Wyoming Pipelines

I. Introduction

This document provides an overview of hydrocarbon pipeline regulation in Wyoming and covers regulations from the wellhead through the midstream distribution network and up to the interstate transportation pipeline system. This document does not focus on downstream pipelines, also known as local distribution pipelines, which deliver hydrocarbons to their final, metered point of sale.

The United States’ pipeline system is made up of more than 2.6 million miles of pipeline.

Pipelines provide significant transportation resources for the purpose of gathering, processing and delivering hydrocarbons to end markets across the United States. Pipeline operations within the United States have become relatively seamless and are considered the safest way to transport hydrocarbons from the point of production to the end consumer.

Although rare, pipeline incidents can present significant risks to populated areas and the environment. Complexities associated with pipeline infrastructures often make it hard for landowners, local governments and regulators to understand the multijurisdictional implications of pipeline management and how to respond to pipeline incidents.

This document is intended to be a resource for the public, local governments, regulators, and those who are regulated to gain a broader understanding of the scope of regulatory oversight at various points in the pipeline system.

A. Hydrocarbons

Hydrocarbons follow four general industry segments along their route to market: upstream exploration and production, midstream gathering and processing, downstream transmission, and end-use distribution.

(1) The upstream segment includes exploration and production (E&P), well drilling, hydraulic fracturing and well completion activities.
(2) The midstream gathering and processing (G&P) segment collects hydrocarbons - starting at a meter point near the well site, and then transports unrefined, raw product to processing plants where they convert raw hydrocarbons into marketable compounds such as natural gas or natural gas liquids.

(3) The downstream segment includes transmission and storage of marketable products. These products are transported by contract for the owner of the product and usually cross multi-state jurisdictions. Compressor stations, meter stations, mainline valves and smaller facilities support the transmission system.

(4) The distribution segment includes end-use markets which sell or deliver the product to the final consumer through local distribution companies or a gas utility company.

B. Types of Pipelines

Pipelines are one of the safest, most cost effective ways to transport products among the different hydrocarbon industry segments. Although the unusually high volume of product transported by pipeline and the extensive saturation of pipelines into our nation’s infrastructure would imply a higher degree of environmental and safety incidents (pipelines move nearly two-thirds of petroleum products in the United States, and nearly all natural gas), in reality, the opposite is true. Pipelines result in fewer spillage incidents and personal injuries than road and rail transportation. North Americans are more likely to be killed by a lightning strike than to be involved in a pipeline accident.

**Liquid pipelines** transport crude oil or natural gas liquids (NGLs) from producing fields to refineries, where they are turned into gasoline, diesel, and other petroleum products.

**Natural gas pipelines** transport gas from wells to processing plants, and then to distribution systems that take the natural gas directly to homes and businesses.

Pipeline infrastructures can be broken down into four main categories: (1) in-field production, or gathering pipelines; (2) intrastate pipelines; (3) interstate transmission pipelines; and (4) distribution pipelines.

1. **In-Field Production or Gathering Lines** gather raw hydrocarbons from the wellhead or point of production. These pipelines combine and deliver the gathered raw product to larger pipelines. Gathering lines run relatively short distances, are smaller in diameter, and operate at lower pressures. (Gathering lines are 2 to 24 inches in diameter and operate at pressures from negative (vacuum or suction) to 1,000 pounds per square inch (psi).) Gathering lines typically are built of high quality, carbon steel and to a specific industry standard. This standard defines the minimum standards of quality for the construction of onshore carbon steel pipelines.

2. **Intrastate Pipelines** operate within single state borders and link producers to local markets and to the interstate pipeline network. Although an intrastate pipeline system is defined as one that operates totally within one state, an intrastate pipeline company may have operations in more
than one state. As long as these operations are separate and do not physically interconnect, they are considered intrastate, and are not jurisdictional to the Federal Energy Regulatory Commission (FERC). *(Source US Energy Information Administration (EIA).)* If an intrastate line touches federal lands, it is subject to the same procedures and requirements as an interstate line, including the National Environmental Policy Act (NEPA) process, including: Wildlife, cultural, environmental, and economic studies, among others; Public hearings; Review of proposed alternatives; and Federal approval before construction. The Wyoming Public Service Commission (PSC) has regulatory safety jurisdiction over any “intrastate gas pipeline facility” as defined under the Pipeline Inspection, Protection Enforcement, and Safety Act of 2006 (49 USC § 60101, et seq., as amended) and W.S. 37-2-131. The Wyoming PSC also imposes a civil penalty for violation of the federal Natural Gas Pipeline Safety Act of 1968 (W.S. 37-2-128).

3. **Interstate Pipelines** cross multistate jurisdictions and are regulated at the federal level. Two-thirds of the lower 48 States are almost totally dependent upon the interstate pipeline system for their supplies of natural gas. In many instances, natural gas must be routed through several interstate pipeline systems before it reaches its final destination. The interstate portion of national natural gas pipeline network represents about 71 percent of all natural gas mainline transmission mileage installed in the United States. *(EIA)* Interstate pipelines are made of high-strength, large-diameter steel pipe (range in diameter from 6 to 48 inches and operate at pressures from 100 to 1,440 psi).

4. **Distribution Pipelines** sell or deliver pure natural gas or other finished products into and through a city, town, or rural area to individual end users (residential, commercial, etc.) through local distribution companies or a gas utility company. They generally are 12 inches in diameter or less and generally operate at a pressure less than 50 pounds per square inch (Some exceptions do exist. For example: some distribution pipelines operate at pressures up to 300 psi and can be 24 inches in diameter).
C. **Components of an Interstate Pipeline**

1. **Compressor stations.** Natural gas is transported at high pressure using compression (300-1440 psi). To maintain this pressure throughout the length of the pipelines, compressor stations are located approximately every 60 miles along the line. Compressor stations are made up of large turbines, motors or engines pressurize the gas and move it through the pipeline.

2. **Meter Stations.** Meter stations are considered to be the “city gate” of a pipeline and are the point where a distribution company receives the gas from the transmission pipeline. Meter stations measure the flow of the gas into the local utility, which then reduces the operating pressure for local sale and distribution.

3. **Mainline Valves.** A mainline valve is a shut-off device installed in the transmission pipeline to stop the flow of gas as needed. Some valves are manually operated, while others are either automatic or operated by remote control. These valves are located every 5 to 20 miles along the pipeline and are subject to regular inspection.

4. **Pipeline Markers.** Pipeline markers alert excavators of the presence of pipelines within an easement. Markers contain the name of the operator and emergency contact information. Markers are located near road, rail, fence, water crossings and curbs. Markers do not necessarily represent the exact location of the pipeline facilities within the easement.

