Part 191 Reporting Requirements for Natural Gas Pipelines
Contact Information

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U.S. Department of Transportation
PHMSA Office of Training and Qualifications

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Part 191

This Part prescribes requirements for the **REPORTING** of:

- Incidents
- Annual Pipeline Summary Data
- Safety Related Conditions
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

→ Where hydrocarbons are: Produced or First Separated, Dehydrated, or otherwise Processed
→ Whichever Facility is Farther Downstream
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"
Operator is the Gas Company Customer

Not required to submit Incident, Safety Related Condition, or Annual Reports under Part 191
This Part Does Apply To:

Onshore Gathering of Gas **Inside** of the following areas:

(i) An Area within the Limits of any:
- Incorporated or Unincorporated City
- Town
- Village
This Part **Does** Apply To:

**Onshore Gathering of Gas**

**Inside** of the following areas:

(ii) Any Designated:
- Residential or Commercial Area
- Subdivision
- Business
- Shopping Center
- Community Development
Incident:

Release of Gas - - "and"

- Fatality
- Hospitalization Injury
- $50,000* Property Damage and/or Gas Loss

*Proposed change to volumetric
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
- Call the NRC IMMEDIATELY
- Complete an incident form within 30 days
  - Form RSPA F 7100.1 (Distribution) or
  - Form RSPA F 7100.2 (Transmission)
Telephonic Notice:

- National Response Center
- 1-800-424-8802
- Earliest “Practicable Moment” following discovery ~ No Later than 2 Hours
Telephonic Notice:

- NRC Manned by the U.S. Coast Guard
- Make Sure They Know This is a Natural Gas Pipeline Facility
- Document the NRC Report Number, Date, and Time, for the Incident Report
- NTSB, Homeland Security, and other agencies receive automatic notification
Incident Reports:

Due 30 days after DETECTION of Incident

May Require Additional Reports

MASTER METER & LNG* OPERATORS EXEMPT

*Proposed Incident Report for LNG

191.9 Distribution
191.15 Transmission / Gathering
**Office of Pipeline Safety**  
Pipeline and Hazardous Materials Safety Administration  

**OPS Online Data Entry and Operator Registration System**

**OPS Home | ODES Main | Contact Information**

### Operator Registration

- You must have an OPS provided Operator ID and Personal Identification Number (PIN) to submit reports using this system.
- If you are not sure if you are an operator, you can read more information about Operators or search our database.
- If you do not have an Operator ID, you can request an Operator ID.
- If you have an Operator ID but do not have a PIN, you can request a PIN.
- If you have a PIN and would like to change it, you can change your PIN.

### On-Line Data Entry

<table>
<thead>
<tr>
<th>Gas Transmission and Gathering Systems</th>
<th>PHMSA F 7100.2</th>
<th>01/02</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incident Report Gas Transmission &amp; Gathering Systems</td>
<td>PHMSA F 7100.2-1</td>
<td>12/05</td>
</tr>
<tr>
<td>Annual Gas Transmission &amp; Gathering System</td>
<td>PHMSA F 7100.1</td>
<td>03/04</td>
</tr>
<tr>
<td>Gas Distribution Systems</td>
<td>PHMSA F 7100.1-1</td>
<td>12/05</td>
</tr>
<tr>
<td>Incident Report - Gas Distribution Systems</td>
<td>PHMSA F 7100.1-1</td>
<td>12/05</td>
</tr>
<tr>
<td>Annual Gas Distribution System</td>
<td>PHMSA F 7100.1</td>
<td>03/07</td>
</tr>
<tr>
<td>Hazardous Liquid Pipeline Systems</td>
<td>PHMSA F 7000.1</td>
<td>01/01</td>
</tr>
<tr>
<td>Incident Report Hazardous Liquid Pipeline Systems</td>
<td>PHMSA F 7000.1-1</td>
<td>03/07</td>
</tr>
<tr>
<td>Annual Hazardous Liquid or Carbon Dioxide Systems</td>
<td>PHMSA F 7000.1</td>
<td>03/07</td>
</tr>
<tr>
<td>Gas Integrity Management</td>
<td>PHMSA F 7000.1-1</td>
<td>03/07</td>
</tr>
<tr>
<td>Gas Integrity Management Reporting</td>
<td>PHMSA F 7000.1-1</td>
<td>03/07</td>
</tr>
<tr>
<td>Public Awareness Program Clearinghouse Submittal</td>
<td>PHMSA F 7000.1</td>
<td>03/07</td>
</tr>
<tr>
<td>Public Awareness Program Clearinghouse Submittal</td>
<td>PHMSA F 7000.1-1</td>
<td>03/07</td>
</tr>
</tbody>
</table>

