

Schedule 5: It may be noted that the baseline data for specific measurement should be available with the operator.

Comments: If the baseline data is not available, the operator shall gather the missing data during the integrity assessment phase of the project. For example, if the operator don't have information such as pipe diameter, joint coating type, wall thickness, grade etc, these can be collected during the step 3 (direct examination) phase of Direct Assessment and records shall be updated for subsequent assessment. Even if ILI is used as an assessment, data shall be gathered during the validation dig.

Baseline data may not be a pre requisite to start any assessment.

Section 5.1.3: While implementing External Corrosion Direct Assessment if the pipe is exposed, the operator is advised to conduct examinations for threats other than that for external corrosion also (like mechanical and coating damages).

Comments: Please remove coating damages from the section, it is related to external corrosion.

ECDA may detect other pipeline integrity threats such as internal corrosion, mechanical damage, stress corrosion, microbiologically influence corrosion, when such threats are identified, additional relevant inspections must be performed.

Section 5.1.3: Pre-assessment incorporating various data gathering, database integration and analysis

Comments: Determining the feasibility of performing direct assessment is a major step during the pre-assessment phase. Please include "determining Direct Assessment feasibility" in this section.

Section 5.2.2: For all sections of the pipelines above ground, all pipeline skids and pressure vessels, a periodic thickness assessment and comparison with baseline values may be done and employed as Integrity Assessment tool.

Comments: Implementation API 570 methodology would be beneficial for the above grade pipe assessment and establishing reasonable reassessment interval. Soil to air interface need to be considered.

Section 6.1.3: Generally, these are high-population-density areas, difficult-to-evacuate facilities (such as hospitals or schools), and locations where people congregate (such as places of worship, office buildings, or fields).

Comments: There should be a definition for potential impact area, either we need to establish class location based method or we need to determine the potential impact radius using the pipeline operating pressure. Pressure plays a major role in determining impact.

Section 6.1.6: After the completion of Integrity assessment like inline inspection, and coating health surveys etc,

Comments: Suggest to remove Coating health surveys since it is a part of integrity assessment, needs to be ILI, DA and Hydro testing

Section 6.1.6 A: Mitigation through repair actions

Comments: It would be beneficial if we could provide predict burst pressure ranges for scheduled and monitored indications also.

Appendix III: Interval

Comments: It sounds like the maximum 10 years interval is for the reassessment purpose.

We also need to consider the reassessment interval predicted using the remaining life calculation. If the reassessment interval from remaining life is less than 10 years then that should be considered as an interval.

In United States CFR they used to consider 7 years reassessment interval

Appendix III: Interval

Comments: It sounds like the maximum 10 years interval is for the reassessment purpose.

- 1) What is the baseline requirement for the newly constructed infrastructure, typically this used to 10 years for natural gas pipelines in United States*
 - 2) Whether the interval requirement is same for the pipelines located in the potential impact areas and non potential impact areas.*
-