



Part 191 and Other Reporting Requirements for Natural Gas Pipelines

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 <0 psig
 - Through a pipeline not regulated (§192.8)
 - Within inlets of Gulf of Mexico, except for requirements of §192.612



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









Minneapolis, MN

March 17, 2011





Philadelphia, PA January, 2011

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

- i. Death or personal injury necessitating in-patient hospitalization**
- i. Estimated property damage of \$50,000 or more, including loss to operator and others, but excluding the cost of gas lost**
- i. 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

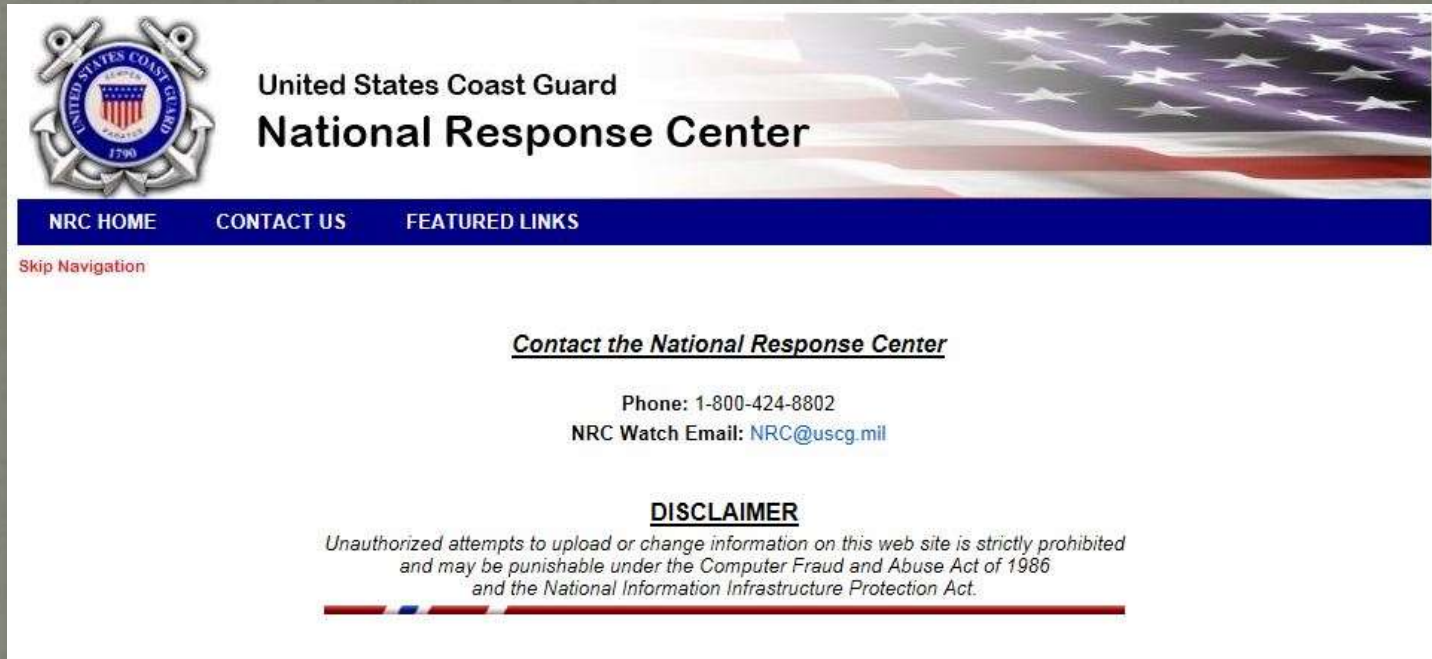
Section 9(b)(1) of Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011

- **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



The image shows the header of the United States Coast Guard National Response Center website. It features the Coast Guard emblem on the left, which includes a shield with a red and white striped field and a blue top section with a white anchor. The text "UNITED STATES COAST GUARD" and "1790" are visible. To the right of the emblem, the text "United States Coast Guard" and "National Response Center" is displayed. Below this is a dark blue navigation bar with the links "NRC HOME", "CONTACT US", and "FEATURED LINKS". Under the navigation bar, there is a "Skip Navigation" link. The main content area has a background image of the American flag. It contains the text "Contact the National Response Center" with a phone number "1-800-424-8802" and an email address "NRC Watch Email: NRC@uscg.mil". Below this is a "DISCLAIMER" section with a warning about unauthorized uploads and changes to information on the website, citing the Computer Fraud and Abuse Act of 1986 and the National Information Infrastructure Protection Act.