D. **National Pipeline Mapping System**

Information about all pipelines operating in a community can be found by accessing the National Pipeline Mapping System (NPMS) on the Internet at [www.npms.phmsa.dot.gov](http://www.npms.phmsa.dot.gov). NPMS provides the public access to pipeline maps, along with product and operator contact information.
E. Gathering Line Construction Standards

Gathering lines are constructed using pipeline industry codes, standards and recommended practices to ensure safe operations and protection for the public and the environment. This emphasis on safe design, construction, operation and maintenance of pipelines is governed by documents that present industry accepted guidelines such as:

- The United States Department of Transportation (DOT) regulations
- The American Society of Mechanical Engineers (ASME) standards
- The U.S. Department of Labor Occupational Safety and Health Administration (OSHA) regulations

New onshore pipelines are designed and fabricated to comply with the latest revision of all applicable federal, state and local codes, standards and regulations, except as modified to be more stringent by individual companies. Codes and standards include, but are not limited to:

- API Spec 5L, “API Specification For Line Pipe”
- API Spec 6D, “API Specification For Pipeline Valves”
- ANSI B16.5, “Steel Pipe Flanges and Flanged Fittings”
- ASME B31.8, “Gas Transmission and Distribution Piping Systems”
- API Standard 1104, “Welding of Pipelines and Related Facilities”
- ASME Section IX, “Qualification Standard for Welding and Brazing Procedures, Welders, Brazers, and Welding and Brazing Operators”
- DOT Pipeline Safety Regulations Part 192, “Transportation of Natural and Other Gas by Pipeline: Minimum Standards”
- DOT Pipeline Safety Regulations Part 195, “Transportation of Hazardous Liquids by Pipeline”
- National Fire Protection Association (NFPA) Standards
- National Association of Corrosion Engineers (NACE) SP0169 Control of External Corrosion on Underground or Submerged Metallic Piping Systems

F. Storage

Natural gas may be stored in inventory underground under pressure. Underground natural gas storage can be used to effectively balance a variable market with a nearly constant supply of natural gas provided by the pipeline system. Storage fields are the warehouses that give a ready supply of natural gas that can serve a market with high peak demands in warm or cold weather. There are three types of natural gas storage facilities: depleted reservoirs in oil and/or gas fields, aquifers, and salt cavern formations.

Most existing gas storage in the United States is in depleted natural gas or oil fields that are close to consumption centers. Conversion of a field from production to storage duty takes advantage of existing wells, gathering systems, and pipeline connections. The principal owners/operators of
underground storage facilities are interstate pipeline companies intrastate pipeline companies, local distribution companies (LDCs), and independent storage service providers. In the past, LDCs have generally used underground storage exclusively to serve customer needs directly. However, some LDCs have both recognized and been able to pursue opportunities for additional revenues available with the deregulation of underground storage. There are about 120 entities that currently operate the nearly 400 active underground storage facilities in the lower 48 states. In Wyoming, currently there are nine natural gas storage fields (eight depleted reservoirs and one aquifer), of which five are regulated by FERC and four which are regulated by the Wyoming PSC.
G. History of Pipelines in Wyoming

Wyoming’s first crude oil pipeline was constructed in 1911. Currently, there are approximately 100 companies operating over 38,600 miles of pipelines (does not include all gathering lines) in Wyoming carrying crude oil, natural gas or petroleum products. Petroleum pipelines are located in all of the state’s 23 counties. (Source: Petroleum Association of Wyoming (PAW).) (Map Source: Wyoming Pipeline Authority)

Wyoming is located in the US Energy Information Administration’s Central Region for interstate pipelines. The Central Region produces more gas than it consumes and is considered a net exporter of natural gas.

H. History of Pipeline Regulation in the United States

I. WYOMING SPECIFIC ISSUES

1. Easements

Transmission pipelines normally follow well-defined easements and often share the same corridor with other utility lines. Easements vary in width, but generally are anywhere from 50 to 175 feet depending on the number of pipelines and terrain. Multiple pipelines are normally located within the same pipeline easement.

After a pipeline project is announced, a land agent from the pipeline company directly contacts landowners to begin negotiations to acquire necessary land rights across their property. Land rights to be negotiated may include an easement (which provides the company a permanent right to construct, operate and maintain the pipeline and appurtenant facilities), access rights, and temporary workspace (used only during the construction phase). Easements may also include language to protect landowners and their property, such as reclamation to pre-existing conditions, specific seeding requirements, required repairs to fences, roads, or other property features, etc. Abandonment language is not always included but can be added to state how the line is to be abandoned, such as abandoned in place and the terms agreed to for leaving it in place, or removal and subsequent reclamation.

The amount offered to secure these land rights is based on standard practices used in the appraisal industry to determine a fair market value for the easement or other land rights (See W.S. §1-26-704 for Wyoming’s definition of Fair Market Value). At the start of negotiations landowners are provided information that describes how the offer is derived. Landowners are encouraged to review the information, consult with an appraiser or attorney if they desire, and provide the land agent any supporting material that should be considered.

Companies generally attempt to negotiate land rights with each landowner along the route in a fair and equitable manner to reach a cooperative settlement that considers the needs of both parties. If a negotiated settlement is not possible, land rights may be acquired through use of eminent domain – often referred to as condemnation. Companies are required to attempt to reach a negotiated agreement with landowners prior to exercising any rights of eminent domain. Exercise of eminent domain is not a preferred practice in the natural gas industry. Negotiated settlements are the most common form of land use agreement for all companies.

2. Innocent Landowner Statute

Wyoming Statute 35-11-1801 protects landowners from liability in the event of accidents, spills or other impacts potentially caused by the presence of pipelines on their property so long as the landowner does not cause or contribute to the source of contamination.

3. Orphan Pipelines

If a leak were to occur in a pipeline with no clear ownership, or if the owner is unavailable or no longer in business, the Wyoming Department of Environmental Quality (DEQ) determines if the pipeline is eligible for funding under the agency’s Orphan Site program under its Solid and Hazardous Waste Division. Sites identified under the Orphan Site program are, and have been, prioritized on the basis of risk and are addressed as funds are made available to the program.
II. Regulatory Framework

Relevant regulations covering liquid and natural gas pipelines fall into three principal categories:

(1) Environmental protection and location,
(2) Pipeline safety, and
(3) Worker safety.

Wyoming’s pipelines are regulated to protect public health, safety, and the environment by a host of federal and state agencies

Depending on the type of product being handled and the location/function of the particular pipeline (e.g., gathering vs. transmission), pipelines and associated facilities are subject to regulation by the following agencies and programs:

- US Bureau of Land Management (BLM)
- US Department of Transportation, Pipeline & Hazardous Materials Safety Admin. (PHMSA)
- Federal Energy Regulatory Commission (FERC)
- US Environmental Protection Agency (EPA)
- US Army Corps of Engineers (USACE)
- US Occupational Safety/Health Admin. (OSHA)
- Wyoming Oil and Gas Conservation Commission (WOGCC)
- Wyoming Department of Environmental Quality (DEQ)
- Wyoming Office of State Lands and Investments (OSLI)
- Wyoming Public Service Commission (PSC)
- Wyoming Department of Workforce Services, OSHA Division (W-OSHA)

A. Federal Agencies with Pipeline Regulatory Oversight

1. The National Environmental Policy Act

All federal agencies are responsible for complying with all National Environmental Policy Act (NEPA) requirements whenever federal funding is involved or a federal permit is issued. Agencies are required to conduct an initial Environmental Assessment (EA) to determine whether or not they subsequently must develop an Environmental Impact Statement (EIS), issue a Finding of No Significant Impact (FONSI), or implement a Categorical Exclusion (CatEx), depending on the impact the proposed activity may have on “the quality of the human environment.”

