

## Gas Notice of Proposed Rulemaking Consulting

The Integrity Plus DOT compliance team has reviewed the 500+ page *PHMSA-2011-0023 Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines*, otherwise known as, the Gas Notice of Proposed Rulemaking (NPRM) which includes changes that will affect 49 CFR Parts 191 and 192. Proposed changes include integrity management requirements, operation and maintenance requirements and regulation of onshore gas gathering lines.

Integrity Plus's compliance team offers services to assist your team in determining the effects of this regulation change to your company's operations. We provide operators of varying sizes and complexities with a right-sized Gas NPRM consultation and strategy.

	Flowchart	Problem Identification	Recommendations	Consultation & Implementation
Programmatic Gap Analysis <b>Silver</b>	✓	✓		
Resource Gap Analysis <b>Gold</b>	✓	✓	✓	
Covered Segment Analysis <b>Platinum</b>	✓	✓	✓	✓

## Gas NPRM Flowchart

*Confused about what the new, proposed gas rule will mean for you? Short on time to try to wrap your head around the Gas NPRM document?*

Integrity Plus's DOT Compliance Experts have created a process flow diagram to help you visualize and comprehend the requirements of the new Gas NPRM. This flowchart highlights the additional requirements that operators will be expected to comply with should the NPRM be finalized, as currently written. The chart organizes the NPRM into pipeline compliance functional topics for easier identification of the impact to your program and internal resource groups.

## Programmatic Gap Analysis

*Looking for answers on how the new proposed gas rule will impact your current program implementation?*

Integrity Plus's DOT Compliance Team can provide assistance in identifying your potential program gaps based on the proposed requirements in the Gas NPRM. Integrity Plus will conduct a gap analysis of your current pipeline safety programs against the Gas NPRM to identify where changes may be required in your specific pipeline compliance programs to meet the new, proposed requirements. Knowing and understanding these gaps can help you prioritize and plan for future implementation and maintenance of your current compliance program(s).

## Resource Gap Analysis

*There are many moving parts in the new Gas NPRM. Do you know how the new requirements will change your compliance support needs?*

Integrity Plus DOT Compliance Professionals will conduct a gap analysis and evaluation of your current pipeline resources and technology capabilities in order to identify potential bottlenecks. Using information found through a Programmatic Gap Analysis, a Resource Gap Analysis of different types of resources is performed to help you prioritize and plan for the future by understanding man-hours and technology that may be beneficial to your program. This formal analysis can also serve as a technical justification behind budgeting adjustments and hiring decisions.

## Covered Segment Analysis

*Are you concerned about the amount of segments covered by new gathering pipeline and Moderate Consequence Area requirements as a result of the Gas NPRM?*

In addition to a Programmatic and Resource Gap Analysis, Integrity Plus compliance experts evaluate how many of your company's pipeline segments will be subject to the new gathering pipeline and Moderate Consequence Area (MCA) requirements of 49 CFR 192. Our compliance team gives you an analysis of additional requirements, resources, and technology needed to comply with these new requirements, as well as, a cost per mile target value that will help support compliance activities through advanced budgetary planning. This formal study serves as an excellent compliance demonstration in regulatory inspections or as technical justification for operational decisions.



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