-incident testing; and cast iron pipeline program
More Direct Oversight	Part 192.305	Requires reporting for new construction projects >$200,000 or >10% of system value	Ohio Administrative Code , Chapter 4901:1 Utilities, Section 1-16, Gas Pipeline Safety	4901:1-16-06 Construction Reports
Response to Leaks	Part 192.723	Requirements for leak grading and repair	Ohio Administrative Code , Chapter 4901:1 Utilities, Section 1-16, Gas Pipeline Safety	4901:1-16-04 Records, maps, inspections, and leak classifications
Replacement Program	Part 192.487	Requires replacement of bare steel mains and services through the Accelerated Main Replacement Program		All AMRP orders are operator specific
Replacement Program	Part 192.489	Requires replacement of cast iron mains and services through the Accelerated Main Replacement Program	PUCO Opinion and Order Case No. 01-1228-GA-AIR dated 4/19/2006	All replacement orders are operator specific – this is an example of a 10 yr program for former Cincinnati Gas

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
				& Electric
Replacement Program	Part 192.489	Requires replacement of Service Line and Riser Replacement Program for Prone to Fail Risers on Customer owned Service Lines	PUCO Findings and Order Case No. 09-573-GA-UNC PUCO Opinion and Order Case No. 07-689-GA-AIR dated 3/19/2008 PUCO Opinion and Order Case No. 07-478-GA-UNC dated 4/9/2008	All replacement orders are operator specific – this is an example
Extending LDC Responsibility	Part 192.703	Distribution operators must inspect master meter systems upon request of Safety Section or master meter operator	Ohio Administrative Code , Chapter 4901:1 Utilities, Section 1-16, Gas Pipeline Safety	4901:1-16-07 Master meter systems and safety inspections.
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits		Inspection Forms and Frequency Operator Inspections

Oklahoma

Key Stats	
State Agency	Oklahoma Corporation Commission
Division	Transportation Division
Department	Pipeline Safety Department
Web	http://www.occeweb.com/tr/PLShome.htm
Regulated Intrastate Pipeline Systems	240
Regulated Master Meter Operators	
Regulated LNG Systems	
Regulated Hazardous Liquid Systems	16
Regulated LPG Systems	
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	8

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5K level	Oklahoma Administrative Code Title 165. Corporation Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	OAC 165:20. 5-1 Definitions
Enhanced Reporting	Part 191.3	Requires Incident Notification within 1 hour to 2 hours	Oklahoma Administrative Code Title 165. Corporation Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	OAC 165:20. 5-11 Telephonic notice of certain incidents
Enhanced Reporting	Part 191.3	Requires Reports of all building evacuations involving gas	Oklahoma Administrative Code Title 165. Corporation Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	OAC 165:20. 5-15 Telephonic notice of an evacuation of a building
Enhanced Reporting		Requires Notification of Change of Ownership within 5 days of completion of agreement	Oklahoma Administrative Code Title 165. Corporation Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	OAC 165:20. 5-4 OAC 165:20. 7-4 Change of Ownership
More Direct Oversight	Part 192 305	Requires 7 day (or immediate if emergency with 5 day	Oklahoma Administrative Code Title 165. Corporation	OAC 165:20. 5-32 OAC 165:20. 7-2 Notice requirements

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		follow-up) advance notice of construction activities greater than 1 mile for Commission inspections	Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	for construction
Authority beyond OPS		Gas Companies shall not furnish gas to residences where customer house piping does not conform to NFPA 54	Oklahoma Administrative Code Title 165. Corporation Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	OAC 165:20. 5-34 Restrictions on connections to consumers
Authority beyond OPS		Gathering lines not subject to Part 192 are required to report incidents to OCC	Oklahoma Administrative Code Title 165. Corporation Commission, Chapter 20. Gas & Hazardous Liquid Pipeline Safety	OAC 165:20. 10-3 Telephonic notice of certain non-DOT gathering pipeline incidents
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

State statutes limit the safety initiatives in Oklahoma that are more stringent than Federal Regulations. There are only a few exceptions regarding notifications that are allowed. The Oklahoma Statutes Citationized in Title 52. Oil and Gas Chapter 1 - Gas Pipelines and Companies Pipelines (Act of 1907) in Section 5 - *Construction and Operation of Pipelines - Safety Regulations - Markers - Personnel - Expenses* states

A. The Corporation Commission is hereby authorized, directed and empowered to promulgate, adopt and enforce reasonable rules establishing minimum state safety standards for the design, construction, maintenance and operation of all pipelines used for the transmission and distribution of natural gas in this state. **However, except as otherwise provided in subsection B of this section, the Commission shall not promulgate, enforce or interpret any rule or regulation unless such rule, regulation or interpretation shall be consistent with and no more restrictive than the rules, regulations and interpretations of the United States Secretary of Transportation for pipeline transportation and pipeline facilities.** When any such transmission pipeline shall be constructed, operated or maintained under, through and across a highway, section-line road or improved public road or street, there shall be erected directly above where such pipeline enters or leaves said highway, section-line road or improved public road or street, a suitable sign or marker stating thereon the name of the owner of such pipeline and such other information as the Corporation Commission may by rule direct.

B. The Commission is authorized and directed to promulgate and enforce reasonable rules relating to an incident on a gathering pipeline unit not subject to the U.S. Department of Transportation Pipeline Safety Regulations, codified at 49 CFR Parts 191 and 192, provided that such rules of the Commission **are limited to the following specified areas**: telephonic notification of and a written report about the incident which shall be consistent with and require no more information than the rules, regulations and interpretations issued by the U.S. Department of Transportation Pipeline Safety Regulations relating to the reporting of incidents, maps depicting the location of the incident, and reasonable corrective measures to the gathering pipeline unit involved in the incident.

Oregon

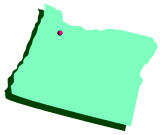
Key Stats

State Agency	Oregon Public Utilities Commission
Division	Utility Safety, Reliability and Security Division
Department	Gas Pipeline Safety
Web	http://www.puc.state.or.us/PUC/safety/index.shtml
Regulated Intrastate Pipeline Systems	15
Regulated Master Meter Operators	3
Regulated LNG Systems	2
Regulated LPG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	9

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Incident must be reported at $5K property damage level	Oregon Administrative Rules, Chapter 860 Public Utilities Commission, Division 24 Safety Standards Installation of Service	860-024-0050 (1) Incident Reports
Enhanced Reporting	Part 191.3	Report interruptions to 50 or more customers or greater than 2 hours	Oregon Administrative Rules, Chapter 860 Public Utilities Commission, Division 24 Safety Standards, Installation of Service	860-024-0050 (1) Incident Reports
Damage Prevention	Part 192.321	Tracer wire or other similar conductive marking tape or device with the facility to allow for later location and marking shall be placed if within ROW	Oregon Administrative Rules, Chapter 952 Oregon Utility Notification Center, Division 1	952-001-0070 Operators to Mark Underground Facilities or Notify Excavator that None Exist

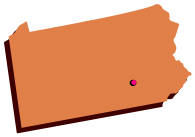
Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Damage Prevention	Part 192.614 Part 191.23	Geo-hazard Program A full-time geologist keeps tabs on the rainfall in areas of geologic interest. analyzes the stability of pipeline system and recommends adjustments to ensure safety and to avert damage from landslides and ground movements of all kinds	Oregon Public Utility Commission Order No. 01-843, Sept 25, 2001, Docket # Um1030	Stipulation
Extending LDC Responsibility	Part 192.361	Each gas utility shall furnish, **own,** operate, maintain, and replace the service connections when needed.	Oregon Administrative Rules, Chapter 860 Public Utilities Commission, Division 21 Utility Regulation, Installation of Service	860-021-0050 Installation of Gas Service
Replacement Program	Part 192.487	Replace Bare Steel in Accelerated Program with rate relief.	Oregon Public Utility Commission Order No. 01-843, Sept 25, 2001, Docket # Um1030	Stipulation
Design/Install Requirements	Part 192.325	Requires 12 inch separation of electric underground facilities from gas underground facilities	Oregon Administrative Rules, Chapter 860 Public Utilities Commission, Division 24 Safety Standards, General	860-024-0010 Construction, Operation, and Maintenance of Electrical Supply and Communication Lines s
State Inspection Programs	Part 190.203	Priority in inspections will be given to those systems and plants with greater risk potential. The following factors will be considered in determining potential risk: the size of the plant or system and the number of customers it serves, the ratio of total pipe to cathodically protected pipe, the ratio of total pipe to coated pipe, the leaks per mile of main, the percentage of	Oregon Administrative Rules, Chapter 860 Public Utilities Commission, Division 31 Inspection Of Gas Pipeline Operators And Waiver Of Safety Standards	860-031-0005 Inspection of Gas Pipeline Operator Facilities



Oregon

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		unaccounted-for gas volume, and the number of past accidents.		
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections



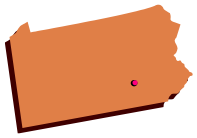
Pennsylvania

Key Stats

State Agency	Pennsylvania Public Utility Commission
Division	Transportation and Safety
Department	Gas Safety Division
Web	http://www.puc.state.pa.us/transport/gassafe/gassafe_index.aspx
Regulated Intrastate Pipeline Systems	45 (=36+9)
Regulated Master Meter Operators	0
Regulated LNG Systems	4
Regulated Hazardous Liquid Systems	9
Regulated LPG Operators	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	10

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Reports of all outages greater than 2,500 customer s or 5% of the system whichever is less	PA Code (Rule) Chapter 67 Service Outages	§ 67.1. General Provisions
More Direct Oversight	Part 192.305	Requires 30 day Advance Report of Project Construction, Reconstruction, Maintenance Projects >$300,000 or 10% of Plant in Service	PA Code (Rule)	§ 59.38. Filing of Major Construction Reports
Operating Pressure	Part 192.623 Part 192.197	Limits pressures after service regulator to minimum of 2 in w.c. and maximum of 14 in w.c.	PA Code (Rule)	§ 59.29 Gas Pressure Requirements
Leak Tests	Part 192.723	Requires repeated leak surveys during frost conditions (winter)	None?	Annual Letter from Program Manager Leakage Surveys



Pennsylvania

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Replacement Program	Part 192.489	Requires Cast Iron/BS mains and services Accelerated Replacement Program with Rate Adder	**PA PUC Order**	
Extending LDC Responsibility	Part 192.723	Requires LDC to Leak Survey Customer Owned Service Lines, leave Tag for Non Accessible Sites, shutoff service if no repair are made to hazardous leaks	PA Code (Rule)	§ 59.34 Leakage Surveys of customer owned Lines
Design/Install Requirements	Part 192.144	Orifice Metering must be constructed and maintained per 1978 AGA GMC Report #3	PA Code (Rule)	§ 59.28 Installations
Enhanced Record Keeping	Part 192.605	Requires Maps to contain size, character, location, drip, street valve, district regulator & service connection	PA Code (Rule)	§ 59.37 Maps, Plans, Records
Inactive Services	Part 192.727	Inactive Service must be cutoff if greater than 3 months if BS/CI with annual status reports and leakage survey	PA Code (Rule)	§ 59.36 Inactive Services
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

TOC

Puerto Rico

Key Stats	
State Agency	Puerto Rico Public Service Commission
Division	
Department	
Web	http://www.pr.gov/csp/inicio/
Regulated Intrastate Pipeline Systems	1
Regulated Master Meter Operators	0
Regulated LPG Operators	
Regulated LNG Systems	1 pending
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	0

Applicable Requirement in CFR

There are no safety initiatives in Puerto Rico that are more stringent than Federal Regulations. The Federal Regulations are incorporated by reference including all federal advisory bulletins, and federal interpretations.

National Association of Pipeline Safety Representatives

TOC

Rhode Island

Key Stats	
State Agency	Rhode Island Division of Public Utilities & Carriers
Division	Public Utilities & Carriers
Department	Engineering
Web	www.ripuc.org
Regulated Intrastate Pipeline Systems	1
Regulated Master Meter Operators	26
Regulated LNG Systems	2
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	12
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	19

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports with no minimum defined $$$ level, no requirement for in-patient hospitalization, all excavating damages, involvement by police, fire, and/or media, any house or building being evacuated, and a significant situation determined by the involving either overpressure, loss of system pressure, or outages.	2006 RI Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems	Appendix "B" Natural Gas Telephonic Notice Reporting Requirements
Enhanced Reporting	Part 192.615	Requires Quarterly Reporting of Response Times to respond to leak calls	Docket #3476 Service Quality Plan established during company merger.	See specific Order for Applicable sections
More Direct Oversight	Part 192.305	Requires daily reporting for all pipeline related construction for company crews and contractors.	Division standard practice	Division standard practice

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Operating Pressure	Part 192.201	Limits Over Pressuring Set Levels to < 12 in w.c	2006 RI Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems	Section D. Part 2a. Pressure Requirements: Pressure Variations
Operating Pressure	Part 192.741	Requires installation of SCADA on 20% of regulator stations,	Rhode Island Public Utilities Commission Order 20468, Sept 12 2011, Docket #4219 Gas Infrastructure, Safety, and Reliability Plan	See specific Order for Applicable sections
Response to Leaks	Part 192.615	Prescribes Standards for Response Times to Emergency/Leaks/Odor Complaints/Evacuations as 90% in 30 minutes during normal bus hours and 90% in 45 minutes during non business hours	Rhode Island Public Utilities Commission Order 17605, November 21 2003, Docket #3476 Service Quality Plan	Item 2 and Item 5 of Order
Damage Prevention	Part 192.614 Part 190.221	States Gas Pipeline Safety Division is enforcement authority for all underground damage prevention rules of RI	RI General Law R.I.G.L. §39-1.2 Underground Damage Prevention	R.I.G.L. §39-1.2
Replacement Program	Part 192.489	Requires Cast Iron/BS mains and services Accelerated Replacement Program with Rate Adder	Rhode Island Public Utilities Commission Order 19991, April 7 2009, Docket #4034 Accelerated Replacement Program for Leak Prone Pipe.	Item 1 of Order
Replacement Program	Part 192.353	Requires Relocating all Existing High Pressure Inside Meter sets to the Outside of the facility	Rhode Island Public Utilities Commission Order 19991, April 7 2009, Docket #4034 Accelerated Replacement Program for Leak Prone Pipe.	See specific Order for Applicable sections
Replacement Program	Part 192.489	Requires 1800 leak repairs as a result of cast iron joint encapsulation with Rate Adder	Rhode Island Public Utilities Commission Order 20468, Sept 12 2011, Docket #4219 Gas Infrastructure,	See specific Order for Applicable sections

Rhode Island

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Safety, and Reliability Plan.	
Replacement Program	Part 192.355	Requires replacement of obsolete regulators, replace water intrusion mains identified during last flooding period with Rate Adder	Rhode Island Public Utilities Commission Order 20468, Sept 12 2011, Docket #4219 Gas Infrastructure, Safety, and Reliability Plan	See specific Order for Applicable sections
Authority Beyond OPS	Part 192.605	Red Tagging Appliances and observing unsafe conditions in connection or reconnection of gas service and a definition of "Potentially Hazardous Conditions".	2006 RI Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems	Tariff Language/ Section B. Definitions: Number 21
Inactive Services	Part 192.727	Inactive Services must be cutoff if older than 5 years of inactive service.	2006 RI Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems	Section I. Abandonment of Gas Services
Enhanced Record Keeping	Part 192.605	Requires Maps to contain size, character, location, of all mains and service connections and valves. Layout of all principal metering and regulator stations.	2006 RI Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems	Section G. Records and Reports, Part 3. System Maps
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

South Carolina

Key Stats

State Agency	Office of Regulatory Staff of South Carolina
Division	Electric and Gas Regulation
Department	Pipeline Safety
Web	http://www.regulatorystaff.sc.gov/
Regulated Intrastate Pipeline Systems	31
Regulated Master Meter Operators	5
Regulated LNG Systems	2
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	20

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.603	Requires Annual filing of Inspection and Maintenance Plans with ORS	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-412(viii) Data to be Filed with the Commission and Provided to the ORS
Enhanced Reporting	Part 192.603	Requires Annual filing of Emergency Plans with ORS	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-412 (viii) Data to be Filed with the Commission and Provided to the ORS
Enhanced Reporting	Part 192.603	Requires Annual filing of Welders and Proof of Certification with ORS	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-412 (viii) Data to be Filed with the Commission and Provided to the ORS
Enhanced Reporting	Part 191.3	Requires Reports of all outages greater than 50 customer or outage duration greater than 6 hours	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records	103-414 Interruption of Service.