Environmental Assessment

An EA is a concise public document with three defined functions:

1. It briefly provides sufficient evidence and analysis for determining whether or not to prepare an EIS;
2. It aids an agency's compliance with NEPA when no EIS is necessary, i.e., it helps identify better alternatives and mitigation measures; and

3. It facilitates preparation of an EIS when one is necessary.

**Environmental Impact Statement**

An EIS is required by NEPA for any federal action which may have the result of "significantly affecting the quality of the human environment". An EIS provides a detailed analysis of the proposed federal action and generally is prepared for projects the proposing agency views as having significant prospective environmental impacts. An EIS provides a discussion of significant environmental impacts and reasonable alternatives (including a No Action alternative).

**Categorical Exclusion**

A CatEx can be applied to a proposed project if the activity has been studied adequately in the past and it has been determined the activity will have no significant impact on the environment, or if the project can be compared with different activities that statutes define as not having a significant impact. Once a project qualifies for a CatEx, agencies may implement the proposed activity without further environmental review.

**Finding of No Significant Impact**

A FONSI is issued when the environmental analysis and interagency review during the EA process determine the proposed project will have no significant impacts on the quality of the environment.

2. **United States Bureau of Land Management.**

The United States Bureau of Land Management (BLM) is a Federal Land Management Agency under the authority of the United States Department of the Interior which administers more than 247.3 million acres (1,001,000 km²) of public lands in the United States, including 17.5 million acres of public lands and 40.7 million acres of federal mineral estate in Wyoming.

The following is a list of requirements the BLM includes in all grants to build pipelines on BLM land.

- All design, material, and construction, operation, maintenance, and termination practices shall be in accordance with safe and proven engineering practices.

- The holder is prohibited from discharging oil or other pollutants into or upon the navigable waters of the United States, adjoining shorelines, or the waters of the contiguous zone in violation of Section 311 of the Clean Water Act as amended, 33 U.S.C. 1321, and the regulations issued there under, or applicable laws of the State(s) of Wyoming and regulations issued there under. Holder shall give immediate notice of any such discharge to the AO and such other Federal and State officials as are required by law to be given such notice.

- This grant or permit is issued subject to the holder's compliance with all applicable regulations contained in Title 43 Code of Federal Regulations parts 2800 and 2880.
• The holder shall inform the AO within 48 hours of any accidents on federal lands that require reporting to the Department of Transportation as required by 49 CFR Part 195.

• The holder shall comply with the Hazardous Materials Management Plan/Summary in the RMP ROD (Appendix 32) and/or the appropriate EIS ROD, including requirements to transport, store, utilize, and dispose of hazardous substances. The holder shall maintain a hazardous substances release contingency plan that shall include, among other things, provision to notify the BLM AO in the event of any release of hazardous substances associated with project operations.

3. US Department of Transportation, Pipeline and Hazardous Materials Safety Administration

Through the 1968 Natural Gas Act, the US Congress created the Office of Pipeline Safety (OPS) within the US Department of Transportation’s Research and Special Programs Administration. In 2005, Congress updated this authority and OPS was transferred to the newly created US Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). OPS is the main regulatory agency responsible for regulating (inspecting for compliance) the operation and maintenance of jurisdictional natural gas pipelines under 49 CFR Part 192. OPS inspects and enforces the pipeline safety regulations for interstate gas pipeline operators in Wyoming. OPS also inspects and enforces the pipeline safety regulations for interstate and intrastate hazardous liquid pipeline operators in Wyoming.

The rules governing pipeline safety are included in Title 49 of the Code of Federal Regulations (CFR), Parts 190-199. Through these regulations the agency establishes minimum pipeline safety standards and has overall regulatory responsibility for hazardous liquid and gas pipelines under its jurisdiction in the United States. These regulations address pipe manufacturing, construction techniques, operating procedures, training, and more.

4. Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC also reviews proposals to build liquefied natural gas (LNG) terminals and interstate natural gas pipelines. As part of that responsibility, FERC:

Regulates the transmission and sale of natural gas for resale in interstate commerce; regulates the transportation of oil by pipeline in interstate commerce; approves the siting and abandonment of interstate natural gas pipelines and storage facilities; and ensures the safe operation and reliability of proposed and operating LNG terminals.

USDOT regulates and rigorously inspects the following types of transmission pipelines and facilities in Wyoming:

• Interstate natural gas lines
• Most crude oil lines
• Refined product lines
• Natural gas liquid lines
• Carbon dioxide lines
• Non-rural crude oil gathering lines
• Liquefied natural gas facilities associated with gas processing plants
Interstate pipelines are required to obtain federal approval and permits from FERC by way of a “certificate of public convenience and necessity” prior to construction, operation and decommissioning and abandonment of interstate pipelines. Almost all applications to FERC for interstate natural gas pipeline projects require some level of coordination with one or more additional federal agencies. For example, the EPA assists FERC and/or State authorities in determining if the environmental aspects of a pipeline development project meet acceptable guidelines. FERC is also required to take the lead on the environmental reviews under the National Environmental Policy Act, the Endangered Species Act, the National Historic Preservation Act, and the Magnuson-Stevens Act.

FERC has authority to require compliance with health and safety laws through its mandated certificates of authority and enforces its regulatory requirements through imposition of civil penalties and other means as it oversees environmental matters related to natural gas projects and administers accounting and financial reporting regulations and conduct of regulated companies. FERC, however, is not a surface management agency and thereby does not have a mechanism to requires companies to seek a bond to comply with FERC regulations.

5. US Environmental Protection Agency

The US Environmental Protection Agency (EPA) maintains an overreaching mission to “protect human health and environment.” Its specific role in regulating pipelines focuses on accident prevention and emergency management. In particular, the agency focuses on oil spills and their potential impact to the environment. (For a full list of statutes and regulations impacting the EPA’s role in emergency management see http://www.epa.gov/emergencies/lawsregs.htm.) The EPA, however, is considering increased regulation over natural gas pipelines under the Clean Air Act to restrict methane leakage from natural gas transmission pipelines.

The EPA and OSHA also regulate Breakout Tanks in conjunction with PHMSA based on a determination on how the tanks are used. Tanks defined as Breakout Tanks are involved with the Transmission of Hazardous Liquids and are regulated by DOT. Other tanks can be a combination of DOT and/or EPA.

