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**RE: Docket number is PHMSA-2015-0205
July 12, 2016**

The Pipeline Safety Trust appreciates the opportunity to comment on PHMSA's proposed revisions to the Gas transmission Incident reporting form, and the effort that went in to getting input from stakeholders before issuing this proposal. We support all of the proposed changes, but we want to make a few specific comments.

The differences between the reporting thresholds for gas incidents and hazardous liquid incidents prevents the two types of transmission lines from being compared directly on a incident to incident basis. We recognize that a change in the reporting threshold for gas transmission lines to substantially lower the volume that triggers an incident report may require a separate rulemaking. We encourage PHMSA to undertake that effort in the course of its continuing efforts to improve the quality of the data it collects and to make the safety metrics provided to the public have meaning. A direct comparison of the types of pipelines would be facilitated by substantially lowering it to an amount equivalent to the 5 gallon and 5 barrel volume triggers for hazardous liquids – approximately 715 cubic feet and 30,000 cubic feet, respectively.

D7d. Property Damage – other

Because of a concern raised to us by a right of way landowner, we have learned that contract security services employed by an operator to make repairs on an interstate gas transmission line are not always reported as a cost in the property damages calculated, and in his circumstances and perhaps others, that reporting failure made a difference in whether the circumstances were reported as an incident or not. We urge PHMSA to clarify in the instructions that any cost of security used during investigation or repairs following a release must be included in the property damages calculation on the incident form.

G2. Natural Force Damage – We are particularly pleased to see PHMSA proposing to gather information on whether incidents have been caused by the presence of a tree or tree roots. We believe the data collected will provide some basis for the perennial battles over the presence of trees near transmission pipelines.

G3(1) Excavation damage – exemption information. We are also happy to see PHMSA proposing to gather information relating to state one-call law exempt activities that lead to incidents. The remaining state law exemptions should be eliminated or significantly reduced, and perhaps this information will provide the basis to do so.

We otherwise support the proposed changes.