

**Department of Transportation
Office of the Chief Information Officer**

**Supporting Statement
“Annual and Incident Reports for Gas Pipeline Operators”
OMB Control No. 2137-0522
Docket No. PHMSA-2021-0039
RIN 2137-AF51**

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for a revision of a currently approved collection entitled “Annual and Incident Reports for Gas Pipeline Operators” (OMB Control No. 2137-0522). The current expiration date for this information collection is August 31, 2026.

The revision of this information collection is necessary due to the following PHMSA action that will affect the current collection of information:

Pipeline Safety: Gas Leak Detection and Repair Proposed Rule: Requires gas pipeline operators to report the total number of leaks in a calendar year.

- Adds 10, 860 burden hours to this information collection for annual reporting.

Part A. Justification

1. Circumstances that make collection of information necessary.

The reports contained within this information collection support the Department of Transportation’s strategic goal of safety. Annual summary reports help to inform PHMSA and the public of release incident risks and trends. Gas pipeline releases can cause human injuries, fatalities, economic losses, and environmental damage. Rapid reporting, detailed incident reports, and annual summary reports all help to inform PHMSA and the public of release incident risks and trends. The National Transportation Safety Board (NTSB), the U.S. Department of Transportation’s Office of the Inspector General, and the General Accounting Office all urged PHMSA to collect this information. The information is an essential part of PHMSA’s overall effort to minimize natural gas storage, transmission, gathering, and distribution pipeline failures.

The requirements for annual reporting and telephonic notification of incidents are in 49 CFR Part 191. The PHMSA delegation of authority is found in 49 CFR 1.97 which allows for PHMSA to exercise the authority vested in the Secretary in under Chapter 601 of title 49, U.S.C.

The specific legislative authority cites for the requirements in 49 CFR Part 191 include 49 U.S.C. 60102, 60103, 60104, 60108, 60117, 60118, 60124 and the recently revised 60139.

2. How, by whom, and for what purpose is the information used.

PHMSA uses this information collection to gather annual data and failure information from natural gas pipeline operators. The term “natural gas pipeline operators” includes Gas Transmission operators, Gas Distribution operators, and LNG pipeline facility operators.

PHMSA collects annual information from gas pipeline operators via annual reports. The annual report form has query fields regarding incident cause categories, impacts, failure mechanisms, locations, and other details about natural gas pipeline incidents. PHMSA uses the information to track incidents and help guide future regulations to reduce future pipeline incidents. The annual report forms are identified as follows:

- Underground Natural Gas Storage Annual Report
- Gas Transmission Annual Report
- LNG Annual Report
- Type R Reporting-Regulated Annual Report

The information from annual reports is used for identifying existing or potential pipeline safety problems, to develop statistical and data/safety reports, and to develop benefit-cost analyses pertaining to pipeline safety.

3. Extent of automated information collection.

PHMSA requires operators to submit all required reports electronically with an exception for those operators to whom electronic submissions would pose an undue burden and hardship. Pipeline operators are encouraged to file the incident and annual reports online at www.phmsa.dot.gov.

4. Efforts to identify duplication.

PHMSA is the only federal agency that collects information related to distribution pipeline failures. No similar information is requested by the government or industry on distribution pipeline failures that occur between the point-of-sale to a distribution company and a customer’s meter.

The information collection on gas transmission and gathering pipelines is extremely limited in terms of scope and population of gas pipeline operators covered. The

Department of Interior (DOI) collects information that is in some ways similar to that collected by PHMSA, but the information DOI collects does not cover all gas transportation or gathering pipelines.

5. Efforts to minimize the effects on small business.

For PHMSA to be able to effectively carry out its legislative mandate and monitor natural gas pipeline safety, it is essential that both large and small operators of pipelines provide annual reports. PHMSA will make exception in cases where it is not feasible for operators to submit electronically.

6. Impact of less frequent collection of information.

The biennial report to Congress mandated by 49 U.S.C. 60124(b) would not have current information without the annual report data. Less frequent information collection could compromise the safety and economic viability of the U.S. pipeline system.

PHMSA would not be able to assess the rate and locations of incidents to the gas transmission and gathering pipelines without this information collection.

