Part 191 and Other Reporting Requirements for Natural Gas Pipelines

PHMSA



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration

Part 191

This part prescribes requirements for the Reporting of:

- Incidents
- Safety related conditions
- Annual pipeline summary data
- Other reporting requirements





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An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:



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- A death, or personal injury necessitating in-patient hospitalization;
- ii. Estimated property damage of \$50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost;



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- iii. Unintentional estimated gas loss of three million cubic feet or more;
 - An event that results in an emergency shutdown of an LNG facility or an underground natural gas storage facility. Activation of an emergency shutdown system for reasons other than an actual emergency does not constitute an incident.
 - 2) An event that is significant in the judgment of the operator, even though it did not meet the criteria of paragraphs (1) or (2) of this definition.



Examples of Reportable Incidents



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November 29, 2016 – Enterprise Products Pipeline Rupture near Kansas City International Airport

- 10-inch Ethane/Propane pipeline operating at approximately 1000 psi. failed due to Stress Corrosion Cracking (SCC).
- Burning product was visible for miles.







February 6, 2008 – The Columbia Gas Hartsville Compressor Station was Struck by Tornadoes

- The Hartsville Station was a 52,000 HP compressor station.
- Survivors said the light in the sky from the burning station illuminated the tornadoes, warning them to take cover.







February 6, 2008 – The Columbia Gas Hartsville Compressor Station was Struck by Tornadoes

- An F-2 tornado touched down directly over the compressor station.
- Columbia Gas reports three transmission lines were shut down due to this incident.







April 29, 2016 – A Texas Eastern 36-inch Natural Gas Pipeline near Philadelphia Ruptured and Caught Fire.

- Homes were destroyed and people were sent running for safety.
- At least one person sustained injured from the flames.







Emergency Shutdown of an LNG Facility or an Underground Natural Gas Storage Facility

NOTE: Activation of ESD for reasons other than an actual emergency does not constitute an incident







An event deemed significant in the judgment of the operator, even though it doesn't meet other criteria for an incident.



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Significant Events

The operator should define these significant events:

- Lower thresholds for property loss
- Emergency response
- Media
- Loss of Customers

Intrastate operator's criteria may be guided by state regulations





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What should an operator do when a reportable incident occurs?

The Operator should:

- Activate the Emergency Response Plan
- Call the NRC (National Response Center) at 1-800-424-8802 at the earliest practicable moment following discovery (§191.5)
- Make the NRC call within one hour



Complete an incident form as soon as practicable, but within 30 days

<u>https://portal.phmsa.dot.gov/pipeline</u>. You will need your OPID (Operator Identification Number), Username and Password.

• §191.9 (Gas Distribution) or §191.15 (Gas Transmission and UGS)



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The report should be filed electronically (§191.7)

- PHMSA Form 7100.1 (Gas Distribution), PHMSA Form 7100.2 (Gas Transmission), or PHMSA Form 7100.4 (Underground Natural Gas Storage)
- Additional supplemental reports should be filed, as needed Be sure to finalize the report



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

- Make the call, even if you're not certain the call is required.
- It's better to make the call when it may not be necessary than to not make the call and determine later a notification was required.





If it turns out an NRC notification was made, but wasn't required:

- No 30 day report required
- The NRC report cannot be rescinded
- Consider the NRC notification a courtesy call



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If the operator determines the incident wasn't reportable, after a 30-day report has been filed:

- The operator must send a letter requesting the incident be rescinded.
- Only the operator can request a report be rescinded.







Report Submission

§191.7 If electronic reporting imposes an undue burden and hardship, the operator may submit written request for an alternative reporting method.

- The request must describe the undue burden and hardship
- PHMSA will review the request, and may authorize in writing an alternative reporting method



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Report Submission

Federal reporting does not supersede State Reporting Requirements.

- The operator may still be required to file a written report with the state regulatory agency.
- Reporting to the NRC will NOT automatically send a copy to the state



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Gas Transmission Incident Reporting

Completing the Gas Transmission Report:

- Complete all parts of the report accurately, including 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.

