

Part 191

and Other Reporting Requirements for Natural
Gas Pipelines

A series of horizontal lines in teal and white colors, extending from the right side of the slide towards the center, positioned below the main text.

Part 191

- This part prescribes requirements for the **REPORTING** of:
 - Incidents
 - Safety related conditions
 - Annual pipeline summary data
 - Other reporting requirements



This Part Does Not Apply To:

191.1 (b)

- Offshore gathering of gas
 - Upstream from the outlet flange of each facility where hydrocarbons are produced
- Outer continental shelf upstream from the point where a production operator transfers responsibility to a transport operator



This Part Does Not Apply To:

- Onshore Gathering of gas
 - Through a pipeline operating at less than 0 psig
 - Through a pipeline not regulated (§ 192.8)
 - Within inlets of Gulf of Mexico, except for requirements of § 192.612



A technician opens a pressure gas valve inside the Oil and Natural Gas Corp (ONGC) group gathering station on the outskirts of the western Indian city of Ahmedabad

Definition (§191.3)

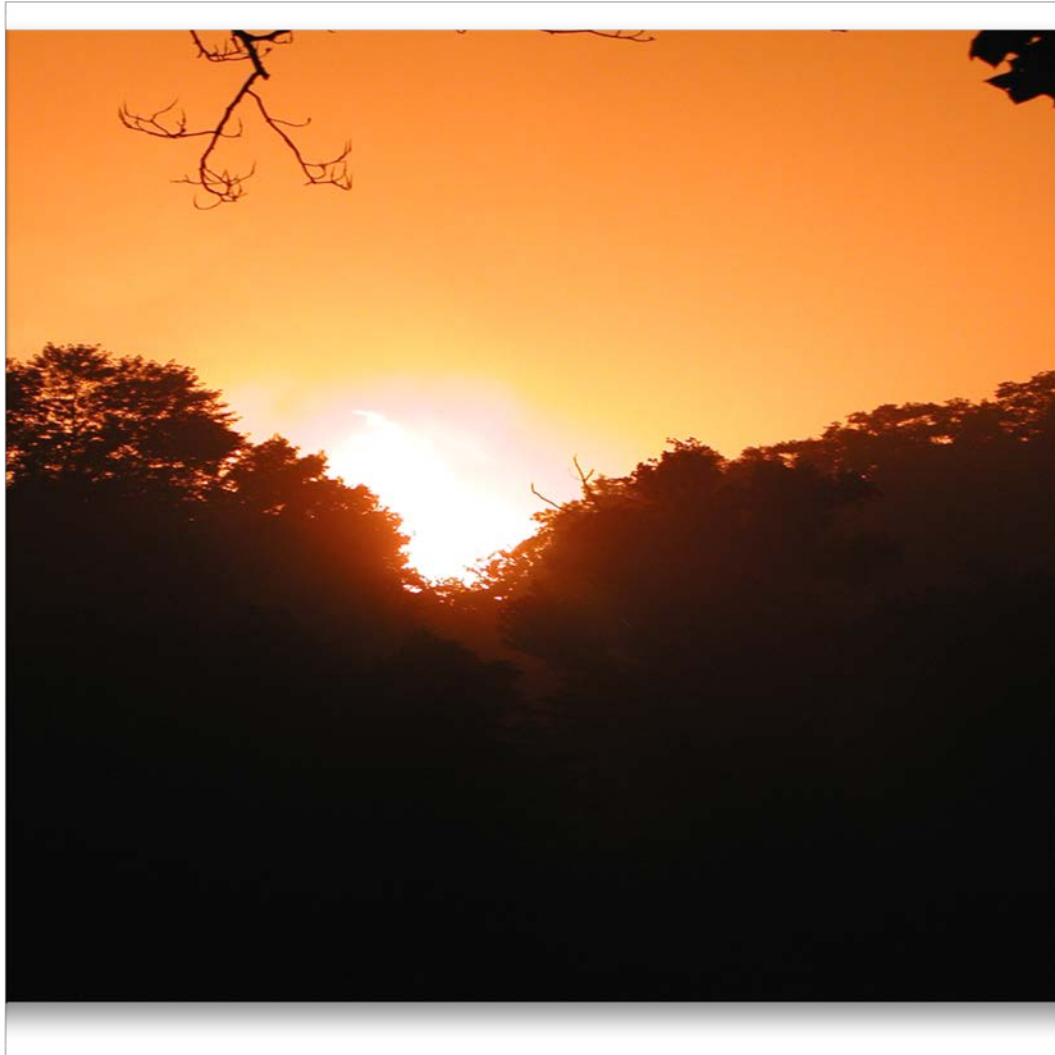
- Master Meter System:
- A pipeline system for distributing gas within, but not limited to, a definable area such as:
 - Mobile Home Park
 - Housing Project
 - Apartment Complex
- Supplies the "Ultimate Consumer"
 - Where the Operator Purchases Metered Gas from an Outside Source for Resale



