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Pipeline Safety Reg Bows To API RP-80

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Vorys partner Gregory D. Russell authored the article "Pipeline Safety Reg Bows To API RP-80," which appeared in the October 2010 issue of *The American Oil & Gas Reporter*.

On March 15, 2006, the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a final rule defining onshore gas gathering for purposes of enforcing federal pipeline safety regulations (49 CFR Part 192). Intended to establish a bright-line test for distinguishing between production and gathering facilities, PHMSA adopted the industry standard definitions for production operation and onshore gathering set in the American Petroleum Institute's Recommended Practice 80 ("RP-80").

While ending a decades-long battle on how to appropriately characterize these facilities, discussions with regulators and operators suggest there are still a few issues that need clarifying. In the article, Mr. Russell discusses ways that producers and regulators can minimize the risk of mischaracterization by paying close attention to the representative applications and supplemental definitions contained in RP-80. To read the full article, please [click here](#).