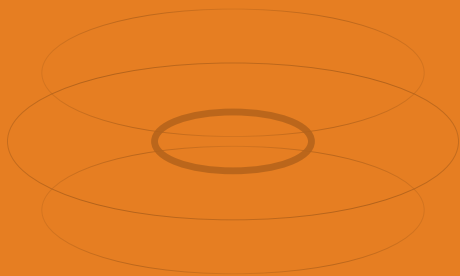


OWNER

Regulatory Applicability and Compliance Matrix



Document No.: [REDACTED] REG-RPT-001

Rev. A, Issued for Review

Date: September 29, 2026

Project: [REDACTED] [REDACTED]



TORUS

[REDACTED], [REDACTED] County, [REDACTED]

N O T I C E

This document was prepared by TORUS for the use of the client named on the cover, under the terms of the agreement between TORUS and the client. It reflects the information available and the scope agreed at the date of issue. Information supplied by the client or by vendors has been used as received unless this document states that it was checked. Codes, site data and vendor information change over time, and conclusions may need to be revisited when they do. A document that is not issued for construction, or that is not sealed where a seal is required, shall not be used for construction. Use of this document by anyone other than the client is at that party's own risk.



ISSUE SUMMARY AND APPROVAL

This page records each issue of REG-RPT-001. The preparer, reviewer and approver sign for each revision.

Rev.	Date	Issue purpose	Description
A	2026-09-29	Issued for Review	First issue

Contributors

Rev.	Discipline	Prepared by	Reviewed by	Approved by
A	Regulatory			

CONTENTS

1.	INTRODUCTION	1
1.1.	PURPOSE	1
1.2.	SCOPE AND EXCLUSIONS	1
2.	REFERENCES	2
2.1.	REGULATIONS AND STANDARDS	2
2.2.	PACKAGE DOCUMENTS	3
3.	SUMMARY OF CONCLUSIONS	4
4.	PIPELINE JURISDICTION AND THE GATHERING LINE DETERMINATION	6
4.1.	JURISDICTION	6
4.2.	THE 49 CFR 192.8 FRAMEWORK	6
4.3.	TYPE A, B, C AND R GATHERING (49 CFR 192.8(B) AND (C), 192.9)	7
4.4.	LIKELY OUTCOME AND BASIS DECISION	8
5.	49 CFR PART 192 SUBPART-BY-SUBPART COMPLIANCE MATRIX	9
5.1.	SUBPART A, GENERAL	9
5.2.	SUBPART B, MATERIALS	9
5.3.	SUBPART C, PIPE DESIGN	10
5.4.	SUBPART D, DESIGN OF PIPELINE COMPONENTS	10
5.5.	SUBPART E, WELDING OF STEEL	13
5.6.	SUBPART F, JOINING OF MATERIALS OTHER THAN BY WELDING	14
5.7.	SUBPART G, GENERAL CONSTRUCTION REQUIREMENTS FOR TRANSMISSION LINES AND MAINS	14
5.8.	SUBPART H, CUSTOMER METERS, SERVICE REGULATORS AND SERVICE LINES	15
5.9.	SUBPART I, REQUIREMENTS FOR CORROSION CONTROL	16
5.10.	SUBPART J, TEST REQUIREMENTS	17
5.11.	SUBPART K, UPRATING	18
5.12.	SUBPART L, OPERATIONS	18
5.13.	SUBPART M, MAINTENANCE	20
5.14.	SUBPART N, QUALIFICATION OF PIPELINE PERSONNEL	21
5.15.	SUBPART O, GAS TRANSMISSION PIPELINE INTEGRITY MANAGEMENT	21
5.16.	SUBPART P, GAS DISTRIBUTION PIPELINE INTEGRITY MANAGEMENT	22
6.	49 CFR PART 191 (REPORTING) AND PART 199 (DRUG AND ALCOHOL)	23
7.	, 165:20	24
8.	AIR QUALITY	25
8.1.	40 CFR 60 SUBPART OOOOB BY AFFECTED FACILITY	25
8.2.	40 CFR 60 SUBPART JJJJ AND 40 CFR 63 SUBPART ZZZZ, G-101	26
8.3.	OTHER FEDERAL AIR RULES (NON-APPLICABILITY SHOWN)	27
8.4.	40 CFR 98 SUBPART W	28
8.5.	DEQ, 252:100	28



9.	WATER, OIL AND WASTE	30
10.	OCCUPATIONAL SAFETY	31
11.	ELECTRICAL, FIRE, BUILDING, DAMAGE PREVENTION AND SECURITY	32
12.	REGULATORY OPEN ITEMS	34
13.	CONCLUSIONS AND NEXT STEPS	35

FIGURES AND TABLES

Table 2-1: Regulations and Standards	2
Table 2-2: Project Documents Cited.....	3
Table 3-1: Summary of Regulatory Conclusions.....	4
Table 4-1: Gathering Line Tests Under 49 CFR 192.8	6
Table 4-2: Regulated Gathering Line Types.....	7
Table 4-3: Likely Classification Outcomes	8
Table 5-1: Part 192 Subpart A, General	9
Table 5-2: Part 192 Subpart B, Materials	10
Table 5-3: Part 192 Subpart C, Pipe Design	10
Table 5-4: Part 192 Subpart D, Design of Pipeline Components	11
Table 5-5: Part 192 Subpart E, Welding of Steel.....	13
Table 5-6: Part 192 Subpart F, Joining of Materials Other Than by Welding	14
Table 5-7: Part 192 Subpart G, General Construction Requirements for Transmission Lines and Mains.....	14
Table 5-8: Part 192 Subpart H, Customer Meters, Service Regulators and Service Lines.....	15
Table 5-9: Part 192 Subpart I, Requirements for Corrosion Control.....	16
Table 5-10: Part 192 Subpart J, Test Requirements.....	17
Table 5-11: Part 192 Subpart K, Upgrading	18
Table 5-12: Part 192 Subpart L, Operations	18
Table 5-13: Part 192 Subpart M, Maintenance	20
Table 5-14: Part 192 Subpart N, Qualification of Pipeline Personnel.....	21
Table 5-15: Part 192 Subpart O, Gas Transmission Pipeline Integrity Management	21
Table 5-16: Part 192 Subpart P, Gas Distribution Pipeline Integrity Management	22
Table 6-1: Reporting and Drug and Alcohol Testing Requirements.....	23
Table 7-1: Requirements.....	24
Table 8-1: OOOOb Applicability by Affected Facility.....	25
Table 8-2: Engine Requirements for G-101	27
Table 8-3: Other Federal Air Rules Not Applicable	27
Table 8-4: Greenhouse Gas Reporting.....	28
Table 8-5: Air Quality Rules.....	28
Table 9-1: Water, Oil and Waste Requirements.....	30



Table 10-1: Occupational Safety Requirements 31

Table 11-1: Electrical, Fire, Building, Damage Prevention and Security Requirements..... 32

Table 12-1: Regulatory Open Items..... 34

1. INTRODUCTION

1.1. PURPOSE

This report identifies the federal and regulations that apply to the design, construction, testing, operation and maintenance of the (). For each requirement it states how the design complies and which project document carries the requirement, so that the Engineer of Record, the Owner's compliance staff and the Contractor can trace every obligation to a deliverable.

1.2. SCOPE AND EXCLUSIONS

The review covers the station from inlet insulating joint IJ-101 to outlet insulating joint IJ-102, and the Owner's outlet lateral from IJ-102 to the tap valve flange of (the receiving pipeline operator). The trunkline, the hot tap and the upstream lateral from the Owner's treating facility are excluded; the trunkline's regulatory status is the receiving pipeline operator's determination.

This is an engineering applicability review, not a legal opinion. Where the outcome depends on facts not yet known, the item is marked HOLD, using the project HOLDS of GEN-DB-001 and GEN-RPT-002 or a regulatory open item (RH) listed in Section 12. Clause numbers are cited where the rule text is well established; where a clause or threshold shall be confirmed against the current Code of Federal Regulations or Administrative Code before the construction issue, the entry is marked TBV.

2. REFERENCES

2.1. REGULATIONS AND STANDARDS

Table 2-1 lists the regulations and standards reviewed.