 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.*

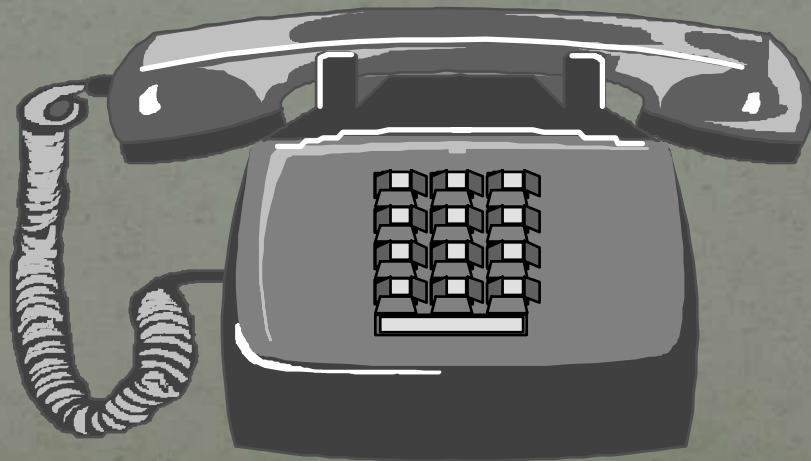
- National Response Center 1-800-424-8802
 - <http://www.nrc.uscg.mil>
- Online Reporting No Longer Available!

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

Gas Transmission Incident Report Form

DOT Form PHMSA F 7100.2-1

<http://portal.phmsa.dot.gov/pipeline>

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 < 100 customers**

➤ **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

DOT Form PHMSA F 7100.1-1

<http://portal.phmsa.dot.gov/pipeline>

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)

A leak that constitutes an emergency

Emergency responders such as police or fire department are on scene.

All Pipelines



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
 $\geq 20\%$ SMYS**



SAFETY- RELATED CONDITIONS

(§191.23)

**Any Material Defect or Physical Damage
that Impairs the Serviceability**

**Pipelines operating
 $\geq 20\%$ SMYS**



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)

- **Must be received by OPS** within 5 working days of Determination
- No more than 10 working Days After Discovery
- No specific form
 - Information Requirements are in §191.25

Fax to: (202) 366-7128

NEW! Email to:

InformationResourcesManager@dot.gov

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

Pipeline Safety Regulatory Certainty and Job Creation Act of 2011

- **Section 23 For gas transmission pipelines, if the MAOP exceeds the build-up allowed for operation of pressure-limiting or control devices, the owner or operator shall report the exceedance to the Secretary and appropriate State authorities on or before the 5th day following the date on which the exceedance occurs**

ADB-2012-11

**“Gas Transmission MAOP Exceedance”
and provide the following information:**

- **Operator information, date, and name of person submitting the report.**
- **The name of the person who determined the condition exists.**
- **The date the condition was discovered and the date the condition was first determined to exist.**
- **The location of the condition,**

ADB-2012-11

- The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action.
- These reports must be received within five days of the occurrence using one of the reporting methods described in Sec. 191.25(a).

§191.22 National Registry of Pipeline Operators

(a) Effective January 1, 2012 *OPID Request*. Each operator of a gas pipeline, gas pipeline facility, ...must obtain from PHMSA an Operator Identification Number (OPID).

This requirement applies to all new and existing operators, including operators who have already been assigned one or more OPID.

§191.22 – National Registry of Pipeline and LNG Operators

- Operator who already has OPID must, by January 1, 2012, validate the information associated with each OPID number , and correct the information as necessary, but no later than June 30, 2012.
- Operator must use assigned OPID for all reporting requirements.

§ 191.22 National Registry of Pipeline Operators

(b) *Changes.* ... through the National Registry of Pipeline and LNG ... at

<http://opsweb.phmsa.dot.gov>

60 days prior to any of the following events:



Notification 60 days prior

- (i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs **\$10 million or more**. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;

Notification 60 days prior

- (ii) Construction of 10 or more miles of a new pipeline; or
- (iii) Construction of a new LNG plant or LNG facility



Report within 60 days after

- (i) A change in the primary entity responsible (i.e., with an assigned OPID) for managing or administering a safety program required by this part covering pipeline facilities operated under multiple OPIDs.**
- (ii) A change in the name of the operator;**

Report within 60 days after

- (iii) A change in the entity (e.g., company, municipality) responsible for an existing pipeline, pipeline segment, pipeline facility, or LNG facility;**
- (iv) The acquisition or divestiture of 50 or more miles of a pipeline or pipeline system subject to Part 192 of this subchapter; or**
- (v) The acquisition or divestiture of an existing LNG plant or LNG facility subject to Part 193 of this subchapter.**

