

**Comments to 30 CFR 250  
Subpart J—Pipelines and Pipeline Rights of-Way**

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Section Number		General Comment	Recommendation to MMS
<b>General</b>			
<b>250.1000</b>	Definitions.	The glossary of acronyms should be added.	
<b>250.1001</b>	What general performance and recordkeeping requirements apply to OCS pipelines?	Records must be kept for as long as pipeline is in place unless otherwise cleared by RS.	
<b>250.1002</b>	What are the types of OCS pipelines?	Lease term or ROW pipeline, what is the difference?	
<b>250.1003</b>	Which departments have jurisdiction over OCS pipelines?	DOT & DOI	
<b>250.1004</b>	What are the criteria for determining jurisdiction?	This section and CFR 49, Section 195.1 "Applicability" (5) and (6) and Sec. 192.1 "Scope of part" (1) and (5) should be aligned. The diagram from the Memorandum of Understanding between the DOI/MMS and DOT/FERC should be included.	This section should be written in the same language and agreed upon with DOT/FERC using the 1996 MOU as a basis. It should be identical the description used in 49 CFR 192 & 195.
<b>250.1005</b>	What are the requirements regarding jurisdiction transfer points?	This section is written as if the operators determine the exact locations of the regulatory breaks per (2-b). I assume the schematics and regulatory break points must be submitted to the DOT and DOI for agreement, but it is not stated here.	A clear requirement, such as a schematic or PFD showing the DOI/DOT code breaks should be included.
<b>250.1006</b>	When must I submit the applications, requests, plans and reports, and make the notifications required by this subpart?	The format for the applications, requests, plans and reports, and make the notifications should be stipulated.  Also definition of what constitutes "notified" should be included.	The definition of what constitutes "notified" should be included.
<b>Applications for New Pipelines</b>			
<b>250.1007</b>	How do I apply for approval of a new pipeline?	Regional Director (not RS) may waive required information. States electronic filing an option but sites 250.186(3) which has not been included.	
<b>250.1008</b>	Where must I send copies of my pipeline application?	Must notify all affected other pipeline ROW holders, same as now. Also copy any affected state.	
<b>250.1009</b>	How does MMS process a pipeline application?	Review does not start until RS considers application "complete". RS may require	

Section Number		General Comment	Recommendation to MMS
		amendments.	
250.1010	What conditions must my pipeline application meet?	<ol style="list-style-type: none"> <li>1. RS approval of Development Operations Coordination Documents (DOCD) or Development and Production Plans (DPP) for originating structure.</li> <li>2. Copy of State approval if enters State waters</li> <li>3. Crossing of waterway requires Corps permit</li> <li>4. Copies of agreement from affected lease/ROW holders, showing they had at least 30 days to respond.</li> <li>5. Modification permit from RS for receiving end.</li> <li>6. Concurrence from affected leaseholders and Secretary of Commerce (Sec-Com).</li> <li>7. Demonstrate Oil Spill Financial responsibility.</li> </ol>	
250.1011	What can I do if an affected State objects to my pipeline ROW application?	Amend you application, appeal to the Sec-Com, or withdraw your application.	
250.1012	How will the Regional Supervisor notify me of the decision on my pipeline application?	Approval may have conditional requirements, segment number will be assigned at this time. If disapproved reasons will be provided.	
250.1013	When may the Secretary cancel approval of a pipeline application?	After a hearing ensuring that requirements of this section are met.	
<b>Pipeline Application Contents</b>			
250.1014	General information.		
250.1015	Other general information.	Need to include and "new technology".	
250.1016	Information regarding other agencies and entities.	Note the warning distance for affected leases/ROW holders is within 500ft of existing <b>ROW</b> (not pipeline) or <b>decommissioned</b> pipeline. Placing anchors or laying of pipeline or accessories.	
250.1017	Location information.	NAD 1927 for GOMR (Gulf) and POCSR, NAD 1983 for AKOCSR and GOMR (Atlantic). Min scale 1"=2000'. Length in ft.	
250.1018	Origination and termination information.	None	
250.1019	Horizontal component and appurtenances information.	You do not cite regulations which if complied with assure approval (example API 1111, or ASME B31.4/31.8 for internal design pressure). You can add the "or equivalent " to allow for ISO ect...	DOI does not cite regulations which if complied with assure approval (example API 1111, or ASME B31.4/31.8 for internal design pressure). You can add the "or equivalent " to allow for