Table 2-1: Regulations and Standards

Citation	Title
49 CFR Part 191	Transportation of Natural and Other Gas by Pipeline; Annual, Incident and Other Reports; Safety-Related Condition Reports
49 CFR Part 192	Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards
49 CFR Part 199	Drug and Alcohol Testing
165:20	, Gas and Hazardous Liquid Pipeline Safety
40 CFR 60 Subpart OOOOb	Standards of Performance for Crude Oil and Natural Gas Facilities (construction after December 6, 2022)
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 CFR 63 Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines
40 CFR 60 Subparts Dc, Kb	Small steam generating units; volatile organic liquid storage vessels (non-applicability shown)
40 CFR 68	Chemical Accident Prevention Provisions (RMP) (non-applicability shown)
40 CFR 98 Subparts A, C, W	Mandatory Greenhouse Gas Reporting
40 CFR 112	Oil Pollution Prevention (SPCC)
40 CFR 122 / Clean Water Act Section 402	NPDES stormwater and hydrostatic test water discharges
252:100	DEQ Air Pollution Control (Chapters 7, 13, 19, 29, 31, 37 as cited)
29 CFR 1910, 1926	OSHA General Industry and Construction
63 O.S. Section 142.1 et seq.	Underground Facilities Damage Prevention Act (OKIE811)
NFPA 70 (2023), 70E, 30, 54, 780	Electrical, electrical safety, flammable liquids, fuel gas, lightning
IFC / IBC as adopted in	Uniform Building Code Commission (HOLD H-11) and State Fire Marshal
API RP 80	Guidelines for the Definition of Onshore Gas Gathering Lines (incorporated by reference in 49 CFR 192.8)
TSA Pipeline Security Guidelines; API 1164	Pipeline security and SCADA cybersecurity

2.2. PACKAGE DOCUMENTS

Table 2-2 lists the project documents that carry the compliance requirements.

Table 2-2: Project Documents Cited

Document	Title
GEN-DB-001	Basis of Design
REG-CAL-001	Air Emissions Inventory and Applicability
REG-RPT-002	Permit and Approvals Matrix and Schedule
REG-RPT-003	Environmental Desktop Review Scope and Constraints
REG-RPT-004	SPCC Plan Framework for T-101
SPC-SPC-001 to 020	Construction specifications (Volume 8)
CON-RPT-001 to 004, CON-CAL-001, CON-LST-001	Construction execution, lifts, contract scope, HSE, O&M outline, long-lead list
PRO-DWG-101 to 111	P&IDs
MEC-LST-001	Line list
PIP-SPC-001	Piping material specification
Pipe Wall Thickness and Branch Reinforcement Calculation (MEC-CAL-001 and MEC-CAL-002)	Pipe wall thickness and branch reinforcement calculation
Hydrostatic Test Calculation (MEC-CAL-003)	Hydrostatic test calculation
Relief Device Sizing Calculation (PRO-CAL-007)	Relief and overpressure protection calculation
Safety Requirements Specification (SAF-SRS-001), LOPA and SIL Verification (SAF-RPT-002 and SAF-CAL-001)	Safety requirements specification, LOPA and SIL verification
Hazardous Area Classification Drawing (ELE-RPT-001 and ELE-DWG-002)	Area classification drawing
Cathodic Protection Design Calculation (CP-CAL-001)	Cathodic protection design
Stormwater Pollution Prevention Plan (CIV-RPT-002)	Stormwater Pollution Prevention Plan

3. SUMMARY OF CONCLUSIONS

Table 3-1 summarizes the conclusions of this review; the sections that follow give the reasoning.

Table 3-1: Summary of Regulatory Conclusions

No.	Topic	Conclusion	Status
1	Pipeline safety jurisdiction	Intrastate. Pipeline Safety Department enforces 49 CFR 191, 192 and 199 as adopted in 165:20	Confirm OPID and jurisdiction with (RH-01)
2	Gathering vs transmission	Not determinable until the upstream facility type (processing plant or not) and class location are confirmed. Possible outcomes: transmission (if the Owner's upstream facility is a processing plant) or Type C regulated gathering. The design already meets transmission requirements. If transmission: evaluate 192.179(e) rupture-mitigation valves and 192.631 control room management	HOLD H-18, H-04
3	Overpressure protection	OPSS SIF-01, SIL 2 (2oo3 PT-133A/B/C on separate safety PLC input cards, closing SDV-102 and SDV-103 at 1,225 psig; SDV-102 full stroke 4 s or less, quarterly partial-stroke test) plus BPCS override meets 192.195, 192.199, 192.201. The 192.201 accumulation limit for the assumed trunk is 1,290 psig (75 % SMYS governs over MAOP + 10 %) and the peak with the 4 s stroke is about 1,260 psig (PRO-CAL-009) (HOLD H-04)	Design complies
4	NSPS 0000b	Process controllers: zero-emission, compliant. Storage vessel: the base design adopts a legally and practicably enforceable liquids throughput limit of 350 bbl/yr, 12-month rolling, so T-101 PTE is 4.88 tpy VOC, below 6 tpy, and T-101 is not an affected facility; vapor control is bid alternate ALT-6. Analyzer vents (183 scf/d) are not process controllers or pneumatic devices (confirm with). Fugitives: meter station without compression is not an affected site. No compressors, no pneumatic pumps	Design complies with the limit; liquids rate HOLD H-20
5	NSPS JJJJ / NESHAP ZZZZ	G-101 purchased as a certified emergency SI engine; hour meter; 100 h/yr maintenance and readiness limit	Design complies
6	air	PTE with the T-101 limit (6.0 MMBtu/h heater, analyzer vents, PRO-CAL-008 blowdown volumes): NOx 2.99, CO 2.86, VOC 7.47, PM 0.20, SO2 0.34 tpy, HAP 0.22 tpy. Below Title V, PSD and the 40 tpy permit-exempt level; VOC above the 5 tpy de minimis level. Expected route: permit-exempt facility or oil and gas permit-by-rule registration	confirmation RH-04
7	GHG reporting	Station 3,393 t CO2e/yr. Subpart W applicability is determined at the Owner's basin-level gathering and boosting facility, not the station alone	Owner to include in basin total RH-05

No.	Topic	Conclusion	Status
8	SPCC	Applies: aggregate aboveground oil capacity 4,351 gal > 1,320 gal (T-101 9 ft 6 in OD x 8 ft; 4; 241 gal shell). Tier I qualified facility eligible. Plan required before T-101 is placed in service	REG-RPT-004
9	Stormwater	Disturbance 1 to 5 acres: construction general permit coverage and SWPPP required. The permitting authority depends on whether the facility is an oil and gas facility under jurisdiction (EPA Region 6 Construction General Permit) or not (OKR10). The SWPPP CIV-RPT-002 is written to satisfy both; hydrotest water discharge follows the same determination	HOLD H-17
10	OSHA PSM / EPA RMP	Not applicable: DOT-regulated pipeline facility; normally unoccupied remote facility; inventory with PRO-CAL-008 volumes 6,379 lb at MAOP and 45 F, below 10,000 lb at every credible operating state	Design basis; see Sections 8.3 and 10
11	Electrical / fire	NEC 2023 Articles 500/501/505 via API RP 500 area classification; NFPA 30 for T-101; NFPA 780; State Fire Marshal / IFC as adopted	Design complies; HOLD H-11
12	Damage prevention	OKIE811 locate before any excavation; one-call and encroachment agreement for work in the ROW	SPC-SPC-001, 002, 012

4. PIPELINE JURISDICTION AND THE GATHERING LINE DETERMINATION

4.1. JURISDICTION

The station and outlet lateral lie wholly within [REDACTED] and deliver into a [REDACTED]-operated line described in the basis as a [REDACTED]. They are intrastate facilities. The [REDACTED] ([REDACTED]) Pipeline Safety Department holds a certification under 49 U.S.C. 60105 for intrastate gas pipelines and enforces 49 CFR Parts 191, 192 and 199 as adopted by reference in [REDACTED] 165:20. If the [REDACTED] trunkline is an interstate facility under FERC jurisdiction, the Owner's facilities remain intrastate provided they end at the [REDACTED] tap valve flange (confirm with the Interconnect and Operating Agreement, HOLD H-01). The [REDACTED] trunkline classification is a [REDACTED] determination and is not made in this package.

4.2. THE 49 CFR 192.8 FRAMEWORK

49 CFR 192.8(a) requires the operator to determine whether an onshore line is a gathering line using API RP 80, subject to the limits in 192.8(a)(1) to (a)(5). The key tests for this station are:

Table 4-1 applies the key tests to the facts known for the station.