South Carolina

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			and Reports	
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5K level	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-415 Incidents
More Direct Oversight	Part 192.303	Requires certificate that public convenience and necessity be issued by Commission prior to construction or operation of any pipeline	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 1 General	103-404 Territory and Certificates
More Direct Oversight	Part 191.3	The gas utility shall advise the commission and ORS of the name, title, address and telephone number of the person or persons who should be contacted in connection with: General management duties, Customer relations (complaints), Engineering and/or operations, Meter tests and repairs. Emergencies during non-office hours	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-412 (vi) Data to be Filed with the Commission and Provided to the ORS
More Direct Oversight	Part 192.305	All gas systems subject to pipeline safety regulation shall notify the commission and the ORS of any construction projects greater than 25,000 feet of piping or $500K	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-412 (ix) Data to be Filed with the Commission and Provided to the ORS
Operating Pressure	Part 192.144	A meter may not be used at a pressure that is more than sixty-seven percent of the manufacturer's shell test pressure or 50% of	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 6	103-475 Test Procedures and Accuracies

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		test pressure if tin meter.	Inspections and Tests	
Operating Pressure	Part 192.741	No gas system shall maintain less than two recording pressure gauges of which one should be portable and pressure records should be kept for minimum of 2 years	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 7 Standards and Quality of Service	103-485 System Pressure Monitoring.
Meter Location/ Protection	Part 192.353	Outdoor meters shall be used where practicable.	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 3 Meters	103-425 Configuration and Location of Meter
Leak Tests	Part 192.723	All buried piping not protected against corrosion must be subjected to instrument leakage surveys as frequently as necessary, but at intervals not exceeding twelve months.	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 7 Standards and Quality of Service	103-493 Leakage
Leak Tests	Part 192.706	Vegetation type leak surveys are prohibited	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 7 Standards and Quality of Service	103-493 Leakage
Response to Leaks	Part 192.723	Leak Classification System and Required timeline for Repairs	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 7 Standards and Quality of Service	103-493 Leakage
Design/Install Requirements	Part 192.7	Good Engineering defined by incorporating following standards: 6) Latest edition of NFPA 54,	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 5	103-461 Acceptable Standards 103-462 Acceptable References

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		7) "Standard Methods of Gas Testing", Circular No. 48, National Bureau of Standards, 1961 or American Meter Handbook E-4 8) "Testing Large Capacity Rotary Gas Meters", Research Paper No. 1741, National Bureau of Standards Journal of Research, September, 1946. 9) "Orifice Metering of Natural Gas", Report No.3 of the AGA Gas Measurement Committee 10) Reports prepared by the Practical Methods Committee of the Appalachian Gas Measurement Short Course, West Virginia University, as follows: Report No.1, "Method of Testing Large Capacity Displacement Meters". Report No.2, "Testing Orifice Meters". Report No.3, "Designing and Installing Measuring and Regulating Stations".	Engineering	

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		Report No.4, "Useful Tables for Gas Men". Report No.5, "Prover Room Practices		
Enhanced Record Keeping	None	All records must be kept within the State of South Carolina	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-410 Location of Records and Reports
Enhanced Record Keeping	Part 192.605	Requires a map showing the gas systems operating area including: Gas production plant , Principal storage facilities, Transmission lines and principal mains by size and valves located thereon, System metering (supply) points, State boundary crossings, Certified area and/or territory served, Names of all communities (post offices) served	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-412 (v) Data to be Filed with the Commission and Provided to the ORS
Enhanced Record Keeping	Part 192.605	Meter records shall keep date of purchase, The complete identification--manufacturer, number, type, size, capacity, multiplier, and constants , the current and last previous locations and the dates of installation at and removal from service at such locations, any repairs made	South Carolina Code of Regulations, Chapter 103 Public Service Commission, Article 4 Gas Systems, Sub Article 2 Records and Reports	103-417 Meter History
Inactive Services	Part 192.727 Part 192.723	Inactive service Lines shall be retired at the main if inactive greater than 2 years or leak	South Carolina Code of Regulations, Chapter 103 Public Service Commission,	103-465 Inactive Service Lines

South Carolina

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		surveyed as "monitoring" within a 2 year period	Article 4 Gas Systems, Sub Article 5 Engineering	
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

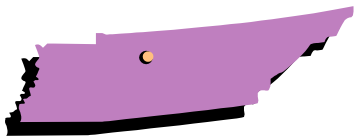
South Dakota

Key Stats	
State Agency	South Dakota Public Utilities Commission
Division	Energy
Department	Pipeline Safety
Web	http://www.puc.sd.gov/pipelinesafety/default.aspx
Regulated Intrastate Pipeline Systems	12
Regulated Master Meter Operators	1
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	0

Applicable Requirement in CFR

There are no safety initiatives in South Dakota that are more stringent than Federal Regulations. The South Dakota Codified Laws in section 49-34B-4. *Promulgation of safety standards—Considerations* states

The commission may, by rules promulgated pursuant to chapter 1-26, **establish safety standards**, **but not more stringent than federal safety standards as** provided by § 49-34B-3, for the intrastate transportation of gas and gas pipeline facilities. The standards may apply to the design, installation, inspection, testing, construction, extension, operation, replacement, and maintenance of gas pipeline facilities. Standards affecting the design, installation, construction, initial inspection, and initial testing do not apply to pipeline facilities in existence on the date the standards are adopted by either this state or the federal government. The safety standards shall be practicable and designed to meet the need for pipeline safety. In prescribing the standards, the commission shall consider:
(1) Relevant available pipeline safety data;
(2) Whether the standards are appropriate for the particular type of pipeline transportation of gas;
(3) The reasonableness of any proposed standards;
(4) The extent to which the standard will contribute to public safety; and
(5) The existing standards established by the secretary of the United States Department of Transportation pursuant to the United States Code, title 49, section 60101 et seq. as amended to January 1, 2011.



TOC

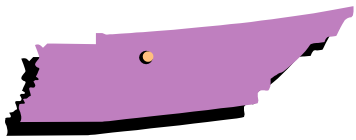
Tennessee

Key Stats	
State Agency	Tennessee Regulatory Authority
Division	Gas Pipeline Safety
Department	
Web	http://www.tennessee.gov/tra/gassafety.html
Regulated Intrastate Pipeline Systems	133
Regulated Master Meter Operators	30
Regulated LNG Systems	2
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	11

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.305	Requires notification of capital expenditures >$50K if customer base is less than 30,000; >$100K if customer base is between 30,000 and 300,000 customers and >$200K if customer base is greater than 300,000 customers	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-1, General Public Utilities Rules	1220-4-1-.01 Capital Additions Budgets Of Utilities.
Enhanced Reporting	Part 191.5	Each utility shall immediately notify the Authority by telephone or telegraph of any interruption to the service of a major portion of its distribution system	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-5, Regulations for Gas Companies	1220-4-5-.36 Interruptions Of Service
Enhanced Reporting	Part 192.605 Part 191.3	Filed with the commission the name, title, address, and telephone number of the person who should be contacted in connection with: 1. General	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-5, Regulations for Gas Companies	1220-4-5-.06 Data To Be Filed With The Authority.

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		management duties. 2. Customer relations (complaints). 3. Engineering operations. 4. Meter tests and repairs. 5. Emergencies during non-office hours.		
More Direct Oversight	Part 192.305	Gas Operators Required to Notify the TRA of Scheduled Pipeline Facility Construction	Division Directive sent to all Operators	Inspection Form
Response to Leaks	Part 192.723	Leak Survey Classification, Definition and Required Action	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-5, Regulations for Gas Companies	1220-4-5-.44 Gas Leak Classification
Replacement Program	Part 192.489 Part 192.487 Part 192.755	All Operators with Cast Iron and or Bare Steel have Ongoing Replacement Programs.	TN. Regulatory Authority Order Docket Nos. 0500258 and 0900183	
Authority Beyond OPS	None	Each customer's piping system shall be tested for pressure and leaks before service is turned on	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-5, Regulations for Gas Companies	1220-4-5-.40 Customer Piping
External Corrosion	Part 192.455(b)	Corrosive Environment is Presumed so no demonstration of test, experience or investigation 192.455 (b) is permitted.	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-1, General Public Utilities Rules	1220-4-1-.09 Pipeline Safety Rule.
Enhanced Record Keeping	None	All records required by these rules or necessary for the administration thereof, shall be kept within Tennessee,	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-5, Regulations for Gas Companies	1220-4-5-.04 Location Of Records
State Inspection Program	Part 192.1	Priority Given to Inspecting Systems w/ Greater Risk Potential Based On Risk Management Program	Rules of the Tennessee Regulatory Authority, Chapter 1220-4-5, Regulations for Gas Companies	1220-4-5-.47 Enforcement Procedures Governing Gas Pipeline Safety
State Inspection	Part 190.203	More Frequent	None	Inspection Forms and



Tennessee

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Program		Inspections/Contacts and Detailed Audits		Frequency Operator Inspections

National Association of Pipeline Safety Representatives

Texas

Key Stats

State Agency	Railroad Commission of Texas
Division	Pipeline Safety
Department	
Web	http://www.rrc.state.tx.us/
Regulated Intrastate Pipeline Systems	5146
Regulated Master Meter Operators	924
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	1356
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	31

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	None	Operators of systems are required to file organizational reports	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.51 Organization Report 16 TAC 3.1 Organization Report; Retention of Records; Notice Requirements
Enhanced Reporting	Part 192.305	Operators must file notice of pipeline construction > 1 miles in length	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.115 New Construction Commencement Report
Enhanced Reporting	Part 195.204	Operators must file notice of pipeline construction > 1 miles in length	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.115 New Construction Commencement Report
Enhanced Reporting	Part 192.305	Operators of sour gas pipelines must file notice of pipeline construction	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.115 New Construction Commencement Report
Enhanced Reporting	Part 192.723	Distribution system operators are required to file report of all leaks repaired twice annually	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.210 Reports
More Direct Oversight	Part 192.303	All gathering and transmission lines are required to be permitted	Title 16 Chapter 3 of Texas Administrative Code	16 TAC 3.70 Pipeline Permits Required

Texas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Odorant	Part 192.625	Use of commercially available Odorization equipment is required	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.215(b) Odorization of Gas
Odorant	Part 192.625	Odorant injection rates calculated at least quarterly required	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.215(d)(1) Odorization of Gas
Odorant	Part 192.625	Farm tap odorizers must be serviced annually	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.215(d)(2) Odorization of Gas
Odorant	Part 192.625	Systems must be tested annually for adequate odorization	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.215(e)(1) Odorization of Gas
Leak Tests	Part 192.723	Leak surveys may be conducted as prescribed or may be risk based	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.206 Risk-Based Leak Survey Program
Response to Leaks	Part 192.615	Procedures for receipt, recording, processing, and review of all leak calls received are required	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.205 Written Procedure for Handling Natural Gas Leak Complaints
Response to Leaks	Part 192.723	Grading of leaks is standardized by using GPTC standards	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.207 Leak Grading and Repair
Response to Leaks	Part 192.613	Timely repair of gas leaks is required according to grade	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.207 Leak Grading and Repair
Replacement Program	Part 192.271	Leaking fittings (pre-1980) must be removed from service	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.208 Mandatory Removal and Replacement Program
Replacement Program	Part 192.271	Fittings encountered during normal activities must be removed unless post 1980 with secondary restraint	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.208 Mandatory Removal and Replacement Program
Replacement Program	Part 192.1001	In conjunction with DIMP, requires replacement as means of reducing identified risks	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.209 Distribution Facilities Replacements
Authority Beyond OPS	Part 192.1	Gas production and gathering lines are regulated from first point of measurement in populated areas.	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.1(a)(1)(B) General Applicability and Standards
Authority	Part 192.1	All gas pipelines	Title 16 Chapter 8 of	16 TAC 8.1(a)(1)(D)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Beyond OPS		originating in Texas waters are regulated	Texas Administrative Code	General Applicability and Standards
Authority Beyond OPS	Part 195.1	All hazardous liquid pipelines originating in Texas waters are regulated	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.1(a)(1)(D) General Applicability and Standards
Extended LDC Responsibility	Part 192.3	Additional definitions are provided for subsequent rules	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.5 Definitions
Extended LDC Responsibility	Part 195.2	Additional definitions are provided for subsequent rules	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.5 Definitions
Cathodic Protection	Part 192.465	Test points must be representative of pipe conditions	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(3) Supplemental Regulations
Cathodic Protection	Part 192.465	Use of leak surveys to determine areas of active corrosion must be frequent enough to monitor corrosion rate	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(3) Supplemental Regulations
Cathodic Protection	Part 192.475	Definition of corrosive gas is supplemented as deterioration of the material	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(4) Supplemental Regulations
Cathodic Protection	Part 192.479	Definition of atmospheric corrosion is supplemented as deterioration of the material	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(5) Supplemental Regulations
Design/Install Requirements	Part 192.271	All fittings installed after Sept 1, 2008 must meet ASTM D2513 Category1 or Part 192.273	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.208 Mandatory Removal and Replacement Program
Risked Based Approaches	Part 192.901	Operators are required to perform integrity assessments of the entire gas pipeline line section	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.101(b) Pipeline Integrity Assessment and Management Plans for Natural Gas and Hazardous Liquids Pipelines
Risk Based Approaches	Part 195.452	Operators are required to perform integrity assessments of the entire hazardous liquid line section	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.101(b) Pipeline Integrity Assessment and Management Plans for Natural Gas and Hazardous Liquids Pipelines

Texas

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Record Keeping	Part 192.455(b)	Rule is enhanced by requiring documented proof of determinations for corrosion areas	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(1) Supplemental Regulations
Enhanced Record Keeping	Part 192.457	Areas of active corrosion must be documented and substantiated	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(2) Supplemental Regulations
Enhanced Record Keeping	Part 192.457	Requires schedule of Cathodic protection placement when active external corrosion is discovered	Title 16 Chapter 8 of Texas Administrative Code	16 TAC 8.203(2) Supplemental Regulations
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

TOC

Utah

Key Stats	
State Agency	Utah Pipeline Safety
Division	Public Utilities
Department	Department of Commerce
Web	http://publicutilities.utah.gov/pipeline.html
Regulated Intrastate Pipeline Systems	100
Regulated Master Meter Operators	86
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	0

Applicable Requirement in CFR

There are no safety initiatives in State of Utah that are more stringent than Federal Regulations. Utah Code Title 54 Public Utilities Statutes and Public Service Commission Rules in Chapter 13 *Promulgates safety standards.*

The commission is responsible for establishing safety standards and practices for intrastate transportation and shall make and enforce rules required by the federal Natural Gas Pipeline Safety Act to maintain state control over the regulation of intrastate pipeline transportation. In the rules section of the same statutes – R746-409-1. The commission hereby adopts, and incorporates by this reference, CFR Title 49, Parts 190, 191, 192, 198, and 199.