**Breakout Tanks.** According to PHMSA, a Breakout Tank is defined as a tank used to: a. relieve pressure surges in a hazardous liquid pipeline system, or, b. receive and store hazardous liquid transported by a pipeline for reinjection and continued transportation by pipeline.

A Multi-jurisdictional Tank, on the other hand, applies to a tankage facility that has both terminal and breakout tanks. This type of facility is subject to the dual jurisdiction of both EPA and DOT. (Year 2000 Memo of Understanding (MOU) between DOT & EPA: http://phmsa.dot.gov/pv_obj_cache/pv_obj_id_E0366134D9699CA41DC049118DC88B62E3A70900 /filename/2000_DOT_EPA.pdf)
6. United States Army Corps of Engineers

The United States Army Corps of Engineers (USACE), is a federal agency under the United States Department of Defense with statutory authority to regulate “any work in, on, over or under navigable waters of the United States, or which affects the course, location, condition or capacity of such waters,” (Section 10 of the Rivers and Harbors Act of 1899). In 1972, amendments to the Federal Water Pollution Control Act added what is commonly called Section 404 authority (33 U.S.C. 1344) to the program which regulates the discharge of dredged or fill material into waters of the United States.

Federal permits issued by the USACE include:

- **Section 404 individual permit**
  - An Individual 404 permit is required when applicants cannot meet the requirements of the Nationwide permit program. Reasons an applicant may not meet these requirements include:
    - 1) Level of impact – Nationwide permits have volume or acreage constraints;
    - 2) Presence of endangered species (which requires a Section 7 Consultation between the USACE and United States Fish and Wildlife Service) or,
    - 3) Presence of eligible cultural resources (which requires consultation between USACE and the State Historic Preservation Office).

- **Section 10 permit** – required for activities that impact navigable waters on a jurisdictional boundary (such as the Snake River where it crosses between the states of Idaho and Wyoming)

- **Nationwide permit program**. Some Nationwide permits have pre-notification requirements and generally require the state to sign off on a Section 401 Water Quality Certification (if the state is unwilling or unable to issue this permit, the project is then required to obtain an individual permit).

7. Occupational Health and Safety Administration

The Occupational Health and Safety Administration (OSHA) is part of the United States Department of Labor and was created to assure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance. OSHA covers most private sector employers and their workers in all 50 states, the District of Columbia, and other US jurisdictions either directly through federal OSHA or through an OSHA-approved state program. State Plans are OSHA-approved job safety and health programs operated by individual states instead of federal OSHA. Section 18 of the OSH Act encourages states to develop and operate their own job safety and health programs and precludes state enforcement of OSHA standards unless the state has an OSHA-approved program.

OSHA approves and monitors all State Plans and provides as much as fifty percent of the funding for each program. State-run safety and health programs must be at least as effective (ALAE) as the federal OSHA program. Federal OSHA provides coverage to certain workers specifically excluded from a State
Plan, for example, those in some states who work in maritime industries or on military bases. To find the contact information of the federal OSHA or State Plan office nearest to you, call 1-800-321-OSHA or go to www.osha.gov.

Wyoming is one of 22 states that have developed an OSHA-approved State Plans that cover both private and public sector workers.

OSHA Regulation of Pipelines

OSHA’s authority is limited by Section 4(b)(1) of the Occupational Safety and Health Act, which precludes OSHA from regulating working conditions over which other federal agencies “exercise statutory authority to prescribe or enforce standards or regulations affecting occupational safety or health.” 29 U.S.C. 653(b)(1). OSHA’s authority to address occupational safety and health hazards associated with oil and gas pipelines is controlled by the scope and nature of regulations enforced by the U.S. Department of Transportation, Office of Pipeline Safety (OPS). In practice, unless the specific pipelines are exempted from coverage under OPS regulations, OSHA authority over working conditions associated with oil and gas pipelines generally is limited to employers (e.g., contractors hired by pipeline owners or operators) and their workers, who are not covered by OPS regulations. See, e.g., Columbia Gas of Pennsylvania v. Marshall, 636 F.2d 913 (3d Cir. 1980); Texas Eastern Transmission Corp., 1975 WL 21706 (OSHRC, Docket Nos. 4078 and 4091, October 28, 1975).

B. State Agencies with Pipeline Regulatory Oversight

1. Wyoming Department of Environmental Quality (DEQ) (307) 777-7781

Safety and integrity of pipelines goes hand-in-hand with protection of the environment. The Wyoming Department of Environmental Quality (DEQ) regulates and permits the various activities of pipelines that affect the environment.

- DEQ regulates the reporting and cleanup of releases from pipelines.
- DEQ regulates and permits the discharge of hydrostatic test waste water from pipelines.
- DEQ regulates and permits the disposal of hazardous waste including waste resulting from construction, operation and maintenance of pipelines.
- DEQ’s Air Quality Division regulates and permits engines used by a pipeline for potential emissions. DEQ also regulates the creation of airborne dust resulting from pipeline construction and maintenance activities pursuant to regulations for general emission standards.
- DEQ regulates and forbids the discharge of any kind of liquids that can contaminate or threaten to contaminate the waters of the state.
- DEQ regulates storm water runoff and, during pipeline construction, requires monthly inspections of disturbances greater than 1 acre to ensure any erosion issues are addressed and surface areas are reclaimed and re-vegetated.
2. Wyoming Oil and Gas Conservation Commission

The Wyoming Oil and Gas Conservation Commission (WOGCC) has authority over in-field production and gathering lines, which includes authority to promulgate rules to prevent “waste,” including spills (W.S. § 30-5-104(v)), and can impose specific site reclamation rules (Chapter 4 § 15). Pipelines are required to operate “with due regard for the preservation and conservation of the property and for the health and safety of the employees and people residing in close proximity to those operations.” (Chapter 3, § 4(a)).

3. Wyoming Office of State Lands and Investments (OSLI)

The Office of State Lands and Investments is the administrative arm of the Board of Land Commissioners which was constitutionally created to manage state trust lands for the benefit of the trust beneficiaries. OLSI’s responsibilities include the direction, control, leasing, and disposal of state trust lands. One aspect of the management of the state trust lands is the granting of easements, temporary use permits, or special use leases for pipelines and pipeline related activities on state trust lands. As a land management agency, OSLI does not have regulatory authority over the pipelines. Instead, as a landowner, OSLI has the authority to require various land protective measures related to the installation of pipelines such as surface impact payments, bonding, and reclamation. The requirements related to these types of activities can be found in the Board of Land Commissioners Rules.