Table 4-1: Gathering Line Tests Under 49 CFR 192.8

Test	Rule (summary)	Fact for [REDACTED]	Effect
Production operation	Gathering begins at the end of production operation (API RP 80 Section 2.2)	Gas has left the Owner's treating facility	The station is not a production facility
Processing plant endpoint	The endpoint of gathering may not extend beyond the furthestmost downstream outlet of a gas processing plant, where the "processing plant" definition in 192.3 applies (192.8(a)(1))	Basis Section 5.1 calls the gas "treated, dehydrated Mid-Continent residue gas". "Residue gas" normally means gas leaving a processing (NGL extraction) plant	If the upstream facility is a processing plant, gathering ends at its outlet and the Owner's lateral and this station are transmission lines (192.3)
Gathering compressor station	Endpoint may not extend beyond the outlet of the furthestmost downstream gathering compressor station (192.8(a)(2))	Upstream facility includes compression (basis Section 6)	Same effect as above if that compression is the last gathering compression
Incidental gathering	API RP 80 incidental gathering is limited to 10 miles from the furthestmost downstream endpoint and must terminate in a gathering line (49 CFR 192.8, gathering line endpoints)	The station is short and delivers into a line [REDACTED] calls gathering	Could preserve gathering status only if the upstream facility is not a processing plant and the [REDACTED] line is itself gathering

Test	Rule (summary)	Fact for	Effect
Delivery into transmission	A line that delivers into a transmission line is not incidental gathering	line status is 's (HOLD H-04)	If the line is transmission, is transmission

4.3. TYPE A, B, C AND R GATHERING (49 CFR 192.8(B) AND (C), 192.9)

If the Owner's facilities are determined to be gathering, the type depends on class location, hoop stress at MAOP and outside diameter:

Table 4-2 summarizes the four types and what each requires.

Table 4-2: Regulated Gathering Line Types

Type	Location	Criteria (metallic pipe)	Main requirements (192.9)
A	Class 2, 3 or 4	MAOP produces hoop stress of 20 % SMYS or more	Transmission requirements with listed exceptions (192.9(c))
B	Class 2 (per 192.8(b)(2) limits), 3 or 4	MAOP below 20 % SMYS	Design, installation, construction, initial inspection and testing for new lines; corrosion control; damage prevention; emergency plans; public awareness; markers; leak surveys (192.9(d))
C	Class 1	MAOP produces hoop stress of 20 % SMYS or more, and OD 8.625 in or greater	Damage prevention, emergency plans, public awareness, line markers, leak surveys, MAOP establishment, corrosion control for new and replaced lines; additional design and testing requirements for OD greater than 16 in or where a building intended for human occupancy or other impacted site is within the potential impact circle (49 CFR 192.9, Type C gathering lines)
R	Class 1 or 2 not meeting Type C	Any other	Incident and annual reporting only (192.9(f))

Facts that set the type for :

- Class location.** County at the indicative coordinates is rural. Class 1 is expected but must be established by a building count within 220 yd of the centerline over any sliding one-mile segment (192.5). HOLD H-18 (survey).
- Hoop stress.** Design factor 0.50 at MAOP 1,440 psig (basis Section 7): hoop stress at MAOP is about 50 % SMYS, well above the 20 % threshold. Even at the OPSS-limited operating pressure the stress exceeds 20 % SMYS.
- Outside diameter.** NPS 12 (12.75 in OD) exceeds 8.625 in and is below 16 in.
- Potential impact radius.** Per 49 CFR 192.903, $r = 0.69\sqrt{pd^2}$, with p in psig and d in inches. For the NPS 12 station piping and lateral at 1,440 psig, $r = 0.69 \times (1,440)^{0.5} \times 12.75 = 334$ ft. At the

delivery pressure of 1,200 psig limited by the overpressure shutdown system it is 305 ft, and for the 24 in trunkline at 1,200 psig (HOLD H-04) it is 574 ft.

Buildings intended for human occupancy within 334 ft of the station piping or lateral determine whether the additional Type C requirements apply and whether any identified site or HCA exists. B-101 and B-102 are unoccupied equipment buildings. Offsite structures within 334 ft: HOLD H-18 (survey).

4.4. LIKELY OUTCOME AND BASIS DECISION

Table 4-3 sets out the possible outcomes and TORUS's judgment of their likelihood.

Table 4-3: Likely Classification Outcomes

Scenario	Condition	Classification	Likelihood (engineering judgment, pending H-18)
1	Upstream Owner facility is a processing plant (residue gas)	Transmission line (192.3)	Most likely
2	Upstream facility is treating and dehydration only, line is gathering, Class 1, no building within PIR	Type C regulated onshore gathering, OD 8.625 to 16 in	Possible
3	As scenario 2, with a building or site within PIR, or Class 2 or higher	Type C with added requirements, or Type A	Less likely

Basis decision. GEN-DB-001 Section 4 requires design to transmission-line requirements irrespective of the gathering classification. This report adopts that decision: every design, construction, testing and records requirement of Part 192 that applies to a transmission line is applied to (Section 5). The classification then affects only the operating, reporting and integrity-management obligations, which the Owner sets in its O&M procedures (CON-RPT-004). The Owner shall document the 192.8 determination in writing, retain it for the life of the pipeline, and file it with as required. The determination is HOLD H-18. If the outcome is transmission, two further evaluations are required before gas-in: 192.179(e) to (g) rupture-mitigation valves (SDV-101 and SDV-103 are candidates) and 192.631 control room management.

RCRA consequence. The classification also governs waste management: EPA treats pigging wastes from gathering lines as exempt exploration and production wastes, but not pigging wastes from transmission lines (EPA 1993 regulatory determination clarification, TBV). See REG-RPT-003 Section 7.

5. 49 CFR PART 192 SUBPART-BY-SUBPART COMPLIANCE MATRIX

Legend for “Applies”: Y = applies as transmission (design basis); C = applies as Type C gathering too; N = not applicable, with reason.

5.1. SUBPART A, GENERAL

Table 5-1 lists the Subpart A requirements and how the design meets each.

Table 5-1: Part 192 Subpart A, General

Section	Requirement	Applies	How complies	Document
192.1, 192.3	Scope, definitions	Y	Station and lateral are “pipeline” and “pipeline facility”; custody meter station is not a “customer meter”	This report
192.5	Class location	Y/C	Class 1 expected; building count survey before IFC; design factor 0.50 is more conservative than any class requires	HOLD H-18
192.7	Incorporation by reference	Y	API 5L, API 6D, API 1104, ASME B31.8, B16.5, MSS SP-75, ASME VIII and IX cited at the incorporated editions or later (EOR to confirm edition equivalence)	 PIP-SPC-001, SPC-006, SPC-007
192.8, 192.9	Gathering determination and requirements	Y	Section 4 of this report	HOLD H-18
192.10 to 192.12	OCS, petroleum gas, UNGS	N	Not offshore, not petroleum gas, no storage	
192.13	General: design, install, construct, test per Part 192	Y	Volume 8 specifications	SPC-001 to SPC-020
192.14	Conversion to service	N	New construction	
192.15, 192.16	Rules of construction; customer notification	N (192.16)	No service lines	
192.18	Notifications to PHMSA (alternative methods, specified construction)	Y	Notify if the Owner elects any “other technology” or alternative method; none planned	Owner

5.2. SUBPART B, MATERIALS

Table 5-2 lists the Subpart B requirements and how the design meets each.

Table 5-2: Part 192 Subpart B, Materials

Section	Requirement	Applies	How complies	Document
192.53, 192.55	Materials qualified; steel pipe to listed spec	Y	API 5L X52 PSL2, CVN at -20 F; small bore A106 Gr B	 PIP-SPC-001; basis Section 7
192.63	Marking of materials	Y	Receiving inspection verifies marking against MTRs	SPC-006, SPC-020
192.65	Transportation of pipe (rail/ship, D/t ratio 70 or more)	Y	Contractor to certify transport per API RP 5L1 / 5LW where applicable (D/t for NPS 12 is below 70; clause applies if D/t 70 or more)	SPC-006
192.67	Records: material properties (transmission)	Y	Traceable, verifiable, complete MTRs for pipe and components retained for life	SPC-020

5.3. SUBPART C, PIPE DESIGN

Table 5-3 lists the Subpart C requirements and how the design meets each.

Table 5-3: Part 192 Subpart C, Pipe Design

Section	Requirement	Applies	How complies	Document
192.103 to 192.115	Design formula $P = (2St/D) \times F \times E \times T$	Y	$F = 0.50$, $E = 1.0$, $T = 1.0$ (basis Section 7); wall thickness by MEC	Pipe Wall Thickness and Branch Reinforcement Calculation (MEC-CAL-001 and MEC-CAL-002)
192.111	Design factor for crossings, fabricated assemblies, stations	Y	$F = 0.50$ applied to all station piping and the lateral (more conservative than 0.60 required for Class 1 station piping)	Basis Section 7
192.112	Alternative MAOP design	N	Not used	
192.127	Records: pipe design (transmission)	Y	Wall calc retained for life	SPC-020

5.4. SUBPART D, DESIGN OF PIPELINE COMPONENTS

Table 5-4 lists the Subpart D requirements and how the design meets each.