National Association of Pipeline Safety Representatives

TOC

Vermont

Key Stats	
State Agency	Vermont Department of Public Service
Division	Engineering Division
Department	Natural Gas and Propane Engineering Area
Web	http://publicservice.vermont.gov/natural-gas/natural-gas.html
Regulated Intrastate Pipeline Systems	1
Regulated Master Meter Operators	0
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	0
Regulated LPG Operators	20
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	8

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires Incident Reports at $5K level	Vermont Public Service Board Rules, 6.100 Enforcement Of Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	6.160 Accidents and Emergencies
Enhanced Reporting	Part 191.3	All emergency contacts shall be filed with DPS and VT Public Service Board	Vermont Public Service Board Rules, 6.100 Enforcement Of Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	6.160 Accidents and Emergencies
Enhanced Reporting	Part 191.3	All transmission line failures and major failures of distribution shall promptly notify DPS and VT Public Service Board	Vermont Public Service Board Rules, 6.100 Enforcement Of Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	6.159 Interruptions of Service
Valves	Part 192.747	Curb Valves used as service shutoff valves must be inspected	Vermont Public Service Board Rules, 6.100 Enforcement Of	6.156 Curb Shutoffs

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		annually at places of public assembly.	Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	
Extending LDC Responsibility	Part 192.3	Operator responsibility extended to first fitting past the meter or last fitting before it enters the building, whichever is farther downstream	Vermont Public Service Board Rules, 6.100 Enforcement Of Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	6.155 Service Piping
Enhanced Record Keeping	Part 192.605	Requires Maps to contain size, operating pressure, location, street valve, regulator station to be filed with DPS upon request	Vermont Public Service Board Rules, 6.100 Enforcement Of Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	6.157 Maps of Transmission and Distribution System
Inactive Services	Part 192.727	Inactive Service must have a device installed to cut off the gas outside the cellar wall area if older than 1 year of inactive service	Vermont Public Service Board Rules, 6.100 Enforcement Of Safety Regulations Pertaining To Intrastate Gas Pipeline And Transportation Facilities	6.156 Curb Shutoffs
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Virginia

Key Stats	
State Agency	State Corporation Commission
Division	Utility and Railroad Safety
Department	
Web	www.scc.virginia.gov/urs
Regulated Intrastate Pipeline Systems	14
Regulated Master Meter Operators	131
Regulated LNG Systems	2
Regulated Hazardous Liquid Systems	4
Regulated LPG Operators	33
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	30

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Incidents involving $5,000 damage, media coverage, death, injury requiring hospitalization	Division directive	General Letter to all Operators
Enhanced Reporting	Part 191.11 Part 192.617 Part 192.723	All repaired leaks and the associated details every 6 months	Division directive	General Letter to all Operators
Enhanced Reporting	Part 192.603	All O&M revisions required to be submitted to VCC	Division directive	General Letter to all Operators
Enhanced Reporting	Part 192.614	All excavation damage to pipelines must be reported to VCC	Division directive	General Letter to all Operators
Enhanced Reporting	Part 192.305	All large projects (exceeding $100,000)	Division directive	General Letter to all Operators
Enhanced Reporting	Part 192.616 Part 192.614	Supplement operator public awareness and damage prevention plans with additional focused efforts	Virginia State Corporation Commission Order, June 29 2010, Case No. URS-2010-00055	Section 3
More Direct Oversight	Part 192.305	Daily construction sheets required to be submitted to VCC	Division directive	General Letter to all Operators
Damage Prevention	Part 192.614	Installation of tracer wire tags with safety message at meters	Virginia State Corporation Commission Order,	Section 2

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			August 22 2011, Case No. URS-2002-00414	
Damage Prevention	Part 192.614	Installing electronic marker balls on new service lines	Virginia State Corporation Commission Order, October 26, 2009, Case No. URS-2009-00041	Section 2
Damage Prevention	Part 192.614	Create and teach courses on safe digging and locating at a community college	Virginia Code Title 56 Public Service Companies, Chapter 10.1 Utilities,	§56-265
Damage Prevention	Part 192.614	Work with gas operators to pilot new locating technology	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2010-00390	Section 2
Damage Prevention	Part 192.614	Revision of procedures to include directional boring and locating of lines	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2011-00128	Section 2
Training/ Qualifications	Part 192.616	Implement a web based training portal for fire and emergency responders	Virginia State Corporation Commission Order, February 11 2010, Case No. URS-2010-00390	Section 2
Operator Qualification	Part 192.801	OQ for new construction	Division directive	General Letter to all Operators
Meter Location/ Protection	Part 192.355	Inspection of all meter/regulator facilities for proper protection	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2009-00043	Meter Installation and Protection
Replacement Program	Part 192.497	Replace aging cast iron pipelines	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2009-00326	Section 2
Authority Beyond OPS	Part 192.614	Changed Virginia Building Code to require tracer wire on sewer laterals so that less damage occurs with gas pipeline installations	Virginia Uniform Statewide Building Code (USBC) Part1 Virginia Construction Code, Chapter 3 Use and Occupancy Classification	Section P3002.2.1 Tracer wire.

Virginia

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Extending LDC Responsibility	None	Taking over the operation of master meters by LDC's	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2009-00043	Others
Cathodic Protection	Part 192.465	Identification of all potential isolated short sections	Virginia State Corporation Commission Order, April 1 2011, Case No. URS-2010-00389	Section 2
			Virginia State Corporation Commission Order, February 11 2010, Case No. URS-2010-00390	Section 2
Design/ Install Requirements	Part 192.325	Require minimum 12-inch separation with any utility or structure	Virginia law	§56-257
Design/Install Requirements	Part 192 1007	Use of electrofusion machines with GPS and barcode capability	Virginia State Corporation Commission Order, February 11 2010, Case No. URS-2010-00390	Section 2
Design/Install Requirements	Part 192.741	Identify regulator stations serving 500 customers or more and install telemetry	Virginia State Corporation Commission Order, April 1 2011, Case No. URS-2010-00389	Section 2
Design/Install Requirements	Part 192.605	Revision of procedures to include directional boring and locating of lines	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2011-00128	Section 2
Risk-Based Approaches	Part 192.614 Part 192.1007	Inline inspection to ensure no gas cross-bores of sewer facilities	Virginia State Corporation Commission Order, February 11 2010, Case No. URS-2010-00390	Section 2
Risk- Based Approaches	Part 192.1007	Leak survey of cast iron and bare unprotected steel to establish base line	Virginia State Corporation Commission Order, February 11 2010, Case No. URS-2010-00390	Section 2

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Risk Based Approaches	Part 192.1007	Study of non-hazardous leaks to reduce frequency of such leaks	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2009-00043	Section 2
Enhanced Record Keeping	Part 192.605	Various parts of O&M's to address specific noted violations	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2009-00043	
			Virginia State Corporation Commission Order, June 29 2010, Case No. URS-2010-00055	Section 3
			Virginia State Corporation Commission Order, July 30 2010, Case No. URS-2010-00166	Section 2
			Virginia State Corporation Commission Order, April 1 2011, Case No. URS-2010-00389	Section 2
Enhanced Record Keeping	Part 192.605	Operator conduct complete review of safety records to ensure compliance	Virginia State Corporation Commission Order, June 29 2010, Case No. URS-2010-00055	Section 3
Inactive Services	Part 192.727	Eliminate all service and main line stubs	Virginia State Corporation Commission Order, August 22 2011, Case No. URS-2011-00128	Section 2
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

Washington

Key Stats

State Agency	Washington Utilities and Transportation Commission
Division	Safety and Consumer Protection
Department	Pipeline Safety
Web	http://www.utc.wa.gov/publicSafety/pipelineSafety/Pages/default.aspx
Regulated Intrastate Pipeline Systems	32
Regulated Master Meter Operators	10
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	6
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	57

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	None	Requires annual reporting of all construction defects and material failures resulting in leakage. Each gas pipeline company must categorize the different types and number of defects and material failures.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(7)(c) Reporting Requirements
Enhanced Reporting	Part 191.5 Part 191.9 Part 191.15	Requires reports within 2 hrs of all building evacuations involving gas releases.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(1)(c) Reporting requirements
Enhanced Reporting	Part 191.5 Part 195.52	Requires reports within 2 hrs of all incidents.	Washington Administrative Code 480-93 (Gas Companies-Safety) Washington Administrative Code 480-75 (Hazardous Liquid Pipelines-Safety	WAC 480-93-200(1)(c) Reporting requirements WAC 480-75-630 (1)(d) Incident Reporting
Enhanced Reporting	Part 191.5 Part 191.9 Part 191.15	Requires reports of all unplanned interruptions of service	Washington Administrative Code 480-93 (Gas	WAC 480-93-200(1)(e) Reporting

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		to greater than 25 customers	Companies-Safety)	requirements
Enhanced Reporting	Part 191.5 Part 191.9 Part 191.15	Requires reports for taking any transmission, HP supply, or major distribution pipeline out of service.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(2)(b) Reporting requirements
Enhanced Reporting	Part 191.5 Part 191.15	Requires reports within 2hrs of all unintentional ignitions of gas	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(1)(d) Reporting Requirements
Enhanced Reporting	Part 191.5 Part 191.9 Part 191.15	Requires reporting within 24 hours of all uncontrolled releases of gas exceeding two hours	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(2)(a) Reporting Requirements
Enhanced Reporting	Part 191.5 Part 191.9 Part 191.15	Requires reporting within 24 hours of any gas pipeline pressure exceeding the established MAOP	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(2)(d) Reporting Requirements
Enhanced Reporting	Part 191.11 Part 191.13 Part 191.15	Requires submission of each failure analysis report completed or received by a gas pipeline company, concerning any incident or hazardous condition due to construction defects or material failure within five days of completion or receipt of such report.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(6) Reporting Requirements
Enhanced Reporting	Part 192.305	Requires new pipeline companies to file design, construction, and material specifications at least 45 days prior to construction.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-017 Filing requirements for design, specification, and construction procedures
Enhanced Reporting	Part 192.305	Requires new pipeline companies to file O&M procedure manuals and emergency response plans at least 45 days	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-180 (2) Plans and procedures

Washington

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		prior to operating any pipeline. Revisions to manuals must be filed annually.		
Enhanced Reporting	Part 192.305	Report at least 45 days prior to construction or replacement of any segment of a gas transmission pipeline equal to or greater than 100' in length.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-160(1) Reporting requirements of proposed construction
Enhanced Reporting	Part 192.353	Notify the UTC at least three business days prior to commencing a pressure test of a gas pipeline that will have an MAOP that produces a hoop stress of 20% or more of the SMYS.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-170(1) Tests and reports for gas pipelines
Enhanced Reporting	Part 191.11 Part 191.17	Pipeline company must file with the UTC, and with appropriate officials of all municipalities where gas pipeline companies have facilities, the names, addresses, and telephone numbers of the responsible officials of the gas pipeline company who may be contacted in the event of an emergency. In the event of any changes in such personnel, the gas pipeline company must immediately notify the commission and municipalities.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(8) Reporting requirements
Enhanced Reporting	Part 192.617	Requires annual reporting of all construction defects and material failures resulting in leakage.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(7)(c) Reporting requirements
Enhanced Reporting	Part 195.52	Requires incident reporting within 2	Washington Administrative Code	WAC 480-75-630(1)(d-f)

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		hours of all haz liquid lines of releases of 5 gallons or more, $25K of property damage, or news media event.	480-75 (Hazardous Liquid Pipelines-Safety)	Incident Reporting
More Direct Oversight	Part 192.305	Requires daily reports of construction and repair activities (company and their contractors). Reports must be received no later than 10:00 a.m. each day of the scheduled work.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-200(9) Reporting requirements
More Direct Oversight	Part 192.353	Notify the UTC at least three business days prior to commencing a pressure test of a gas pipeline that will have an MAOP that produces a hoop stress of 20% or more of the SMYS.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-170(1) Tests and reports for gas pipelines
Valves	Part 192.181 Part 192.745 Part 192.747	Requires written main line valve maintenance program detailing valve selection process, inspection, maintenance, operating procedures, and criteria noted in rule.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-100(1) Valves
Valves	Part 192.181 Part 192.745 Part 192.747	Requires written service line valve maintenance program detailing valve selection process, inspection, maintenance, operating procedures, and criteria noted in rule.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-100(2) Valves
Valves	Part 192.181 Part 192.745 Part 192.747	Valves must be operated and maintained at least annually.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-100(3) Valves
Pressure Testing	Part 192.553	When uprating to a MAOP greater than sixty psig, submit at least 45 days before, a	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-155 Increasing maximum allowable operating pressure

Washington

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		written plan of procedures including all applicable specifications with drawings of the affected pipeline systems.		
Operator Qualification	Part 192.801	Includes “new construction” in the definition of “covered task”	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-013 Covered Tasks
Meter Location	Part 192.353	Residential and commercial meter set assemblies should be installed outside at the building wall.	Washington Administrative Code 480-90 (Gas Companies-Operations)	WAC 480-90-323(3) Meter set assembly location
Meter Location	Part192.355	The meter set assembly must be protected with a protective barrier whenever damage by vehicles or marine traffic is likely to occur.	Washington Administrative Code 480-90 (Gas Companies-Operations)	WAC 480-90-323(4) Meter set assembly location
Odorant	Part 192.625	Sniff tests must be performed at least once monthly.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-15(2) Odorization of gas
Odorant	Part 192.625	Each gas pipeline company must odorize the gas in its pipeline	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-15(2) Odorization of gas
Odorant	Part 192.625	Pipeline company must take prompt action to investigate and remediate odorant concentrations that do not meet the minimum requirements.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-15(3) Odorization of gas
Leak Tests	Part 192.723 Part 192.706	"Business district" means an area where the public regularly congregates or where the majority of the buildings on either side of the street are regularly utilized, for	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(3) Definitions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		financial, commercial, industrial, religious, educational, health, or recreational purposes.		
Leak Tests	Part 192.723 Part 192.706	"High occupancy structure or area" means a building or an outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by twenty or more persons on at least five days a week for ten weeks in any twelve-month period. (The days and weeks need not be consecutive.)	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(14) Definitions
Leak Tests	Part 192.723	Gas pipelines operating at or above two hundred fifty psig - at least once annually, but not to exceed fifteen months between surveys;	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-188(3)(c) Gas leak surveys
Leak Tests	Part 192.723	Cast iron, wrought iron, copper, or noncathodically protected steel - at least twice annually, but not to exceed seven and one-half months between surveys	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(2)(c) Definitions
Leak Tests	Part 192.723	Unodorized gas pipelines - at least monthly	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(2)(c) Definitions
Leak Tests	Part 192.723 Part 192.706	Prior to paving or resurfacing, following street alterations or repairs where gas pipelines are under the area to be paved, and where damage could have occurred to gas pipelines	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(4)(a) Definitions