Section Number		General Comment	Recommendation to MMS
			ISO, DnV, ect
250.1020	Schematic flow diagram.	None	
250.1021	Shallow hazards information.	The requirements for preparing the report should be specified and not left to the RS discretion.	The current text is more specific. The proposed text is to broad and should be replaced with the old text.
250.1022	Construction information.	None	
250.1023	Onshore support base, terminal, support vessels, and aircraft information.	None	
250.1024	Operation information.	None	
250.1025	Service and products information.	None	
250.1026	Biological and archaeological information.	None	
250.1027	Requests for alternative compliance or departure.	None	
250.1028	Oil and hazardous substance spill response information.	Calculation of spill allows for leak detection/shut down.	
250.1029	Oil Spill Financial Responsibility (OSFR) demonstration information.	Not required if calculated volume from line less than 1000 bbl worst case. No calculation needed if total line than 1000 bbl.	
250.1030	Environmental Impact Analysis (EIA) information.	None	
<b>Pipeline Design</b>			
250.1031	What are the general requirements for designing a pipeline?	None	
250.1032	What must I do to avoid or mitigate hazards?	Loosely worded, I assume this covers span analysis and rectification	
250.1033	What are the design requirements for horizontal components and risers?	(a) I would suggest removing and calculation here and use the API 1111reference only. By providing a calculation here you are in effect adding one more potential conflict in the future should the API/ASME RP's change (as they often do). For example in (a).2 you reference B31.8, but for a liquid line the reference would be B31.4. (b)Same as above reference should be to API 1111 or ASME B31.4/31.8. Pipes can collapse in less than 1000 ft of water. ( c ) SCR design requirements are the same for fixed or floating platforms. The difference is only	30 CFR should avoid using specific calculation from specific codes. As the codes are updated they will become in conflict with the regulations. Specifically for this section in the current proposal: <ul style="list-style-type: none"> <li>• (a) Remove and calculation here and use the API 1111reference only.</li> <li>• (a).2 you reference B31.8, but for a liquid line the reference would be B31.4.</li> <li>• (b) Reference should be to API 1111 and/or ASME B31.4/31.8 and reference to water depth removed. Pipes can</li> </ul>

Section Number		General Comment	Recommendation to MMS
		<p>in the input loads.</p> <p>(i).(1) The "2 year storm" stability requirement for jetted pipe does not make sense, unless the sentence is supposed to read "If the pipeline <b>will be</b> jetted down to 3ft....". This assume that the requirement is for the pipe to be stable for the period prior to jetting.</p> <p><b>Suggested Addition: "For all buried or jetted pipeline vertical stability shall also be confirmed."</b></p>	<p>collapse in less than 1000 ft of water.</p> <ul style="list-style-type: none"> <li>(i).(1) The "2 year storm" stability requirement for jetted pipe does not make sense, unless the sentence is supposed to read "If the pipeline <b>will be</b> jetted down to 3ft....". This assumes that the requirement is for the pipe to be stable for the period prior to jetting.</li> <li><b>Suggested Addition: "For all buried or jetted pipeline vertical stability shall also be confirmed."</b></li> </ul>
250.1034	What are the design requirements for appurtenances?	<p>(d).(1) Anode design life minimum is now 30 years. This seems high for a flowline in a field that may only last ½ that. Anode design codes are very conservative and great strides have been made in optimizing (i.e. reducing) the anode quantities over the last 10 years by R&amp;D. It appears that the MMS is increasing the minimum design life to counter this trend. Previously the requirement was in 250.1002 and was 20 years.</p> <p>(d) (2) The regulation is now very specific about anode mass, but equally important, and more commonly overlooked, is the anode driving potential which is a product of composition, surface area, temperatures, anode spacing, and the surrounding media.</p> <p><b>Suggested Revision: Remove the specific calculations and reference the NACE and/or DnV RP's.</b></p>	<p>The calculation given provides the basic equation for anode mass, however does not address the corresponding, and equally important calculation for required anode surface area.</p> <p>The simplest way to address this issue is remove the specific calculations and reference the appropriate NACE and/or DnV RP's.</p>
250.1035	What are the design requirements for sour service?	None	
250.1036	When must I sectionalize a pipeline?	30 CFR 254.47 has methods for calculating "worst case" but there is no guidance regarding when to sectionalize the pipeline. If the MMS/DOI has a maximum allowable "worst case" it should state it here.	30 CFR 254.47 has methods for calculating "worst case" but there is no guidance regarding when to sectionalize the pipeline. If the MMS/DOI has a maximum allowable "worst case" it should state it here.
<b>Pipeline Fabrication</b>			
250.1038	What are the general requirements for	Very general and easy to "comply with"	