NOTICE: This report is required by 49 CF \$100,000 for each violation for each day to exceed \$1,000,000 as provided in 49 USC	R Part 191. Failure to report o at such violation pensista excep 10122.	an result in a civil penalty not to exceed t that the maximum civil penalty shall not	Form Approved OMB NO: 2137-0522 Expines: 10/31/2016
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	INCIDENT REPORT - Report Date NATURAL AND OTHER GAS TRANSMISSION AND GATHERING PIPELINE SYSTEMS No. (DOT Use Only)		
displays a current valid OME Control collection of information is estimated data needed, and completing and rev comments regarding this burden estim information Collection Clearance Offic INSTRUCTIONS Important: Please read th information requested and pro one from the PHMSA Pipeline	Number. The OMB Control to be approximately 10 hou ewing the collection of infon- ate or any other aspect of th er. PHMSA, Office of Pipelin the separate instruction vide specific examples. Safety Community We	Inequired to respond to, nor shall are ments of the Reprevent Reduction Ac Number for this information collection is per response, including the time for mation. All responses to this collection is collection of information, including a e Safety (PHP-30) 1200 New Jensey A s for completing this form befor . If you do not have a copy of the D Page at Imp: News planes dor.	s 2137-0522. Public reporting for this in of information are mandatory. Send uggestions for reducing this burden to: venue, SE, Washington, D.C. 20590. The you begin. They clarify the he instructions, you can obtain
PART A - KEY REPORT INFORMAT	ION Report Type:	(select all that apply) Original	Supplemental Final
Last Revision Date			
Operator's OPS-issued Operator Io Name of Operator: Address of Operator:	entification Number (OPID):		
3.a	R ASSTEIS)		
3.5(3.6			
3.o State: / / /	(I)		
3.d Zip Code: / / / /	<u>,,,,,,,,</u>		
Location of Incident: Latitude: <u>III</u> . <u>[I]</u> . Longitude: - <u>III</u> . <u>[I]</u> Longitude: - <u>III</u> .	<u> </u> 	7. Local time (24-hr clock) and date National Response Center (if app <u>I I I I I I</u> <u>I I</u> Hour Mont	plicable): <u>1 1 1 1 1 1 1</u> Day Year
Indextr resolute non. Unintentional release of gas Intentional release of gas Reasons other than release of	f gas		
Gas released: (select only one, ba Natural Gas Propane Gas Synthetic Gas Hydrogen Gas Landfill Gas	sed on predominant volume	released)	
🗆 Other Gas 🖨 Name:			
10. Estimated volume of gas released	unintentionally:	<u>/ / // / / / Th</u>	ousand Cubic Feet (MCF)
11. Estimated volume of intentional a	nd controlled release/blowdo		
12. Estimated volume of accompanying	ng liquid released:	<u> 8</u> a	mela



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Gas Transmission Incident Reporting

Completing the Gas Transmission Report:

- Use of the federal incident investigation form may be helpful in gathering information for the report.
- The form was updated in 2010 to add questions regarding control room management, and added a number of categories for incident causes.
- Fill out all sections that apply to the incident.

NOTICE: This report is required by 49 CPI \$100,000 for each violation for each day th exceed \$1,000,000 as provided in 49 USC 6	R Part 191. Pailure to report of at such violation pensists except 0122.	an result in a civil penalty not to exceed that the maximum civil penalty shall not	Form Approved OMB NO: 2137-0522 Expires: 10/31/2016
U.S. Department of Transportation Pipeline and Hazandous Materials Safety Administration	INCIDENT REPORT - NATURAL AND OTHER GAS TRANSMISSION AND GATHERING PIPELINE SYSTEMS No. 1007 Inc. 0001		
A federal agency may not conduct or s to comply with a collection of informa displays a current vaid OMB Control In collection of information is estimated i data needed, and completing and revi- comments regarding this burden estim information Collection Clearance Office INSTRUCTONS	tion subject to the requirem aumber. The OMB Control 1 to be approximately 10 hour ewing the collection of inform	ents of the Paperwork Reduction Ar Number for this information collection is per response, including the time for nation. All responses to this collection	inson be subject to a penalty for failur tit unless that collection of informatio is 2137-0522. Public reporting for this reviewing instructions, gathering th or of information are mandatory. Sen
	ide specific examples.	If you do not have a copy of	
PART A - KEY REPORT INFORMATI		(select all that apply) Original	
Last Revision Date	in the second	and a second sec	- copperation and and
1. Operator's OPS-issued Operator Id	entification Number (OPID):		
2. Name of Operator:			
3. Address of Operator.			
3.a			
3.6	(Address)		
6	200		
3.o State: / / /			
3.d Zip Code: / / / /	<u> </u>		
Local time (24-hr clock) and date of <u></u>	 Cay Year	O. National Response Center Report Laboratorial Response Center (Report Laboratorial Response Center (frage Laboratorial Response Cen	e of initial telephonic report to the
8. Incident resulted from: Unintentional release of gas Intentional release of gas Reasons other than release of	(gas		
Q. Gas released: (select only one, bac Natural Gas Propane Gas Synthetic Gas Hydrogen Gas Landfil Gas	ied on predominant volume i	eleased)	
🗆 Other Gas 🗢 Name:			
10. Estimated volume of gas released	unintentionally:	<u>, , , , , , , , , , , , , , , , , , , </u>	
11. Estimated volume of intentional an	d controlled release/blowdov	wn: <u>/ / // / / Tho</u>	usand Cubic Feet (MCF)
12. Estimated volume of accompanyin	g liquid released:	<u> B</u>	<u>erreis</u>
rm PHMSA F 7100.2 (rev 10-2014)		n of this form is permitted	Page 1 of 19