Washington

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Leak Tests	Part 192.723 Part 192.706	In areas where substructure construction occurs adjacent to underground gas pipelines, and damage could have occurred to the gas pipeline, each gas pipeline company must perform a gas leak survey following the completion of construction, but prior to paving	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(4)(b) Definitions
Leak Tests	Part 192.723	After third-party excavation damage to services, each gas pipeline company must perform a gas leak survey from the point of damage to the service tie-in	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-05(4)(e) Definitions
Response to Leaks	Part 192.723	Based on an evaluation of the location and/or magnitude of a leak, the gas pipeline company must assign one of the leak grades defined in WAC 480-93-18601 to establish the leak repair priority.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-186(1) Leak evaluation
Response to Leaks	Part 192.723	Must investigate any odor, leak, explosion, or fire, which may involve its gas pipelines, promptly (*means to dispatch qualified personnel without undue delay)* after receiving notification	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-185(1) Gas leak investigation
Response to Leaks	Part 192.723	Grade 1 and 2 leaks can only be downgraded once to a Grade 3 leak without a physical repair. After a leak has been downgraded once, the	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-186(4) Leak evaluation

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		maximum repair time for that leak is twenty-one months.		
Replacement Program	None	Complete Cast Iron & Bare Steel (207 Miles) replacement program (1 company)	WUTC Commission Order No. 2, Jan 31, 2005, Docket # PG-030080 and PG-030128	Appendix A Exhibit 1
External Corrosion	Part192.465	Must complete remedial action within 90 days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-110(2) Corrosion control
Cathodic Protection	Part 192.465	Must take a cathodic protection test reading each time an employee or representative of the gas pipeline company exposes the facility and the protective coating is removed.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-110(8) Corrosion control
Design/Install Requirements	Part 192.325	For PE, separation requirements from other utilities. 12 inches (perpendicular) and 6 inches (when crossing).	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-178(4) and (5) Protection of plastic pipe
Design/Install Requirements	None	Commission approval required prior to operating a gas pipeline at pressures greater than 250 psig, and up to and including 500 psig within 100' of a building or High Occupancy Structure (HOS). May not operate a gas pipeline at >500 psig within 500' of a building, a HOS, or highway without commission approval.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-020 (1)(a) & (1)/(b) Proximity considerations
Enhanced	Part 192.625	Odorization records	Washington	WAC 480-93-015 (5)

Washington

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Record Keeping		must be kept for five years)	Administrative Code 480-93 (Gas Companies-Safety)	Odorization of gas
Enhanced Record Keeping	Part 192.491	Each gas pipeline company must record and retain a record of each cathodic protection test, survey, or inspection required by 49 CFR Subpart I	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-110 (1) Corrosion control
Enhanced Record Keeping	None	Instrument calibration and ID records must be kept for odorization equipment, cathodic protection equipment and instrumentation, pressure testing equipment, and gas detection equipment.	Washington Administrative Code 480-93 (Gas Companies-Safety)	WAC 480-93-015(5) Odorization of gas, 480-93-110(3) Corrosion control, 480-93-170(10) Tests and reports for gas pipelines, 480-93-188(2) Gas leak surveys
Enhanced Record Keeping	Part 192.709(c) Part 192.723	Maintain all gas leak investigation records for the life of the pipeline	Washington Administrative Code 480-93 (Gas Companies-Safety)	480-93-185(1) Gas leak investigation
Enhanced Record Keeping	Part 192.517	Must maintain pressure test records for the life of the pipeline	Washington Administrative Code 480-93 (Gas Companies-Safety)	480-93-170(7) Tests and reports for gas pipelines
Enhanced Record Keeping	Part 192.517	Must keep detailed records of all pressure tests performed. Data points required outlined in rule. When multiple pressure tests on a single installation, the gas pipeline company must maintain a record of each test.	Washington Administrative Code 480-93 (Gas Companies-Safety)	480-93-170(7) & (9) Tests and reports for gas pipelines
State Inspection Programs	None	Risked based inspection program in place.	N/A	
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

West Virginia

Key Stats

State Agency	Public Service Commission of West Virginia
Division	Engineering
Department	Gas Pipeline Safety Section
Web	http://www.psc.state.wv.us/div/eng.htm
Regulated Intrastate Pipeline Systems	38
Regulated Master Meter Operators	79
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	2
Regulated LPG Operators	1
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	5

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	192.605	Requires filing of inspection and maintenance plans and periodic changes with the commission.	West Virginia Code of State Rules, Title 150 Legislative Rule, Public Service Commission , Series 4, Rules and Regulations for the Government of Gas Utilities and Gas Pipeline Safety	150 CSR 4, Section 9.7.1 Inspection and Maintenance Plans
Enhanced Reporting	192.301	Requires completion report within 60 days	West Virginia Code of State Rules, Title 150 Legislative Rule, Public Service Commission , Series 4, Rules and Regulations for the Government of Gas Utilities and Gas Pipeline Safety	150 CSR 4, Section 9.9 Completion Report
More Direct Oversight	192.301	Requires 30-day notice of major construction	West Virginia Code of State Rules, Title 150 Legislative Rule, Public Service Commission , Series 4, Rules and Regulations for the Government of Gas Utilities and Gas	150 CSR 4, Section 9.8.1 Major Construction

West Virginia

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
			Pipeline Safety	
Odorant	192.625	Each utility shall file with the Commission a report of its plan for odorization.	West Virginia Code of State Rules, Title 150 Legislative Rule, Public Service Commission , Series 4, Rules and Regulations for the Government of Gas Utilities and Gas Pipeline Safety	150 CSR 4, Section 8.2.4 Safety Requirements
State Inspection Program	Part 190.203	Specifies inspection intervals of O&M at least every 18 months and Master Meter Operators at least every 30 months	West Virginia Code of State Rules, Title 150 Legislative Rule, Public Service Commission , Series 4, Rules and Regulations for the Government of Gas Utilities and Gas Pipeline Safety	150 CSR 4, Section 11.5 Inspections, Enforcement, and Appeals

Wisconsin

Key Stats

State Agency	Wisconsin Public Service Commission
Division	Gas and Energy Division
Department	Pipeline Safety Program
Web	http://psc.wi.gov/utilityInfo/gas/pipelineSafety.htm
Regulated Intrastate Pipeline Systems	11
Regulated Master Meter Operators	
Regulated LNG Systems	0
Regulated Hazardous Liquid Systems	
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 192.305	Unless a gas public utility is required to obtain a certificate of authority, it shall notify the commission of any of the following projects using the notification procedure in par. (b): 1. Connection of service to a customer that appears to be a master meter system operator. 2. Making a new connection to an interstate or intrastate gas pipeline. (b) A utility desiring to proceed with a project identified under par. (a) shall file a notification with the commission at least 15 days, or as soon as practicable, before it intends to begin	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 133 Construction, Installation, And Placing In Operation Of Facilities By Gas Utilities	PSC 133.03 When commission authorization or notification is required

Wisconsin

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		construction of the project. The notification shall include a brief description and location of the project		
Enhanced Reporting	Part 192.605	All gas public utilities and gas pipeline operators shall file with the public service commission a copy of the manual of written procedures for conducting operations and maintenance activities under 49 CFR 192.605(a). Each change in the manual shall be filed with the commission within 20 days after the change is made.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter I , General Provisions	PSC 135.019 Adoption of federal minimum pipeline safety standards by reference.
Enhanced Reporting	Part 192.615	All gas public utilities and gas pipeline operators shall file with the public service commission a copy of emergency response required under 49 CFR 192.605(a). Each change in the manual shall be filed with the commission within 20 days after the change is made.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter I , General Provisions	PSC 135.019 Adoption of federal minimum pipeline safety standards by reference.
Enhanced Reporting	Part 191.3	Each interruption of service which affects more than 100 customers shall be reported by mail, telephone, or telegraph to the commission within 48 hours following the discovery of the interruption	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 134 Standards for Gas Service	PSC 134.18 Record of interruption of service
Enhanced Reporting	Part 192.305	A single gas pipeline project and associated	Wisconsin Administrative Code,	PSC 133.03 When commission

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		plant, or any plant or addition to plant the cost of which exceeds $1,500,000 or 4% of the utility's gross gas operating revenue received during the previous calendar year. 5 Other scenarios requiring notification are specified.	Public Service Commission (PSC) Chapter 133 Construction, Installation, And Placing In Operation Of Facilities By Gas Utilities	authorization or notification is required
Valves	Part 192.747	Inspection shall include checking of alignment to permit use of a key or wrench and clearing from the valve box or vault any debris which would interfere or delay the operation of the valve. Records shall be maintained to show specific valve location and such records shall be made continuously accessible to authorized personnel for use under emergency conditions..	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.747 Valve maintenance: distribution systems addition
Valves	Part 192.747	The by−pass valves in district regulator stations supplying gas to a low pressure distribution system shall be sealed, locked or otherwise be rendered incapable of operation, except by authorized personnel.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.747 Valve maintenance: distribution systems addition
Valves	Part 192.365	Whenever gas is supplied to a theater, church, school, factory or other building where large numbers of persons assemble, an outside valve in such case will be required.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.365 Service lines: location of valves addition

Wisconsin

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Valves	Part 192.355	Requires check valve on services to be installed in certain situations	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.355 Customer meters and regulators: protection from damage additions
Pressure Testing	Part 192.505	Except in freezing weather or when water is not available, pipe-lines or mains larger than 6 inches in diameter, installed in class locations 1, 2, or 3, shall be hydro-statically tested in place to at least 90% of the specified minimum yield strength.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.505 Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS addition
Pressure Testing	Part 192.511	Each segment of a service line, other than plastic, intended to be operated at a pressure between 0 and 1 p.s.i.g. shall be given a leak test at a pressure of not less than 50 p.s.i.g.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.511 Test requirements for service lines addition
Pressure Testing	Part 192.751	Whenever the accidental ignition in the open air of gas/air mixture might be likely to cause personal injury or property damage, precautions shall be taken.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.751 Prevention of accidental ignition addition
Operating Pressure	Part 192.623	At no outlet in the service area shall it ever be greater than one and one−fourth of the standard service pressure nor greater than 12 inches of water nor ever be less than one−half of the standard service	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 134 Standards for Gas Service	PSC 134.23 Pressure variation

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		pressure nor less than 4 inches of water. (b) At any single outlet it shall never be greater than twice the actual minimum at the same outlet. (c) At any one outlet the normal variation of pressure shall not be greater than the following: Minimum Pressure Normal Variation Permissible 4−5 in. 3 in. 5−6 in. 3l⁄2 in. 6−8 in. . 4 in		
Operating Pressure	Part 192.753	Existing unreinforced bell and spigot jointed cast iron pipe shall be operated at low pressure unless it can be proved to the public service commission that it can be satisfactorily operated at a higher pressure. However, the operating pressure under any circumstances shall not exceed 15 p.s.i.g	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.753 Caulked bell and spigot joints addition
Operating Pressure	Part 192.621	The maximum allowable operating pressure under any circumstances shall not exceed 15 p.s.i.g. Except for maintenance of existing mains, no new cast iron may be installed after November 1, 1999	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.621 Maximum allowable operating pressure: high−pressure distribution systems additions
Operating Pressure	Part 192.621	The intercity or supply mains for these distribution systems may be operated at	Wisconsin Administrative Code, Public Service Commission (PSC)	PSC 135.621 Maximum allowable operating pressure: high−pressure

Wisconsin

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		pressures higher than 60 p.s.i.g. if the number of services supplied from these mains are limited and these mains are not an integral part of the distribution system. The pressure and the services supplied from these higher pressure intercity and supply mains shall be limited to 60 p.s.i.g. unless the service lines are equipped with series regulators or other pressure limiting devices as prescribed in 49 CFR 192.197(c).	Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	distribution systems additions
Operating Pressure	Part 192.623	No person may operate a low pressure distribution system at a pressure in excess of that provided by s. PSC 134.23 (1).	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.623 Maximum allowable operating pressure: low−pressure distribution systems addition
Damage Prevention	Part 192.707	When transmission lines are located outside urban areas, their location shall be marked, recognizable to the public, at each fence line, road crossing, railroad crossing, river, lake, stream, or drainage ditch crossing and wherever it is considered necessary to identify the location of a pipeline to reduce the possibility of damage or interference.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.707 Line markers for mains and transmission lines addition
Damage Prevention	Part 192.721	When distribution mains are located	Wisconsin Administrative Code,	PSC 135.722 Addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		outside urban areas, their location shall be marked, recognizable to the public, at each fence line, road crossing, railroad crossing, river, lake, stream, or drainage ditch crossing and wherever it is considered necessary to identify the location of a pipeline to reduce the possibility of damage or interference.	Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	
Damage Prevention	Part 192.614	All operators of natural gas pipelines shall be a member of a single, state−wide one−call system. If there is more than one state−wide one−call system, the public service commission may determine which system the operators will join.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.614 Damage prevention program addition
Damage Prevention	Part 192.375	Plastic service lines that are not encased shall either be installed with an electrically conductive wire having adequate corrosion resistant characteristics or protection or some other acceptable means of readily locating the buried service pipe from the ground surface shall be provided.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.375 Service lines: plastic addition
Leak Tests	Part 192.743	Service regulators and associated safety devices on customers' premises shall be inspected and tested periodically to	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II	PSC 135.744 Addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		determine whether they are in proper operating condition. This shall include testing of the set pressure of the regulator at a specific flow rate, determination of the lock−up pressure, and determination as to whether there are any leaks, internal or external, associated with the regulator. The test interval shall be the same as the interval between meter changes in the meter rotation program under s. PSC 134.30.'	Additions to 49 CFR Part 192	
Leak Tests	Part 192.613	Whenever a road or street is paved or repaved with permanent pavement, the operator shall do all of the following: 1) Check for leaks with continuous sampling to 100 ppm 2) visual examination of condition 3) repair any leaks 4) replace pipe if it is likely to be corroded prior to next street resurfacing	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.613 Continuing surveillance additions
Leak Tests	Part 192.723	In addition to 49 CFR 192.723(b)(1), an additional leakage survey with a leak detection device shall be conducted over street openings in business districts, as shown by maps filed with the public service commission by each	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		utility, at intervals not exceeding 15 months, but at least once each calendar year and not more [less] than 4 months before or after the survey required under 49 CFR 192.723(b)(1).		
Leak Tests	Part 192.723	In each business district the piping from the service entrance to the meter outlet and metering and regulating equipment shall be tested for gas leakage in those buildings that have gas service	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions
Leak Tests	Part 192.723	A survey of all buildings used for public gatherings, such as schools, churches, hospitals, and theaters, shall be conducted at intervals not exceeding 15 months, but at least once each calendar year. The piping from the service entrance to the meter outlet and metering and regulating equipment shall be tested for gas leakage.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions
Leak Tests	Part 192.723	In incorporated cities and villages, in addition to a survey of public buildings, the operator shall conduct a leak survey of all mains using a continuous−sampling instrument capable of detecting and measuring combustible gas in air concentrations of 100	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions

Wisconsin

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		parts per million. The utility may substitute for the test required by this provision a survey by mobile flame ionization or infrared gas detection units. The tests required by this provision shall be made at intervals not exceeding 15 months, but at least once each calendar year.		
Leak Tests	Part 192.723	Along all mains in unincorporated areas, a leakage survey with leak detection equipment shall be conducted at least once every 2 calendar years at intervals not exceeding 27 months	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions
Leak Tests	Part 192.723	A leakage survey of all services conducted with an acceptable leak detection device shall be made at intervals not exceeding five years	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions
Leak Tests	Part 192.723	When a leak complaint is received and the odor of gas indicates that there is a leak in or near the premises, a search shall be carried to conclusion until the leak is found	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.723 Distribution systems: leakage surveys additions
Leak Tests	Part 192.723	When a leak is found and repaired, a further check shall be made in the vicinity of the repaired leak to determine if there is any other source of migrant gas in the neighborhood.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.724 Addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Authority Beyond OPS	None	All changes in the pressure and specific gravity greater than the allowable variation, and changes in the composition of the gas which would materially affect the operation of the customer's appliances must be accompanied by a general inspection and adjustment of all appliances that would be affected by the changes	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 134 Standards for Gas Service	PSC 134.10 Service on customer's premises.
Authority Beyond OPS	None	Each utility shall adopt and file with this commission a policy for inspection of customer's appliances. Each gas utility shall establish an educational and inspection program designed to inform customers and assist the general public in the proper and efficient operation and maintenance of gas burning equipment	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 134 Standards for Gas Service	PSC 134.10 Service on customer's premises.
Authority Beyond OPS	None	Whenever a gas utility is required to enter a customer's premises to re−establish service to relight appliances due to a non− emergency interruption of service, an inspection of the burner ignition and flame appearance shall be made on each appliance which is relit to check for safety and efficient operation. The utility will be prepared to advise the	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 134 Standards for Gas Service	PSC 134.10 Service on customer's premises.