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	fabricating a pipeline?		
<b>Pipeline Construction</b>			
250.1040	What are the general requirements for constructing a pipeline?	(b) "on approved route" should be defined. I assume that anywhere within the 200ft ROW is "on the route", and that minor deviations outside that can be submitted to MMS/DOI as an amendment, but again <b>it should be explicit: What is "on the route: and what to do if it is not.</b>	(b) "on approved route" should be defined. I assume that anywhere within the 200ft ROW is "on the route", and that minor deviations outside that can be submitted to MMS/DOI as an amendment, but again <b>it should be explicit: What is "on the route", and what to do if it is not.</b>
250.1041	Who must I notify before I begin construction?	None	
250.1042	What must I do to avoid or mitigate hazards during construction?	None	
250.1043	What must I do to install a hot tap?	None	
250.1044	What must I do to protect a horizontal component?	Good spanning covered.	
250.1045	What must I do to protect a riser?		
250.1046	What must I do to protect an appurtenance and crossing?	<b>"..protection in less than 500ft. Either bury, matt, or cage....."</b>	<b><i>This section requires burial or protective structures in water less than 500ft. Protection from what is not given. How are the design loads used to design the structure to be determined? A more complete requirement should be added.</i></b>
250.1047	What must I do to construct a pipeline in or near a designated use area?	None	
250.1048	What must I do to construct a pipeline in or near a sensitive biological feature or area?	None	
250.1049	What must I do to construct a pipeline in or near an archaeological resource?	None	
250.1050	When must I prepare and implement an H2S contingency plan for construction?	20ppm limit	
250.1051	What information must I submit after construction is completed?		
<b>Pipeline Risers Connected to Floating Platforms</b>			

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250.1052	What are the requirements for pipeline risers connected to floating platforms?	(d) (1) says you need a PE, at kick off meeting MMS said they were backing off this...wording says "or equivalent" but that usually means chartered or other foreign PE like certification. (d) (3) no conflict of interest allowed.	Requirement that a CVA needs to be a PE should be removed. wording says "or equivalent" but that usually means chartered or other foreign PE like certification. Many qualified engineers are not PE certified. Conversely there are many PE's who would not and should not be able to act as CVA's.
250.1053	What are the requirements for pipeline riser verification plans?	Design must be complete at least 30 days prior to submission to RS a pipeline application. Separate ones required for each riser. (d) CVA nominated by Company.	Implies that submissions are required for every riser even if identical to existing or planned risers on the same facility. Should reinstate the provision from current text that provides conditions when fabrication and installation CVA does not need to be performed.
250.1054	What must the CVA do to verify pipeline riser design?		
250.1055	What must the CVA do to verify pipeline riser fabrication?	CVA must at least be part time "on-site".	
250.1056	What must the CVA do to verify pipeline riser installation?		
<b>Pipeline Pressure Testing</b>			
250.1057	What are the general requirements for pressure testing a pipeline?		
250.1058	What are the requirements for conducting a hydrostatic pressure test for a pipeline?	Notification 48 hr prior Test pressure 1.25 of MAOP, but not greater than 95% of yield. Stable for last two hours,	
250.1059	What are the requirements for leak testing a pipeline?	<b>Very loose definition, "no leaks observed" and "sufficient pressure", should be to same criteria as MAOP.</b>	This is a very loose definition using, "no leaks observed" and "sufficient pressure". These terms need to be clearly defined as they are a source of disagreement.
250.1060	When must I perform a pressure test on a pipeline?	8 hr test after install	
250.1061	What information must I include in a pressure test report?		
<b>Pipeline Safety Equipment</b>			
250.1062	What are the general requirements for pipeline safety equipment?		
250.1063	What are the safety equipment requirements for		