Incidents (§191.3)

If you go out to a site on or near a pipeline and you see
this:

You May Have an Incident



30" pipeline operating
at 800 psi at 11 o'clock
pm. Glow seen for 30
miles



Hole the next morning.



Glow in the sky from a 40,000 HP compressor station being destroyed by tornados. Know of at least a dozen people whose lives were saved due to the glow in the sky, and being able to see the tornados.



40,000 HP station
destroyed by 2 or
more F-2 tornados.



Minneapolis, MN
March 17, 2011

The explosion happened in a 20-inch steel line that was installed in 1994. No one lost power, except for those who asked for the gas to be shut off. Minneapolis 911 did not receive any calls about a gas leak in the area prior to the fire.



Philadelphia, PA January, 2011

A gas main explosion in a Northeast Philadelphia neighborhood that sent a 50-foot fireball into the sky, left one person dead (gas company employee), injured five others and forced dozens of residents from their homes

Incident - §191.3

- **Incident means any of the following events:**
 - A release of gas, LNG, LPG, refrigerant gas, or gas from LNG facility that results in one or more of the following consequences:

Incident - §191.3

- Death or personal injury necessitating in-patient hospitalization
- Estimated property damage of \$50,000 or more, including loss to operator and others, but excluding the cost of gas lost
- Unintentional estimated gas loss of three million cubic feet (3,000 MCF) or more

Incident - §191.3



- Emergency Shutdown of an LNG Facility

(Activation of ESD for reasons other than an actual emergency does not constitute an incident)

Incident - §191.3

- Significant in Judgment of the Operator

**Even though it
doesn't meet criteria**



Significant Events

- Operator should define these significant events
 - Lower thresholds for property loss
 - Emergency response
 - Media
 - Loss of Customers

Intrastate operators may be driven by state regulations



What should an operator do when there is a reportable incident?

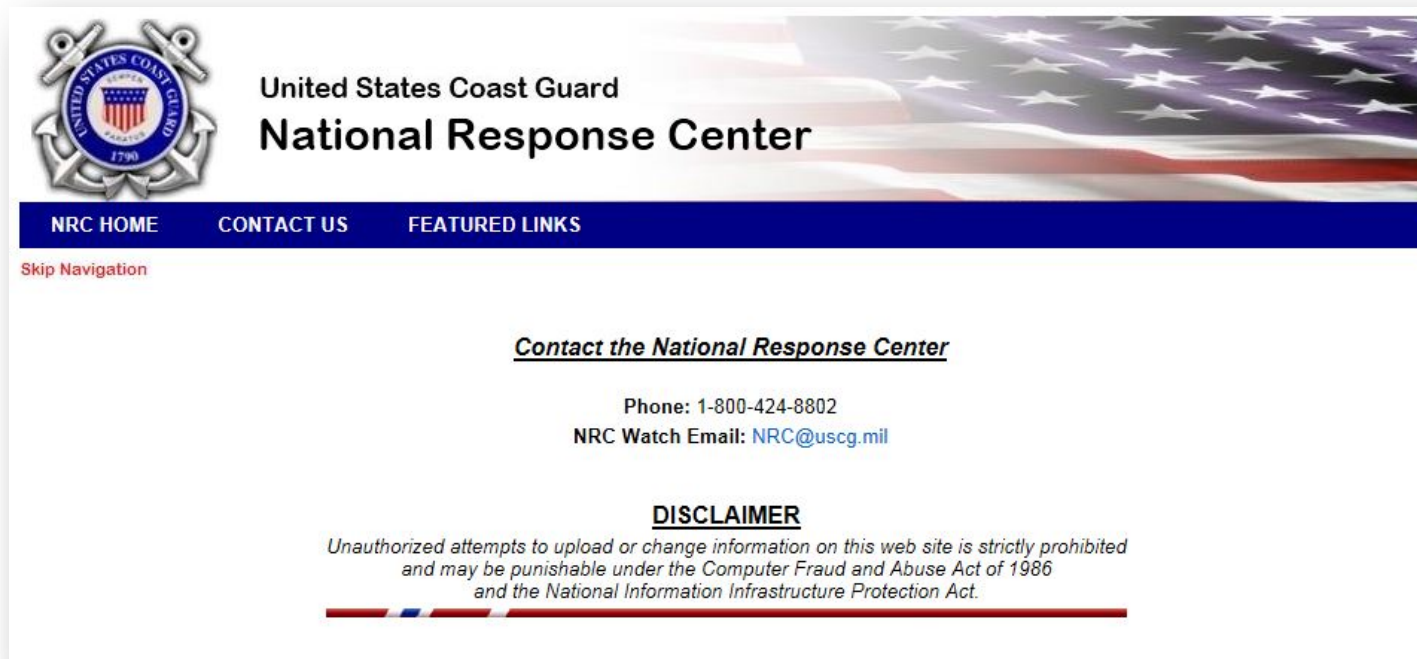
- **Activate Emergency Response Plan**
- **Notify the NRC “at the earliest practicable moment following discovery” (§191.5)**
- **(Within One Hour)**


