





"What Will Happen Next?" Pipeline Safety Reauthorization and PHMSA Priorities

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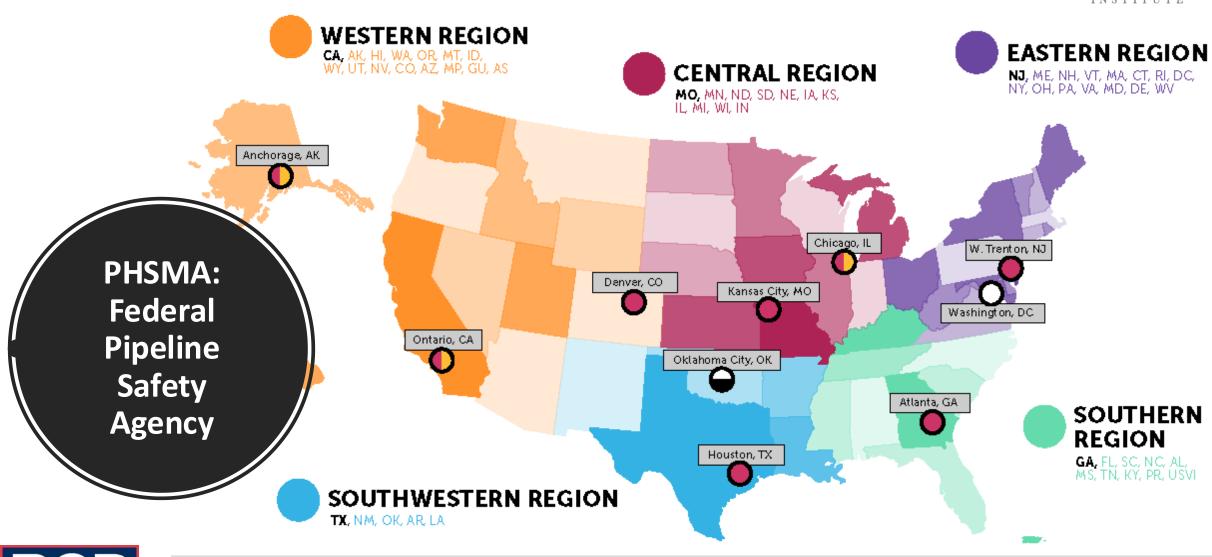
Agenda



- □ About PHMSA
- □ Changes at PHMSA
- □ PHMSA Advisory Bulletins
- Rulemakings and Priorities
- □ NTSB Investigations and Reports
- □ Pipeline Safety Reauthorization 2025
- □ Voluntary Information Sharing

















PHMSA Regulatory Scope



Includes:

- □ Design of new / repaired pipelines
- □ Construction of new / repaired pipelines
- ☐ Testing of new / repaired pipelines
- □ Operations of existing pipelines
- □ Emergency Response of existing pipelines

- □ Maintenance / Inspection / Integrity Assessment/ Repair
- □ Corrosion Control of existing pipelines
- □ Qualification / Training of OMER personnel
- □ Drug & Alcohol Testing of OMER personnel
- □ Reporting of new / existing pipelines

Doesn't Include:

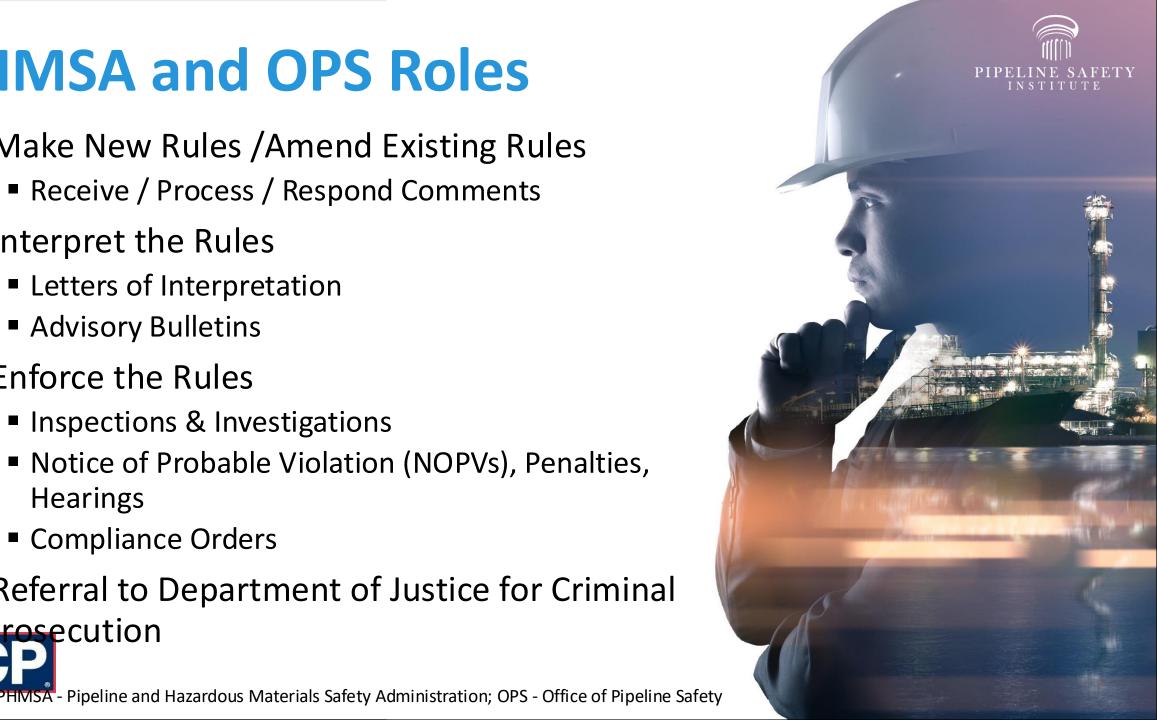
- □ Commercial tariffs (Federal Energy Regulatory Commission FERC)
- □ ROW (Right of Way) agreements



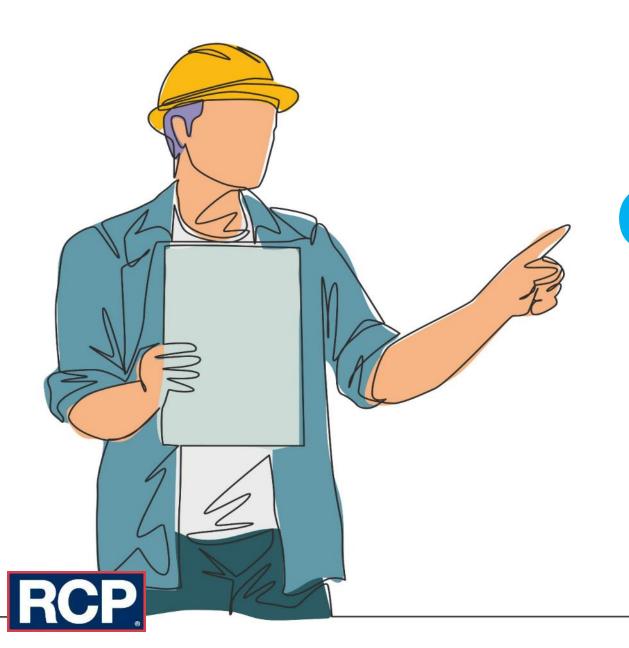
□ Pipeline siting

PHMSA and **OPS** Roles

- □ Make New Rules /Amend Existing Rules
 - Receive / Process / Respond Comments
- ☐ Interpret the Rules
 - Letters of Interpretation
 - Advisory Bulletins
- □ Enforce the Rules
 - Inspections & Investigations
 - Notice of Probable Violation (NOPVs), Penalties, Hearings
 - Compliance Orders
- □ Referral to Department of Justice for Criminal Prosecution







Changes at PHMSA

A New Administration with New Priorities PIPEL



Trump 47: Focus on Deregulatory Activities

- "Ensuring Lawful Governance and Implementation of the President's
 'DOGE' Deregulatory Agenda" (Executive Order 14219, February 19, 2025).
- "Unleashing Prosperity through Deregulation" (Executive Order 14192, January 31, 2025) "10-to-1".
- □ DOT RFI: "Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs" published April 3, 2025.
- Proposed Name Change: Gulf of Mexico to Gulf of America published May 20, 2025.