*Proposed Requirement for Use of Electronic Forms*

## Gas Transmission Incident Report Form

NOTICE: This report is required by 49 CFR Part 190. Failure to report can result in a civil penalty not to exceed $10,000 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 60132.

**PART A – KEY REPORT INFORMATION**

<table>
<thead>
<tr>
<th><strong>Report Type</strong></th>
<th>(select all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Original</td>
<td>Supplemental</td>
</tr>
<tr>
<td>Final</td>
<td></td>
</tr>
</tbody>
</table>

1. Operator’s OPR-issued Operator Identification Number (CPID): [ ]

2. Name of Operator: [ ]

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

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

5. Location of Incident:
   a. Latitude: [ ]
   b. Longitude: [ ]

6. National Response Center Report Number:
   a. Hour: [ ] Month: [ ] Day: [ ] Year: [ ]

7. Local time (24-hr clock) and date of initial telephonic report to the National Response Center (if applicable):
   a. 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
   - Other Gas

10. Estimated volume of gas released unintentionally: [ ] Thousand Cubic Feet (MCF)

11. Estimated volume of intentional and controlled release/breakdown: [ ] Thousand Cubic Feet (MCF)

12. Estimated volume of accompanying liquid released: [ ] Barrels

Form PHMSA F 7100.2 (Rev. 01-2019)
What happens if an operator calls the NRC and discovers later that this is not a reportable incident?
Instead of filing the incident report form, the operator sends a letter explaining why this is not a reportable incident.
Due on March 15 for Preceding CY

**EXEMPT:**
- LPG System < 100 customers
- Master meter operators
- LNG* Facilities

*Proposed Annual Report for LNG*
Changes introduced in 2003 (Transmission)

- Separate Form for each State in Which System Operates
- New Section Added to “Part B” for Reporting Miles of Pipe by Decade of Installation
- New Section Added to “Part B” for Reporting Miles of Pipe by Class Location
- “Part C” contains More Categories for Reporting Total Leaks Eliminated/Repaired
Changes introduced in 2005 (Distribution)

- Separate Form for each State in Which System Operates
- New Section Added to “Part B” for Reporting Miles of Pipe by Decade of Installation
- “Part C” contains More Categories for Reporting Total Leaks Eliminated/Repaired
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
“Leak” Categories ~ Part C

- Corrosion
- Natural Forces
- Excavation
- Other Outside Force Damage
- Material and Welds
- Equipment
- Operations
- Other
- Offshore (Transmission)
# Gas Distribution Annual Report Form

## Part A: Operator Information

1. **Name of Operator**
2. **Location of Office Where Additional Information May Be Obtained**
   - Number and Street
   - City and County
   - State and Zip Code
3. **Operator's 5 Digit Identification Number**
4. **Headquarters Name & Address, If Different**
   - Number and Street
   - City and County
   - State and Zip Code
5. **State in Which System Operates**

## Part B: System Description

### 1. General

<table>
<thead>
<tr>
<th>Material</th>
<th>Unknown</th>
<th>2' or Less</th>
<th>Over 2' Thru 4'</th>
<th>Over 4' Thru 6'</th>
<th>Over 6' Thru 12'</th>
<th>Over 12'</th>
<th>Total</th>
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<td>Steel</td>
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### 2. Miles of Mains in System at End of Year