7. Special circumstances.

There are no special circumstances within this request.

8. Compliance with 5 CFR 1320.8.

On May 18, 2023, PHMSA published a Noticed of Proposed Rulemaking (88 FR 31890) to seek public comments on the proposed data collection.

On May 5, 2021, PHMSA held a two-day virtual Pipeline Leak Detection, Leak Repair and Methane Emission Reductions public meeting to engage stakeholders on gas pipeline leak detection and repair issues as an important step in fulfilling the requirements of Sections 113 and 114 of the PIPES Act of 2020 ("Act"). During the meeting, stakeholders—including environmental and public safety groups, Federal and state governments, and the pipeline industry shared perspectives on improving gas pipeline leak detection and repair. Topics discussed included the scope of the current problem, as well as advanced technologies and practices to address methane emissions from natural gas pipeline systems.

Additionally, PHMSA maintains an “open-door” policy with its stakeholders where continual engagement on ways to improve pipeline safety are routine. In this vein, PHMSA participates in various discussions where updates on this information collection are provided. PHMSA includes updates on this information collection in its regulatory updates presentation that is used to update stakeholders on the status of pending actions. PHMSA takes all feedback received into consideration in the proposed adjustments.

9. Payments or gifts to respondents.

There is no payment or gift provided to respondents associated with this collection of information.

10. Assurance of confidentiality.

PHMSA does not have the authority to guarantee confidentiality, however, this information collection does not include anything of a sensitive nature or of any matters considered private.

11. Justification for collection of sensitive information.

This information collection does not involve questions of a sensitive nature.

12.

Estimate of burden hours for information requested.

Current Number of Responses: 2,445	Proposed Number of Responses: 2,445
Current Burden Estimate: 104,596 hours	Proposed Burden Estimate: 115,456 hours

PHMSA intends to revise this information collection in conjunction with proposed regulatory changes made in the Pipeline Safety: Gas Leak Detection and Repair NPRM **resulting in an increased burden of 10,860 hours.**

PHMSA currently estimates that approximately 1,810 operators spend 54 hours, annually, completing the Natural and Other Gas Transmission and Gathering Pipeline Systems Annual Report - PHMSA Form F7100.2-1. The requested revision would revise form F7100.2-1 to collect the total number of leaks identified on a gas pipeline system within the calendar year. PHMSA estimates that it will take operators an **additional 6 hours**, annually, to compile and submit the newly requested data – bringing the estimated time for completion of the form to 60 hours per operator.

The currently approved burden for completing PHMSA Form F7100.2-1 is 1,810 responses and 97,740 hours (1,810 responses * 54 hours). As a result of the proposed change, the burden for this information collection will increase by 10, 860 hours for an overall burden of 108,600 hours (1,810 responses *60 hours) for natural and other gas transmission annual reporting activities

A breakdown of the overall burden for this information collection request is below: demonstrated below:

IC	Responses	Burden Per Response	Total Burden
Gas Transmission	1,810	60 hours per report	108,600 hours

and Gathering Annual Report			
LNG Annual Report	113	12 hours per report	1,356 hours
Underground Storage Annual Report	124	20 hours per report	2,480 hours
Type R Reporting-Regulated Annual Report	130	21	2,730
Gas Notifications	268	1.08 hours	290 hours
Total	2,445 Annual Responses		115,456 Annual Burden Hours

(a) Annual Reports for gas transmission and gas gathering systems, LNG Facilities, and underground natural gas storage facilities (Section 191.17) w/ 2,177 responses

Annual reports are required for all operators of gas transmission and gathering pipeline systems, liquefied natural gas facilities and underground natural gas storage facilities. An explanation of the estimated burden for each report collection is detailed as follows:

1. Transmission Systems Annual Report **(108,600 hours)**

PHMSA estimates that it receives approximately **1,810** gas transmission annual reports each year. PHMSA estimates that it will take operators approximately **60** hours to compile and submit the data required to comply with this annual reporting requirement. This includes the time it will take to review instructions, gathering the data needed, completing, reviewing and submitting the requested data.

Accordingly, PHMSA estimates the burden associated with collecting Gas Transmission and Gathering Systems annual data to be 108,600 hours (1,810 reports *60 hours per report) each year.