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	a departing pipeline?		
250.1064	What are the safety equipment requirements for an incoming pipeline?	An Flow Safety Valve (FSV) on all incoming pipes? Also at all tie-ins?	
250.1065	What are the safety equipment requirements for a crossing pipeline?	An FSV for all crossing pipelines? I hope they mean at the platform.	
250.1066	What are the safety equipment requirements for a bi-directional pipeline?		
250.1067	When must I provide redundant safety equipment?	HIPPS section	
250.1068	What are the safety equipment requirements for a pipeline pump?		
250.1069	What must I do if safety equipment fails to operate as intended?		
<b>Pipeline Leak Detection</b>			
250.1071	When do I need to use a leak detection system?		
<b>Pipeline Internal Corrosion Control and Flow Assurance</b>			
250.1074	What are the general requirements for internal corrosion control?		
250.1075	What are the general requirements for flow assurance?		
<b>Pipeline Operations and Maintenance</b>			
250.1078	What are the general requirements for operating and maintaining a pipeline?		
250.1079	What written procedures must I establish before I operate an OCS pipeline?	Baseline integrity by either internal inspection of pressure test.	
250.1080	When must I mark the MMS assigned pipeline segment number on a pipeline?		
250.1081	How do I determine the MAOP of a pipeline?		
250.1082	What must I do if the pipeline transports H2S?		
250.1083	What are the requirements for conducting remote operations during a platform evacuation?		
250.1084	What are the requirements for testing pipeline safety equipment?		
250.1085	What must I do when safety equipment is		

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	removed from service?		
250.1086	What must I do when a pipeline is taken out of service?	After 30 days of no use.	
250.1087	What must I do if a pipeline is shut in?	Requirements for visual inspection (ROV) and leak test if: Storm passed within 25 miles, Unexplained automatic shut down occurred You had indications it may have been damaged (dragged anchor for example)	
250.1088	What must I do if a pipeline leaks?		
250.1089	What must I do if I need to flare or vent gas from a pipeline?	See subpart K 250.1155	
250.1090	When must I provide impact protection for existing risers?		
250.1091	When will MMS suspend or temporarily prohibit pipeline operations?		
<b>Pipeline Modifications and Repairs</b>			
250.1093	What must I do to modify an approved pipeline?		
250.1094	What are the general requirements for repairing a pipeline?		
250.1095	What must I do to commence and complete a repair?		
250.1096	What must I do to repair a pipeline using a clamp?		
250.1097	When do I need to submit a corrective action plan and report?		
<b>Pipeline Surveying, Monitoring, and Inspection</b>			
250.1100	What are the general requirements for surveying, monitoring, and inspecting a pipeline?		
250.1101	What must I do to survey and monitor a pipeline or route?	Monthly by air or sea	
250.1102	What inspections are required for my pipeline or route?		
250.1103	What additional inspections or surveys may the Regional Supervisor require?	<b>There is wide latitude here but no clear requirement. If I build a line without pigging ability can the next RS ask me to intelligently</b>	<b>There is wide latitude here but no clear requirement. If I build a line without pigging ability can the next RS ask me to intelligently</b>