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		customer relative to the safety and efficiency of connected appliances.		
Extending LDC Responsibility	None	The operators shall report the number of leaks which were found in customer−owned facilities by either a survey or complaint during the preceding calendar year.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter I , General Provisions	PSC 135.016 Leak survey reports
Cathodic Protection	Part 192.457	Notwithstanding the provisions of 49 CFR 192.457(b) regarding active corrosion, effectively coated steel distribution pipelines, except for those portions including services and short sections that because of their nature and installation make cathodic protection impractical and uneconomical, shall be cathodically protected along the entire area that is effectively coated in accordance with this subpar	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.457 External corrosion control: buried or submerged pipelines installed before August 1, 1971 addition
Design/Install Requirement	Part 192.53	Twenty inch steel pipe and larger, with a SMYS of 52,000 p.s.i.g. or higher, shall be tested for fracture toughness in accordance with the applicable section of respective API standard under which it was produced, except for small lot purchases of pipe where testing for fracture toughness is	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.053 General Additions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		impractical		
Design/Install Requirement	Part 192.53	When substantial quantities of pipe are acquired certified reports of chemical composition and physical properties shall be obtained; when the quantity of pipe involved is so limited that this requirement would be impractical, a certified statement shall be obtained setting forth the specification under which the pipe was manufactured.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.053 General Additions
Design/Install Requirement	Part 192.55	Pipe manufactured from steel made by the Bessemer process shall not be used	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.055 Steel pipe addition
Design/Install Requirement	Part 192.125	Fittings in copper piping and exposed to the soil, such as service tees and pressure control fittings, shall be made of bronze, copper or brass	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.125 Design of copper pipe addition
Design/Install Requirement	Part 192. 163	All compressor station buildings shall be constructed of Non-combustible materials, Exits shall be provided in compliance with the requirements of the Wisconsin Commercial Building Code, chs. Comm 60 to 65. Ladders shall not be used for exits. All electrical	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.163 Compressor stations: design and construction additions

Wisconsin

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		equipment and wiring installed in gas transmission and distribution compressor stations shall conform to the requirements of the state electrical code, chs. Comm 16 and PSC 114.		
Design/Install Requirement	Part 192.171	Fire protection. Fire−protection facilities shall be provided as specifically directed by the department of commerce and the local fire department. The operation of fire−protection facilities, such as pumps, shall not be affected by an emergency shutdown	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.171 Compressor stations: additional safety equipment addition
Design/Install Requirement	Part 192.173	There shall be compliance with the state heating, ventilation, and air conditioning code,	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.173 Compressor stations: ventilation addition
Design/Install Requirement	Part 192.181	The distance between the valve and the regulator or regulators shall be sufficient to permit the operation of the valve during an emergency such as a large gas leak or a fire in the station. These valves shall be in accessible locations neither closer than 25 feet nor more than 1,500 feet distant from each regulator station	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.181 Distribution line valves addition
Design/Install Requirement	Part 192.183	In the design of vaults and pits for pressure limiting, pressure relieving and pressure	Wisconsin Administrative Code, Public Service Commission (PSC)	PSC 135.183 Vaults: structural design requirements additions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		regulating equipment, the installed equipment shall be protected from damage, such as that resulting from an explosion within the vault or pit, which may cause portions of the roof or cover to fall into the vault.	Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	
Design/Install Requirement	Part 192.183	Vault or pit openings shall be located so as to minimize the hazards of tools or other objects falling upon the regulator, piping, or other equipment. The control piping and the operating parts of the equipment installed shall not be located under a vault or pit opening where workers can step on them when entering or leaving the vault or pit, unless such parts are suitably protected. Whenever a vault or pit opening is to be located above equipment which could be damaged by a falling cover, a circular cover should be installed or other suitable precautions taken.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.183 Vaults: structural design requirements additions
Design/Install Requirement	Part 192.187	The outside end of the ducts shall be equipped with a suitable weatherproof fitting or vent−head designed to prevent foreign matter from entering or obstructing the duct. The effective area of the openings in such	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.187 Vaults: sealing, venting, and ventilation addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		fittings or vent−heads shall be at least equal the cross−sectional area of a 4−inch duct. The horizontal section of the ducts shall be as short as practical and shall be pitched to prevent the accumulation of liquids in the line. The number of bends and offsets shall be reduced to a minimum and provisions shall be incorporated to facilitate the periodic cleaning of the ducts		
Design/Install Requirement	Part 192.189	Equipment shall operate safely if submerged. Electrical equipment in vaults shall conform to the applicable requirements of the state electrical code.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.189 Vaults: drainage and waterproofing additions
Design/Install Requirement	Part 192.195	Prescribes 6 types of suitable devices that are allowed for high pressure distribution systems. Prescribes 5 types of suitable devices for low pressure distribution systems. Prescribes 2 types of suitable devices that are allowed for bottle tight holders.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.195 Protection against accidental over pressuring additions
Design/Install Requirement	Part 192.197	The service regulator shall be of a type that is capable under normal operating conditions of regulating the downstream pressure within the limits of s. PSC 134.23 and of	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.197 Control of the pressure of gas delivered from high−pressure distribution systems additions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		limiting the build−up of pressure under no−flow conditions to 50% or less of the discharge pressure maintained under flow conditions.		
Design/Install Requirement	Part 192.197	In addition to the provisions of 49 CFR 192.197(a) and (b), if the maximum actual operating pressure of the distribution system is greater than low pressure and is equal to or less than 60 p.s.i.g., a suitable protective device shall be installed to prevent unsafe overpressuring of the customer's appliances should the service regulator fail. These devices may be installed as an integral part of the service regulator or as a separate unit. Some of the suitable types of protective devices to prevent over pressuring of customers' appliances are: (1) A monitoring regulator. (2) A relief valve. (3) An automatic shut−off device.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.197 Control of the pressure of gas delivered from high−pressure distribution systems additions
Design/Install Requirement	Part 192.197	Breather vents shall be provided on all service regulators	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.197 Control of the pressure of gas delivered from high−pressure distribution systems additions
Design/Install Requirement	Part 192.199	Outlet ports shall be insect−proof and	Wisconsin Administrative Code,	PSC 135.199 Requirements for

Wisconsin

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		consideration shall be given to all exposures in the immediate vicinity including windows or locations where gas can enter confined areas;	Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	design of pressure relief and limiting devices additions
Design/Install Requirement	Part 192.199	Precautions shall be taken to prevent unauthorized operation of any valve which will make pressure limiting devices inoperative. This provision applies to isolating valves, by−pass valves, and valves on control or float lines which are located between the pressure limiting device and the system which the device protects. 2 methods are specified for compliance	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.199 Requirements for design of pressure relief and limiting devices additions
Design/Install Requirement	Part 192.203	The company operating the pipelines shall take specified precautions where gas pipelines parallel overhead electric transmission lines on the same right−of−way,	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.204 Addition
Design/Install Requirement	Part 192.245	Precautions to Avoid Explosions of Gas−Air Mixtures or Uncontrolled Fires During Construction Operations are specified as requirements	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.246 Addition
Design/Install Requirement	Part 192.279	Copper pipe shall be joined by using either a compression type coupling or a brazed or soldered lap joint. The	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas	PSC 135.279 Copper pipe addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		filler material used for brazing shall be a copper−phosphorous alloy or silver base alloy. Butt welds are not permissible for joining copper pipe or tubing	Safety Subchapter II Additions to 49 CFR Part 192	
Design/Install Requirement	Part 192.307	The field inspection provided on each job shall be suitable to reduce to an acceptable minimum the chances that gouged or grooved pipe will get into the finished transmission line or main. Inspection for this purpose just ahead of the coating operation and during the lowering in and backfill operation is required.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.307 Inspection of materials addition
Design/Install Requirement	Part 192.309	Due primarily to climate conditions, gouges, grooves, notches, and dents have been found to be an important cause of steel pipe failures and an attempt shall be made to prevent or eliminate harmful defects of this nature.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.309 Repair of steel pipe addition
Design/Install Requirement	Part 192.319	Requirement of grading the ditch so that the pipe has a firm, substantially continuous bearing on the bottom of the ditch. When long sections of pipe that have been welded alongside the ditch are lowered in, care shall be exercised so as not to jerk the pipe or impose any	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.319 Installation of pipe in a ditch additions

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		strains that may kink or put a permanent bend in the pipe.		
Design/Install Requirement	Part 192.321	The casing pipe shall be reamed and cleaned to the extent necessary to remove any sharp edges, projections, or abrasive material which could damage the plastic during and after insertion. That portion of the plastic piping which spans disturbed earth shall be adequately protected by a bridging piece or other means from crushing or shearing from external loading or settling of backfill. Care shall be taken to prevent the plastic piping from bearing on the end of the casing.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.321 Installation of plastic pipe additions
Design/Install Requirement	Part 192.323	Casing requirements of highway authorities shall be followed; however, construction type shall not be any less than provided by 49 CFR 192.323	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.323 Casing addition
Design/Install Requirement	Part 192.323	Whenever a steel pipeline is installed under a railroad track and a casing is not used, the operator shall install the pipeline using the methods prescribed in Gas Research Institute report number GRI−91/0285, entitled "Guidelines for Pipelines Crossing Railroads and Highways."	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.324 Addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Design/Install Requirement	Part 192.325	No distribution main or transmission line shall be installed under buildings.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.325 Underground clearance addition
Design/Install Requirement	Part 192.355	At locations where service regulators might be submerged during floods, either a special anti−flood type breather vent fitting shall be installed, or the vent line shall be extended above the height of the expected flood waters	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.355 Customer meters and regulators: protection from damage additions
Design/Install Requirements	Part 192.371	Requirements for protecting coating of steel services when boring or driving through rocky soils	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.371 Service lines: steel addition
Design/Install Requirement	Part 192.377	Copper service lines installed within a building may not be concealed. Ferrous valves and fittings installed on under-ground copper service lines shall be protected from contact with the soil or insulated from the copper pipe.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.377 Service lines: copper additions
Design/Install Requirement	Part 192.629	No pipeline, main, or service shall be purged into any building or confined space.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.629 Purging of pipelines addition
Design/Install Requirements	Part 192.713	Gouges and grooves of lesser depth than 10%	Wisconsin Administrative Code,	PSC 135.713 Transmission lines:

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		of the nominal wall thickness of the pipe may be removed by grinding out to a smooth contour provided the grinding does not reduce the remaining wall thickness to less than the minimum prescribed by 49 CFR 192 for the conditions of use.	Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	permanent field repair of imperfections and damages addition
Design Install Requirements	Part 192.735	All aboveground oil or gasoline storage tanks shall be constructed and protected in accordance with ch. Comm 10.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.735 Compressor stations: storage of combustible materials addition
Design Install Requirements	Part 192.741	Each low pressure distribution system shall be equipped with telemetering or recording pressure gage or gages as may be required to properly indicate the gas pressure in the system at all times. At least once each year the pressure variation shall be determined throughout each system.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.741 Pressure limiting and regulating stations: telemetering or recording gauges addition
Risk Based Approaches	Part 192.719	If inspections at any time reveal an injurious defect, gouge, groove, dent, or leak, immediate temporary measures shall be employed to protect the property and public if it is not feasible to make permanent repair at time of discovery. As	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.720 Addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		soon as feasible, permanent repairs shall be made using recognized methods of repair.		
Enhanced Record Keeping	Part 192.613	Whenever underground pipes are exposed in order to repair leaks, the utility shall record on the repair order the nature of the leak and possible cause from observation.	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.613 Continuing surveillance additions
Inactive Services	Part 192.727	Special efforts shall be made to include services which have not been used for ten years in a way that will remove gas from the customers' premises. The plan shall include all of the following provisions: (1) If the facilities are abandoned in place, they shall be physically disconnected from the main at the service tee. The open ends of all abandoned facilities shall be capped, plugged, or otherwise effectively sealed. (2) In cases where a main is abandoned, together with the service lines connected to it, insofar as service lines are concerned, only the customers' end of such service lines need be sealed. (3) Until the time a service is abandoned, it shall be treated as active for purposes of	Wisconsin Administrative Code, Public Service Commission (PSC) Chapter 135 Gas Safety Subchapter II Additions to 49 CFR Part 192	PSC 135.727 Abandonment or deactivation of facilities addition

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
		applying the regulations of 49 CFR 192. If a service line is not treated as an active line, it shall be physically disconnected at the main and purged, no later than 2 years after becoming inactive		
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

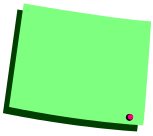
Wyoming

Key Stats

State Agency	Wyoming Public Service Commission
Division	Pipeline and Water Division
Department	Gas and Pipeline Safety Program
Web	http://psc.state.wy.us/htdocs/pipe_water_new.htm
Regulated Intrastate Pipeline Systems	38 (11 distribution, 23 transmission, 4 gathering)
Regulated Master Meter Operators	0
Regulated LNG Systems	1
Regulated Hazardous Liquid Systems	1
Quantity of State Pipeline Safety Initiatives that exceed CFR 190-199	0 12

Applicable Requirement in CFR

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires notifications of all building evacuations greater than 25 people involving gas within 2 hours	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 420 (a (iii)) Additional Gas Utility Interruption Reporting
Enhanced Reporting	Part 191.3	Requires notifications of all outages greater than 25 customer within 2 hours	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 420 (a (ii)) Additional Gas Utility Interruption Reporting
Enhanced Reporting	Part 191.3	Requires quarterly reporting of all major, minor, sustained service interruptions	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 420 (b) Additional Gas Utility Interruption Reporting
Enhanced Reporting	Part 191.3	Requires monthly construction progress reports and completion report within 180 days of finish	Wyoming Public Service Commission Current Rules and Regulations Chapter II, General Regulations	Section 229 Construction Reports