Annual Reporting

Annual reports are due on March 15th for the previous calendar year

- §191.11 Distribution
- §191.12 Distribution Systems: Mechanical Fitting Failure Reports
- §191.17 Transmission, Underground Natural Gas Storage, Gathering, and LNG

LPG System operators with less than 100 customers, LNG, and Master Meter Operators are exempt from the reporting requirements



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Transmission Annual Report

A separate form is required 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 the instructions
- Integrity Management (IM) required reporting (§192.945) is included in the annual report



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A separate form is required for each State in which the system operates

"Part B" is system description, including;

- Miles of mains and services,
- Materials,
- Line sizes,

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- Number of services,
- Decade of installation



§192.1007(e)

Distribution operators must report:

- (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;



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Definition of a "Leak"

A "Leak" is an unintentional escape of gas from a pipeline. Test failures are not included.

A Non-Hazardous Release that can be Eliminated by Lubrication, Adjustment, or Tightening is Not a Leak

§192.1001 defines a Hazardous Leak as a leak that represents an existing or probable hazard to persons or property, and requires immediate repair or continuous action



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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
- IncorrectOperations
- Other



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IM reporting requirements found in §192.1007(e) have been added to the 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.



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Excess Flow Valve Reporting Requirements in §192.383(c):

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

Report the estimated number of EFVs in system

- Cumulative number
- Add current year to last years number
- Understand accuracy issues

Report the total number of EFVs installed during past year



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Mechanical Fitting Failure Reporting

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 the state has regulatory authority, also report to the state.



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All owners and operators of underground storage facilities used for the storage of natural gas, as defined in 49 CFR part 192, are required to submit annual reports.

Facility operators must have submitted their first annual report on PHMSA Form 7100.4-1 for the 2017 calendar year by March 15, 2018.



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Part A includes the Underground Natural Gas Storage Facility's Operator Information.

PART A - OPERATOR INFORMATION

A1. Operator's OPS-issued Operator Identification Number (OPID): <u>auto-populated based on PHMSA</u> <u>Portal log-in</u>

- A2. Name of Operator: auto-populated based on OPID
- A3. Address of Operator
- A3a. Street Address: auto-populated based on OPID
- A3b. City: auto-populated based on OPID
- A3c. State: auto-populated based on OPID
- A3d. Zip Code: auto-populated based on OPID



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PART B – STORAGE F	ACILITY <u>Complete Part B once for each independent storage facility</u>
B1. Facility Name (chc	osen by operator):
B2. Select only one:	INTERstate INTRAstate
PHMSA USE ONLY Un	it ID:
B3. Facility Location	Latitude: / / / / / / / / /
	Longitude: - / / / / / / / / / /
	State: County:
B4. Energy Informatio	n Administration Gas Field Code:
Names of Reservoirs w	vithin this facility: populated from Parts C1
Gas Volumes	
B5. Working gas capa	city (billion standard cubic feet (BCF)), include two decimal places:
B6. Base (also known places:	as Cushion or Pad) gas (billion standard cubic feet (BCF)), <i>include two decimal</i>
B7. Total gas capacity	(billion standard cubic feet (BCF)): calc



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Part C includes specific information concerning the Reservoirs and Wells.

PART C – RESERVOIRS AND WELLS <u>Complete Part C once for each reservoir or geologic</u> storage formation within a facility
Facility Name: <u>populated from Part B1</u>
C1. Reservoir name (chosen by operator):
C2. Year reservoir placed in storage service:
C3. Type (select only one): 🛛 Salt Cavern 🔲 Hydrocarbon Reservoir 🖓 Aquifer Reservoir
Other Description of type:
C4. Maximum Wellhead Surface Pressure
C4a. Text identifying the indicator well:
C4b. Maximum surface pressure (pounds per square inch gauge (psig)) at the indicator well:
 Reservoir or Geologic Storage Formation Depth
C5. Approximate Maximum Depth (feet):
C6. Approximate Minimum Depth (feet):
Wells
C7. Number of Injection and/or Withdraw Wells:



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Underground Natural Gas Storage Annual Report

Part D includes the Contact Information for the person submitting the report.