4. Wyoming Public Service Commission

PHMSA’s authorizing statutes provide for state assumption of all, or part of, the intrastate regulatory and enforcement responsibility through annual “certification agreements.” Through certification by OPS, the Facility Engineering Section of the Wyoming Public Service Commission (PSC) inspects and enforces pipeline safety regulations for intrastate gas pipeline operators in Wyoming. Operator compliance with state and federal pipeline safety regulations is monitored through a comprehensive inspection and enforcement program. The program is made up of field inspections of operations, maintenance, and construction activities; programmatic inspections of operator procedures, processes, and records; incident investigations and corrective actions; and through direct dialogue with operator management. The PSC works in partnership with PHMSA to assure pipeline operators are meeting requirements for safe, reliable, and environmentally sound operation of their facilities. These data are reported annually as part of the state's annual pipeline safety program certification or agreement to PHMSA. Information on enforcement actions taken by PHMSA is available at the Pipeline Safety Enforcement Program homepage.

Wyoming State Statute 37-1-103 (a) empowers the Public Service Commission (PSC) to certain entitlements regarding public utilities which include oil and natural gas pipelines. A public utility (as defined in W.S. 37-1-101 (vi)(G) and PSC Rules and Regulations, Chapter 2, Section 202 (b)(c)) means and includes every person that owns, operates, leases, controls or has power to operate, lease or control any plant, property or equipment for the transportation or conveyance to or for the public of oil or gas by pipeline, or any plant, property, or equipment, used for the purpose of transporting, selling or furnishing natural gas to any consumer or consumers within the state of Wyoming for industrial, commercial or residential use. Exceptions apply to any such plant, property or equipment used for any of the following purposes:
a. *For the transportation or sale of natural gas within or between oil and gas fields or potential oil and gas fields for residential, commercial, industrial or other use reasonably necessary in the exploration, development or operation of the field;*

b. *For drilling, producing, re-pressuring, or other oil or gas field operations;*

c. *For operation of natural gas processing plants;*

d. *For the sale of natural gas by the producer to a consumer for use in industrial or commercial plants or establishments of any kind or nature.*

The PSC implements its authority over gas utilities according to PSC rules and regulations defined in Chapter 4, Section 417, ‘All pipelines and pipeline facilities for the transportation of gas within the State of Wyoming shall conform with and be subject to all the provisions of Sections 191.1 through and including 191.19 and 192.3 through and including 192.753, and all appendixes incorporated therein, of the Federal Minimum Safety Standards promulgated by the United States Department of Transportation by dictate of the Natural Gas Pipeline Safety Act of 1968, which standards appear in Part 191 and 192 of Title 49 of the Code of Federal Regulations as published in the Federal Register on August 19, 1970 (35 C.F.R. 13247).’

5. **Wyoming Department of Workforce Services, OSHA Division**

The **Wyoming Department of Workforce Services, OSHA Division** (W-OSHA) implements the OSHA-approved state plan by providing for the administration of rules and regulations aimed at the prevention of accidents and occupational diseases, as well as offers a variety of educational tools for all industries, businesses, employees and associations. Wyoming Safety-OSHA also offers free consultation services to employers who want to meet OSHA standards.

As an extension of OSHA, W-OSHA’s authority is limited by Section 4(b)(1) of the Occupational Safety and Health Act, which precludes OSHA from regulating working conditions over which other federal agencies "exercise statutory authority to prescribe or enforce standards or regulations affecting occupational safety or health." 29 U.S.C. 653(b)(1). W-OSHA’s authority to address occupational safety and health hazards associated with oil and gas pipelines is controlled by the scope and nature of regulations enforced by the U.S. Department of Transportation, Office of Pipeline Safety (OPS). In practice, unless the specific pipelines are exempted from coverage under OPS regulations, W-OSHA authority over working conditions associated with oil and gas pipelines generally is limited to employers (e.g., contractors hired by pipeline owners or operators) and their workers, who are not covered by OPS regulations. See, e.g., *Columbia Gas of Pennsylvania v. Marshall*, 636 F.2d 913 (3d Cir. 1980); *Texas Eastern Transmission Corp.*, 1975 WL 21706 (OSHRC, Docket Nos. 4078 and 4091, October 28, 1975).

C. **Environmental Regulation (State & Federal)**

1. **Spill/release/leak reporting and response**

Prompt reporting of spills/releases/leaks is required to a variety of government agencies, depending upon the type, quantity, and location/affected media of the spill/release:

**State & local** – Chapter IV of DEQ’s water quality regulations cover the state’s spill reporting, containment and cleanup requirements. They can be found at [http://soswy.state.wy.us/Rules/RULES/553.pdf](http://soswy.state.wy.us/Rules/RULES/553.pdf).
Example release reporting matrices are provided in Appendices B-1 and B-2, delineating how an operator complies with the levels of required reporting to relevant regulatory and emergency response entities.

WOGCC’s Pipeline Release Response Procedure is presented in Appendix C.

Federal – releases of hydrocarbon liquids to water or other pollutants above federal Reportable Quantities must be reported to the National Response Center; significant incidents, accidents resulting in explosions or fires, and releases of greater than 5 gallons or more generally must be reported to PHMSA.

- The PHMSA and WYPSC reporting and response process is presented in Appendix D.

Response and cleanup obligations are mandated under both state and federal regulations:
- State requirements and regulations for hydrocarbon releases, commensurate with the applicable state agency (e.g. DEQ, WOGCC or PSC).
- Federal requirements and regulations for hydrocarbon releases and releases of other materials (Clean Water Act, Oil Pollution Act, CERCLA), as well as emergency response training requirements.

2. Air quality

- Both EPA and DEQ regulate air emissions associated with certain facilities under the federal Clean Air Act and Wyoming’s Environmental Quality Act, WS 35-11-101 et seq.

- Direct federal regulation of equipment/activities (EPA):
  - New Source Performance Standards (NSPS) regulate emissions from specific processes and equipment; require emissions control and reduction practices.
  - National Emission Standards for Hazardous Air Pollutants (NESHAP) regulate emissions of HAPs, applying Maximum Achievable Control Technology (MACT) standards.

- Direct state regulation of equipment/activities in Wyoming (DEQ):
  - Emission controls or operation requirements for condensate tanks, dehydrators, pneumatic valves, RICE engines, and flares. Etc.

Air quality construction and operating permits for facilities and equipment.

- State air permitting requirements govern regulation of “major and minor sources.”
  - Permits incorporate specific state regulatory requirements to reduce air emissions.
  - Impose Reasonably Available Control Technology (RACT) requirements on existing sources under special conditions or in non-attainment areas.

- Federal Title V Operating Permits apply to “major sources.”
  - Title V permits incorporate all applicable federal regulations to manage and reduce air emissions, and also include monitoring, record keeping, and reporting requirements.

- Federal Prevention of Significant Deterioration (PSD) permits for new/modified “major sources.”
- Impose Best Available Control Technology (BACT) for new construction or modifications to permits in attainment areas, and RACT and Lowest Available Emission Rate (LAER) in non-attainment areas.

3. Water quality and waste management

Spill containment – Spill Prevention, Control, and Countermeasure (SPCC) plans address spill preparedness, response, containment structures (CDOL).

- The plans, designed to prevent or contain releases of hydrocarbons, apply to liquids holding tanks in the field, at compressor stations, and at natural gas processing plants.

