

DEPARTMENT OF TRANSPORTATION
1INFORMATION COLLECTION

SUPPORTING STATEMENT

“Class Location Change Recordkeeping Requirements”

OMB Control No. 2137-XXXX (PHMSA is requesting a new OMB Control No.)
Docket No. PHMSA-2017-0151
RIN 2137-AF29

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) of a new information collection entitled, “Class Location Change Recordkeeping Requirements”. The development of this information collection is necessary due to the following PHMSA action that will trigger components of the Paperwork Reduction Act:

Docket No. PHMSA-2017-0151 - Pipeline Safety: Class Location Change Requirements

- o This collection will add 137 Annual Responses and 10, 960 Annual Burden Hours for recordkeeping requirements.**

Part A. Justification

1. Circumstances that make the collection of information necessary.

According to the provisions in the Pipeline Safety: Class Location Change Requirements final rule, natural gas transmission pipeline operators who experience a change in their class location and elect to use the IM alternative must comply with the specified recordkeeping requirements.

This information collection promotes the US DOT’s Safety Strategic Goals. 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.

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

The information will be used by PHMSA to measure compliance with the pipeline safety regulations. The information assists Federal pipeline safety inspectors and State pipeline safety inspectors participating in the gas pipeline safety program.

3. Extent of automated information collection

Operators are permitted to keep records in any retrievable form. They may use the latest information technology to reduce the additional information collection burden.

4. Describe efforts to identify duplication

There is no duplication, as the information collected is unique to specific situations.

5. Efforts to minimize the burden on small businesses.

The burden has been made as simple as possible. PHMSA expects impacted operators to be large and small businesses. For PHMSA to be able to effectively carry out its mission and monitor overall pipeline safety, it is essential that both large and small operators of pipelines comply with the associated directives.

6. Impact of less frequent collection of information.

It is not possible to conduct the collection less frequently and still ensure the necessary level of safety to life and property inherent in transporting natural gas. Without this information, PHMSA would not be able to adequately assess operator's compliance with the pipeline safety regulations. Therefore, less frequent information collection could compromise the safety of the U.S. pipeline system and the environment.

7. Special Circumstances.

None.

8. Compliance with 5 CFR 1320.8(d).

PHMSA issued a Final Rule on January 14, 2026 (91 FR 1608), inviting public comment on the associated information collection request. The Pipeline Safety Trust (PST) submitted a comment asserting that the obligation to maintain traceable, verifiable, and complete records for pressure tests and pipe materials is a pre-existing requirement under the Pipeline Safety Regulations (PSR). Consequently, PST argued that this burden should not be duplicated under the Class Location Change Requirements final rule. PHMSA acknowledges this point. Since the expectation for operators to maintain these records is already codified in the PSR, PHMSA has adjusted the information collection request to remove the estimated TVC records burden for operators utilizing the IM alternative.

9. Payment 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.

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

12. Estimate of burden hours for information requested.

137 Annual Responses and 10,960 Annual Burden Hours

PHMSA proposes this new information collection to help operators comply with amendments to the Federal Pipeline Safety Regulations. The Pipeline Safety: Class Location Change Requirements final rule requires natural gas transmission pipeline operators who experience a change in their class location and elect to use the IM alternative to comply with specific recordkeeping requirements.

Operators must amend applicable sections of its O&M manual(s) to incorporate the program requirements should they elect to use the new IM option promulgated by this final rule. PHMSA estimates operators will need to update O&M manuals for approximately 137 affected pipeline segments. PHMSA estimates this action to take 80 hours per segment.

Operators must maintain records of all actions implemented to meet the program requirements for the life of the pipeline.

A breakdown of the estimated burden is below:

IC	Responses	Burden Per Response	Total Burden
Update O&M Manuals	137	80 hours	10,960 hours
Total	137 annual responses		10,960 annual burden hours

13. Estimate of the total annual costs burden.

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) is estimated as \$58.97 Using an estimated fringe benefit of

approximately 35 percent, the recordkeeping requirements for the gas operators are prepared at the average rate of \$79.61 per hour for an overall cost of \$872,525.60.

14. Estimates of costs to the Federal Government

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

15. Explanation of the program change or adjustments.

The Pipeline Safety: Class Location Change Requirements final rule requires natural gas transmission pipeline operators who experience a change in their class location and elect to use the IM alternative to amend applicable sections of its O&M manual(s) to incorporate the program requirements. Operators must maintain records of all actions implemented to meet the program requirements for the life of the pipeline.

16. Publication of results of data collection.

This information will not be published for statistical purposes.

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

PHMSA is not seeking such approval.

18. Exceptions to the certification statement.

There is no exception.