

Pipelines

Mr. Chairman, Commissioners, my name is Barbara Ehrlich and I live on Jackson Street in Las Vegas.

We have heard about many of the adverse affects that oil and gas development will have on San Miquel County. I would like to bring up an issue that has seldom been addressed. If we have drilling and we have wells, we will have pipelines.

There are 3 types of lines running from a well: gathering, transmission and distribution. Gathering lines travel short distances gathering products from wells and then moving them to natural gas facilities. Transmission lines transport the natural gas within a state or across state lines. Distribution lines move the natural gas to homes, businesses and some industries.

According to an Associated Press article from 3/23/12 entitled "Audit: Natural gas lines tied to fracking lack oversight" by Garance Burke, there are 200,000 miles of gathering lines and 40,000 miles of hazardous liquid gathering lines nationwide. But only about 24,000 of those miles are regulated. (The Government Accountability Office) In Pennsylvania, gathering lines in a rural area receive no federal oversight if there are fewer than 10 homes within 220 yards of a pipeline. The industry is not required to report pipeline-related fatality, injury or property damage information about the unregulated lines.

In a conversation with Jason Montoya, head of the Pipeline Safety Bureau at the NM PRC on Dec. 13 of last year, we received some interesting and alarming information. Before and during well construction pipeline inspection is regulated by the Federal Energy Regulatory Commission (FERC). Once natural gas pipeline projects become operational, safety is regulated, monitored and enforced by the U.S. Department of Transportation and the U.S. Pipeline and Hazardous Material and Safety Administration, Office of Pipeline Safety. The Federal Government delegates the authority to enforce some its regulations to state-level pipeline safety authorities. In New Mexico this is the NM PRC Pipelines Safety Bureau. There are 22,651 miles of all 3 types of pipelines in New Mexico. Approximately 4,500 miles are interstate. This is probably under-reported (as of 3/15/11 data from Pipeline Datamart-reported to the Federal Government by pipeline operators).

The New Mexico Pipeline Safety Bureau has 6 inspectors for pipeline safety oversight. One is a meter inspector so that leaves 5 actual pipeline inspectors who are in the field 80% of the time. Each inspector has over 5,000 miles of transmission and distribution lines to inspect. Gathering lines are not regulated or inspected. These lines are the responsibility of the owner. Information on gathering lines is often unknown: location, depth, owner, material, etc. The PRC also conducts construction

Exposed Gathering Pipeline
San Juan County, NM



inspection but not on 100% of all pipes. Most inspections are not physical, just an examination of documents to determine if the companies are following regulations. Mr. Montoya stated that he would hire 3 inspectors just for new construction if he could.



If we are going to have a substantial ordinance, we need to make sure that pipeline safety and monitoring are included. Construction quality, maintenance practices, location and depth of pipelines has to be disclosed. We have to have frequent regular inspections for leaks and corrosion. It is important that the cost of inspection and monitoring not be borne by the county but by the industry itself.

Pipelines from a well or wells on one property will often have to run through an adjacent property. The County can be involved in routing so as to minimize impact on private land.

Lack of pipeline safety can have serious consequences for public health and safety as well as for livestock, wildlife and the land itself. I would hope that a County Oil and Gas Ordinance would address this issue.

Thank You