Wyoming

State Page Last Revised: Sept. 2011

Category	Federal Regulation Part/SubPart	Additional or More Stringent State Requirement	State Source Type {Law/Rule/Order}	State Source Detail
Enhanced Reporting	Part 191.3	Requires 5 year forecast of construction projects	Wyoming Public Service Commission Current Rules and Regulations Chapter II, General Regulations	Section 230 Construction Forecast Reports
Enhanced Reporting	Part 191.3	Requires Incident Reports at $2K level	Wyoming Public Service Commission Current Rules and Regulations Chapter II, General Regulations	Section 233 Incident Reports
More Direct Oversight	Part 191.3	Requires updated contact list of supervisors every 6 months	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 420 (c) Additional Gas Utility Interruption Reporting
Enhanced Record Keeping	Part 192.605	Requires Maps to contain size, character, location, drip, street valve, district regulator & service connection updated no later than 180 days	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 401 (d) Records
Enhanced Record Keeping	Part 192.605	Requires pressure charts of supply points for 3 years	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 401 (b) Records
Enhanced Record Keeping	Part 192.605	Requires meter records of capacity, purchase, id #, type, capacity, manufacturer and location	Wyoming Public Service Commission Current Rules and Regulations Chapter IV, Special Regulations Gas Utilities Only	Section 401 (e) Records
Enhanced Record Keeping	Part 192.605	Requires calibration of equipment identified and records kept for 10 Years	Wyoming Public Service Commission Current Rules and Regulations Chapter II, General Regulations	Section 247 Program for Calibration Recertification of Equipment.
State Inspection Program	Part 190.203	More Frequent Inspections/Contacts and Detailed Audits	None	Inspection Forms and Frequency Operator Inspections

National Association of Pipeline Safety Representatives

Appendix

State Pipeline Safety Initiatives that Exceed Federal Code

The following pages contain a Summary of Pipeline Initiatives Description for Each State

State Pipeline Safety Initiatives that Exceed Federal Code

	ALABAMA	ARIZONA	ARKANSAS	CALIFORNIA	COLORADO	CONNECTICUT	DISTRICT OF COLUMBIA	DELAWARE	FLORIDA	GEORGIA	IDAHO	ILLINOIS	INDIANA	IOWA	KANSAS	KENTUCKY	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MICHIGAN	MINNESOTA	MISSISSIPPI	MISSOURI	MONTANA	NEBRASKA
Number of State Initiatives	**5**	**39**	**49**	**26**	**11**	**48**	**14**	**4**	**53**	**12**	**6**	**11**	**21**	**11**	**47**	**19**	**7**	**76**	**12**	**11**	**79**	**30**	**5**	**68**	**0**	**3**
Enhanced Reporting																										
Incident reporting criteria - lower property damage threshold		2	1	2			1		1	1				1		1					1			1		
Incident reporting criteria - one hour or two hour notification					1	1	1			1							2	1				1		1		1
Incident reporting criteria - significant media coverage		1		1									1								1					
Incident reporting criteria - bodily injury includes outpatient treatment			1																							
Expanded reporting criteria - includes any pipeline > 100 ppm H2S; any carbon monoxide related events, over pressuring pipeline, fire not caused by operator, transmission shutdown, failure to serve master meter ops, > 5 gallons release of Haz liquid		5	1													1					1					1
Additional reporting rqmts - non-incident including: safety related conditions, 3rd party damage reporting , unplanned interruptions, safety index report, building evacuations, major main failures, transmission failures, list of master meter operators served, suspicious acts, status of condition of pipe and shared with municipalities served, annual organizational chart, annual report for master meters, report of any unplanned gas ignition		1	1	1	4	4						1	2		1	4		4			1	3	1	2		
Require reports of outages of >specified number of customers					1				1				1	1		1		2			1	1				
Periodic leak status reports						4			1									1						1		
Inspection Progress Reports for Regulator Stations, Emergency Valves						2																				
Aging Workforce Succession Report						1																				
Cast Iron/Bare Steel Replacement Reporting						2																1				
Plastic pipe inventory, Plastic failure reporting, Construction Defect Failure Reporting																		1				1				
Pressure Complaints (too low/too high)																										
Electronic Access to Most Current O&M, Procedures, OQ																						1				
Operation & Maintenance Plans must be filed/approved	1	1	1			1	1					1	1		1			1			1	1		1		
Emergency Response Plans must be filed/approved	1	1		1		1							1		1			1				1		1		
Public Awareness Plans must be filed/approved																		1						1		
Operator Qualification Plan must be filed/approved																		1						1		
Quality Assurance Plan must be filed/approved																		1								
Integrity Management Plan must be filed/approved																		1						1		
Construction Standards must be filed/approved									1									1				1		1		
Damage Prevention Plan must be filed/approved																		1						1		
Provide Contact List for emergencies to Safety Inspectors, for resolving and providing situational awareness regarding service Interruptions							1												1			1				
Annual Reporting of List of Welders and Certification of Welders																										
Reporting of Response Times Emergency/Odor Complaints/Leaks																		1				1		1		
Annual Report for Operation and Maintenance Activity Hours																		1								
Pressure Test (Strength Test) Report with Certification of Pipeline																										
Any record of required tests, summaries that Commission requests						1																				
Requires notification of change of ownership, merger, acquisition						2																1				
Projects, Extensions, Improvements to Capital of Gas Utility		1				1			1				1		1		2	1		1		1	1			
More Direct Oversight																										
Definition of Operator Expanded includes: pipeline operators that contain >100 ppm H2S, H2S operators must use NACE Standard MR-0175-99 and API RP55 -95,		1	1																		1					
More direct oversight of construction activities (or reports to allow same)	1				1	2				1					1	1		1	1			1				
Definitions expanded for " transport" "persons" "operator" and "master meter" "state" "distribution system", "low pressure distribution system", "master meter system" "Corrosion", "Customer", "Hoop stress", "Leak", "Leakage survey", "Pressure", "Sour gas", "System", "Vault" "feeder line" "high pressure distribution", "yard line", "CGI", "sustained reading", "follow up inspection"		6							3												9			12		
Conversion procedures required fron non regulated to regulated operator									1																	
Requires Lab Exams for Investigating Failures		1																								
More direct oversight of testing (>100 psi) (or reports to allow same)																1										
Certificate Required for Operations or Certain New Construction			2																							
Notice to State Safety Staff of consultants doing routine work to allow closer oversight															1											
Limits span of control for oversight of outside contractors crews							1		1																	
Emergency Procedures must recognized sour gas safety precautions including educating public, Emergency Program requires annual meeting with Emergency Responders on Emergency Procedure				1																	2					
Require Inspections of outside construction crews (quality assurance)						1									1			2								
Amendments of OQ, O&M plans required after incidents, AOC discovered, emergency repairs made, require OQ and O&M plans on sight during construction					1		1																			
Advisory Bulletins must be incorporated into action plans					1																					

State Pipeline Safety Initiatives that Exceed Federal Code

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Visual Weld Inspectors must be previously identified in writing			1																							
Valves																										
Valve Box Criteria (accessiblity,non transmittal of external loads, free of debris)																		2								
Bypass Valves must be sealed and locked																										
Blow-down valve requirements for mains, Sectionalizing block valves requirement for sour gas pipelines									1												1					
Non Emergency Valves must be inspected every 5 years																		1								
Emergency Valves must be accessible at all times									1									1						1		
Emergency valve program, selection criterion for service valves, enhanced inspection, annual drill on operating emergency valves, emergency valves inspected every 6 months for sour gas, specified design requirements for sour gas									1									1			2			1		
Buried Curb Valves required on all high pressure service lines at places of public assembly, installation of curb valve when repair excavation is made																				1						
Curb Valves must be inspected annually at places of assembly, public assembly places require outside valve																										
Service shut-off valve criteria, Check valve required for certain services									1				1								1					
Periodic service must include partial stroke																					1	1		1		
Pressure Testing																										
Additional requirements for Uprating for determining MAOP									1						1			1						1		
All service lines must be pressure tested to at least 90 psig																				1						
Requires test pressure for transmission pipelines be maintained for a period of 24hrs, requires specified time period for pressure testing, requires independent witness of test, increased frequency				3																	1					
No Pressure Testing allowed against a live operational valve													1													
Requires Pressure Testing to more than 50% for certain operating pressures or more stringent minimums															1						2					
Operating Pressure																										
More restrictive limits on operating pressure			1									1				2								1		
Multiple Pressure Recording Devices required per system, Recording device needs to be portable																										
Meters cannot be operated above specified % of pressure test							1																			
Max actual operating pressure must be < MAOP (cannot equal)			1																							
Add 'l reqmts for overpressure protection, more frequent inspection cycles	1																				1			1		
Restrictive test requirements for low-pressure line																										
Max pressure limit on cast iron pipe																					1					
Tag/post pressure reliefs with setpoint and downstream MAOP																					1					
Mains >200 psi, 125 psi must meet transmission requirements																										
District Regulator Stations required to be inspected monthly by operator						1																				
Must notify if low-pressure system exceeds 0.5 psi																										
Damage Prevention																										
Enhanced damage prevention requirements for pipeline operators such as: can only be member of single or specified One Call Ctr, must oversee all transmission line excavations and document all findings, extending trainining to local community colleges, pilot new technologies, transmission line and certain deistribution line require enhanced marking and indentification at specific locations, must monitor all excavations of sour gas						2				1											1	1				
Identification tape above trench-installed						1	1											1	1		1					
Tracer wire requirements, RFID Electronic ball requirements		1							1									1								
Damage prevention performance limits in rates																										
Enhanced public notification and identification rqmts							1														1			1		
Enforcement authority						1							1		1			1				1				
Geohazard program																										
Some CGA best practices required										2					1			1								
Trenchless installations per GPTC Appendix G-192-6																		1								
Locators to be knowledgeable of Trenchless Technology Techniques, Incorporate Trenchless techniques into procedures																		1				1				
Locators to Trained to a minimum requirement (NULCA or equiv)																										
Limits Locators to in house (no outside contractors)																										
Training/Quals (not including OQ)																										
Certification/extra training/including more frequent for polyethylene/plastic			1															1								
Leak Surveys need Trained Personnel regarding equipment and Classification Procedures			1																							

State Pipeline Safety Initiatives that Exceed Federal Code

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Training required for all opeartions of sour gas including employee safety																					1					
Training required for Flow Reduction or Flow Interruption during Emergency																										
Training required for Vegetation Management Leak Surveys															1											
Training Required of External First Responders																										
Exams/training rqmts for system managers, enhanced training program required												1											1			
Operator Qualification																										
Additonal Requirements for OQ Traniners and Evaluators																								1		
Additional Knowledge/Skill/Ability Demonstration																								1		
OQ evaluation must include training																								1		
OQ extended to cover construction									1																	
Meter Location/Protection																										
Meters/regulators must be outside (unless impractical)												1									1					
Physical protection for meters												1										1				
Residential services must be near bldg walls; no downstream buried pipe except outdoor services						1												1	2							
Relocating meters from property line to building wall																										
Customer Meters must be protected from snow and ice damage													1					1				1				
Master Meters no longer allowed						1												1								
Meters must be replaced every 10 years																										
Operator responsible for service lines regardless of meter location																		1						1		
Odorant																										
Increased testing frequency of odorant			1			1			1						1	1	1	1						2		
Odorant tests locations specified at furtherest point from source			1														1									
Lower limit for odorant															1				1	1						
Odorant requirment for transmission line									1																	
All intrastate lines must be odorized																								1		
Prompt action for insufficient odorization														1												
Equipment requirements																										
Farm tap requirements			1																							
More specific reporting																										
Limit for odorant throughout system																										
Sniff Test required for service calls entering buildings															1											
Increased testing requirements of Odorant for Master Meter Operators			1																							
Leak Tests																										
Define Business District, Define Impractical to survey, Define High Occupancy Structure							1						1		1			1								
Vegetation Surveys prohibitied as leak survey for all pipelines		1																								
Additional surveys for Public Buildings inside and out				1			1											1								
Additional surveys for mains on structures (bridges)																										
Enhanced Leak test requirements services- frequency															1									1		
Enhanced Leak test requirements mains: -requires higher frequency, apply to Master Meter Operators		1	2	1											1			1	1		1			1		
Increased patrol frequency for mains/feeders															1						2			1		
Leak check for customer lines (on startup)												1	1	1					1		1			1		
Additional leak surveys for inactive services																										
Flame ionization surveys of bare steel mains if electrical survey impractical (defined)															1											
Leak Test Procedure must ensure discovery of leaks			1																					1		
Additional Leak Test on Services after 3rd Party Damage																								1		
Additional Leak Test required where 3rd Party Excavations near pipeline such as under pavement, road substructures																										
Enhanced leak test rqmts - pressure/duration			1																		1					
Additional surveys - cast iron (winter and non winter)															1			1								
Acceptable test equipment specified and calibration requirements		1	2						1						1			1	1							
Risk-based model for survey frequency																										
Test and repair all leaks before operating >30% SMYS																					1					
Repair all leaks found in uprating tests																					1					

State Pipeline Safety Initiatives that Exceed Federal Code

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Response to Leaks																										
classification/repair rqmts for leaks		1	2	1		1		1	1	1			1		1	1		1			3			1		
All leaks treated as emergency									1					1							1					
All leaks treated as failure including root cause determination															1											
Specified Time Frame to respond to reports of leaks			2			1								1	1			1						1		
Leak inventory limits						1																				
Upgrading/Downgrading of Leaks Prohibited or Restricted																		1								
After Repair of Leaks Post Survey Required																		1								
Class 1 Leaks require notification to local Fire Dept																		1								
Address class B or Class 2 more frequently																		1								
Replacement Programs																										
Cast/bare steel replacement programs (rate relief)			1			1				1					1			1			1					
CI/bare steel/copper replacement program (no rate adder)							◙		◙				1	◙								1	◙	1		
CI replacment when encroched by outside construction activities																				1				1		
Risk-based plan for pipe replacement																								1		
Cast Iron sampling rqmt with replace criteria															1											
Service Replacement resulting from low pressure, flow restrictions, freezing												1														
Replacement program for Sour Gas Segments and Remedial Measures																					3					
Fitting Replacement Program or requirements																										
Mandated Accelerated main replacement resulting from inadequate system pressure levels or other customer complaints															1	◙						1				
Plastic replacement program - response to issues														1	1							1		1		
Entire CI/bare steel replacement completed for one or more operators													1		1							1		1		
State regulation requires replacing CI and limits new installation of CI																				1						
Replace mains that have been subject to flooding or obsolete regulators																										
Relocate/Replace Inside Meters to Outside Meters																					1					
Set Criteria for Encapsalation of Joint Leaks as Repair Method																					1					
Replacing customer-owned yard lines and private lines from master meters or customer service risers prone to leaks															1											
Authority Beyond OPS (not rate)																										
Authority to order change in public interest, assessments, compliance with state statutes		1				2			1				1													
Modify State building code to prevent pipeline and sewer interference																										
Encourage safety enhancement through rate cases						1									1			1								
Red Tag/Reconnect Service Procedure required for customer appliances, NFPA 54 conformance required before gas provided						1			1									1						1		
Sour Gas Scope and Authority																					2					
All pipelines in State Waters (off shore) subject to regulations. Certain interstate operators subject to State Safety Regs																										
Gathering Line Rquirements for Type A, B, C, Gathering Lines not subject to 192 must report incidents, Gathering Lines are from first point of measurement					1																1					
Requires Assistance from non operators in disseminating public awareness plans and materials										1																
Extending LDC Responsibility																										
Public Awareness Plans must include messages to end use customers of customer responsibilities for downstream piping and appliances and reporting gas leaks, notifications to customers relocating within operators districts																		1	1					2		
Jurisdiction extended beyond meter												1														
Extended LDC responsibility for service lines or master meter operations												1												1		
Operator required to respond to other operator emergencies if in same county										1																
Maintenance responsibility for buried customer lines													1		1											
Operator owns service lines regardless of meter location																								1		
External/Internal Corrosion																										
Sour Gas Analysis and Monitoring Intervals																					2					
Pipe-Type & Bottle-Type Holders: Plan For Inspection and Testing				4												1										
90 days to remediate									1								1									
Cathodic Protection																										
Enhanced CP criteria, repair times		1							11						1									2		
Corrosive environment presumed															1											
Bare Steel Services must have Close Interval Survey															1											