Practicable

- Section 9(b)(1) of Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011
 - Issue regulations requiring NRC notification with one hour of discovery of incident
- ADB - 2013 – 01
- Notice as soon as practicable following confirmed discovery of incident , or not later than one hour following the time of a confirmed discovery

§191.5 - Immediate Notice

- National Response Center 1-800-424-8802
 - <http://www.nrc.uscg.mil>
- Online Reporting No Longer Available!



 United States Coast Guard
National Response Center

[NRC HOME](#) [CONTACT US](#) [FEATURED LINKS](#)

[Skip Navigation](#)

Contact the National Response Center

Phone: 1-800-424-8802
NRC Watch Email: NRC@uscg.mil

DISCLAIMER

Unauthorized attempts to upload or change information on this web site is strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and the National Information Infrastructure Protection Act.

ONLINE REPORTING

§191.7

- Online Report Requirements

- <https://portal.phmsa.dot.gov/pipeline>

- OPID
- Username
- Password



The screenshot shows the PHMSA Portal website. At the top left is the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration logo. The main header reads "PHMSA PORTAL". Below the header are navigation links: "Hazmat Enrollment Help", "Pipeline Enrollment Help", "Contact Us", "FAQs", and "Status". The main content area features a large image of an industrial facility on the left and a sidebar on the right with smaller images. The sidebar includes a login form with fields for "User Name:" and "Password:", a "Login" button, and a "Create Account" button. Below the login form are links for "Forgot password / User ID?" and "OPID Registration". At the bottom, there are tabs for "PHMSA", "Pipeline Safety", and "Hazmat Safety". A disclaimer section at the very bottom states: "You are accessing a U.S. Government information system, which includes this computer, the computer network on which it is connected, all other computers connected to this network, and all storage media connected to this computer or other computers on this network. This information system is provided for U.S Government use only."

Post-Incident

- Complete an incident form as soon as practicable, but within 30 days
 - §191.9 (distribution) or §191.15 (transmission)
- Filed electronically (§191.7)
 - Form RSPA F 7100.1 (Distribution) or
 - Form RSPA F 7100.2 (Transmission)
- Additional supplemental reports as needed
- Final report

**MASTER METER & LNG
OPERATORS EXEMPT**

What happens if an operator calls the NRC and discovers later that this is not a reportable incident?



Not an Incident?

- NRC reports cannot be rescinded
- No 30 day report required
- Courtesy call to PHMSA or appropriate State Agency



Not an Incident?

- If after filing the 30 day report, the operator determined the event does not meet the definition of an incident, the operator must send a letter requesting the incident be rescinded.
- Only operator can rescind report!

Report Submission

- §191.7 If electronic reporting imposes an undue burden and hardship, operator may submit written request for an alternative reporting method.
 - Request must describe the undue burden and hardship
 - PHMSA will review request, and may authorize in writing and alternative reporting method.

Report Submission

- Operator may still be required to file a written report with your state regulatory agency!
- Reporting to the NRC will NOT automatically send a copy to the state

- Complete all parts of the report accurately and especially what type of report, original, supplemental, or final.
- An original report will be the first report turned in, a supplemental may be turned in after the original if more information has been discovered since the original report has been submitted.
- List all injuries and fatalities and whether they were employee's, contractor's, or the public.

