

**DEPARTMENT OF TRANSPORTATION  
BEFORE THE  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**

Pipeline Safety: Information Collection Activities,	)	
Revision to Gas Transmission and Gathering	)	
Pipeline Systems Annual Report,	)	Docket No. PHMSA-2012-0024
Gas Transmission and Gathering Pipeline Systems	)	
Incident Report, and Hazardous Liquid Pipeline	)	
Systems Accident Report	)	

**COMMENTS OF  
THE ASSOCIATION OF OIL PIPE LINES  
AND THE AMERICAN PETROLEUM INSTITUTE**

The Association of Oil Pipe Lines (“AOPL”)<sup>1</sup> and the American Petroleum Institute (“API”)<sup>2</sup> appreciate the opportunity to submit comments in response to PHMSA’s proposed changes to the Hazardous Liquid Pipeline Systems Accident Report in the above-captioned proceeding. These comments are limited to responding to the Notice and Request for Comment issued in the *Federal Register* on September 21, 2012.

**I. Part C. Additional Facility Information**

In the initial round of comments, AOPL and API proposed that PHMSA restructure Part C of the Accident Report to permit all data on pipe girth welds to be collected in one location. Currently, if values differ on either side of the girth weld, one value is listed in Part C while the

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<sup>1</sup> AOPL is a national trade association that represents owners and operators of oil pipelines across North America, and educates the public about the vital role oil pipelines serve in the daily lives of Americans. AOPL members bring crude oil to the nation’s refineries and important petroleum products to our communities, including all grades of gasoline, diesel, jet fuel, home heating oil, kerosene, propane, and biofuels. Together, API and AOPL members operate approximately 90% of the hazardous liquids pipeline miles in the United States.

<sup>2</sup> API is the only national trade association that represents all aspects of America’s oil and natural gas industry—an industry which supports 9.2 million American jobs and 7.7 percent of the U.S. economy. API’s more than 500 corporate members, from the largest major oil company to the smallest of independents, come from all segments of the industry. They are producers, refiners, suppliers, pipeline operators and marine transporters, as well as service and supply companies that support all segments of the industry.

other value is listed in Part H, in the narrative, alongside other additional information provided by the operator. In the Notice and Request for Comment, PHMSA indicated that this proposal would require extensive modifications to the form and methods of data analysis, and that it would consider this suggestion during the next review of the Accident Report.

Although AOPL and API recognize that this update may involve complex upgrades and alterations, AOPL and API would like to emphasize the value derived from this change. Importantly, adopting the proposed change would enable the data to be more easily viewed and analyzed by pipeline operators and the public. Indeed, the way this section is currently organized frustrates the ability of operators and the public (and, arguably, PHMSA) to analyze the data and thereby learn from specific incidents. In addition, including all information relating to girth welds in one location would eliminate confusion by operators inputting data and reduce operator error. This change would also allow operators to complete one section before moving forward on the form, instead of advancing the screen to Part H to complete the remaining portion of girth welds, then subsequently backtracking to complete Part C and the remainder of the Accident Report, as is currently the case. In short, the proposed change would provide meaningful improvements to the Report that would help advance the goals of pipeline safety.

## **II. Part G. Apparent Cause**

In the initial round of comments, AOPL and API also requested certain changes to Part G, Section G6 of the Accident Report Form. Although PHMSA indicated that the proposed suggestions would be considered during the next review of the Accident Form in 2013, given that the proposed changes would add value to all stakeholders, AOPL and API request that they be considered at this time.

Specifically, AOPL and API requested that “abnormal wear” be included as an available option on the list of additional factors that contributed to equipment failure. AOPL and API also requested that an option for “none” be included on this list. Including these factors would minimize operator use of the option “other.” Fewer uses of the option “other” would reduce time spent reviewing these factors, increase the specificity of the data provided, and offer added insight into the source of equipment failures.

AOPL and API further requested that the language in Section G6, stating “Complete the following if any Equipment Failure sub-cause is selected,” be deleted. This deletion would ensure that operators complete the inquiry regardless of whether a sub-cause exists, adding more data from which operators, PHMSA, and the public may learn.

## **III. Conclusion**

AOPL and API appreciate the opportunity to comment on the proposed changes to Form 7000-1 and request that PHMSA consider these comments in promulgating its final rule.

Sincerely,



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