<table>
<thead>
<tr>
<th>Material</th>
<th>Unknown</th>
<th>1' or Less</th>
<th>Over 1' Thru 2'</th>
<th>Over 2' Thru 4'</th>
<th>Over 4' Thru 6'</th>
<th>Over 6' Thru 8'</th>
<th>Over 8'</th>
<th>Total</th>
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<tbody>
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<td>Steel</td>
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</table>

### 3. Number of Services in System at End of Year

<table>
<thead>
<tr>
<th>Material</th>
<th>Unknown</th>
<th>1' or Less</th>
<th>Over 1' Thru 2'</th>
<th>Over 2' Thru 4'</th>
<th>Over 4' Thru 6'</th>
<th>Over 6' Thru 8'</th>
<th>Over 8'</th>
<th>Total</th>
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</tbody>
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*Form PHMSA P-100-1-1 (12-05)*
### Gas Distribution Annual Report Form

#### Part C - Total Leaks Eliminated/Repaired During Year

<table>
<thead>
<tr>
<th>Cause of Leak</th>
<th>Mains</th>
<th>Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrosion</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Forces</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Excavation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other outside force damage</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other operations</td>
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<tr>
<td>Other</td>
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</tr>
</tbody>
</table>

#### Part D - Total Number of Leaks on Federal Land Repaired or Scheduled for Repair

<table>
<thead>
<tr>
<th>Year</th>
<th>Repair</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>1940</td>
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<td></td>
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<tr>
<td>1950</td>
<td></td>
<td></td>
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<tr>
<td>1960</td>
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<tr>
<td>1970</td>
<td></td>
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<tr>
<td>1980</td>
<td></td>
<td></td>
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<tr>
<td>1990</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
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</tr>
</tbody>
</table>

#### Part E - Percent of Unaccounted for Gas

\[
\text{Unaccounted for gas as a percent of total input for the 12 months ending June 30 of the reporting year} = \frac{\text{Unaccounted for gas}}{\text{Total Input}} \times 100
\]

#### Part F - Additional Information

#### Part G - Preparer and Authorized Signature

<table>
<thead>
<tr>
<th>Preparer's Name and Title</th>
<th>Area Code and Telephone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Preparer's email address</th>
<th>Area Code and Facsimile Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Title of Person Signing</th>
<th>Area Code and Telephone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

Authorized Signature

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Note: The table and form continue with more detailed data and instructions for filling in the report.
Each operator shall report the existence of any of the following safety related conditions
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

Transmission Lines (20% or more SMYS)
SAFETY-RELATED CONDITIONS

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

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

LNG Facilities
SAFETY-RELATED CONDITIONS

Any Material Defect or Physical Damage that Impairs the Serviceability

Transmission Lines (20% or more SMYS)
SAFETY-RELATED CONDITIONS

Any Malfunction or Operating Error That Causes the Pressure To Exceed MAOP plus Buildup.

All Pipelines
SAFETY-RELATED CONDITIONS

A leak that constitutes an emergency

All Pipelines
SAFETY- RELATED CONDITIONS

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

LNG Facilities
SAFETY-RELATED CONDITIONS

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

All Pipelines
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
SAFETY-RELATED CONDITIONS

Reports are required for:

- General Corrosion
- Localized Pitting on Bare pipelines
Filling Safety Related Condition Reports

- 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
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 Saturday, Sunday, and Federal Holidays
• PSIA 2002 requires all 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)
<table>
<thead>
<tr>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Have written procedures</td>
</tr>
<tr>
<td>Have the forms and information available</td>
</tr>
<tr>
<td>Work with regulatory agencies</td>
</tr>
<tr>
<td>Review process and work</td>
</tr>
<tr>
<td>Check for completeness and accuracy</td>
</tr>
<tr>
<td>Sign and file on time</td>
</tr>
<tr>
<td>Turn in supplemental reports as required</td>
</tr>
</tbody>
</table>
Information Websites

PHMSA Office of Training and Qualifications
http://www.phmsa.dot.gov/pipeline/tq

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

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