- National Pollutant Discharge Elimination System (NPDES) permits regulate discharges to surface waters, and the stormwater pollution prevention program mitigates stormwater impacts (CDPHE).

- Facilities with direct water discharges must hold and comply with NPDES permits, and as applicable hold stormwater plans where stormwater permits are required.

Underground Injection Control (UIC wells) regulations and permitting.

- Regulates and permits proper disposal underground of certain appropriate oil and gas hydrocarbon and water wastes pursuant to EPA regulatory requirements.

Wetlands protection – Clean Water Act § 404 permit requirements govern pipeline construction and facility siting (USACE).

Landfill disposal requirements and waste management regulations/permitting.

4. Emissions Reporting

Toxic Substances Control Act, the Emergency Planning and Community Right to Know Act, and the Superfund Amendments and Reauthorization Act (Title III) contain requirements for air pollutants; federal greenhouse gas reporting requirements (Subpart W); state/federal release reporting; state emissions reporting (APEN forms).
Wyoming Release Reporting Decision Tree: Immediate Notification

**Note:** Any release “discharged” into an impervious secondary containment structure, and is completely contained and recovered without discharge to environmental media is not subject to external reporting.

- **Release Reported to Hot Line:**
  - YES: Natural Gas (including Propane and/or Butane)
  - YES: Fire, Explosion, Injury or other Major Incident
  - YES: Immediate notice to: LEPC, SERC/WEMA
  - **NO:**
    - YES: DOT Jurisdiction?
      - YES: Go to DOT Reporting Criteria Next Page
      - NO: Immediate means "within 24 hours" unless otherwise noticed

- **Refined Oil Products:**
  - Lubricants or any other products refined from crude oil
  - **Note:** Oil means oil or lubricant of any kind. Anything that will cause a sheen on water.

- **Refined Oil Products:**
  - Amine/DEA RQ = 100 lbs
  - DEA is in limited use at WY Facilities. Confirm or See MDEA Reporting Criteria
  - DEA Confirmed
  - **NO:**
    - **YES:** Methanol
      - RQ = 5,000 lbs 759 gals
      - **NO:**
        - YES: Amine/MDEA?
          - **YES:**
            - Ethylene Glycol RQ = 5,000 lbs 539 Gals
            - **NO:**
              - **YES:**
                - Glycol Diethylene, Propylene
                - **NO:**
                  - **YES:**
                    - Triethylene Glycol (TEG)
                    - **NO:**
                      - **YES:**
                        - Mercury RQ = 1 lb
                        - **NO:**
                          - **YES:**
                            - Caustic Soda, Sulfuric Acid RQ = 1,000 lbs 57 Gals
                            - **NO:**
                              - **YES:**
                                - Any substance not listed
                                - **NO:**
                                  - **YES:**
                                    - No Further Action Required
                                    - **YES:**
                                      - Call: WOGCC if at a wellsite (Pipeline Release)

**Any threat to groundwater or surface water call:**
- WDEQ, SERC/WEMA, and LEPC. If sheen on surface water call: NRC
  - >10 bbls/420 Gal
    - **YES:**
      - Immediate means call: LEPC, WOGCC, WDEQ, SERC/WEMA.
    - **NO:**
      - **YES:**
        - Potential for off-site impact call: LEPC, WOGCC, WDEQ, SERC/WEMA
      - **NO:**
        - **YES:**
          - Methanol
          - RQ = 5,000 lbs 759 gals
          - **NO:**
            - **YES:**
              - Potential for off-site impact call: LEPC, SERC/WEMA

**Any release:**
- WOGCC if at a wellsite (Pipeline Release)
  - Any sheen on surface water call NRC.
  - Any entry into groundwater call: WDEQ, LEPC, SERC/WEMA
  - Any volume with fire or major consequence call: LEPC, WOGCC
  - Any volume with fire or major consequence call: LEPC, SERC/WEMA

- **Any entry into groundwater call:**
  - LEPC, SERC/WEMA. Any sheen on surface water call NRC.
  - Any threat to groundwater or surface water call: WDEQ, LEPC, SERC/WEMA. Any sheen on surface water call NRC.
  - Any threat to groundwater or surface water call: WDEQ, LEPC, SERC/WEMA. Any sheen on surface water call NRC.

**Any threat to ground or surface water call:**
- SERC/WEMA, WDEQ, LEPC
  - Any threat to ground or surface water call: WDEQ, LEPC, SERC/WEMA.
  - Immediate means: call: WDEQ, LEPC, SERC/WEMA. Any sheen on surface water call NRC.

**Notes:**
- **Majors Incident:** (Undefined by Wyoming) Fire, Explosion, Injury requiring Hospitalization, Any Media Event, Property loss of >$50,000
- **Note:** Oil means oil or lubricant of any kind. Anything that will cause a sheen on water.
- **Note:** If RQ call: NRC, WDEQ, SERC/WEMA, and LEPC. If sheen on surface water call: NRC.
- **Adjust amt. released if mixed with water.**

**Contact Information:**
- WDEQ: 307-777-7781 (24 hrs)
- LEPC: See Local County
- SERC/WEMA: 307-777-7761 (after hrs)
- WOGCC: 7147 (8 hrs), 4900 (8 hrs), 7781 (24 hrs)
Wyoming Release Reporting Decision Tree: DOT Reporting Criteria

Do not review this matrix unless it has been reported that the facility or pipeline is in DOT jurisdiction and product released is natural gas or HVLs.

Note: Loss/Damage Est. > $50,000 call NRC within 1 hour

*Death of any person, personal injury necessitating hospitalization, estimated property damage including cost of cleanup and recover, value of product lost, and damage to the property of the operator or others, or both exceeding $50,000.

**Except that no report is required for a release of less than 5 BBLs resulting from pipeline maintenance activities if the release is:
1. Not otherwise reportable per the matrix,
2. Confined to company property or pipeline right-of-way and cleaned up promptly.

**DOT Criteria met from previous page

**Natural Gas or Hazardous Liquid release from pipeline

* Death, Injury requiring hospitalization

Explosion or fire not intentionally set by operator

HVLs any sheen on a waterway

Property Damage

**Haz Liquid or HVL release of 5 Gallons or

**Release from maintenance activity

**Less than 5 BBL's

**Judgement of Company to report

Report within 2 hours to: OPS, NRC, OSHA, WPSC

Report within 2 hours to: OPS, NRC, WPSC

Report within 1 hour to: OPS, NRC, WPSC

Report within 1 hour to: OPS, NRC, WPSC

Report within 1 hour to: OPS, NRC, WPSC

Report within 1 hour to: OPS, NRC, WPSC
III. Safety

A. Pipeline Safety

1. General framework

Pipeline safety is governed by federal law – Federal statutes and regulations, CFR 49 Parts 190 – 199, prescribe comprehensive pipeline safety standards for the pipeline transportation of natural gas and hazardous liquids.