State Pipeline Safety Initiatives that Exceed Federal Code

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Corrosive Gas defined, active corrosion deinition include deterioratin of pipe, periodic reports specified or defined																										
Requirements for Cathodic Protection near Power Transmission Lines																										
Shorter Intervals for Cathodic Protection Testing															1									1		
Readings req'd on all exposed pipe uncoated																										
Design/Install Requirements																										
Gas Compressor Stations Start Up/Shut Down Procedures and Maintenace Porcedures, gas compressor station fuel storage requirements, gas compressor station design requirments																2					1					
Restriction on Cast Iron Installations less than 4" diameter mains								1																		
Purging Restrictions in confined space, purging procedure for sour gas																					1					
More restrictive joint requirements, copper joints require specific joining and material requirments			4																		1					
Specified welding standards		1							2												6					
Calibrated equipment required to inspect for coating damage prior to install, equipment accuracy requirements for pressure and flow															◙											
Only 0.32 design factor allowed for plastic (not 0.40)																		1								
Above ground transmission pipeline is prohibited for class 2,3,4 locations, sour gas pipelines prohibited from Class 3 or 4 unless authorized															1						1					
Installation requirements for plastic pipe, all plastic fittings must meet ASTM D2513 Category 1, ASTM D2513 1995 edition for temps greater than 100 Deg, fusion machines must be GPS and barcode capable		3	5						1																	
Orifice Metering Constructed/Maintained per AGA GMC Rpt #3																										
New pipe only steel and polyethylene, steel for any pressure >100 psi, bedding and backfill requirements, specifed material considerations for steel pipe		2				1																		1		
40" or 48" depth of cover in agricultural areas, sour gas pipelines														1							1					
Mains in public ROW must have 36 in cover, 30 in cover																		1								
Services in public ROW must have 30 in cover, all services must have 18 in cover																		1								
Interstate Pipelines including services must have > 24 in cover																		1								
Requires gas pipelines to cross over rather than under for interfering facilities, installation requirements for continous bedding and avoiding kinking and permanent bending, steel pipe installation restirctions to limit gouges																		1								
All Regulators including service regulators must be vented outside, breather type vents on service regulators above flooding potential, vents require weather proof heads with cross sectional area specified			1																							
Service Regulators cannot supply more than 2 psig to customers, service regulators to be inspected upon meter changeout, service regulators must be 3 ft from source ignition		1				2																				
Service Regulators cannot be direct buried																		1								
Specified separation from buried electric lines (12 inch, 8 inch), 48 inch separation for sour gas, 12" separation or other precautions for plastic (some states 6" separation)		1				1								1				1			1					
Trans. Rqmts apply to all pipe >125 psi in class 3 or 4, all pipelines must meet Class 3 or 4 requirements, all transmission lines must be classified as Class 3 or 4 regardless of location, all sour gas pipelines designed to Class 4 (0.40 factor)																				1	1					
Mains with MAOP > 200 psig or 125 psig or 250 psig) must meet enhanced design, construction and maintenance requirements																				1						
Inlet **AND** outlet valves at distribution regulator stations or specified distances from the station, vault design requirements						1			1									2						1		
Adequate over pressure protection required at town border stations and district regulating stations including if pre 1971 installation, District Reg Station Fencing Requirements, Vault Requirements																					2			1		
More Specific Farm Tap Requirments																1										
Device must be installed for monitoring and indicating failure of operating regulator within Over Pressure Protection System																								1		
Directional Drilling requirements, construction requirements to avoid gas/air explosive mixture																					1					
Identification of facilities required: multiservice installations, meters, district regulator stations, above ground installations									2																	
Telemetry required at regulator stations serving specified quantity of customers																										
Casings prohibited on metal pipelines, casing requirements preventing shearing, GI-91/0285 Guidelines for Pipelines Crossing Rails and Highways when no casing is used									1																	
Does not allow gas lines, haz liq lines under buildings, no concealed copper services and fitting restictions on copper services		1							1																	
Location restrictions for higher-pressure systems, pipelines must consider overhead electric transmission influence, easements of has liquid pipeline must be clear of all encroached structures				1																						

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Expanded Incorporation By Reference for Acceptable Engineering Standards: NFPA54, NBS Method of Gas Testing, NBS Testing Lg Cap Rot Meters, AGA No.3 Orifice Metering, WV Short Course on Practical Methods, National Association of Corrosion Engineers International Standard NACE MR0175/ISO 15156, 2004-2007																					1					
No buried galvanized or aluminum pipe		1																			1					
Service Lines install by external contractors must be certified to meet State Requirments			1																							
Written Emergency Plan must have provisions for installation and blasting that include PPE for workers and knowledge of state damage prev laws										1																
Specific Design Requirements for Pipe Type Holders and Bottle Holders				7																						
Specifies restoration of agricultural land after installation occurs, protective coating of steel services when boring through rocky soils														1												
New Master Meter Operator System must be reviewed/certified by LDC			1																							
Risk-based approaches																										
Inline inspections required to reveal cross bore of sewer laterals																						1				
Base line and trending of cast iron and bares steel, non hazardous leaks																										
Operators required to perform integrity assessments of entire line section, temporary and permanent repairs based on inspections to reveal defects, gouges, dents or leaks, requires operator determination of plant replacement based on operator inspections																										
Annual eval of bare/cast						1									1											
Enhanced Record Keeping																										
OQ must cross reference with O&M and Emergency Plan																		1								
Maintain Records of Abandon Mains or facilities after a given date						1												1								
More stringent data elements such as Test Pressures, Duration of Strength Test, Date, Description of Facilities, retention of pressure charts, testing services in equivalent manner as mains with associated records															1						1			1		
Regulator & Relief Valve Calcs required of all OPP devices															1											
All Records must be kept InState or accessible instate									1																	
Odorometer Records must be kept for specified duration, odorant records include sampling and odorant quantities used															1			1			1					
Leak Survey Records or Leak Investigation Records required for longer than 5 years,							1	1	1						1			1						1		
Lifetime Records requirement for all Public Outreach																										
Lifetime Records requirement for Corrosion Control of all Pipelines			2															1								
Lifetime Records requirement for Strength Testing of all Pipelines									1						1			1								
Lifetime Records requirement for Welding of all Pipelines, Welding Records must be at job site									1												1					
All Key Valves or Critical Valves must be identified on Records/Maps			1						1																	
Enhanced Corrosion Records such as documentation of corrosion areas, active corrosion, schedules of placement of cathodic protection devices, maps and records of cathodic protection devices			1												1									1		
Enhanced Meter Record Details Required (Capacity, Purchase Date, Type, Location, Pressure Rating, Accuracy Etc.)																1			1							
Maintain Calibration Records and Identification of Equipment for specified duration																										
Leak Progression Maps must be updated and maintained																		1								
Investigate and Maintain Records of all Leaks as Failures, detailed leak reporting including cause, Records shall be kept as to leak complaints and remediation of leaks									1						1						1					
review requirements																										
GPS Coordinates required to be taken on exposed main, tees, valves, etc..																		1								
Detailed Mapping Requirements			4						1				1										1			
Inactive Services																										
Requirement to cut inactive services off at main during demolition																		1								
period		1					1		1									1		2						
State Inspection Programs																										
Ability to Use Outside Consultants for State led inspections when necessary, State to maintain GIS database of haz liquid pipeline operators and historical activities				1		1																1				
Inspections focused by risk													1									1				
More frequent inspections/ contact/detailed audits	1	1	1	1	1	1	1	1	1	1		1	1	1	1	1		1	1	1	1	1	1	1		1
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● Status Uncertain - please contact each State Individually for determination

State Pipeline Safety Initiatives that Exceed Federal Code

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Number of State Initiatives	3	46	51	8	63	17	0	8	8	9	10	0	18	23	0	11	30	0	8	31	57	5	69	12	1154	
Enhanced Reporting																									***261***	
Incident reporting criteria - lower property damage threshold	1	1	1	1	1	1			1	1			1	1					1	1	1			1	26	24
Incident reporting criteria - one hour or two hour notification									1												2				13	11
Incident reporting criteria - significant media coverage					1								1								1				7	7
Incident reporting criteria - bodily injury includes outpatient treatment													1												2	2
Expanded reporting criteria - includes any pipeline > 100 ppm H2S; any carbon monoxide related events, over pressuring pipeline, fire not caused by operator, transmission shutdown, failure to serve master meter ops, > 5 gallons release of Haz liquid					1																1				11	7
Additional reporting rqmts - non-incident including: safety related conditions, 3rd party damage reporting , unplanned interruptions, safety index report, building evacuations, major main failures, transmission failures, list of master meter operators served, suspicious acts, status of condition of pipe and shared with municipalities served, annual organizational chart, annual report for master meters, report of any unplanned gas ignition		3	1	3	1				1				1			1	1		1	1	7		2	2	56	28
Require reports of outages of >specified number of customers		1	1		1	1				1	1		1	1		1	1				1		1	1	23	22
Periodic leak status reports		1	2																	1					11	7
Inspection Progress Reports for Regulator Stations, Emergency Valves																									2	1
Aging Workforce Succession Report																									1	1
Cast Iron/Bare Steel Replacement Reporting																									3	2
Plastic pipe inventory, Plastic failure reporting, Construction Defect Failure Reporting		1																			1				4	4
Pressure Complaints (too low/too high)		1											1												2	2
Electronic Access to Most Current O&M, Procedures, OQ		1																							2	2
Operation & Maintenance Plans must be filed/approved		1	1	1	1									1						1	1	1	1		21	21
Emergency Response Plans must be filed/approved		1	1											1							1		1		14	14
Public Awareness Plans must be filed/approved																				1					3	3
Operator Qualification Plan must be filed/approved																									2	2
Quality Assurance Plan must be filed/approved																									1	1
Integrity Management Plan must be filed/approved																									2	2
Construction Standards must be filed/approved																					1				5	5
Damage Prevention Plan must be filed/approved																				1					3	3
Provide Contact List for emergencies to Safety Inspectors, for resolving and providing situational awareness regarding service Interruptions						1								1		1			1		1			1	9	9
Annual Reporting of List of Welders and Certification of Welders														1											1	1
Reporting of Response Times Emergency/Odor Complaints/Leaks		1			1								1												6	6
Annual Report for Operation and Maintenance Activity Hours		1																							2	2
Pressure Test (Strength Test) Report with Certification of Pipeline			1																						1	1
Any record of required tests, summaries that Commission requests																									1	1
Requires notification of change of ownership, merger, acquisition									1																4	3
Projects, Extensions, Improvements to Capital of Gas Utility		1			1	1											3			1	2		1	1	23	19
More Direct Oversight																									***87***	
Definition of Operator Expanded includes: pipeline operators that contain >100 ppm H2S, H2S operators must use NACE Standard MR-0175-99 and API RP55 -95,																									3	3
More direct oversight of construction activities (or reports to allow same)		1	1	1		1			1		1		1	1		1	1			1	1	2		1	25	23
Definitions expanded for " transport" "persons" "operator" and "master meter" "state" "distribution system", "low pressure distribution system", "master meter system" "Corrosion", "Customer", "Hoop stress", "Leak", "Leakage survey", "Pressure", "Sour gas", "System", "Vault" "feeder line" "high pressure distribution", "yard line", "CGI", "sustained reading", "follow up inspection"																									30	4
Conversion procedures required fron non regulated to regulated operator																									1	1
Requires Lab Exams for Investigating Failures																									1	1
More direct oversight of testing (>100 psi) (or reports to allow same)			1		1	1															1				5	5
Certificate Required for Operations or Certain New Construction			1											1											4	3
Notice to State Safety Staff of consultants doing routine work to allow closer oversight																									1	1
Limits span of control for oversight of outside contractors crews		1																							3	3
Emergency Procedures must recognized sour gas safety precautions including educating public, Emergency Program requires annual meeting with Emergency Responders on Emergency Procedure																									3	2
Require Inspections of outside construction crews (quality assurance)		1	2																						7	5
Amendments of OQ, O&M plans required after incidents, AOC discovered, emergency repairs made, require OQ and O&M plans on sight during construction																									2	2
Advisory Bulletins must be incorporated into action plans																									1	1

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Number of State Initiatives	**3**	**46**	**51**	**8**	**63**	**17**	**0**	**8**	**8**	**9**	**10**	**0**	**18**	**23**	**0**	**11**	**30**	**0**	**8**	**31**	**57**	**5**	**69**	**12**	**1154**	
Visual Weld Inspectors must be previously identified in writing																									1	1
Valves																									***37***	
Valve Box Criteria (accessiblity,non transmittal of external loads, free of debris)																							1		3	2
Bypass Valves must be sealed and locked																							1		1	1
Blow-down valve requirements for mains, Sectionalizing block valves requirement for sour gas pipelines																									2	2
Non Emergency Valves must be inspected every 5 years																									1	1
Emergency Valves must be accessible at all times																							1		4	4
Emergency valve program, selection criterion for service valves, enhanced inspection, annual drill on operating emergency valves, emergency valves inspected every 6 months for sour gas, specified design requirements for sour gas		1	1		2																2				11	8
Buried Curb Valves required on all high pressure service lines at places of public assembly, installation of curb valve when repair excavation is made			1		1																				3	3
Curb Valves must be inspected annually at places of assembly, public assembly places require outside valve					1														1				1		3	3
Service shut-off valve criteria, Check valve required for certain services					1																1		1		6	6
Periodic service must include partial stroke																									3	3
Pressure Testing																									***20***	
Additional requirements for Uprating for determining MAOP					1																1				6	6
All service lines must be pressure tested to at least 90 psig																									1	1
Requires test pressure for transmission pipelines be maintained for a period of 24hrs, requires specified time period for pressure testing, requires independent witness of test, increased frequency			1																						5	3
No Pressure Testing allowed against a live operational valve																									1	1
Requires Pressure Testing to more than 50% for certain operating pressures or more stringent minimums					1																		3		7	4
Operating Pressure																									***30***	
More restrictive limits on operating pressure		1	1		1						1		1										3		13	10
Multiple Pressure Recording Devices required per system, Recording device needs to be portable														1											1	1
Meters cannot be operated above specified % of pressure test														1											2	2
Max actual operating pressure must be < MAOP (cannot equal)																									1	1
Add 'l reqmts for overpressure protection, more frequent inspection cycles					2																				5	4
Restrictive test requirements for low-pressure line																									0	0
Max pressure limit on cast iron pipe																							1		2	2
Tag/post pressure reliefs with setpoint and downstream MAOP																									1	1
Mains >200 psi, 125 psi must meet transmission requirements																									0	0
District Regulator Stations required to be inspected monthly by operator																									1	1
Must notify if low-pressure system exceeds 0.5 psi		1			2																		1		4	3
Damage Prevention																									***49***	
Enhanced damage prevention requirements for pipeline operators such as: can only be member of single or specified One Call Ctr, must oversee all transmission line excavations and document all findings, extending trainining to local community colleges, pilot new technologies, transmission line and certain deistribution line require enhanced marking and indentification at specific locations, must monitor all excavations of sour gas			1																	2			3		11	7
Identification tape above trench-installed			2																						7	6
Tracer wire requirements, RFID Electronic ball requirements			1							1										1			1		7	7
Damage prevention performance limits in rates					1																				1	1
Enhanced public notification and identification rqmts																				1					4	4
Enforcement authority		1	1										1												8	8
Geohazard program										1															1	1
Some CGA best practices required																									4	3
Trenchless installations per GPTC Appendix G-192-6																									1	1
Locators to be knowledgeable of Trenchless Technology Techniques, Incorporate Trenchless techniques into procedures																				1					3	3
Locators to Trained to a minimum requirement (NULCA or equiv)		1																							1	1
Limits Locators to in house (no outside contractors)		1																							1	1
Training/Quals (not including OQ)																									***10***	
Certification/extra training/including more frequent for polyethylene/plastic																									2	2
Leak Surveys need Trained Personnel regarding equipment and Classification Procedures																									1	1