2. LNG Annual Report **(1,356 hours)**

PHMSA estimates that there are 82 LNG pipeline operators for 113 LNG facilities. PHMSA expects to receive an annual report submission for each of the 113 LNG facilities. PHMSA estimates that it will take LNG operators 12 hours to prepare each annual report submission. This includes the time it will take to review instructions, gathering the data needed, completing, reviewing and submitting the requested data. Accordingly, PHMSA estimates the information collection burden associated with the LNG annual report information collection to be approximately 1,356 hours (113 LNG reports* 12 hours per report) each year.

3. Underground Natural Gas Storage Facility Annual Report (**2,480 hours**)

49 CFR § 191.17 requires each operator of an underground natural gas storage facility to submit an annual report on DOT PHMSA Form 7100.4-1 by March 15, for the preceding calendar year. PHMSA estimates that there are 124 operators of underground natural gas storage facilities. PHMSA expects each of these operators to spend 20 hours, annually, to prepare annual report submissions. This includes time for reviewing instructions, gathering the data needed, reviewing the required data, and completing and submitting PHMSA Form 7100.4-1 for an overall burden of 2,480 hours (124 reports *20 hours per report) for annual report submissions.

4. Type R Reporting Regulated Gas Gathering Annual Report (**2,730 hours**)

49 CFR§ 192.8 designates “Type R” gathering lines as lines that are not regulated gathering lines under 49 CFR Part 192 but are subject to incident and annual reporting requirements in 49 CFR Part 191. PHMSA created new DOT Form PHMSA F7 100.2-3 for Type R gas gathering systems that are not subject to the safety requirements in 49 CFR Part 192. Type R operators are required to submit DOT Form PHMSA F7 100.2-3 by March 15, for the preceding calendar year. PHMSA estimates that there are 130 Type R operators who are subject to this requirement. PHMSA estimates that it will take operators approximately 21 hours annually to complete this report. This includes time for reviewing instructions, gathering the data needed, reviewing the required data, and completing and submitting the mandatory report. This will result in an overall annual burden of 130 responses and 2,730 (130 reports *21 hours per report) hours.

*(b) Gas Transmission Notifications w/ 268 responses * 1.08 hours (290 hours)*

(c) Total Hours:

Annual Reports (108,600 +1,356+2,480+2,730) + Gas Notifications (290) = **115,456 hours.**

13. Estimate of total annual costs to respondents.

PHMSA assumes that the reporting would be made by an engineering manager. Based on the industry-specific occupational and wage estimates provided by the U.S. Department of Labor’s Bureau of Labor Statistics, median hourly wage of an engineering manager (for NAICS 486000 – pipeline transportation)¹ is estimated as \$77.50. Using an estimated fringe benefit of approximately 35 percent, the recordkeeping requirements for the gas operators are prepared at the average rate of \$104.63 per hour.

The total annual estimated costs for this information collection with all the incorporated proposals would be \$12,080,161.30 (= \$104.63 * 115,456 hours)

¹ https://www.bls.gov/oes/current/naics3_486000.htm

14. Estimate of cost to the Federal Government.

PHMSA spends an estimated cost of \$189,969.00 to operate and maintain this information collection. Operations and maintenance include PRA compliance, interface improvements, database management, planning, revisions, and customer service.

	Monthly Average (Hrs)	Hourly Rate	Annual Hours	Total Costs
Salary Costs*	7	\$38.82/hr	84	\$3,260
Contracting Costs	129.25	\$120.38/hr	1551	\$186,709
TOTAL				\$189,969.00

15. Explanation of program changes or adjustments.

The Pipeline Safety: Gas Leak Detection and Repair proposed rule requires gas pipeline operators to report the total number of leaks in a calendar year. PHMSA is revising this information collection in conjunction with the proposed regulatory changes and expects the change to result in an increased burden of 10,860 hours.

16. Publication of results of data collection.

PHMSA will summarize the incident and annual reports post the results on PHMSA's website.

17. Approval for not displaying the expiration date for OMB approval.

PHMSA will display the expiration date.

18. Exceptions to certification statement.

There are no exceptions to the certification statement.