Part 191 Reporting Requirements for Natural Gas Pipelines
Part 191

This Part prescribes requirements for the REPORTING of:

- Incidents
- Safety Related Conditions
- Annual Pipeline Summary Data
Incident:

- Release of Gas - - "and"
- Death
- Hospitalization Injury
- $50,000 Property Damage
- Estimated gas loss of 3 million cubic feet (3,000 mcf) or more
Incident:

Emergency Shutdown of an LNG Facility
Incident:

Significant in Judgment of the Operator
What should an operator do when there is a reportable incident?

- Activate Emergency Response Plan
- Notify the NRC IMMEDIATELY
- Complete an incident form within 30 days
  - Form RSPA F 7100.1 (Distribution) or
  - Form RSPA F 7100.2 (Transmission)
Immediate Notification

- National Response Center
  - 1-800-424-8802
  - Electronically at www.nrc.uscg.mil
- Earliest “Practicable Moment” following discovery ~ No Later than 2 Hours
§191.7 states each report required by this section must be submitted electronically

http://opsweb.phmsa.dot.gov
§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 an alternative reporting method.
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 Reports

- Separate Form for each State in Which System Operates
- “Part B” for Reporting Miles of Pipe by Decade of Installation and by Class Location
- “Part C” corresponds to IM requirements for Reporting Total Leaks Eliminated/Repaired
- IM required reporting (§192.945) also part of annual report
Distribution Reports

- Separate Form for each State in Which System Operates
- “Part B” for Reporting Miles of Pipe by Decade of Installation
- “Part C” aligns with IM requirements for reporting Total Leaks Eliminated/Repaired
- IM reporting requirements (§§192.1007 and 192.1009) have been added to form
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

- Hazardous Leak means a leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous. (§192.1001)
“Leak” Categories ~ Part C

- Align with IM Requirements
  - Corrosion
  - Natural Forces
  - Excavation
  - Other Outside Force Damage
  - Material and Welds
  - Equipment
  - Operations
  - Other
## Gas Distribution Annual Report Form

### Part C: Total Leaks and Hazardous Leaks Eliminated/Repaired During Year

<table>
<thead>
<tr>
<th>Cause of Leak</th>
<th>Mains</th>
<th>Hazardous</th>
<th>Services</th>
<th>Hazardous</th>
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</thead>
<tbody>
<tr>
<td>Corrosion</td>
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<tr>
<td>Natural Forces</td>
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<td>Excavation Damage</td>
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<td>Other Outside Force Damage</td>
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<td>Material or Welds</td>
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<td>Equipment</td>
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<td>Incorrect Operations</td>
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<tr>
<td>Other</td>
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</tbody>
</table>

**Number of Known System Leaks At End of Year: Scheduled For Repair:** __________

### Part D: Excavation Damage

- **Number of Excavation Damages:** ______________
- **Number of Excavation Tickets:** ______________

### Part E: Excess Flow Valve (EFV) Data

- **Total Number of EFVs on Single-family Residential Services Installed During Year:** ______________
- **Estimated Number of EFVs In System At End Of Year:** ______________
§192.383 (c) Excess flow valves

Each operator must report the EFV measures detailed in the annual report required by § 191.11
Excess Flow Valves

- 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
Each mechanical fitting failure, as required by § 192.1009, must be submitted on a Mechanical Fitting Failure Report Form PHMSA F-7100.1-2.

Report by either

- Submit reports throughout the year
- All reports not later than March 15 of the following year
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
§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;
§ 191.22 National Registry of Pipeline Operators

(a) **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 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:
(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;

(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;

(iii) A change in the entity (e.g., company, municipality) responsible for an existing pipeline, pipeline segment, pipeline facility, or LNG facility;
(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.
Summary for Reporting Requirements of Part 191

- Have written procedures
- Have the OPID, forms and information available
- Work with regulatory agencies
- Review process and work
- Check for completeness and accuracy
- File on time
- Turn in supplemental reports as required
Information Websites

PHMSA Training and Qualification
http://www.phmsa.dot.gov/pipeline/tq

PHMSA Pipeline Safety Regulations
http://www.phmsa.dot.gov/pipeline/tq/regs
Questions?