



Indiana Utility Regulatory Commission  
Pipeline Safety Division

## **2010 Master Meter Operator Compliance Seminar**

**November 4, 2010**

# **Damage Prevention Programs**

p. 3, Section 4

## **Does operator control all excavation on the property?**

§192.614 – (a) “each operator of a buried pipeline shall carry out ... a written program to prevent damage to that pipeline by excavation activities”

(b) “An operator's pipeline system must be covered by a qualified one-call system where there is one in place.”

Indiana Code IC 8-1-26, Damage to Underground Facilities – Section 17(a): “An operator that has underground facilities located in Indiana must be a member of the Indiana Underground Plant Protection Service or its successor organization” (Indiana 811).



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# Damage Prevention Programs, cont'd

## Total Exemption to Federal Rule

§192.614(d)(3) – “Pipelines to which access is physically controlled by the operator.”

Controlled access cannot be guaranteed without walls or fences and gates.



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# **Damage Prevention Programs, cont'd**

### Partial Exemption to Federal Rule

§192.614(e) "Pipelines operated by persons other than municipalities (including operators of master meters) whose primary activity does not include the transportation of gas need not comply with the following:

- (1) The requirement of paragraph (a) of this section that the damage prevention program be written; and
- (2) The requirements of paragraphs (c)(1) and (c)(2) of this section."



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# Damage Prevention Programs, cont'd

## Partial Exemption to Federal Rule

### §192.614(c)(1-2)

- Notify excavators
- Notify public



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# Damage Prevention Programs, cont'd

## Requirements under the Regulations

### §192.614(c)(3-6)

- Provide for receiving, recording excavation notifications
- Notify excavators of temporary marking
- Locate and mark facilities
- When the operator believes damage is possible, inspect as frequently as necessary during and after excavation to verify pipeline integrity



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# Damage Prevention Programs, cont'd

## IURC Position

### **Join Indiana 811**

- Include in your O&M manual procedures to protect your system from damage.
- Review and strengthen your continuing surveillance procedures, incorporate "walkabouts".