Table 5-4: Part 192 Subpart D, Design of Pipeline Components

Section	Requirement	Applies	How complies	Document
192.143, 192.144	General; qualifying metallic components	Y	Components rated Class 600 (1,440 psig at -20 to 100 F)	 PIP-SPC-001
192.145	Valves (API 6D, marking, rating)	Y	API 6D ball and check valves, Class 600	Valve List (MEC-LST-003)
192.147	Flanges	Y	ASME B16.5 Class 600 RF	 PIP-SPC-001
192.149	Standard fittings	Y	MSS SP-75 WPHY-52, A105	 PIP-SPC-001
192.150	Passage of in-line inspection tools	Y (lateral), N (station)	Station piping (meter station) is excepted (192.150(b)); outlet lateral piggability: short lateral ends at the tap valve; Owner to confirm whether 192.150 exception for short laterals applies (HOLD RH-07)	Piping General Arrangement Drawings (PIP-DWG-001 to PIP-DWG-003)
192.151	Tapping	Y	 performs the hot tap on its line; the Owner's tie-in is to the tap valve flange	SPC-012
192.153	Components fabricated by welding (ASME VIII)	Y	V-101, PR-101 barrel, H-101 coil manifolds to ASME VIII Div 1 with U-stamp	V-101 Filter Separator Datasheet (MEC-DS-001), PR-101 Pig Receiver Datasheet (MEC-DS-002), H-101 Line Heater Datasheet (MEC-DS-003)
192.155	Welded branch connections	Y	Branch reinforcement per MEC calc; SP-97 outlets for small branches	Pipe Wall Thickness and Branch Reinforcement Calculation (MEC-CAL-001 and MEC-CAL-002)
192.157	Extruded outlets	Y if used	Per MSS SP-75	 PIP-SPC-001
192.159	Flexibility	Y	Stress screening	Piping Stress Screening (MEC-CAL-004)

Section	Requirement	Applies	How complies	Document
192.161	Supports and anchors	Y	Supports per STR; not welded to pipe at high stress except per design	Pipe Support Standard Drawings (PIP-DWG-006 and MEC-CAL-005), SPC-004
192.163 to 192.173	Compressor stations	N	No compression. Voluntary ESD system (basis Section 9.3) exceeds requirements	
192.175, 192.177	Pipe-type and bottle-type holders	N	None	
192.179(a) to (d)	Transmission line valve spacing	N (practically)	Lateral about 96 ft buried plus riser; SDV-103 at the station outlet and the tap valve bound it	
192.179(e) to (g), 192.634, 192.636	Rupture-mitigation valves for new transmission lines 6 in and larger (2022 rule)	Y if transmission	SDV-101 and SDV-103 are remote-closeable, spring-return fail-closed electro-hydraulic valves with position feedback to SCADA, and can serve as RMVs. Evaluate whether the lateral qualifies for an exception (short segment, PIR) and document the rupture identification and 30-minute closure capability (TBV). Evaluation required if H-18 finds transmission	 INS-RPT-001 (Control Philosophy Narrative), HOLD H-18
192.181 to 192.191	Distribution valves, vaults, plastic	N		
192.195	Protection against accidental overpressuring	Y	OPSS protects the 1,200 psig trunkline; station itself rated for the maximum upstream pressure (1,150 psig supply below 1,440 psig MAOP; PSVs protect for fire)	Basis Section 9.2; Relief Device Sizing Calculation (PRO-CAL-007); Safety Requirements Specification (SAF-SRS-001)
192.197	Control of pressure delivered to distribution	N		

Section	Requirement	Applies	How complies	Document
192.199	Design of pressure relief and limiting devices	Y	SDV-102 fails closed, strokes fully in 4 s or less, is partial-stroke tested quarterly and full-stroke tested annually, is tested in place, has no bypass that can defeat it without MOC, uses 2oo3 sensing with separate taps; PSVs sized to API 520/521; vents discharge to VS-101 away from ignition sources	Safety Requirements Specification (SAF-SRS-001), Relief Device Sizing Calculation (PRO-CAL-007), Vent Stack Calculation (PRO-CAL-008)
192.201	Required capacity	Y	Downstream pressure limited to the lower of MAOP + 10 % (1,320 psig) and the pressure producing 75 % SMYS; for the assumed NPS 24 x 0.344 in X60 trunk the 75 % SMYS value governs, so the accumulation limit is 1,290 psig . OPSS trip 1,225 psig, 45 psi above the maximum override setting of 1,180 psig; with SDV-102 closing fully in 4 s the peak is 1,260 psig, 30 psi below the limit, and the 5.0 s response fits within the 8.9 s process safety time; SIF-01 SIL 2	 PRO-CAL-009 (Overpressure Protection System Hydraulic Analysis); Basis Section 9.2; LOPA and SIL Verification (SAF-RPT-002 and SAF-CAL-001)
192.203	Instrument, control and sampling piping	Y	316 SS tubing spec T1; root valves at every tap; rated for full MAOP	SPC-014, PIP-SPC-001
192.204, 192.205	Risers; records of components (transmission)	Y (192.205)	Component MTRs and pressure ratings retained	SPC-020

5.5. SUBPART E, WELDING OF STEEL

Table 5-5 lists the Subpart E requirements and how the design meets each.

Table 5-5: Part 192 Subpart E, Welding of Steel

Section	Requirement	Applies	How complies	Document
192.225	Welding procedures qualified to API 1104 or ASME IX	Y	WPS/PQR per API 1104 (pipeline and station butt welds) or ASME IX (vessel and station fabrication)	SPC-007
192.227	Welder qualification	Y	API 1104 Section 6 or ASME IX; transmission operating at 20 % SMYS or more requires full qualification	SPC-007

Section	Requirement	Applies	How complies	Document
192.229	Limitations on welders (6-month continuity, production weld tested)	Y	Contractor maintains welder continuity log	SPC-007, QF forms
192.231	Protection from weather	Y	Windshields, preheat, no welding in rain	SPC-007
192.233	Miter joints	N	Prohibited in the piping spec	 PIP-SPC-001
192.235	Preparation for welding	Y	Bevels per B16.25; cleanliness	SPC-006, SPC-007
192.241	Inspection and test of welds (visual by qualified inspector; NDT)	Y	Qualified welding inspector; 100 % visual	SPC-007, SPC-008
192.243	Nondestructive testing (procedure, qualified personnel, extent, records)	Y	100 % RT or AUT of butt welds exceeds the 192.243(d) percentages; records retained for life	SPC-008, SPC-020
192.245	Repair or removal of defects	Y	Repair per qualified repair WPS; re-examined by the same method	SPC-007, SPC-008

5.6. SUBPART F, JOINING OF MATERIALS OTHER THAN BY WELDING

Table 5-6 lists the Subpart F requirements and how the design meets each.

Table 5-6: Part 192 Subpart F, Joining of Materials Other Than by Welding

Section	Requirement	Applies	How complies
192.271 to 192.287	Cast iron, ductile iron, copper, plastic joining	N	All steel, welded or flanged. Flanged joints are governed by the piping spec and SPC-006 (ASME PCC-1 bolt-up)

5.7. SUBPART G, GENERAL CONSTRUCTION REQUIREMENTS FOR TRANSMISSION LINES AND MAINS

Table 5-7 lists the Subpart G requirements and how the design meets each.

Table 5-7: Part 192 Subpart G, General Construction Requirements for Transmission Lines and Mains

Section	Requirement	Applies	How complies	Document
192.303	Construction in accordance with written specifications	Y	Volume 8 specifications and drawings	SPC-001 to SPC-020
192.305	Inspection: general (inspector not the person who performed the work)	Y	Owner's Inspector independent of Contractor QC	SPC-001, SPC-019

Section	Requirement	Applies	How complies	Document
192.307	Inspection of materials	Y	Receiving inspection of each length of pipe and component	SPC-006
192.309	Repair of steel pipe (dents, gouges, arc burns)	Y	Acceptance limits and cut-out rules	SPC-006
192.311, 192.321	Plastic pipe	N		
192.313	Bends and elbows	Y	Field bends limited per SPC-006; no wrinkle bends	SPC-006
192.315	Wrinkle bends	N	Prohibited	SPC-006
192.317	Protection from hazards (washouts, floods, vehicles)	Y	Bollards around above-grade piping near roads; buried below scour	Site Plan (CIV-DWG-002), SPC-004
192.319	Installation of pipe in a ditch (fit, backfill, coating protection); post-construction coating survey for new onshore transmission (2022 rule, 192.319(d), (e), TBV)	Y	Bedding, padding, rock shield; DCVG or ACVG survey within 6 months after backfill with remediation of severe defects	SPC-006, SPC-009, SPC-015
192.323	Casing	Y if used	No cased crossings planned; if the access road crosses the lateral, heavy-wall uncased per API RP 1102	SPC-006
192.325	Underground clearance (12 in from other structures)	Y	12 in minimum clearance from foreign lines and the trunkline except at the tie-in	SPC-006, SPC-012
192.327	Cover (Class 1 normal soil 30 in; rock 18 in)	Y	36 in minimum, 48 in under roads and drainage (basis Section 10)	SPC-006
192.328	Alternative MAOP construction	N		

5.8. SUBPART H, CUSTOMER METERS, SERVICE REGULATORS AND SERVICE LINES

Table 5-8 lists the Subpart H requirements and how the design meets each.