§191.27 Filing offshore pipeline condition reports

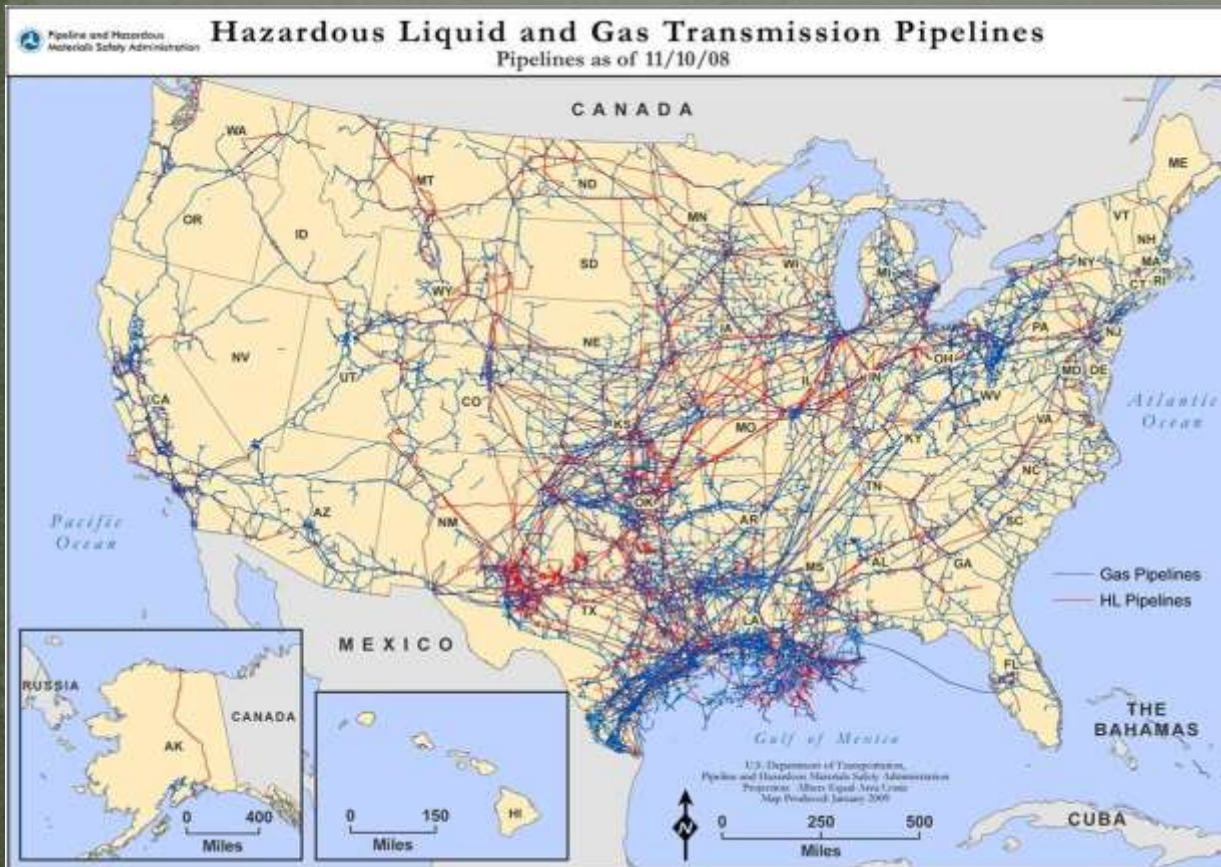
Removed!

Effective Date: Oct 1, 2015

National Pipeline Mapping System (NPMS)

- **PSIA 2002 requires all transmission operators to submit data appropriate for use in the National Pipeline Mapping System (NPMS).**
- **Complete data submission includes the geospatial data, attribute data, and metadata for all LNG, hazardous liquid, and natural gas transmission pipeline operation systems operated by a company**

National Pipeline Mapping System (NPMS)



Updated
annually by
March 15
(ADB 08-07),
or e-mail
stating no
changes

§ 191.29 National Pipeline Mapping System.

NEW!

Effective Date: Oct 1, 2015

§ 191.29 National Pipeline Mapping System.

(a) Each operator of a gas transmission pipeline or LNG facility must provide the following geospatial data to PHMSA for that pipeline or facility:

(1) Geospatial data, attributes, metadata and transmittal letter appropriate for use in the NPMS. Acceptable formats and additional information are specified in the NPMS Operator Standards Manual available at www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366-4595.

§ 191.29 National Pipeline Mapping System.

(2) The name of and address for the operator.

(3) The name and contact information of a pipeline company employee, to be displayed on a public Web site, who will serve as a contact for questions from the general public about the operator's NPMS data.

§ 191.29 National Pipeline Mapping System.

(b) The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.dot.gov or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.

Effective Date: Oct 1, 2015

Additional Reporting Requirements

§192.727(g) - After October 10, 2000

- **Last operator must file a report is required for each abandoned pipeline facility**
 - **Offshore**
 - **Onshore that crosses over, under, or through a commercially navigable waterway**
- **Report to include location ,size, date, method of abandonment, and certification abandoned in accordance with all applicable laws**

Additional Reporting Requirements

- **§192.612 – Underwater inspection and reburial of pipelines in the Gulf of Mexico and its inlets**
 - **If a periodic inspection discovers a underwater pipeline that is exposed or poses a hazard to navigation, the operator shall report it to the NCR within 24 hours.**
 - **Additional marking and remediation requirements**

Summary for Reporting Requirements

- Operators should have:
 - Written procedures
 - Forms and information available
 - Review process and work
- Inspectors should check for:
 - Completeness and accuracy
 - Timely and appropriate reporting
 - Supplemental reports as required
 - Failure investigations (§192.617)

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/>