Personnel Changes at PHMSA



- Secretary of Transportation Sean Duffy, Confirmed
- PHMSA Administrator Paul Roberti, Confirmed
- PHMSA Deputy Administrator Ben Kochman, Confirmed
- □ PHMSA Chief Counsel **Keith Coyle**, *Confirmed*
- PHMSA Director of Governmental, International, and Public Affairs - Emily Wong, Confirmed





PHMSA Actions



- Launched new website for interpretation comments.
 - More stakeholder input & transparency.
- Streamlining the special permit process.
- □ Shifting enforcement focus away from minor/non-safety issues.
- Accelerating the GPAC process.
- Issuing more early-stage rulemaking notices (ANPRMs).
 - To better define risk & scope.
- □ Goal: Act faster, reduce waste, and complete agency priorities.



Administration is Focused on Deregulation



- Unconstitutional
- □ Unlawful Delegation
- □ Poor Reading of Underlying Statute
- Unauthorized Social / Political / Economic Impact
- □ Significant Costs
- □ Impedes Technology
- Impedes Private Enterprise
- Cost Reduction

- □ Ineffective
- Outdated
- Poor Performing
- □ Siting / Permitting Barriers
- Unnecessary Info Collection
- Simplify
- Outdated Technology
- □ Poor Methodology in Rulemaking





PHMSA Advisory

Bulletins





Recent PHMSA Safety Advisory Bulletins



ADB 2025-01 – *Pipeline Safety: Pipeline Safety Management System*, Published March 25, 2025.

- Fulfills a Congressional mandate from Section 205 of the PIPES Act of 2020.
- Addresses a Safety Recommendation from the NTSB.





ADB 2025-01 - PSMS



PHMSA encourages regulated pipeline owners and operators to:

- □ Implement a PSMS program and ensure that the program covers all essential elements of an effective PSMS, such as those in API RP 1173.
- Ensure the PSMS program continually evolves and improves.
- Maintain a positive safety culture that continually promotes diligence throughout the operator's organization and addresses issues that can erode the safety culture.
- Encourages of adoption of PSMS as a voluntary exercise.



ADB 2025-01 - PSMS



- □ Reflected findings in PHMSA's August 2024 Report to Congress:
 - 289 operators whose leadership have committed to implementing a PSMS operate 86% of all gas distribution pipeline mileage.
 - Most larger operators reported their PSMS efforts to be "on track" for completion.
- Per PHMSA's August 2024 Report to Congress, the weakest PSMS elements for process maturity were:
 - Safety Assurance (Element 6)
 - Management Review & Continuous Improvement (Element 7)



Recent PHMSA Safety Advisory Bulletins



ADB 2024-01 Pipeline Safety: Identification and Evaluation of Potential Hard Spots— In-line Inspection (ILI) Tools and Analysis

Published October 18, 2024

- □ Hard spots could affect multiple pipelines manufactured prior to 1970.
- □ PHMSA recommends the use of magnetic flux leakage (MFL) ILI tools and following best practices for ILI data analysis.
- □ Unaddressed hard spots may contribute to Coating degradation, Soil chemistry interaction and Hydrogen-induced cracking.
- □ Pipeline owners and operators should expand hard spot threat evaluations to all pre-1970 pipelines, regardless of manufacturer.





Rulemakings and Priorities





PHMSA PIPES Act Web Chart



You may access the document from the following link:

https://www.phmsa.dot.gov/legislative-mandates/pipes-act-web-chart

PIPES ACT 2020 WEB CHART														
Rule Title/Subject/Docket No.	RIN	Rule Stage	Legislation	Description of Work Plan	Rulemaking Timeline (*actual date)		OST Date for Completing Review (45 days)	Date(s) Sent back to PHMSA	Date(s) Sent Back to OST	Current Staff PHMSA/OST Allocation **	Resource Constraints Affecting Process in PHMSA/ OST	OMB Date for Completing Review (90 days) (reginfo.gov)	Additional Details Affecting Rulemaking	Additional Comments on Rulemaking Status
OPS: Gas Pipeline Leak Detection	2137- AF51	Final Rule	PIPES Act 2020 Sec 113	Complete Final Rule	To OST To OMB FR Pub	TBD TBD TBD				PHMSA: 2 staff OST: 1 staff	YES		meetings May 5-6, 2021, and February 17, 2022.	NPRM published in the Federal Register [88 FR 31890] on 5/18/2023. GPAC meeting held week of November 27, 2023. Additional GPAC meeting held week of March 25th. Unpublished Final Rule withdrawn from the Federal Register for review pursuant to the regulatory freeze issued by the White House on January 20, 2025.
OPS: Safety of Gas Distribution Pipelines	2137- AF53	NPRM	PIPES Act 2020; Leonel Rondon Act Sec 202, 203, 204, and 206	Hold GPAC meeting	To OST To OMB FR Pub	2/14/23* 4/18/23* 9/7/23*	4/10/23	2/27/23 3/15/23	3/14/23 3/21/23	PHMSA: 8 staff OST: 5 staff	YES	7/18/2023		The NPRM published in the FR on 9/7/2023. Comment period closed 11/6/2023. PHMSA is planning GPAC meeting.
OPS: Amendments to Liquefied Natural Gas Facilities	2137- AF45	NPRM	PIPES Act 2016 Sec 27; PIPES Act 2020 Sec 110	Complete NPRM	To OST To OMB FR Pub	12/29/25 2/16/26 6/1/26				PHMSA: 8 staff OST: 5 staff	YES			ANPRM published on 5/5/25. Comment period ended 7/7/25. PHMSA is reviewing over 7000 comments received on the ANPRM.



PHMSA Inspection Priorities



- □ PHMSA Memo dated July 17, 2025 on Inspection and Enforcement Priorities
 - "... By focusing OPS's inspection and enforcement priorities on areas that provide the greatest positive impact to pipeline safety, OPS will be better positioned to fulfill its statutory mission and avoid wasting valuable resources on efforts that produce minimal benefits or that are based on unduly broad, novel, or strained application of the pipeline safety laws or regulations."
 - "... State authorities with certifications to regulate the safety of intrastate pipeline facilities are encouraged to follow these inspection and enforcement priorities in implementing their pipeline safety programs. State authorities with agreements to perform inspections and investigations on behalf of PHMSA should follow these priorities to the same extent as OPS staff."



PHMSA Inspection Priorities



- □ Priority 1: Incidents and Accidents
- □ Priority 2: High and Moderate Consequence Areas
- Priority 3: Control Room Management and Leak Detection
- Priority 4: Damage Prevention and Public Awareness Programs
- □ Priority 5: Transactions and Due Diligence

https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2025-07/PHMSA%20OPS%20Inspection%20and%20Enforcement%20Priorities%20Memo.pdf







Investigations and Reports

NTSB Investigations and Reports



- ☐ The National Transportation Safety Board is active
- □ Currently 9 open investigations
- □ NTSB Findings and Recommendations affect Pipeline Safety Regulations
- Investigations

https://www.ntsb.gov/investigations/Pages/Investigations.aspx

□ Reports

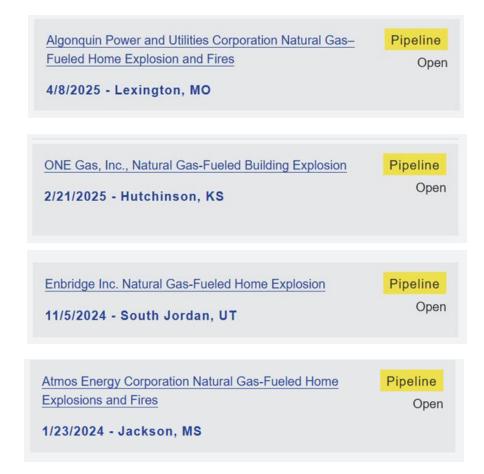
https://www.ntsb.gov/investigations/AccidentReports/Pages/Reports.aspx