Table 5-8: Part 192 Subpart H, Customer Meters, Service Regulators and Service Lines

Section	Applies	Reason
192.351 to 192.383	N	The custody transfer meter station between two operators is not a customer meter or service line. Measurement is governed by the Interconnect and Operating Agreement (HOLD H-01), AGA 9 and API MPMS, not Subpart H

5.9. SUBPART I, REQUIREMENTS FOR CORROSION CONTROL

Table 5-9 lists the Subpart I requirements and how the design meets each.

Table 5-9: Part 192 Subpart I, Requirements for Corrosion Control

Section	Requirement	Applies	How complies	Document
192.452	Applicability to converted and gathering lines	C	Type C new lines require corrosion control; design meets transmission level anyway	
192.455	External corrosion control for new buried pipe: coated and CP within 1 year	Y	FBE (buried), ARO at bores; impressed current or galvanic CP energized before or at startup, well inside 1 year	SPC-009, SPC-015, Cathodic Protection Design Calculation (CP-CAL-001)
192.461	External coating requirements; post-construction coating survey (192.461(f) to (h), 2022 rule, TBV)	Y	Holiday test at specified voltage before lowering-in; indirect survey within 6 months of backfill	SPC-009, SPC-015
192.463	CP criteria (Appendix D)	Y	-850 mV CSE polarized (instant-off) or 100 mV polarization	SPC-015
192.465	External corrosion monitoring: annual pipe-to-soil, rectifier every 2 months, interference bonds	Y	Commissioning survey and O&M intervals	SPC-015, CON-RPT-004
192.467	Electrical isolation (insulating joints, casings)	Y	IJ-101, IJ-102 monolithic joints; flange isolation kits where required by CP design; surge protection across IJs	Cathodic Protection Design Calculation (CP-CAL-001), SPC-015
192.469, 192.471	Test stations and test leads	Y	Test stations at each IJ, at the tie-in and at foreign crossings; leads by exothermic weld per SPC-015	Cathodic Protection Drawings (CP-DWG-001 and CP-DWG-002)
192.473	Interference currents	Y	Interference testing with CP and nearby foreign lines; AC interference per AMPP SP0177 (HOLD H-08)	AC Interference and Mitigation Assessment (CP-CAL-001 Section 11)
192.475	Internal corrosion: corrosive gas not transported unless investigated	Y	Dry, sweet gas to tariff (7 lb/MMscf water, 0.25 gr H ₂ S, 10 ppm O ₂) monitored by AT-142/143/144	Basis Section 5.2

Section	Requirement	Applies	How complies	Document
192.476	Internal corrosion design for new transmission (liquids removal, low points, sampling)	Y	V-101 removes free liquids; PR-101 receives pigs; no unnecessary dead legs; drains at low points	 PRO-DWG-101 to 111
192.477, 192.478	Internal corrosion monitoring (coupons if corrosive; gas stream monitoring program for transmission, TBV)	Y	Continuous analyzers; Owner's gas quality monitoring program in O&M	 CON-RPT-004
192.479, 192.481	Atmospheric corrosion control and monitoring (3 years, not over 39 months onshore)	Y	Three-coat system; soil-to-air wraps	SPC-010
192.483 to 192.489	Remedial measures	Y	O&M procedures	 CON-RPT-004
192.491	Corrosion control records	Y	CP test records, maps retained	SPC-020

5.10. SUBPART J, TEST REQUIREMENTS

Table 5-10 lists the Subpart J requirements and how the design meets each.

Table 5-10: Part 192 Subpart J, Test Requirements

Section	Requirement	Applies	How complies	Document
192.503	General: each new segment tested before operation; leaks located and eliminated	Y	Hydrostatic test of all station piping and the lateral	SPC-011
192.505	Strength test for steel pipelines operating at 30 % SMYS or more: 8 h minimum; 4 h for fabricated units and short sections tested in the shop or field before installation where post-installation leak inspection is possible (192.505(d), TBV); Class 1 station piping test factor per 192.505(a) and 192.619	Y	2,160 psig minimum (1.5 x 1,440 psig), 8 h, not above 100 % SMYS at the test point (basis Section 7). The 1.5 factor also satisfies the test factor needed to establish 1,440 psig MAOP in any class up to Class 3 station piping (192.619(a)(2), TBV)	SPC-011, Hydrostatic Test Calculation (MEC-CAL-003)
192.506	Spike hydrostatic test	N	Not used (applies to MAOP reconfirmation and certain assessments)	
192.507 to 192.513	Tests below 30 % SMYS, service lines, plastic	N		

Section	Requirement	Applies	How complies	Document
192.515	Environmental protection and safety (test water, personnel exclusion)	Y	Test water source and discharge approvals; exclusion zones; stored-energy controls	SPC-011, CON-RPT-003, REG-RPT-002
192.517	Records (operator name, test medium, pressure, duration, charts, elevation variations, leaks and failures); retained for the useful life for transmission	Y	Deadweight logs, recorder charts, calibration certificates, test sketches	SPC-011, SPC-020

5.11. SUBPART K, UPRATING

Table 5-11 lists the Subpart K requirements and how the design meets each.

Table 5-11: Part 192 Subpart K, Upgrading

Section	Applies	Reason
192.551 to 192.557	N	New construction at 1,440 psig design; no upgrading planned

5.12. SUBPART L, OPERATIONS

Table 5-12 lists the Subpart L requirements and how the design meets each.

Table 5-12: Part 192 Subpart L, Operations

Section	Requirement	Applies	How complies	Document
192.603	General operating requirements	Y	O&M manual in place before gas-in	 CON-RPT-004
192.605	Procedural manual for O&M and emergencies; transmission abnormal operations (192.605(c))	Y	O&M procedure list and abnormal operating conditions	 CON-RPT-004
192.607, 192.624	Material verification and MAOP reconfirmation	N	New pipe with traceable, verifiable, complete records; no reconfirmation needed	SPC-020
192.609, 192.611	Change in class location	Y	Continuing surveillance of population	 CON-RPT-004
192.613	Continuing surveillance	Y	O&M procedure	 CON-RPT-004

Section	Requirement	Applies	How complies	Document
192.614	Damage prevention program	Y/C	OKIE811 membership; markers	 CON-RPT-004
192.615	Emergency plans (liaison with fire, police,)	Y/C	Emergency response plan with gas control contacts	 CON-RPT-004
192.616	Public awareness program (API RP 1162)	Y/C	Owner's existing program extended to 	 CON-RPT-004
192.617	Investigation of failures and incidents	Y	O&M procedure	 CON-RPT-004
192.619	MAOP	Y/C	MAOP 1,440 psig established by design and the Subpart J test; Owner records the MAOP determination	SPC-011, SPC-020
192.620	Alternative MAOP	N		
192.625	Odorization	N	Class 1 transmission and gathering lines are not required to be odorized (192.625(b)); gas delivered unodorized consistent with the line (confirm, HOLD H-13)	
192.627	Tapping pipelines under pressure: by a qualified crew	Y ()	The hot tap on the line is performed by or its qualified contractor per API RP 2201	SPC-012
192.629	Purging of pipelines	Y	Nitrogen purge and nitrogen pre-pressurization before gas is admitted, or gas-in only with supply at 900 psig or less and 60 F or warmer, because throttled winter gas reaches -52 F, below the -20 F MDMT; O2 monitoring	SPC-012
192.631	Control room management	Y if transmission with a controller using SCADA	Owner gas control monitors by SCADA and can close SDV-101/103 remotely; if the Owner operates a qualifying control room, points are added to its CRM plan (alarm management, fatigue, shift handover). Evaluation required if H-18 finds transmission	HOLD H-18
192.632, 192.634, 192.635, 192.636	ECA; rupture identification and response; RMV operation	Y if transmission	See 192.179(e) row	HOLD H-18

5.13. SUBPART M, MAINTENANCE

Table 5-13 lists the Subpart M requirements and how the design meets each.