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Training required for all opeartions of sour gas including employee safety																									1	1
Training required for Flow Reduction or Flow Interruption during Emergency			1																						1	1
Training required for Vegetation Management Leak Surveys																									1	1
Training Required of External First Responders																				1					1	1
Exams/training rqmts for system managers, enhanced training program required						1																			3	3
Operator Qualification																									***7***	
Additonal Requirements for OQ Traniners and Evaluators																									1	1
Additional Knowledge/Skill/Ability Demonstration																									1	1
OQ evaluation must include training																									1	1
OQ extended to cover construction		1																		1	1				4	4
Meter Location/Protection																									***27***	
Meters/regulators must be outside (unless impractical)					1									1											4	4
Physical protection for meters			1		1															1	1				6	6
Residential services must be near bldg walls; no downstream buried pipe except outdoor services					1																				5	4
Relocating meters from property line to building wall		1																			1				2	2
Customer Meters must be protected from snow and ice damage																									3	3
Master Meters no longer allowed			1																						3	3
Meters must be replaced every 10 years			1																						1	1
Operator responsible for service lines regardless of meter location		1																							3	3
Odorant																									***35***	
Increased testing frequency of odorant			1														2				1				13	11
Odorant tests locations specified at furtherest point from source																									2	2
Lower limit for odorant					1																				4	4
Odorant requirment for transmission line																									1	1
All intrastate lines must be odorized					1																1				3	3
Prompt action for insufficient odorization					1																1				3	3
Equipment requirements			1														1								2	2
Farm tap requirements																	1								2	2
More specific reporting			1																			1			2	2
Limit for odorant throughout system			1																						1	1
Sniff Test required for service calls entering buildings																									1	1
Increased testing requirements of Odorant for Master Meter Operators																									1	1
Leak Tests																									***75***	
Define Business District, Define Impractical to survey, Define High Occupancy Structure		1																			2				7	6
Vegetation Surveys prohibitied as leak survey for all pipelines														1											2	2
Additional surveys for Public Buildings inside and out		1																					1		5	5
Additional surveys for mains on structures (bridges)		1																							1	1
Enhanced Leak test requirements services- frequency														1							2		1		6	5
Enhanced Leak test requirements mains: -requires higher frequency, apply to Master Meter Operators																							3		12	9
Increased patrol frequency for mains/feeders																									4	3
Leak check for customer lines (on startup)																									6	6
Additional leak surveys for inactive services														1											1	1
Flame ionization surveys of bare steel mains if electrical survey impractical (defined)					1																				2	2
Leak Test Procedure must ensure discovery of leaks																							1		3	3
Additional Leak Test on Services after 3rd Party Damage																					1				2	2
Additional Leak Test required where 3rd Party Excavations near pipeline such as under pavement, road substructures																					2		2		4	2
Enhanced leak test rqmts - pressure/duration																									2	2
Additional surveys - cast iron (winter and non winter)		1									1										1				5	5
Acceptable test equipment specified and calibration requirements			1																				1		9	8
Risk-based model for survey frequency																	1								1	1
Test and repair all leaks before operating >30% SMYS																									1	1
Repair all leaks found in uprating tests					1																				2	2

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Response to Leaks																									***52***	
classification/repair rqmts for leaks		1		1	1									1		1	1				1				24	21
All leaks treated as emergency			1		1	1											1				1				8	8
All leaks treated as failure including root cause determination																									1	1
Specified Time Frame to respond to reports of leaks		1			1																				9	8
Leak inventory limits					1																				2	2
Upgrading/Downgrading of Leaks Prohibited or Restricted					1																1				3	3
After Repair of Leaks Post Survey Required					1																				2	2
Class 1 Leaks require notification to local Fire Dept																									1	1
Address class B or Class 2 more frequently			1																						2	2
Replacement Programs																									***57***	
Cast/bare steel replacement programs (rate relief)		1								1	1		1												12	11
CI/bare steel/copper replacement program (no rate adder)		1	2	◙	1	◙		◙								1				1					9	8
CI replacment when encroched by outside construction activities		1			2																				5	4
Risk-based plan for pipe replacement	1				1																				3	3
Cast Iron sampling rqmt with replace criteria																									1	1
Service Replacement resulting from low pressure, flow restrictions, freezing																									1	1
Replacement program for Sour Gas Segments and Remedial Measures																									3	1
Fitting Replacement Program or requirements																	3								3	1
Mandated Accelerated main replacement resulting from inadequate system pressure levels or other customer complaints																									2	2
Plastic replacement program - response to issues																									4	4
Entire CI/bare steel replacement completed for one or more operators																					1		◙		5	5
State regulation requires replacing CI and limits new installation of CI																							1		2	2
Replace mains that have been subject to flooding or obsolete regulators													1												1	1
Relocate/Replace Inside Meters to Outside Meters													1												2	2
Set Criteria for Encapsalation of Joint Leaks as Repair Method													1												2	2
Replacing customer-owned yard lines and private lines from master meters or customer service risers prone to leaks																									2	2
Authority Beyond OPS (not rate)																									***32***	
Authority to order change in public interest, assessments, compliance with state statutes																									5	4
Modify State building code to prevent pipeline and sewer interference																				1					1	1
Encourage safety enhancement through rate cases		1																							4	4
Red Tag/Reconnect Service Procedure required for customer appliances, NFPA 54 conformance required before gas provided					1	1			1				1			1							3		12	10
Sour Gas Scope and Authority																									2	1
All pipelines in State Waters (off shore) subject to regulations. Certain interstate operators subject to State Safety Regs						1											2								3	2
Gathering Line Rquirements for Type A, B, C, Gathering Lines not subject to 192 must report incidents, Gathering Lines are from first point of measurement									1								1								4	4
Requires Assistance from non operators in disseminating public awareness plans and materials																									1	1
Extending LDC Responsibility																									***22***	
Public Awareness Plans must include messages to end use customers of customer responsibilities for downstream piping and appliances and reporting gas leaks, notifications to customers relocating within operators districts			1																						5	4
Jurisdiction extended beyond meter																			1						2	2
Extended LDC responsibility for service lines or master meter operations					1						1									1			1		8	8
Operator required to respond to other operator emergencies if in same county																									1	1
Maintenance responsibility for buried customer lines					1																				3	3
Operator owns service lines regardless of meter location					1					1															3	3
External/Internal Corrosion																									***10***	
Sour Gas Analysis and Monitoring Intervals																									2	1
Pipe-Type & Bottle-Type Holders: Plan For Inspection and Testing																									5	2
90 days to remediate																					1				3	3
Cathodic Protection																									***32***	
Enhanced CP criteria, repair times					2												1			1			1		20	8
Corrosive environment presumed																1									2	2
Bare Steel Services must have Close Interval Survey																									1	1

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Corrosive Gas defined, active corrosion deinition include deterioratin of pipe, periodic reports specified or defined			1														2								3	2
Requirements for Cathodic Protection near Power Transmission Lines					1																				1	1
Shorter Intervals for Cathodic Protection Testing			1														1								4	4
Readings req'd on all exposed pipe uncoated																					1				1	1
Design/Install Requirements																									***147***	
Gas Compressor Stations Start Up/Shut Down Procedures and Maintenace Porcedures, gas compressor station fuel storage requirements, gas compressor station design requirments																							2		5	3
Restriction on Cast Iron Installations less than 4" diameter mains																									1	1
Purging Restrictions in confined space, purging procedure for sour gas																							1		2	2
More restrictive joint requirements, copper joints require specific joining and material requirments																							2		7	3
Specified welding standards			1		3																		1		14	6
Calibrated equipment required to inspect for coating damage prior to install, equipment accuracy requirements for pressure and flow			1			1																			2	2
Only 0.32 design factor allowed for plastic (not 0.40)																									1	1
Above ground transmission pipeline is prohibited for class 2,3,4 locations, sour gas pipelines prohibited from Class 3 or 4 unless authorized																									2	2
Installation requirements for plastic pipe, all plastic fittings must meet ASTM D2513 Category 1, ASTM D2513 1995 edition for temps greater than 100 Deg, fusion machines must be GPS and barcode capable					1												1			1					12	6
Orifice Metering Constructed/Maintained per AGA GMC Rpt #3											1														1	1
New pipe only steel and polyethylene, steel for any pressure >100 psi, bedding and backfill requirements, specifed material considerations for steel pipe																							4		8	4
40" or 48" depth of cover in agricultural areas, sour gas pipelines					1																				3	3
Mains in public ROW must have 36 in cover, 30 in cover			1																						2	2
Services in public ROW must have 30 in cover, all services must have 18 in cover			1																						2	2
Interstate Pipelines including services must have > 24 in cover			1																						2	2
Requires gas pipelines to cross over rather than under for interfering facilities, installation requirements for continous bedding and avoiding kinking and permanent bending, steel pipe installation restirctions to limit gouges		1																					3		5	3
All Regulators including service regulators must be vented outside, breather type vents on service regulators above flooding potential, vents require weather proof heads with cross sectional area specified																							2		3	2
Service Regulators cannot supply more than 2 psig to customers, service regulators to be inspected upon meter changeout, service regulators must be 3 ft from source ignition																							1		4	3
Service Regulators cannot be direct buried																									1	1
Specified separation from buried electric lines (12 inch, 8 inch), 48 inch separation for sour gas, 12" separation or other precautions for plastic (some states 6" separation)		1	1		2					1										1	1				12	11
Trans. Rqmts apply to all pipe >125 psi in class 3 or 4, all pipelines must meet Class 3 or 4 requirements, all transmission lines must be classified as Class 3 or 4 regardless of location, all sour gas pipelines designed to Class 4 (0.40 factor)			1		1																				4	4
Mains with MAOP > 200 psig or 125 psig or 250 psig) must meet enhanced design, construction and maintenance requirements		2	1																		1				5	4
Inlet **AND** outlet valves at distribution regulator stations or specified distances from the station, vault design requirements					1																		1		7	6
Adequate over pressure protection required at town border stations and district regulating stations including if pre 1971 installation, District Reg Station Fencing Requirements, Vault Requirements																									3	2
More Specific Farm Tap Requirments																									1	1
Device must be installed for monitoring and indicating failure of operating regulator within Over Pressure Protection System																							1		2	2
Directional Drilling requirements, construction requirements to avoid gas/air explosive mixture																				1			1		3	3
Identification of facilities required: multiservice installations, meters, district regulator stations, above ground installations																									2	1
Telemetry required at regulator stations serving specified quantity of customers																				1			1		2	2
Casings prohibited on metal pipelines, casing requirements preventing shearing, GI-91/0285 Guidelines for Pipelines Crossing Rails and Highways when no casing is used																							3		4	2
Does not allow gas lines, haz liq lines under buildings, no concealed copper services and fitting restictions on copper services																							2		4	3
Location restrictions for higher-pressure systems, pipelines must consider overhead electric transmission influence, easements of has liquid pipeline must be clear of all encroached structures					1																1		1		4	4

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Expanded Incorporation By Reference for Acceptable Engineering Standards: NFPA54, NBS Method of Gas Testing, NBS Testing Lg Cap Rot Meters, AGA No.3 Orifice Metering, WV Short Course on Practical Methods, National Association of Corrosion Engineers International Standard NACE MR0175/ISO 15156, 2004-2007						1								1											3	3
No buried galvanized or aluminum pipe																									2	2
Service Lines install by external contractors must be certified to meet State Requirments																									1	1
Written Emergency Plan must have provisions for installation and blasting that include PPE for workers and knowledge of state damage prev laws																									1	1
Specific Design Requirements for Pipe Type Holders and Bottle Holders																									7	1
Specifies restoration of agricultural land after installation occurs, protective coating of steel services when boring through rocky soils																							1		2	2
New Master Meter Operator System must be reviewed/certified by LDC																									1	1
Risk-based approaches																									***11***	
Inline inspections required to reveal cross bore of sewer laterals																				1					2	2
Base line and trending of cast iron and bares steel, non hazardous leaks																				2					2	1
Operators required to perform integrity assessments of entire line section, temporary and permanent repairs based on inspections to reveal defects, gouges, dents or leaks, requires operator determination of plant replacement based on operator inspections						1											2						1		4	3
Annual eval of bare/cast		1																							3	3
Enhanced Record Keeping																									***86***	
OQ must cross reference with O&M and Emergency Plan																									1	1
Maintain Records of Abandon Mains or facilities after a given date		1																							3	3
More stringent data elements such as Test Pressures, Duration of Strength Test, Date, Description of Facilities, retention of pressure charts, testing services in equivalent manner as mains with associated records		1				1								1							1			1	8	8
Regulator & Relief Valve Calcs required of all OPP devices					1																				2	2
All Records must be kept InState or accessible instate		1				1								1		1									5	5
Odorometer Records must be kept for specified duration, odorant records include sampling and odorant quantities used																					1				4	4
Leak Survey Records or Leak Investigation Records required for longer than 5 years,			1																		1				8	8
Lifetime Records requirement for all Public Outreach			1																						1	1
Lifetime Records requirement for Corrosion Control of all Pipelines																					1				4	3
Lifetime Records requirement for Strength Testing of all Pipelines			1		1																1				6	6
Lifetime Records requirement for Welding of all Pipelines, Welding Records must be at job site																									2	2
All Key Valves or Critical Valves must be identified on Records/Maps					2																				4	3
Enhanced Corrosion Records such as documentation of corrosion areas, active corrosion, schedules of placement of cathodic protection devices, maps and records of cathodic protection devices																	3								6	4
Enhanced Meter Record Details Required (Capacity, Purchase Date, Type, Location, Pressure Rating, Accuracy Etc.)														2										1	5	4
Maintain Calibration Records and Identification of Equipment for specified duration			1																		1		1		3	3
Leak Progression Maps must be updated and maintained																									1	1
Investigate and Maintain Records of all Leaks as Failures, detailed leak reporting including cause, Records shall be kept as to leak complaints and remediation of leaks																							1		4	4
review requirements																				2					2	1
GPS Coordinates required to be taken on exposed main, tees, valves, etc..																									1	1
Detailed Mapping Requirements						1					1		1	1					1					1	16	11
Inactive Services																									***15***	
Requirement to cut inactive services off at main during demolition					1																				2	2
period		1									1		1	1					1	1			1		13	12
State Inspection Programs																									***52***	
Ability to Use Outside Consultants for State led inspections when necessary, State to maintain GIS database of haz liquid pipeline operators and historical activities																									3	3
Inspections focused by risk					◙					1						1					1				5	5
More frequent inspections/ contact/detailed audits	1	1	1	1	1	1			1	1	1		1	1		1	1		1	1	1	1	1	1	44	44
																									1154	
Number of State Initiatives	3	46	51	8	63	17	0	8	8	9	10	0	18	23	0	11	30	0	8	31	57	5	69	12	1154	

◙ Status Uncertain - please contact each State Individually for determination