Gas Transmission Incident Report Form

NOTICE: This report is required by 49 CFR Part 101. Failure to report can result in a civil penalty not to exceed \$100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

Form Approved
OMB NO: 2137-0022
Expire: 10/31/2018

U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

**INCIDENT REPORT –
NATURAL AND OTHER GAS TRANSMISSION
AND GATHERING PIPELINE SYSTEMS**

Report Date
No. _____
(DOT Use Only)

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0022. Public reporting for this collection of information is estimated to average approximately 10 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHF-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

INSTRUCTIONS
Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/forms>.

PART A – KEY REPORT INFORMATION Report Type: (select all that apply) Original Supplemental Final

Last Revision Date _____

1. Operator's OPS-issued Operator Identification Number (OPID): _____

2. Name of Operator: _____

3. Address of Operator:
3.a _____ (Street Address)
3.b _____ (City)
3.c State: _____
3.d Zip Code: _____

4. Local time (24-hr clock) and date of the Incident:
_____/_____/_____
Hour Month Day Year

5. Location of Incident:
Latitude: _____
Longitude: _____

6. National Response Center Report Number: _____

7. Local time (24-hr clock) and date of initial telephonic report to the National Response Center (if applicable):
_____/_____/_____
Hour Month Day Year

8. Incident resulted from:
 Unintentional release of gas
 Intentional release of gas
 Reasons other than release of gas

9. Gas released: (select only one, based on predominant volume released)
 Natural Gas
 Propane Gas
 Synthetic Gas
 Hydrogen Gas
 Landfill Gas
 Other Gas ← Name: _____

10. Estimated volume of gas released unintentionally: _____ / Thousand Cubic Feet (MCF)

11. Estimated volume of intentional and controlled release/blowdown: _____ / Thousand Cubic Feet (MCF)

12. Estimated volume of accompanying liquid released: _____ / Barrels

Form PHMSA F 7100.2 (rev 10-2014) Reproduction of this form is permitted Page 1 of 19

- Use of the federal incident investigation form may be helpful in gathering information for the report.
- Form changed in 2010. What used to be a 3 page form is now 20 pages. They have added questions regarding control room management, and added a number of categories for causes.
- Fill out all sections that apply to the incident.

Gas Transmission Incident Report Form

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed \$100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

Form Approved
OMB NO: 2137-0522
Expires: 10/31/2018

U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

**INCIDENT REPORT –
NATURAL AND OTHER GAS TRANSMISSION
AND GATHERING PIPELINE SYSTEMS**

Report Date
No. (DOT Use Only)

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PH-P-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

INSTRUCTIONS
Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipe/line/library/forus>.

PART A – KEY REPORT INFORMATION Report Type: (select all that apply) Original Supplemental Final

Last Revision Date: _____

1. Operator's OPG-issued Operator Identification Number (OPID): _____

2. Name of Operator: _____

3. Address of Operator:
3.a _____ (Street Address)
3.b _____ (City)
3.c State: _____
3.d Zip Code: _____

4. Local time (24-hr clock) and date of the Incident:
_____/_____/_____
Hour Month Day Year

5. Location of Incident:
Latitude: _____
Longitude: _____

6. National Response Center Report Number:
_____/_____/_____
Hour Month Day Year

7. Local time (24-hr clock) and date of initial telephonic report to the National Response Center (if applicable):
_____/_____/_____
Hour Month Day Year

8. Incident resulted from:
 Unintentional release of gas
 Intentional release of gas
 Reasons other than release of gas

9. Gas released: (select only one, based on predominant volume released)
 Natural Gas
 Propane Gas
 Synthetic Gas
 Hydrogen Gas
 Landfill Gas
 Other Gas ↔ Name: _____

10. Estimated volume of gas released unintentionally: _____ / Thousand Cubic Feet (MCF)

11. Estimated volume of intentional and controlled release/blowdown: _____ / Thousand Cubic Feet (MCF)

12. Estimated volume of accompanying liquid released: _____ / Barrels

Form PHMSA F 7100.2 (rev 10-2014) Page 1 of 10

Reproduction of this form is permitted

Annual Reports

- **Due on March 15 for Preceding CY**
 - §191.11- Distribution
 - §191.12 – Distribution Systems: Mechanical Fitting Failure Reports
 - § 191.17 – Transmission, gathering, and LNG