Table 5-13: Part 192 Subpart M, Maintenance

Section	Requirement	Applies	How complies	Document
192.703	General (unsafe segments)	Y	O&M	 CON-RPT-004
192.705	Transmission patrol (Class 1: each calendar year, not over 15 months, more often at crossings)	Y	O&M interval table	 CON-RPT-004
192.706	Transmission leak surveys (Class 1: each calendar year, not over 15 months); gas detection instrument surveys under the 2022 and later leak rules (TBV)	Y/C	Annual leak survey with instrument; station component LDAR is voluntary (not an OOOOb site)	 CON-RPT-004
192.707	Line markers (at crossings and as needed; at the lateral)	Y/C	Markers at the lateral and at the tie-in with Owner name and emergency number	SPC-006
192.709	Maintenance records (patrols, surveys, inspections, tests)	Y	O&M records	SPC-020, CON-RPT-004
192.710, 192.712	Assessments outside HCAs (MCAs); analysis of predicted failure pressure	Y if transmission and MCA	Evaluate once class location and PIR survey complete	HOLD H-18
192.711 to 192.719	Repairs	Y	O&M procedures	 CON-RPT-004
192.731 to 192.736	Compressor station maintenance, gas detection	N	No compressor	
192.739	Pressure limiting and regulating stations: inspection and testing each calendar year, not over 15 months (OPSS, PSVs, PCV-161/162, PSV-161 set 250 psig per)	Y	OPSS functional test also meets the IEC 61511 proof test interval set by the SIL 2 verification; SDV-102 partial-stroke test quarterly	Safety Requirements Specification (SAF-SRS-001), CON-RPT-004
192.743	Relief device capacity review annually	Y	Capacity review against current supply conditions	 CON-RPT-004

Section	Requirement	Applies	How complies	Document
192.745	Transmission valve maintenance (valves needed in an emergency: each calendar year, not over 15 months)	Y	SDV-101/102/103, BDVs, HV isolation valves	 CON-RPT-004
192.747, 192.749	Distribution valves, vaults	N		
192.751	Prevention of accidental ignition	Y	Hot work permits, gas testing, bonding, no smoking	 CON-RPT-003
192.753 to 192.755	Caulked bell and spigot, cast iron	N		
192.756	Joining plastic by heat fusion	N		

5.14. SUBPART N, QUALIFICATION OF PIPELINE PERSONNEL

Table 5-14 lists the Subpart N requirements and how the design meets each.

Table 5-14: Part 192 Subpart N, Qualification of Pipeline Personnel

Section	Requirement	Applies	How complies	Document
192.801 to 192.809	Operator qualification program; covered tasks performed by qualified individuals or under direct observation	Y/C	Covered tasks during construction and commissioning (tie-in, purging, OPSS testing, CP readings, valve operation after gas-in) performed by individuals qualified under the Owner's OQ program; covered tasks under OQ	 CON-RPT-003, CON-RPT-004

5.15. SUBPART O, GAS TRANSMISSION PIPELINE INTEGRITY MANAGEMENT

Table 5-15 lists the Subpart O requirements and how the design meets each.

Table 5-15: Part 192 Subpart O, Gas Transmission Pipeline Integrity Management

Section	Requirement	Applies	How complies
192.901 to 192.951	IMP for transmission segments in HCAs	Y only if a covered segment exists	Class 1 with PIR 334 ft: an HCA exists only if the potential impact circle contains 20 or more buildings intended for human occupancy or an identified site (192.903). Expected none (rural); confirm by survey (HOLD H-18). If none, the Owner documents the HCA analysis and repeats it with continuing surveillance

5.16. SUBPART P, GAS DISTRIBUTION PIPELINE INTEGRITY MANAGEMENT

Table 5-16 lists the Subpart P requirements and how the design meets each.

Table 5-16: Part 192 Subpart P, Gas Distribution Pipeline Integrity Management

Section	Applies	Reason
192.1001 to 192.1015	N	Not a distribution pipeline



6. 49 CFR PART 191 (REPORTING) AND PART 199 (DRUG AND ALCOHOL)

Table 6-1 sets out the reporting requirements of Part 191 and the testing requirements of Part 199.

Table 6-1: Reporting and Drug and Alcohol Testing Requirements

Section	Requirement	Applies	Compliance action	Responsible
191.5	Immediate notice of incidents to the National Response Center (within 1 h of confirmed discovery, TBV)	Y	Emergency plan contact list	Owner
191.7	Reports submitted electronically to PHMSA	Y	Owner's OPID account	Owner
191.15	Incident report (Form PHMSA F 7100.2) within 30 days; gathering: Type R and above	Y	Owner	Owner
191.17	Annual report (Form F 7100.2-1) by March 15	Y	Include miles and facilities	Owner
191.22	Operator identification (OPID) and National Registry notifications, including notice at least 60 days before certain construction (10 miles or more of new pipeline, or major modifications costing \$10 million or more; TBV)	Y	Obtain or confirm the operator identification number; the 191.22(c) construction notice is not expected to be triggered (Section 12, Note 1)	Owner
191.23, 191.25	Safety-related condition reports (within 5 working days of determination, not later than 10 working days after discovery)	Y if transmission	O&M procedure	Owner
191.29	National Pipeline Mapping System submission (transmission and, under the gathering rule, Type A/B/C gathering, TBV)	Y/C	Submit as-built centerline of the lateral after construction	Owner
Part 199	Drug and alcohol testing for employees performing covered functions (operation, maintenance, emergency response)	Y	Contractor personnel performing covered functions after gas-in (and during tie-in and purge) are in a Part 199 compliant program; Contractor submits program and MIS data	Contractor, Owner

7. **165:20**

Table 7-1 sets out the additional state requirements.

Table 7-1: Requirements

Item	Requirement (summary)	Compliance action	Status
Adoption of federal rules	165:20 adopts 49 CFR 191, 192, 199 (and gathering provisions) by reference for intrastate pipelines (section (TBV))	Section 5 and 6 of this report	Complies by design
Operator registration	Operator registers with the Pipeline Safety Department and holds a PHMSA OPID	Owner confirms existing OPID covers or registers a new unit	HOLD RH-01
Construction notification	may require notice of new pipeline construction before start (form and lead time (TBV))	Owner files notice before mobilization	HOLD RH-01, REG-RPT-002
Incident reporting	Telephonic notice to Pipeline Safety in addition to NRC; written reports copied to (timing (TBV))	Emergency plan	Owner
Inspection access	inspectors may inspect construction, tests and records	Contractor gives access; test records available at site	SPC-001
Fees	Annual pipeline safety fee (basis (TBV))	Owner	Owner
pollution and waste jurisdiction	regulates pollution and wastes from oil and gas operations and pipelines in (165:10-7, TBV), including hydrotest water land application and oilfield waste disposal	Hydrotest water and waste disposal routed through -permitted methods	REG-RPT-003

8. AIR QUALITY

The emission values in this section come from REG-CAL-001, Air Emissions Inventory and Applicability. The station's potential to emit is 2.99 tpy of nitrogen oxides, 2.86 tpy of carbon monoxide, 7.47 tpy of volatile organic compounds, 0.20 tpy of particulate, 0.34 tpy of sulfur dioxide and 0.22 tpy of hazardous air pollutants, with 3,393 t CO₂e/yr of greenhouse gas.

8.1. 40 CFR 60 SUBPART 0000B BY AFFECTED FACILITY

0000b applies to affected facilities in the crude oil and natural gas source category that commence construction after December 6, 2022 (60.5365b, TBV). is in the gathering and boosting or transmission segment of that source category.

Table 8-1 takes each 0000b affected facility in turn.

Table 8-1: 0000b Applicability by Affected Facility

Affected facility (60.5365b)	equipment	Applicability	Compliance
Well; well completions	None	N	
Centrifugal compressors	None	N	
Reciprocating compressors	None	N	
Process controllers (collection of natural gas-driven controllers at a site)	None: all actuators electric or self-contained electro-hydraulic (basis Section 7), including SDV-106 (electric spring-return) and SDV-141; fuel regulators PCV-161/162 are self-operated and do not bleed to atmosphere in normal operation; E-161 fuel gas preheater is electric	Zero-emission requirement (60.5390b) met by design; a collection of zero natural gas-driven controllers creates no emitting affected facility (confirm treatment with / EPA guidance)	Specify in SPC-013, SPC-014 that no gas-driven pneumatics are installed; Owner keeps the design record
Pumps (natural gas-driven)	None	N	