**Interstate vs. intrastate pipelines, gas vs. liquid** – PHMSA has exclusive jurisdiction over all aspects of *interstate* transmission pipeline safety. For *intrastate* natural gas or hazardous liquids transmission and gathering pipelines, jurisdiction may be delegated to the states pursuant to a certification agreement between the U.S. Department of Transportation and the state.

In Wyoming:
- PHMSA directly regulates all *intrastate* hazardous liquid pipelines (including regulated rural gathering) and all *interstate* natural gas and hazardous liquid pipelines.
- PSC regulates all *intrastate* natural gas transmission, distribution, and gathering pipelines, pursuant to CRS § 40-2-115(1.5).

**Federal preemption** – Under federal law, states that assume jurisdiction may not adopt additional safety standards that are incompatible with the minimum federal safety standards.

2. Pipeline Safety Regulations

Federal regulations prescribe comprehensive minimum safety requirements for the transportation of gas and hazardous liquids by pipeline. See 49 CFR Parts 191 and 192 (gas) and Part 195 (hazardous liquids). Specifically, these regulations govern:

- Pipe materials and design, design of pipeline components, welding and other methods of joining, construction requirements, customer meters and service lines, corrosion control, testing, uprating, operations, maintenance, personnel qualifications, and integrity management.
- This risk-based regulatory regime recognizes that pipelines located in populated areas, environmentally sensitive areas and High Consequence Areas (HCAs) require more stringent safety standards and practices than pipelines located in largely unpopulated rural areas.
- As a result of these requirements, transmission pipeline operations are generally remotely monitored and controlled continuously, have extensive leak detection and back-up systems (for example, automate shutdown systems), and conduct regularly scheduled inspections to monitor internal and external corrosion, third party damage, or construction/manufacturing issues.
- Gas distribution systems are also subject to risk-based regulations, and operators have distribution integrity management plans that address the major threats to their systems. Most new gas services are installed with an excess flow valve that will shut off the flow of gas if the service is broken.

The federal 2011 Pipeline Safety Act directed PHMSA to study and make recommendations regarding the existing regulatory framework for gathering pipelines.

- Gathering line is defined as:
- Gas - a pipeline that transports gas from a current production facility to a transmission line or main.
- Liquid - a pipeline 219.1 mm (8 5/8 in) or less nominal outside diameter that transports petroleum from a production facility.

For natural gas, Part 192 applies to all transmission pipelines, but is applied differently to the two general classes of gathering pipelines:

- **Non-rural** gathering pipelines (located in Class 2, 3 and 4 areas; see below) are subject to all transmission pipeline regulatory requirements except integrity management.
- **Rural** gathering pipelines (located in Class 1 areas) are not regulated under the federal standards.

This classification system for gas gathering pipelines considers:

(a) The type of material (metallic or non-metallic) and designed pressure rating of the pipe itself, and
(b) The “class” location of the pipeline, which is based upon the proximity of the gathering pipeline to buildings intended for human occupancy (class locations range from Class 1 (very rural) to Class 4 (urban)).

Pipeline operators annually survey development activity in and around pipeline locations in order to identify changes in class categories. If development around a rural Class 1 location causes a change in class category, additional safety regulation requirements are triggered.

For hazardous liquid, Part 195 applies to all non-rural pipelines, but is applied differently to the two general classes of rural pipelines:

- **Regulated rural** gathering pipelines meeting all of the following criteria:
  - Diameter from 6.625” to 8.625”
  - Located within ¼ mile of an unusually sensitive area (“USA”)
  - Operates above 20% SMYS
- **Low stress** pipelines: pipelines operating below 20% specified minimum yield strength (SMYS)
  - Category 1 (integrity management applies) – located within ½ mile of USA and larger than 8.625” diameter
  - Category 2 (integrity management applies) – located within ½ mile of USA (less than 8.625” diameter)
  - Category 3 – all other pipelines, no integrity management program (IMP) required.

3. **High Consequence Areas (HCAs) and Unusually Sensitive Areas (USAs)**

Under both Part 192 and Part 195, PHMSA requires pipeline operators to identify locations along a pipeline route where a pipeline release could have the most significant adverse consequences to human health and safety and the environment. Additional regulatory requirements apply to these areas as part of an operator’s integrity management program.

- Gas transmission pipelines – HCAs are identified solely on the density of population within a certain distance of the pipeline which correlates to the area potentially impacted by a breach or failure. The distance is determined based on the physical and operational characteristics of the
pipeline. A large, high pressure pipeline will have a larger area of impact than a smaller, low pressure pipeline.

- Liquid pipelines – HCAs/USAs are identified based upon the proximity of the pipeline to drinking water sources and unusually sensitive ecological resources, and where the pipeline passes through an area of high population density.

4. Wyoming 811 – “Call Before You Dig” regulation

The biggest threat to the safety and integrity of pipelines and other underground facilities in the United States and Wyoming is the striking of pipelines by third party excavations. As a result, nearly 2/3 of fatalities involving pipelines are due to damage from outside forces.

811 is governed by both federal and state law.

While pipelines are generally well-marked to prevent damage from digging, and the public can find pipeline location information using the National Pipeline Mapping System, the 811 program is the primary means by which pipeline accidents can be prevented.

- One-Call centers provide a free service to assist in marking the location of underground pipelines, as well as buried cable, telephone, electric and other utilities.

- Dial 8-1-1 to be connected to the One-Call center in your area.

- One-Call systems require 48-72 hours’ notice prior to the start of excavation activities.

How Does One-Call Work?

- Excavators telephone One-Call before digging starts. The excavator completes a locate request ticket to have all utilities located with paint and/or flags at the proposed dig site.

- A "locate request call" sets the following process in motion:

  1. Operators with underground facilities in the vicinity of the planned excavation are notified by One-Call.

  2. Operator crews or their subcontractors either mark their underground facilities or tell the excavator they have no lines in the area.

B. Worker Safety

1. Process Safety Management (OSHA) (see 29 CFR 1910.119)

- Unexpected releases of toxic, reactive, or flammable liquids and gases in processes involving highly hazardous chemicals have been reported for various industries that use chemicals with
such properties. Regardless of the industry that uses these highly hazardous chemicals, there is a potential for an accidental release any time they are not properly controlled.

- To help ensure safe and healthful workplaces, OSHA has issued the Process Safety Management of Highly Hazardous Chemicals standard at 29 CFR 1910.119, which contains requirements for the management of hazards associated with processes using highly hazardous chemicals.
- Process Safety Management (PSM) is addressed in specific standards for the general and construction industries. OSHA's standard emphasizes the management of hazards associated with highly hazardous chemicals and establishes a comprehensive management program that integrates three broad dimensions:
  - Facilities that manufacture and handle hazardous materials,
  - Technology of the processes employed, and
  - Personnel who operate, maintain, and support the process.