PART D – CONTACT INFORMATION

D1. Name of person submitting report: _____

D2. Title of person in D1: _____

D3. Work e-mail address of person in D1: auto-populated based on Portal login

D4. Work phone number of person in D1: ______

D5. Name of person to contact with questions about this report:

D6. Title of person in D5: _____

D7. Email address of person in D5: _____

D8. Phone number of person in D5: ______



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







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Any condition that causes a 20% or more reduction in operating pressure or shutdown of operation.

Applies to ALL pipelines





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- Unintended movement or abnormal loading by environmental causes which could affect the serviceability or the structural integrity of the pipeline.
- Applies to ALL pipelines





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- A leak that constitutes an emergency.
- Applies to ALL pipelines





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Any malfunction or operating error that causes the pressure to exceed MAOP plus buildup.

• Applies to ALL pipelines







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General Corrosion

Localized Corrosion Pitting

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

Applies to pipelines operating at 20% or more SMYS.





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- Any material defect or physical damage that impairs serviceability.
- Applies to pipelines operating at 20% or more SMYS





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Any crack or other material defect that impairs the structural integrity or reliability of an LNG Facility.



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Inner tank leakage, ineffective insulation, or frost heave that impairs the structural integrity of an LNG storage tank.



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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







Reports are required for conditions within the Right-of-Way of:

- General corrosion
- Localized pitting on bare pipelines





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Underground Natural Gas Storage Safety-Related Condition Reporting:

 Effective January 18, 2017, Underground Natural Gas Storage facility operators are required to submit Safety-Related Conditions Reports.



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<u>Reportable</u> Safety-Related Conditions for Underground Natural Gas Storage:

- Defects impacting maximum pressure
- Corrosion
- Unintended movement or abnormal loading by environmental causes
- Crack or other material defect that impairs structural integrity or reliability
- Material defect or physical damage that impairs serviceability



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<u>Reportable</u> Safety-Related Conditions for Underground Natural Gas Storage:

- Malfunction or operating error that causes pressure excursion
- A leak that constitutes an emergency
- Safety-related condition that could lead to an imminent hazard and causes a 20% or more reduction in operating pressure or shutdown



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Not a Safety-Related Conditions for Underground Natural Gas Storage If:

- Is or results in an incident* before the filing deadline
- Not near building intended for human occupancy or outdoor place of assembly
- Corrected before the filing deadline

*Refer to 49 CFR §191.3 for the definition of an incident



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Filing a Safety-Related Condition Report §191.25

- File within 5 working days of determination
- No more than 10 working days after discovery of the condition
- There is no specific form
- Information Requirements are in §191.25

Email to: InformationResourcesManager@dot.gov Or Fax to (202) 366-7128



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Safety-Related Condition Reporting Exceptions

- 1. Exists on a Master Meter System or a Customer-Owned Service Line.
- 2. Is a reportable incident.
- 3. Exists on a pipeline that is more than 220 yards from any building intended for human occupancy.
- 4. Is corrected before the deadline for filing.



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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.





§191.22 National Registry of Pipeline Operators

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.

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 their assigned OPID for all reporting requirements.



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§191.22 National Registry of Pipeline Operators

Effective January 18, 2017 each operator of an underground natural gas storage facility must obtain from PHMSA an Operator Identification Number (OPID).

Underground natural gas storage facility operator must use their assigned OPID for all reporting requirements.



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§191.22 National Registry of Pipeline Operators

Changes through the National Registry of Pipeline and LNG 60 days prior to any of the following events:

- 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;
- Construction of 10 or more miles of a new pipeline; or
- Construction of a new LNG plant or LNG facility



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Report Within 60 Days After –

- 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.
- A change in the name of the operator;



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Report Within 60 Days After –

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



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National Pipeline Mapping System §191.29

Each operator of a gas transmission pipeline or liquefied natural gas facility must provide the following geospatial data to PHMSA, effective October 1, 2015

- Geospatial data, attributes, metadata and transmittal letter appropriate for use in the National Pipeline Mapping System.
- The name of and address for the operator.
- 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.



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National Pipeline Mapping System §191.29

§191.29(b) NPMS must be updated annually by March 15 or send an e-mail stating no changes.



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Additional Reporting Requirements

§192.727(g) - After October 10, 2000

The 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.



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Summary for Reporting Requirements

Operators should have:

- Written procedures
- Forms and information available
- Review process and work





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Additional Information

PHMSA Forms and Reporting Instructions http://www.phmsa.dot.gov/pipeline/library/forms

PHMSA Pipeline Safety Regulations <u>http://www.phmsa.dot.gov/pipeline/tq/regs</u>

PHMSA National Pipeline Mapping System <u>http://www.npms.phmsa.dot.gov</u>



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