NTSB Open Pipeline Safety Investigations



Nicor Gas Natural Gas-Fueled House Explosion and Fire Pipeline Open 6/11/2025 - Crestwood, IL Pipeline Atmos Energy Natural Gas-Fueled Home Explosion Open 12/1/2024 - Avondale, LA Baltimore Gas and Electric Natural Gas-Fueled Home Pipeline **Explosion** Open 8/10/2024 - Bel Air, MD Uncontrolled Release of Natural Gas from an Underground Pipeline Storage Well Open 5/7/2024 - Bienville, LA





NTSB Investigation Final Reports (Recent)



Third Coast Infrastructure LLC Crude Oil Release

PDF

No location available.

Accident Date: 11/14/2023 **Report Date:** 6/12/2025

Report Number: PIR-25-02

UGI Corporation Natural Gas-Fueled Explosion and Fire



West Reading, PA

Accident Date: 3/23/2023 **Report Date:** 3/17/2025

Report Number: PIR-25-01

Marathon Pipe Line LLC Pipeline Rupture and Crude Oil



Edwardsville, IL

Release

Accident Date: 3/10/2022 **Report Date:** 12/17/2023

Report Number: PIR-23-02

Kinder Morgan, Inc. Natural Gas-Fueled Explosion and Fire



Coolidge, AZ

Accident Date: 8/14/2021 **Report Date:** 4/26/2023

Report Number: PIR-23-01

Enbridge Inc. Natural Gas Transmission Pipeline Rupture and



Danville, KY

Fire

 Accident Date:
 7/31/2019

 Report Date:
 8/14/2022

Report Number: PIR-22-02

Atmos Energy Corporation Natural Gas–Fueled Explosion
During Routine Maintenance



Farmersville, TX

 Accident Date:
 6/27/2021

 Report Date:
 10/18/2022

Report Number: PIR-22-03

Enbridge Inc. Natural Gas Pipeline Rupture



Hillsboro, KY

Accident Date: 5/3/2022 **Report Date:** 5/30/2022

Report Number: PIR-22-01



Enbridge Inc. Natural Gas—Fueled Building Explosion



5/27/2024 - Youngstown, OH

NTSB Investigation in Reading, Pennsylvania PIPELINE



Incident Date: March 24, 2023

Location: R.M. Palmer Company, Building 2

Event: Natural gas-fueled explosion and fire City: West Reading, Pennsylvania

Key Safety Issues Identified

- Degradation of a retired service tee
- Inadequate threat evaluation to pipeline integrity
- □ Unmarked private pipelines crossing public rights-of-way (e.g., streets)
- Delayed evacuation despite detection of natural gas

- Ineffective safety messaging that may not reach all public members
- □ Lack of guidance on gas leak emergency procedures
- No natural gas detection alarms in commercial buildings
- ☐ Limited accessibility of gas distribution line valves



NTSB Recommendations to PHMSA



- 1) Advisory Bulletin on Plastic Assets (P-25-1), encourage operators to:
 - □ Conduct a one-time inventory of plastic assets exposed to or at risk of elevated temperatures.
 - Identify such assets during maintenance and new construction.
 - □ Evaluate and mitigate risks of degradation.
- 2) Advisory Bulletin on Aldyl A Service Tees (P-25-2), following the March 24, 2023, incident in West Reading, Pennsylvania:
 - Advise operators to address risks tied to Aldyl A service tees with Delrin inserts.
 - □ Recommend replacement or remediation actions.



NTSB Recommendations to PHMSA



3) Improve Public Awareness (P-25-3)

- □ Identify effective ways for operators to communicate with the public in areas covered by the gas distribution system.
- □ Develop and implement plans to increase awareness of natural gas safety.





NTSB Recommendations to AGA



- □ NTSB recommended that the American Gas Association share the details of this accident with its members, encouraging them to evaluate the effectiveness of their public awareness programs and to promote the installation of natural gas alarms.
- □ NTSB recommended that the Gas Piping Technology Committee develop guidance to ensure natural gas pipeline operators' DIMPs appropriately assess and address threats to plastic pipelines from nearby temperature-elevating assets (25-9).