EXEMPT: ***LPG System with less than 100 customers, LNG, and Master Meter Operators***

Transmission Annual Reports

- Separate form for each commodity the operator carries
- Parts A – E are to be completed once for each OPID commodity group annual report, covering ALL of the pipelines and/or facilities
- Parts F – M are to be reported separately for Interstate and for Intrastate facilities, or by state, according to instructions

Transmission Annual Reports

- Integrity Management (IM) required reporting (§192.945) now part of annual report
- Parts F – Integrity Inspections during year and actions take
- Subpart - G – Miles of baseline assessment and reassessment

Distribution Annual Report

- Separate Form for each State in which the System Operates
- “Part B” is system description, including
 - Miles of mains and services,
 - Materials,
 - Line sizes,
 - Number of services,
 - Decade of installation

Distribution Annual Report

- **§ 192.1007 (g)**
 - Report, on an annual basis, the four measures listed in paragraphs (e)(1)(i) through (e)(1)(iv) of this section, as part of the annual report required by § 191.11. An operator also must report the four measures to the state pipeline safety authority if a state exercises jurisdiction over the operator's pipeline.

§192.1007 (e)

- (i) Number of hazardous leaks either eliminated or repaired as required by §192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
- (ii) Number of excavation damages;
- (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
- (iv) Total number of leaks either eliminated or repaired, categorized by cause;

Definition of a "Leak"

- Unintentional Escape of Gas from the Pipeline
Test Failures Not Included
- A Non-Hazardous Release that can be Eliminated by Lubrication, Adjustment, or Tightening is Not a Leak
- §192.1001 defines Hazardous Leak – represents an existing or probable hazard to persons or property, and requires immediate repair or continuous action

Distribution Reports

- Part C aligns with IM requirements for reporting total leaks eliminated or repaired
 - Both total leaks and hazardous leaks
- Align with IM Requirements
 - Corrosion
 - Natural Forces
 - Excavation
 - Other Outside Force Damage
 - Material and Welds
 - Equipment
 - Incorrect Operations
 - Other

Gas Distribution Annual Report Form

PART C -- TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING YEAR				
CAUSE OF LEAK				
	Mains		Services	
	Total	Hazardous	Total	Hazardous
CORROSION				
NATURAL FORCES				
EXCAVATION DAMAGE				
OTHER OUTSIDE FORCE DAMAGE				
MATERIAL OR WELDS				
EQUIPMENT				
INCORRECT OPERATIONS				
OTHER				
NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR: → → →				

PART D -- EXCAVATION DAMAGE	PART E -- EXCESS FLOW VALVE (EFV) DATA
Number of Excavation Damages: _____	Total Number Of EFVs on Single-family Residential Services Installed During Year: _____
Number of Excavation Tickets: _____	Estimated Number of EFVs In System At End Of Year: _____

Distribution Reports

- IM reporting requirements (§192.1007(e)) have been added to form
 - Part D Excavation tickets and damage
- DIMP - §192.1001 Excavation Damage means any impact that results in the need to repair or replace an underground facility due to a weakening, or the partial or complete destruction, of the facility, including, but not limited to, the protective coating, lateral support, cathodic protection or the housing for the line device or facility.

Excess Flow Valves

- **§192.383 (c) Excess flow valves**
 - Each operator must report the EFV measures detailed in the annual report required by §191.11
- **Report two numbers:**
 - **Estimated number of EFVs in system**
 - Cumulative number
 - Add current year to last years number
 - Understand accuracy issues
 - **Total number installed during past year**

§191.12 Mechanical Fitting Failure Reports

- Each Mechanical fitting failure as required by §192.1009 must be submitted on Mechanical Fitting Failure Report Form PHMSA F-7100.1 -2
 - Each mechanical fitting failure that occurs within a calendar year not later than March 15 of the following year, or
 - Operator may submit its reports throughout the year
- If state has regulatory authority, also report to state.

Mechanical Fitting §192.1001

- Mechanical fitting means a mechanical device used to connect sections of pipe. The term "Mechanical fitting" applies only to:
 - 1) Stab Type fittings;
 - 2) Nut Follower Type fittings;
 - 3) Bolted Type fittings; or
 - 4) Other Compression Type fittings

SAFETY- RELATED CONDITIONS (§191.23)

- Each operator shall report the existence of any of the following safety related conditions



SAFETY- RELATED CONDITIONS (§191.23)

- Any Condition that causes a 20% or more Reduction in Operating Pressure or Shutdown of Operation

All Pipelines



SAFETY- RELATED CONDITIONS (§191.23)

- Unintended Movement or Abnormal Loading by Environmental Causes which could affect the serviceability or the Structural Integrity of the Pipeline

All Pipelines



SAFETY- RELATED CONDITIONS (§191.23)

All Pipelines

- A leak that constitutes an emergency
 - Emergency responders such as police or fire department are on scene.