Section Number		General Comment	Recommendation to MMS
		pig the line?	pig the line?
<b>Pipeline Decommissioning</b>			
250.1105	When do I accrue pipeline decommissioning obligations?		
250.1106	When must I decommission a pipeline?	After out of service for 5 years you have 1 year to decom	
250.1107	What must I do to decommission a pipeline in place?	(h) 2624 ft (800m) you can leave appurtenances	
250.1108	What must I do to decommission a pipeline by removal?	The requirements are written such that they encourage leaving in place.	
250.1109	How do I obtain approval to decommission a pipeline?		
250.1110	How does MMS process a decommissioning application?		
250.1111	After I decommission a pipeline, what information must I submit?		
250.1112	When must I remove a pipeline decommissioned in place?	62 FR 7037-7039	
250.1113	What are the requirements for re-commissioning a decommissioned pipeline?		
<b>Pipeline Right-of-Way (ROW) Grants</b>			
250.1115	What is a pipeline ROW grant?		
250.1116	When must I obtain a pipeline ROW grant?		
250.1117	Who can be a pipeline ROW grant holder?		
250.1118	What are the financial security requirements for holding a pipeline ROW grant?	<b>The surety is still listed as \$300,000 but the preamble says it has increased to \$1,000,000</b>	
250.1119	When will MMS terminate the period of liability of my financial security?		
250.1120	When will MMS cancel my financial security?		
250.1121	What happens if my financial security is reduced or lapses?		
250.1122	How will MMS determine that my financial security is forfeited?		

<b>Section Number</b>		<b>General Comment</b>	<b>Recommendation to MMS</b>
<b>250.1123</b>	What penalties can MMS assess if my financial security is not sufficient, is reduced or lapses, or is forfeited?		
<b>250.1124</b>	What happens to my financial security after a pipeline ROW grant terminates?		
<b>250.1125</b>	How do I submit an application for a pipeline ROW grant?		
<b>250.1126</b>	What information must I include in an application for a pipeline ROW grant?		
<b>250.1127</b>	How does MMS process an application for a pipeline ROW grant?		
<b>250.1128</b>	When will MMS temporarily suspend or prohibit construction of an ROW pipeline?		
<b>250.1129</b>	What must I do if the as-built location of the associated ROW pipeline deviates from the approved pipeline ROW grant?		
<b>250.1130</b>	What rental fees and payment schedules apply to a pipeline ROW grant?		
<b>250.1131</b>	What are the terms and conditions for holding a pipeline ROW grant?		
<b>250.1132</b>	How do I modify a pipeline ROW grant?		
<b>250.1133</b>	How does temporary cessation and cessation of pipeline operations affect a pipeline ROW grant?		
<b>250.1134</b>	How do I assign a pipeline ROW grant?		
<b>250.1135</b>	When may MMS suspend a pipeline ROW grant?		
<b>250.1136</b>	How do I relinquish a pipeline ROW grant?		
<b>250.1137</b>	When will a pipeline ROW grant be cancelled, be forfeited, or expire?		
<b>250.1138</b>	What must I do after a pipeline ROW grant terminates?		
<b>Accessories to Right-of-Way (ROW) Pipelines</b>			
<b>250.1140</b>	What are the requirements for an accessory to an ROW pipeline?		
<b>250.1141</b>	How do I obtain approval to install, operate, and maintain an accessory?		

<b>Section Number</b>		<b>General Comment</b>	<b>Recommendation to MMS</b>
<b>250.1142</b>	How does MMS process an accessory application?		
<b>250.1143</b>	Who do I need to notify before I install an accessory?		
<b>250.1144</b>	What information must I submit after an accessory is installed?		
<b>250.1145</b>	What accessory inspections must I conduct?		
<b>250.1146</b>	What must I do to modify an accessory?		
<b>250.1147</b>	When must I decommission an accessory?		