Pipeline Safety Reauthorization







Reauthorization for PHMSA in 2025



Primary Congressional Sub-Committees

□ US House of Representatives

- House Transportation & Infrastructure Railroads, Pipelines and HazMat
 - Chair Nehls (R-TX), Ranking Wilson (D-FL)
- House Energy & Commerce Energy, Climate and Grid Security
 - Chair Duncan (R-SC), Ranking Degette (D-CO)

□ US Senate

- Commerce, Science, & Transportation Surface Trans., Maritime, Freight and Ports
 - Chair Klobuchar (D-MN), Thune (R-SD)

Pipeline Safety Reauthorization 2025



On February 25th, the House Transportation and Infrastructure Subcommittee on Railroads, Pipelines, and Hazardous Materials held a <u>hearing</u> titled: "Promoting and Improving Safety and Efficient Pipeline Infrastructure".

The hearing focused on legislative priorities for reauthorizing the Pipeline and Hazardous Materials Safety Administration (PHMSA)

- Last Congress, the committee passed H.R. 6494: Promoting Innovation in Pipeline Efficiency and Safety (PIPES) Act of 2023.
- □ The House Energy and Commerce Subcommittee on Energy must agree with the House Transportation and Infrastructure Subcommittee on one common House Bill.



Pipeline Safety Reauthorization 2025



 On May 15th, Senate Commerce, Science and Transportation Subcommittee on Surface Transportation, Freight, Pipelines and Safety held a <u>hearing</u> titled:

"Pipeline Safety Reauthorization: Ensuring the Safe and Efficient Movement of American Energy".

Key Hearing Topics

- Regulatory reform
- Emerging technologies
- Safety enforcement
- Threats to pipeline infrastructure

Witnesses included representatives from:

- American Petroleum Institute (API)
- Liquid Energy Pipeline Association
- American Gas Association (AGA)
- Pipeline Safety Trust



Highlights from Previous Acts



- Pipeline Safety Improvement Act of 2002
- □ Pipeline Inspection, Protection, Enforcement and Safety Act of 2006
- Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011
- Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2016
- Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020



PIPES Act 2020

Major mandates or authority changes:

- □ Leak Detection and Repair (LDAR) rule.
- □ Innovative technology and operational practices evaluations.
- Mandate to define "Idle".
- □ Enhance distribution integrity (Merrimack).
- □ Study the implementation of PSMS and report on recommendations.





Pipeline Safety, Modernization, and Expansion Act of 2024*



Key items in the draft document:

- \square CO₂ regulation enhancement and extension into gaseous transportation.
- Establish "Worker Safety Zones".
- Clarity to the previous Act regarding the applicability of LDAR to "Natural Gas".
- Prevent imposition of terms in a Special Permit approval that do not address a known safety risk for the regulation under consideration for waiver.
- Revisit the MAOP reconfirmation as related to previously tested pipelines.
- Separate the "Testing Technology" program from SP requirements in part.
- Establish and implement a process for Voluntary Information Sharing (VIS).



Pipeline Safety, Modernization, and Expansion Act of 2024*



Key items in the draft document (Continued...):

- □ LNG Center for Excellence and working group (FERC,DOE, OSHA, Coast Guard)
- Hydrogen GAO to study a variety of hydrogen blending issues.
- □ Finalize the Class Location change rule.
- Numerous changes to damage prevention (e.g. tickets, exemptions, white line, etc.)
- Add "impairment of operation" and "attempting" to damage a pipeline as criminal acts prosecutable by DOJ.
- Prohibit states/municipalities from banning products transported in regulated pipelines.
- Allow risk-based inspections of breakout tank bottoms.







Voluntary Information Sharing

VIS Work Group



- □ PIPES Act of 2016
- Provide independent recommendations on the need for an information-sharing system among pipeline owners and operators, including ways to encourage exchange of inspection feedback, best practices for protecting proprietary and security-sensitive data, options for secure systems that safeguard proprietary information while advancing inspection technologies and risk analysis, and identification of regulatory, funding, and legal barriers
- 2019 Report recommended enhanced collaboration through voluntary information sharing







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