Affected facility (60.5365b)	equipment	Applicability	Compliance
Storage vessels (single vessel or tank battery with PTE of 6 tpy VOC or more, or 20 tpy methane or more, TBV)	T-101 (9 ft 6 in OD x 8 ft)	Base design: legally and practicably enforceable throughput limit of 350 bbl/yr, 12-month rolling. PTE at the limit: flash (Peng-Robinson, 1,000 scf per stock-tank bbl, PRO-CAL-007) 4.55 plus working and standing 0.34 = 4.88 tpy VOC, below 6 tpy; flash methane 5.12 tpy, below 20 tpy. 6 tpy is reached at 435 bbl/yr; expected pigging liquids are 52 to 260 bbl/yr	N with the limit. PTE determination documented within 30 days of startup (TBV). Compliance records: monthly throughput from truck loadout tickets, cross-checked against LT-191, 12-month rolling total, retained 5 years. If the V-101 liquids rate (HOLD H-20) cannot stay within the limit, exercise bid alternate ALT-6: 95 % vapor control by enclosed combustor with 0000b storage vessel monitoring
Fugitive emissions components (well sites, centralized production facilities, compressor stations)	Meter station, no compression	N: a gathering meter station without compression is not a “compressor station” (60.5430b definition, TBV)	Voluntary annual OGI survey recommended in O&M; 192.706 leak survey applies
Equipment leaks at onshore gas processing plants	Not a processing plant	N	
Sweetening units	None	N	
Associated gas, liquids unloading	N/A	N	
Continuous analyzer and bypass vents (lines 1130 to 1135, 183 scf/d, MEA-CAL-004)	AT-141 to AT-144 sample systems	Not a listed affected facility: sample-system exhausts are not natural-gas-driven process controllers, pneumatic pumps or storage vessels (treatment to confirm with)	Carried in the inventory as a continuous vent (0.15 tpy VOC, 1.26 tpy CH ₄ , REG-CAL-001); the zero-emission actuation design (basis Section 7) covers actuators only, not these vents

8.2. 40 CFR 60 SUBPART JJJJ AND 40 CFR 63 SUBPART ZZZZ, G-101

Table 8-2 sets out the requirements for the standby generator engine.

Table 8-2: Engine Requirements for G-101

Item	Requirement	Compliance
Applicability	Stationary SI ICE ordered after June 12, 2006 and manufactured after January 1, 2009 for emergency engines 25 hp and over (60.4230, TBV)	G-101 about 87.5 bhp (60 kWe / 0.92): applies
Emission standard	Emergency engines 25 < HP < 130: NOx + HC 10 g/hp-hr, CO 387 g/hp-hr (Table 1, TBV)	Purchase an EPA-certified engine (60.4243(b)(1)); certificate of conformity in the vendor submittal
Operation	Emergency use unlimited; maintenance and readiness testing 100 h/yr, of which up to 50 h/yr may be non-emergency use under limited conditions (60.4243(d))	Owner O&M; PTE calculated at 500 h/yr per EPA guidance
Hour meter	Non-resettable hour meter (60.4237)	Specify in G-101 package
Records	Hours of operation, reason for operation, maintenance (60.4245)	O&M records
NESHAP ZZZZ	New emergency SI engine at an area source of HAP complies with ZZZZ by complying with JJJJ (63.6590(c))	No further ZZZZ requirement

8.3. OTHER FEDERAL AIR RULES (NON-APPLICABILITY SHOWN)

Table 8-3 records the other federal air rules considered and why each does not apply.

Table 8-3: Other Federal Air Rules Not Applicable

Rule	Reason not applicable
40 CFR 60 Subpart Dc	Applies to steam generating units 10 to 100 MMBtu/h. H-101 is an indirect water-bath heater at 6.0 MMBtu/h, below 10 MMBtu/h and not a steam generating unit
40 CFR 60 Subpart Kb	T-101 capacity about 16 m3 (567 ft3 shell), below the 75 m3 applicability size; also storage of condensate prior to custody transfer is excluded (TBV)
40 CFR 63 Subpart HH / HHH	No glycol dehydration unit; area source
40 CFR 63 Subpart DDDDD / JJJJJ	Boiler NESHAP: gas-fired process heaters at area sources are not covered by JJJJJ; H-101 is not a boiler at a major source
40 CFR 68 (RMP)	Natural gas and its flammable components: station and lateral inventory with PRO-CAL-008 volumes (944.6 ft3) is 6,379 lb at 1,440 psig and 45 F, below 10,000 lb at every credible operating state; the design envelope corner (1,440 psig at -20 F, not an operating state) gives 10,273 lb; naturally occurring hydrocarbon mixtures before a processing plant are excluded where applicable; and DOT-regulated pipeline transportation is outside RMP (TBV)
40 CFR 98 Subpart C (stationary combustion, standalone)	Facility total 3,393 t CO2e, below 25,000 t

8.4. 40 CFR 98 SUBPART W

Table 8-4 sets out the greenhouse gas reporting position.

Table 8-4: Greenhouse Gas Reporting

Question	Finding
Segment	Onshore petroleum and natural gas gathering and boosting (if gathering) or onshore natural gas transmission pipeline (if transmission)
Facility definition	Gathering and boosting: all G&B equipment under common ownership or control in a single hydrocarbon basin (Basin, AAPG province 360) is one facility. Transmission pipeline: all transmission pipelines owned or operated by a company, reported at company level (98.230, 98.231, TBV)
Station contribution	3,393 t CO ₂ e/yr (H-101 2,841; blowdowns and pigging 186; fugitives 183; T-101 flash methane 130; analyzer vents 32; G-101 21)
Threshold	25,000 t CO ₂ e/yr at the facility (basin) level
Action	Owner adds to its basin-level applicability tally. If the Owner's G&B facility already reports, emission sources (combustion, equipment leaks by population count or survey, blowdown vent stacks, pig launcher/receiver venting, analyzer vents, atmospheric storage tanks) are added to the report. Methane waste emissions charge (Clean Air Act Section 136) applicability follows Subpart W reporting (status of the implementing rule (TBV))

8.5. DEQ, 252:100

Table 8-5 sets out the air quality rules that apply.

Table 8-5: Air Quality Rules

Rule	Requirement	finding	Action
252:100-7 (permits for minor facilities)	Construction of a facility with emissions above de minimis requires a permit, a permit-by-rule (PBR) registration, or qualification as a permit-exempt facility	PTE with the T-101 limit: NO _x 2.99, CO 2.86, VOC 7.47, PM 0.20, SO ₂ 0.34, HAP 0.22 tpy. All below 40 tpy; VOC above 5 tpy	Submit applicability determination to : permit-exempt facility or oil and gas PBR registration, with the 350 bbl/yr T-101 limit as an enforceable condition. Without the limit, at the 990 bbl/yr design allowance of PRO-CAL-005, VOC would be 15.97 tpy, still below 40 tpy, but T-101 would be an OOOOb affected facility. HOLD RH-04
252:100-5	Emission inventory reporting for permitted or registered facilities	Depends on 252:100-7 outcome	Owner
252:100-13	Open burning prohibited except listed exceptions	Clearing debris is chipped or hauled, not burned	SPC-002

Rule	Requirement	finding	Action
252:100-19	PM from fuel-burning equipment	H-101 natural gas, 6.0 MMBtu/h: 0.0075 lb/MMBtu, far below any limit	Complies
252:100-25	Visible emissions (20 % opacity)	Natural gas firing	Complies
252:100-29	Fugitive dust: reasonable precautions	Water trucks, speed limits	SPC-002, SPC-005, REG-RPT-003
252:100-31	Sulfur compounds	Pipeline-quality gas, 5 gr/100 scf max total sulfur: SO2 0.34 tpy	Complies
252:100-37	VOC storage: tanks of 400 gal or more storing VOC with vapor pressure 1.5 psia or more require submerged fill or bottom loading and, above certain sizes, controls (TBV)	T-101 true vapor pressure about 5.5 psia (REG-CAL-001)	Submerged fill (inlet below low liquid level) and PVRV required; T-101 datasheet to show T-101 Liquids Tank Datasheet (MEC-DS-004)

9. WATER, OIL AND WASTE

Table 9-1 sets out the water, oil and waste requirements.