2. Risk Management Plans (EPA-administered, see Clean Air Act Amendments of 1990, § 112(r))

- The Clean Air Act Amendments of 1990 required the U.S. EPA to promulgate regulations and guidance for chemical accident prevention at facilities that use extremely hazardous substances. The Risk Management Plan (RMP) rule builds upon existing industry codes and standards, and requires companies of all sizes that use certain flammable and toxic substances to develop and submit to the EPA an RMP that includes:
  - (1) A hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases;
  - (2) A prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and
  - (3) An emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies should an accident occur.

3. Equipment and Activity Safety Standards (OSHA)

- Governs construction safety, trenching and shoring, personnel protective equipment, fall protection, hearing protection, hazardous materials training and protection, etc.

C. Emergency Local Response

1. Coordination with Local Emergency Response Agencies

During a pipeline emergency, actions taken by local emergency responders are critical to protecting lives, property and the environment. Pipeline operators, therefore, meet regularly with local emergency responders and participate in regular (sometimes annual) emergency management exercises to ensure effective collaboration and coordination in the unlikely event of an emergency. These activities are spelled out in written emergency plans and standard processes which are required and regulated by the U.S. Department of Transportation.

Local emergency response agencies include: fire departments, law enforcement, public safety and emergency planning and management.
D. What I should do if I find a leak? *(Source Pipeline 101)*

Despite industry’s best efforts and government oversight, leaks from pipelines do sometimes happen. Pipeline operators have multiple ways to detect leaks, from computer based leak detection systems to regular patrols of the pipeline right-of-way, and detect most pipeline ruptures themselves. Pipeline control rooms monitor safety indicators like changes in pressure, flow and volume along the pipeline, using sophisticated systems with many inputs. Control room personnel are trained to shut down a pipeline at the first sign of a leak and contact emergency responders.

The best ways for you to detect a spill in your neighborhood is to use your senses of **sight**, **smell** and **sound**. You may have a leak if:

- You see dead discolored vegetation that is otherwise green along a pipeline 'right-of-way', or see pools of liquid not usually present along the pipeline 'right-of-way', or see cloud of vapor or mist not usually present along the pipeline 'right-of-way'.
- You smell an unusual odor or scent of petroleum along a pipeline 'right-of-way'.
- You hear an unusual hissing or roaring sound along a pipeline 'right-of-way'.

If you have detected the signs that a leak may have occurred, you should take the following actions:

- Leave the leak area immediately. Walk into the wind away from the possible hazardous fumes.
- Do not touch, breathe, or make contact with leaking liquids.
- Do not light a match, start an engine, use a wireless telephone, switch on/off light switches, or do anything that may create a spark.
- From a safe location, call 9-1-1 or your local emergency response number and the pipeline company. Call collect, if needed, and give your name, phone number, a description of the leak and its location.
- Warn others if you can do so safely.
- Do not drive into a leak or vapor cloud area.
- Notify the operator of the pipeline (it will be posted on a pipeline marker - markers -- these are signs, located at regular intervals, that include information about the transmission pipeline operator).

In Case of Emergency *(Source IPAA)*

Natural gas pipeline leaks are rare, but being able to recognize and respond to a suspected leak or rupture is an important part of living and working safely around underground pipelines. Your personal safety should be your first concern should you encounter any of these signs or conditions.

Signs of a natural gas pipeline RUPTURE:

- Loud roaring or explosive sound; OR
- Very large flames and loud roaring noise.

**Follow these steps:**

If there are no flames present:
• **Immediately evacuate the area**

• **Do not start or turn off motor vehicles or electrical equipment** (such as cell phones, pagers, two-way radios, or lights) as **this could cause the gas to ignite**

• Abandon any equipment being used in or near the area

• Move far enough away from the noise until you can have a normal conversation

• Discourage others from entering the area

• From this safe location, **call 911** or contact the local fire department or law enforcement and

• Notify the operator of the pipeline (it will be posted on a pipeline marker).

**If flames are present:**

• Move behind a structure that provides protection until there is a reduction in noise

• Plan a route away from the fire that offers shelter

• Driving away from the area is acceptable

• Move far enough away from the flames until you feel comfortable

• Discourage others from entering the area

• From this safe location, **call 911** or contact the local fire department or law enforcement and

• Notify the operator of the pipeline

Any one of these is a sign of a suspected natural gas pipeline **LEAK:**

• Whistling or hissing sound;

• Distinctive, strong odor, often compared to rotten eggs;

• Dense fog, mist or white cloud;

• Bubbling in water, ponds or creeks;

• Dust or dirt blowing up from the ground; or

• Discolored or dead vegetation above the pipeline right of way.

**Follow these steps:**

• **Carefully evacuate the immediate area** to where you can no longer hear, see or smell the gas

• Avoid introducing any sources of ignition in the area

• **Do not start or turn off motor vehicles or electrical equipment** (such as cell phones, pagers, two-way radios, or lights) as **this could cause a spark**

• Abandon any equipment being used in or near the area

• Avoid any open flames

• Discourage others from entering the area
• Call 911 or contact the local fire department or law enforcement from a safe location

• Notify the operator of the pipeline

Two important things to remember:

• Do not attempt to extinguish a natural gas fire

• Do not attempt to operate any pipeline valves or equipment

Natural Gas Pipeline Safety – It’s a Shared Responsibility *(Source IPAA)*

Serious accidents on interstate natural gas pipelines are rare. But when leaks or ruptures occur, they can cause significant harm to persons and property.

Pipeline safety is a responsibility shared among many people, including pipeline company personnel, the federal and state agencies that oversee natural gas pipelines, public safety officials and -- equally as important -- our neighbors who live and work near pipelines.

YOU are an integral part of the safe operation of natural gas pipelines.

If there is a pipeline in your community, you need to: 1) be informed of where the pipeline facilities are located; 2) be aware of activities around these facilities, especially anything that appears “out of the ordinary;” and 3) be responsive – know what action to take in the unlikely event of an emergency or the presence of unusual or suspicious activity.

Here’s how to be informed, aware and responsive:

• **Find out if a transmission pipeline is on or near your property**

• Check the pipeline mapping resources available through the Wyoming Pipeline Authority at [https://www.wyopipeline.com/web-based-interactive-map/](https://www.wyopipeline.com/web-based-interactive-map/).

• Look for pipeline markers -- these are signs, located at regular intervals, that include information about the transmission pipeline operator

• Read any mailings you receive from pipeline companies -- if you get them, this means there is a pipeline in your area.

• **Use the One-Call System before you do any type of excavation.**

• **Call 811 Before You Dig** so underground pipes and utilities are properly identified and marked.
• Excavate carefully around any pipeline facilities.

• Inform the One-Call System and pipeline operator of possible unmarked excavation or pipeline damage that may have been caused by digging.

  *Familiarize yourself with pipeline events and how to respond.*

• Report any unusual or suspicious activities in or around pipeline facilities by calling 911 and the pipeline operator, using the emergency number from a pipeline marker, brochure or other materials you have received.