

**BEFORE THE  
PIPELINE AND HAZARDOUS MATERIALS SAFETY  
ADMINISTRATION UNITED STATES DEPARTMENT OF  
TRANSPORTATION WASHINGTON, D.C.**

Notification and Request for Comments	)	Docket Number: PHMSA–2021-
Pipeline Safety: Information Collection	)	0054
Activities	)	

**COMMENTS OF THE  
NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES  
(NAPSR)**

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The National Association of Pipeline Safety Representatives (NAPSR), established in 1982, is an organization of state agency pipeline safety managers, directors and technical personnel who are responsible for the administration of their state's Pipeline Safety Programs. NAPSR provides an effective mechanism for fostering the federal/state partnership through 50 state agency programs (Gas and Hazardous Liquids) whose mission is, "to strengthen state pipeline safety programs by promoting improved pipeline safety standards, education, training, and technology".

The States are responsible for pipeline safety oversight of approximately (2021 data):

11,504.6 miles of jurisdictional gas gathering pipelines (67% of U.S. total),  
104,818.6 miles of gas transmission pipelines (35% of U.S. total), and  
2,229,063 miles of gas distribution main and service pipelines (>99% of U.S. total).

Additionally, NAPSR members oversee the safety of 133 liquefied natural gas (LNG) plants (79% of U.S. total) and 166 LNG tanks (69% of U.S. total).

The responsibility for oversight and legal jurisdiction (by agreement with PHMSA or otherwise) of these pipelines is borne by all NAPSR member states. As PHMSA partners, the state members of NAPSR have an interest in developing regulations that not only increase pipeline safety, but that are fair, clear, unambiguous, and consistent.

**General Comments**

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On October 31, 2022, the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA), published in the Federal Register a Notification and Request for Comments in the above referenced Docket

entitled *"Pipeline Safety: Information Collection Activities"*, Docket Number PHMSA 2021- 0054 which requests comments to PHMSA's request for the Office of Management and Budget (OMB) to renew data collection requirements that are scheduled to expire. "

PHMSA is planning to request revisions to the following forms;

- PHMSA F 7000-1 *Accident Report – Hazardous Liquid and Carbon Dioxide Pipeline Systems*,
- PHMSA F 7100.2-1 *Annual Report for Natural and Other Gas Transmission and Gathering Pipeline Systems*,
- PHMSA F 7000.1-1 *Annual Report for Hazardous Liquids and Carbon Dioxide Pipeline Systems*,
- PHMSA F 7100.1-1 *Annual Report for Gas Distribution Systems*, and
- PHMSA F 7100.1 *Incident Report – Gas Distribution Systems*
- PHMSA F 7100.3 *LNG Incident Form*

PHMSA proposes to revise the annual reports to collect data on excavation damage events to align with the Common Ground Alliance's (CGA) *Damage Information Reporting Tool* ("DIRT"). PHMSA proposes to revise its incident/accident reports to update the excavation damage questions to match the 2018 version of the CGA DIRT report and collect state one-call law exemption data when any sub-cause is selected under excavation damage. In the hazardous liquids accident report, PHMSA is proposing to require the collection of tank data in Parts C3u and C3v for all reports where A14, "Part of the system involved in the Accident" is "Onshore Breakout Tank or Storage Vessel." In all three gas incident reports, PHMSA is proposing to add the local time and date of "confirmed discovery" to better assess operator compliance with PHMSA's reporting regulations. PHMSA is also proposing to remove Part E of the gas distribution annual report pertaining to the number of excess flow valves ("EFVs") and manual service line shut-off valves installed or in the system.

NAPSR supports the PHMSA efforts to collect damage data within the annual reports that mirror, to some extent, the CGA DIRT data collection categories. NAPSR also agrees that more transparency is needed with respect to these damages and that the information would be helpful in focusing damage prevention regulation enforcement efforts.

NAPSR has no other specific comments and supports PHMSA'S request that OMB renew existing information/data collection requirements.

NAPSR would like to express thanks to PHMSA for the opportunity to provide comments on this topic.

Respectfully submitted by:

National Association of Pipeline Safety Representatives

By:

Date: November 30, 2022

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