Table 9-1: Water, Oil and Waste Requirements

Rule	Trigger	Finding	Document
CWA 402, construction stormwater	Disturbance of 1 acre or more (tract 2.41 ac plus about 0.3 to 0.4 ac access road)	Coverage required. In , issues OKR10 for most construction, but discharges from oil and gas facilities under jurisdiction are covered by EPA Region 6 under the EPA Construction General Permit (permit area (TBV)). Which authority applies is HOLD H-17; the SWPPP CIV-RPT-002 is written to satisfy both, and the NOI is filed with whichever authority H-17 confirms	REG-RPT-002 W-01; Stormwater Pollution Prevention Plan (CIV-RPT-002); HOLD H-17
CWA 402, hydrostatic test water	Discharge of test water to land or surface water	Same jurisdiction determination, HOLD H-17. Preferred: no discharge to waters; haul to a permitted disposal facility or land-apply under the authorization H-17 confirms, after testing	SPC-011; REG-RPT-002 W-04
CWA 404 / NWP 12	Discharge of fill into waters of the United States	Siting avoids all waters (basis Section 13). Not required unless the desktop review or field check finds a jurisdictional feature on the access road or lateral route	REG-RPT-003
40 CFR 112 SPCC	Aggregate aboveground oil capacity over 1,320 gal and reasonable expectation of discharge	4,351 gal counted (T-101 4; 241 gal): applies; Tier I eligible	REG-RPT-004
40 CFR 112.20 FRP	42,000 gal with over-water transfer, or 1,000,000 gal	Not applicable	REG-RPT-004
RCRA / waste rules	Pig solids, filter elements, T-101 liquids, hydrotest water	E&P exemption applies only if the facility is gathering (HOLD H-18); transmission pigging wastes are non-exempt and must be characterized	REG-RPT-003 Section 7
water use	Taking stream or groundwater for hydrotest	Temporary or provisional permit, or purchase from a permitted supplier	REG-RPT-002 W-03
well rules (785)	Deep anode well for the station impressed-current CP system (CP-CAL-001)	May require registration or permitting of the anode well and a licensed driller; completion report	REG-RPT-002 W-07; HOLD H-19

10. OCCUPATIONAL SAFETY

Table 10-1 sets out the occupational safety requirements, including why process safety management does not apply.

Table 10-1: Occupational Safety Requirements

Rule	Requirement	finding
29 CFR 1926 Subparts C, D, E, K, L, M, P, Q, R, CC, AA	Construction: general safety, health, PPE, electrical, scaffolds, fall protection, excavations (competent person, protective systems at 5 ft and deeper, 1926.651/.652), concrete, steel erection, cranes and derricks (operator certification, assembly, power line clearance, 1926.1400 series), confined spaces (1926.1200 series)	Contractor HSE plan CON-RPT-003; lifts per CON-CAL-001
29 CFR 1910.119 PSM	Processes with 10,000 lb or more of flammable gas	Not applicable: DOT-regulated pipeline facilities are generally outside OSHA's working-condition coverage under OSH Act Section 4(b)(1) for the aspects PHMSA regulates; the station is a normally unoccupied remote facility (1910.119(a)(2)(iii)); and the inventory with PRO-CAL-008 volumes (944.6 ft3 including the 96 ft lateral) is 4,821 lb at 1,150 psig and 45 F and 6,379 lb at 1,440 psig and 45 F, below 10,000 lb at every credible operating state. The design envelope corner (1,440 psig at -20 F) gives 10,273 lb, but it is not an operating state: inlet gas is 45 F minimum (basis Section 6). Inventory calculated with the GERG-2008 equation of state for the design gas.
29 CFR 1910.146, 1910.147, 1910.269 (as applicable), 1910.1200	Operations: permit-required confined spaces (V-101, T-101, H-101 firebox), lockout/tagout, hazard communication	O&M procedures CON-RPT-004
NFPA 70E	Electrical safe work practices, arc flash labels	Arc flash study by ELE; labels on B-102 equipment One-Line Diagram (ELE-DWG-001)

11. ELECTRICAL, FIRE, BUILDING, DAMAGE PREVENTION AND SECURITY

Table 11-1 sets out these requirements.

Table 11-1: Electrical, Fire, Building, Damage Prevention and Security Requirements

Code or authority	Requirement	How complies	Document
NFPA 70 (2023 NEC) Articles 500, 501, 505; API RP 500	Hazardous location classification and wiring methods	Area classification drawing; Class I Div 1 / Div 2 equipment and seals	Hazardous Area Classification Drawing (ELE-RPT-001 and ELE-DWG-002), SPC-013
NEC Article 250, IEEE 80	Grounding and bonding	Station ground grid	Grounding Design and Drawings (ELE-CAL-005 and ELE-DWG-004), SPC-013
NFPA 780	Lightning protection	Air terminals on VS-101 and buildings as required	Lightning Protection Design (ELE-CAL-006 and ELE-DWG-004)
NFPA 30	T-101 flammable/combustible liquid tank: spacing, normal venting (PVRV-193), flame arrestor (FA-193), emergency venting (EV-193; 16 in), containment	Plot plan spacing; containment 24 x 24 ft, X 18 to 42, Y 88 to 112	Plot Plan (MEC-DWG-001), REG-RPT-004
NFPA 54	Fuel gas piping in buildings (B-101 heater if gas-fired)	Electric heat preferred in B-101; if gas-fired, NFPA 54 applies	SPC-016
API 12K, API RP 556 guidance	Line heater and burner management	BMS-150, SIL 2-certified for SIF-05, with two diverse flame detectors, low bath level and high bath temperature trips, TT-156 high-high gas outlet trip at 140 F, and heater-area fire detector BE-213	H-101 Line Heater Datasheet (MEC-DS-003)

Code or authority	Requirement	How complies	Document
IBC / IFC as adopted by the Uniform Building Code Commission; State Fire Marshal	Prefabricated buildings B-101, B-102 (unoccupied equipment enclosures, Group U or S-2, classification (TBV)); fire code for flammable liquid storage	State Fire Marshal plan review if required for the occupancy; unincorporated County has no local building permit (TBV)	HOLD H-11, REG-RPT-002
 Underground Facilities Damage Prevention Act (OKIE811)	Notify OKIE811 at least 48 h (excluding weekends and holidays) before excavation; white-line; respect tolerance zone; hand-dig within tolerance zone (details (TBV))	Contractor ticket for every excavation; standby for any work within its ROW	SPC-002, SPC-012, CON-RPT-003
 encroachment and crossing requirements	Written approval for work in the ROW, crossing mats, cover and clearance	Per requirements (HOLD H-01 / H-04)	SPC-012
TSA Pipeline Security Guidelines; Security Directives	Security program; directives apply to operators notified by TSA as critical	Owner confirms whether TSA has designated its system; fence, intrusion switch ZS-211, cybersecurity per API 1164	Basis Section 9.9; Control System Architecture Drawing (INS-DWG-001)

12. REGULATORY OPEN ITEMS

Table 12-1 lists the regulatory open items raised by this review, each with the party responsible.

Table 12-1: Regulatory Open Items

Item	Description	Needed from	Affects
RH-01	registration, operator identification number, and construction notification form and timing	Owner compliance	Notification before mobilization
RH-04	confirmation of the authorization route (permit-exempt facility or oil and gas permit-by-rule), including the T-101 throughput limit as an enforceable condition	Owner,	Air authorization before construction
RH-05	Basin-level tally for 40 CFR 98 Subpart W	Owner	Greenhouse gas reporting
RH-07	Whether the outlet lateral must be designed for in-line inspection tools under 49 CFR 192.150	Owner, mechanical	Lateral design
H-17	Stormwater and hydrotest water permitting authority, EPA Region 6 or	Owner, 	Notice of intent route
H-18	Written 49 CFR 192.8 determination: upstream facility type, status of the receiving line, class location building count and buildings within the 334 ft potential impact radius; if transmission, the rupture-mitigation valve (192.179) and control room management (192.631) evaluations	Owner, , survey	Operating, reporting and integrity obligations; waste status; valve and SCADA configuration
H-20	V-101 liquids rate, which sets the T-101 throughput limit	Owner's treating facility	OOOOB storage vessel status

Note 1: The construction notification of 49 CFR 191.22(c), previously an open item, is not triggered: it applies to 10 miles or more of new pipeline and to major modifications of existing facilities, and this project adds about 96 ft of new lateral (TBV).

The project HOLDs also referenced are H-01, H-02, H-04, H-08, H-11, H-13, H-15, H-16 and H-19 (GEN-DB-001 and GEN-RPT-002).

13. CONCLUSIONS AND NEXT STEPS

The station can be built and operated in compliance with every regulation reviewed. The design already meets the Part 192 requirements for a transmission line, so the gathering or transmission determination (HOLD H-18) changes only the operating, reporting and integrity management obligations, not the physical design, unless the outcome is transmission and the rupture-mitigation valve evaluation calls for changes to SDV-101 or SDV-103 automation. Overpressure protection meets 49 CFR 192.195, 192.199 and 192.201, with a peak of about 1,260 psig against the 1,290 psig accumulation limit of the assumed trunkline.

On the environmental side, the station is a minor air source, T-101 stays outside Subpart OOOOb under the recommended 350 bbl/yr enforceable throughput limit, and a Tier I SPCC plan and construction stormwater coverage are required. Process safety management and the risk management program do not apply.

TORUS recommends that the Owner, before the construction issue: document the 49 CFR 192.8 determination and, if the station is transmission, complete the rupture-mitigation valve and control room management evaluations; confirm registration and notification with the ; confirm the air authorization route with ; and resolve the stormwater permitting authority. The permits and their schedule are set out in REG-RPT-002.