Submitting T-4 Permit Filings

Who files?

A T-4 pipeline permit is required to operate pipeline or gathering systems. Unless you are operating production or flowlines, or if you are excluded under the rules in 16 Texas Administrative Code (TAC) §8.1(b)(4), "General Applicability and Standards", you will need to obtain a pipeline permit, to be renewed annually. Each organization performing activities subject to the jurisdiction of the Commission shall maintain a current and active P-5 (Organization Report) with the Commission. See 16 TAC 3.1 for the specific wording of this requirement.

To view our rules, visit the RRC website at https://rrc.texas.gov/general-counsel/rules/current-rules/.

How to file?

All permit filings must be submitted using the Commission's Online System. The specific system for pipeline permit filings is called the Pipeline Online Permitting System (POPS). If new to the Online System, an operator must first designate a Security Administrator. The Security Administrator will be responsible for creating and managing POPS user accounts for users within their company, for assigning filing rights to those accounts, and for performing maintenance activities (e.g. resetting passwords) when needed. To designate this person, complete and submit a *Security Administrator Designation (SAD) form* (find the SAD form at https://www.rrc.state.tx.us/media/6056/formsadp.pdf) by emailing it to the RRC using this address: rrconline-security@rrc.texas.gov. Once the SAD form is processed, the Security Administrator will receive a User ID and a temporary password. Now, the Security Administrator can login to the RRC Online System (visit the RRC Online System at https://webapps.rrc.state.tx.us/security/login.do) and create User IDs for users within their company.

For more information on Security Administrators, visit the RRC website at https://www.rrc.texas.gov/about-us/resource-center/forms/online-filing-at-rrc/becoming-a-security-administrator/.

What to file?

New Permits and Renewals

To apply for a new permit, file a **New Liquid Permit** or a **New Gas Permit** and pay the non-refundable new permit fee.

To renew an existing permit, file a **Renewal** and pay the both the Mileage Fee and the Permit Fee. Permits must be renewed annually, and Renewals must be filed before their expiration date to avoid late fees. The permit expiration date can be found in POPS and is determined by the first letter of the operator name. To view the renewal schedule and find more information on fees, visit the RRC Pipeline Safety fees page at https://www.rrc.texas.gov/pipeline-safety/pipeline-fees/.

Amendments and Inactivates

To report changes to an existing permit (e.g. pipeline addition, abandonment, fluid change, pipeline replacement) file an **Amendment**. There are no fees associated with filing an amendment. Note that Amendments *do not* renew a permit or change their expiration date. If up against a renewal expiration deadline, always renew first, then amend.

If all lines in a permit are abandoned according to our rules, or if all lines in a permit are moved to another permit, file an **Inactivate.** Operators do not need to renew inactive permits.

Full Transfers

During a full transfer (entire permit / pipeline is transferred between operators), the divesting operator must file first by filing a **Divesting Transfer.** Once the Commission approves the Divesting Transfer, the permit will appear in the acquiring

operator's POPS Dashboard. Then, the acquiring operator will file an **Acquiring Full Transfer** to complete the transfer. (As of September 1, 2020, the acquiring operator shall pay a renewal fee upon acquisition.) Both operators should file within 30 days of the effective transfer date or the acquiring operator may be subject to a penalty for operating without a permit.

Transfer Merges

As of September 1, 2020, there is a new type of application in POPS called the Transfer Merge. As the acquiring operator in a *full* transfer, the acquiring operator has the option to file a **Transfer Merge** instead of an Acquiring Full Transfer. The Transfer Merge will not only perform the action of the Acquiring Full Transfer, but in addition, it will merge the transferred lines into an existing permit of the operator's choosing.

Partial Transfers

During a partial transfer (portion of the permit / pipeline is transferred between operators), either operator can file first. The divesting operator will file a **Divesting Transfer** and the acquiring operator will file an **Amendment**. Both operators should file within 30 days of the effective transfer date or the acquiring operator may be subject to a penalty for operating without a permit.

Required attachments

If wondering what attachments are needed for an application, view the "Pipeline Permit Cheat Sheet" on the RRC website at https://www.rrc.texas.gov/media/37384/pipeline-permit-cheat-sheet.pdf.

To view sample cover letters and overview maps, visit the RRC Pipeline Safety forms webpage at https://www.rrc.state.tx.us/pipeline-safety/forms/.

To view sample shapefiles, visit the RRC Pipeline Safety mapping webpage at https://www.rrc.state.tx.us/pipeline-safety/mapping/digital-submissions/.