

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

**Supporting Statement
Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline
Operators
OMB Control No. 2137-0610
Docket No. PHMSA-2025-0019
RIN 2137-AF44**

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for proposed revisions to an information collection under OMB Control No. 2137-0610 entitled, “Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline Operators.”

This request is made in conjunction with the Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines (NPRM), which includes expanded notification requirements for gas transmission integrity management assessments.

PHMSA expects this action to add 1,039 responses and 415,600 hours to the estimated burden of this information collection for plan development and notification activities.

The existing authorization to collect information under this OMB Control No. expires on June 30, 2028.

Part A. Justification

1. Circumstances that make collection of information necessary.

This information collection request pertains to gas transmission operators that are subject to the Gas Transmission Pipeline Integrity Management requirements detailed in 49 CFR Part 192 Subpart O. The gas transmission integrity management requirements became effective February 14, 2004. The regulation improves pipeline safety through (1) accelerating the integrity assessment of pipelines in high consequence areas, (2) improving integrity management systems within companies, (3) improving the government's role in reviewing the adequacy of integrity programs and plans, and (4) providing increased public assurance in pipeline safety.

The information collection required by gas transmission integrity management requirements is the maintenance of a written integrity management program and records that demonstrates compliance with Subpart O to PHMSA by operators of gas transmission pipelines in high

consequence areas. Operators must maintain their integrity management records for the life of the pipeline, and PHMSA or State regulators may review it as a part of inspections. Gas transmission operators are also required to report to PHMSA certain actions related to their integrity management program. This information collection supports the DOT strategic goal of safety by reducing the number of incidents in natural gas transmission pipelines.

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

Federal pipeline safety inspectors and state pipeline safety inspectors participating in the pipeline safety program will use the maintained records to determine compliance with 49 CFR Part 192 Subpart O operators of gas transmission pipelines in high consequence areas

3. Extent of automated information collection.

Operators are permitted to keep integrity management plan records in any retrievable format, including the use of the latest information technology. PHMSA actively encourages the use of electronic technology wherever possible.

4. Efforts to identify duplication.

There is no other similar information available.

5. Efforts to minimize the burden on small businesses.

Smaller operators will have lower costs than the larger operators, as they will likely have fewer pipelines that are located in HCAs.

6. Impact of less frequent collection of information.

If the activities were conducted less frequently, then PHMSA's ability to gather pertinent information on the status of pipelines in HCAs would be reduced, as would PHMSA's ability to monitor and ensure safety as directed by Congress in Pipeline Safety Improvement Act of 2002.

7. Special circumstances.

The collection is consistent with all OMB guidelines, except guideline 5 CFR 1320.5(d)(2) (maximum retention 3 years). In the case of integrity testing, testing may take place as infrequently as once every ten years. Since some actions build on previous work, to maintain a complete picture of the integrity management associated with a pipeline, the collected information will need to be retained for the life of that pipeline. Some information may be of confidential in nature, and PHMSA will consider requests for confidentiality from operators on a case-by-case basis.

8. Compliance with 5 CFR 1320.8.

PHMSA maintains an “open-door” policy with its stakeholders where continual engagement on ways to improve pipeline safety are routine. PHMSA published a Notice of Proposed Rulemaking in the Federal Register [91 FR 42272] on July 8, 2026. The comment period closes on September 8, 2026.

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.

11. Justification for collection of sensitive information.

The information collection requirements do not involve questions of a sensitive nature.

12. Estimate of burden hours for information requested.

PHMSA estimates that 721 gas transmission operators are expected by to submit on-going yearly updates for the plans and comply with associated recordkeeping and notification requirements. Based on its experience monitoring the plans in past years, PHMSA estimates the following hour requirements for the four components of this information collection request:

Plan modification - 233 hours of engineering time and 80 hours for clerical time or 313 hours per operator

Record keeping - 80 hours of clerical time for each operator

Data integration - 1,020 hours (700 hours of engineering time and 320 hours of clerical time)

Reports for Special Circumstances

In addition to the responses specified above, PHMSA estimates approximately 12 additional responses per year. These responses are for reports that at an operator may need to submit when dealing with a special situation relative to their plan. PHMSA estimates an additional 2.8 hours per response which yields an approximate 34 additional hours to the information collection.

Dent ECA Procedures Notifications

The Pipeline Safety: Repair Criteria NPRM would also require gas transmission pipeline operators who perform an Engineering Critical Assessment (ECA) for dents to submit their ECA procedures to PHMSA. This submission must be made through the notification and no-objection process outlined in § 192.617. The submission may also include a request to use alternative

technology or methodology for reliably identifying anomalies that would be actionable under the rule's requirements. PHMSA expects 1,039 operators to spend approximately 400 hours developing and submitting the documents to PHMSA. **This requirement results in a one-time burden of 1,039 responses and 415,600 hours.**

Therefore, this information collection has estimated total of 1,772 responses and 1,434,407 burden hours as demonstrated in the table below:

IC	Responses	Hours per Response	Total
Plan Modification	721	313 hours	225,673 hours
Recordkeeping	721	80 hours	57,680 hours
Data Integration	721	1,020 hours	735,420 hours
Special Circumstances Report	12	2.8 hours	34 hours
Dent ECA Procedures Notification	1,039	400 hours	415,600 hours
Total	1,772	1,816 hours	1,434,407

13. Estimate of total annual costs to respondents.

Integrity Assessment Notifications are assumed to be made by a senior engineer. 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 pipeline operators are prepared at the average rate of \$104.63 per hour.

The cost burden associated with this information collection is estimated to be \$104.63 x 1,434,407 hours = \$150,082,004.00

14. Estimate of cost to the Federal Government.

There is no additional cost to the Federal Government associated with this information collection.

15. Explanation of program changes or adjustments.

PHMSA proposes to modify this collection to include a new notification provision in the Pipeline Safety: Repair Criteria NPRM. Under the proposal, gas transmission operators who perform an Engineering Critical Assessment (ECA) for dents would be required to submit their ECA procedures to PHMSA through the notification and no-objection process outlined in

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

§192.712. PHMSA expects 1,039 operators to spend approximately 400 hours developing and submitting ECA documentation to PHMSA. The burden estimate for this information collection has been adjusted accordingly.

16. Publication of results of data collection.

This information will not be published.

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

OPS is not seeking approval to not display the expiration date.

18. Exceptions to certification statement.

There is no exception.