SAFETY- RELATED CONDITIONS (§191.23)

- Any Malfunction or Operating Error that causes the pressure to exceed MAOP plus buildup.



All Pipelines

SAFETY- RELATED CONDITIONS (§191.23)

- General Corrosion
- Localized Corrosion Pitting
 - To a degree where Leakage Might Result
 - Where Wall Loss due to Corrosion Requires the MAOP to be Reduced

**Pipelines operating at
20% SMYS or more**



SAFETY- RELATED CONDITIONS (§191.23)

- Any Material Defect or Physical Damage that Impairs the Serviceability

**Pipelines operating at
20% SMYS or more**



SAFETY- RELATED CONDITIONS (§191.23)

- Any Crack or other Material Defect that Impairs the Structural Integrity or reliability of an LNG Facility

**LNG
Facilities**



SAFETY- RELATED CONDITIONS (§191.23)

- Inner Tank Leakage, Ineffective Insulation, or Frost Heave that impairs the Structural Integrity of an LNG Storage Tank

LNG Facilities



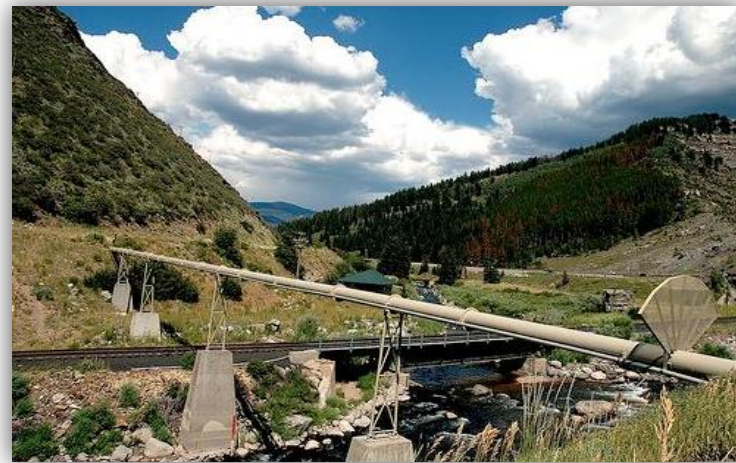
SRC

Reporting Exceptions

- **Exists on a Master Meter System or a Customer-Owned Service Line**
- **Is a Reportable Incident**
- **Exists on a Pipeline that is more than 220 yards from any Building Intended for Human Occupancy**
- **Is corrected Before the Deadline for filing**

SAFETY- RELATED CONDITIONS

- Reports are required for:
- Conditions within the Right-of-Way of
 - an Active Railroad, Paved Road, Street,
 - or Highway, or within 220 yards of a building suitable for human occupancy



SAFETY- RELATED CONDITIONS



- Reports are required for:
 - General Corrosion
 - Localized Pitting on Bare pipelines

Filing Safety Related Condition Reports (§191.25)

- Within 5 working days of Determination
- No more than 10 working Days After Discovery
- No specific form
 - Information Requirements are in §191.25

InformationResourcesManager@dot.gov

Fax to (202) 366-7128

Time Frame For Submitting Safety Related Condition Reports

MON-TUE-WED-THU-FRI-SAT*SUN*MON-TUE-WED-THU-FRI-SAT*SUN*MON

**DISCOVER*

1 2 3 4

5 6 7 8 9 10

**DETERMINE*

1 2 3 4 5

**Working days excludes Saturdays, Sundays,
and Federal Holidays**

Information Websites

- PHMSA Forms and Reporting Instructions
- <http://www.phmsa.dot.gov/pipeline/library/forms>
- PHMSA Pipeline Safety Regulations
- <http://www.phmsa.dot.gov/pipeline/tq/regs>
- PHMSA National Pipeline Mapping System
- <http://www.npms.phmsa.dot.gov/>

Any Questions??





THANKS!

Bryan Kichler
Pipeline Safety Specialist
PHMSA Training and Qualifications
Bryan.Kichler@dot.gov