

Meeting Questions and Answers:

Subject: Natural Gas or Other Gas Transmission & Gathering Systems Annual Report and One Rule Webinar

Start Time: Thursday, March 31, 2011 1:30 PM - 4:00 PM GMT

Todd asked: Has the NPMS submittal date been pushed to align with the Annual Report date?

Answer: Currently operators are requested to align their NPMS submission with AR due dates to facilitate consistency of reporting. However, it is not mandatory currently. PHMSA is considering a rule change in the near future to implement that as a requirement.

Rodney **Asked:** We operate under an ID in Texas and the operator of recorder in LA; therefore do I need to file 2 different reports for each ID/state?

Answer: File a separate report for each state where sections of the form are by state. Certain sections roll up nationally. The online system will help navigate the sections and the headers on the sections in the form also indicate which sections are by state or rolled-up.

Brian **Asked:** Does only regulated gathering need to be listed or all miles of gathering.

Answer: report only regulated gathering mileage.

Pam Asked: For Part C (volumes transported) - LDCs do NOT need to fill this out?

Answer: this report is for reporting transmission mileage, not distribution mileage. Do not report volumes with respect to transmission miles that are part of a distribution system as the form states in Part C.

Brad asks: Section F - if several individual anomalies are repaired with one repair sleeve is this reported as one repaired anomaly? If pipe is replaced and several anomalies are not examined, is the replacement reported as one repaired anomaly?

Answer: When multiple anomalies are repaired and meet any one of the following, then the repair is considered a single repair: the anomalies are interactive; the anomalies are repaired using one sleeve (composite included); the anomalies are repaired using one section of replacement pipe.

Kevin Asked: The earlier slide referenced 192.933, is 192.933c the correct reference?

Answer: 192.933 parts c and part d.

Brian **Asked:** In reference to previous question about part K, which parts can be listed to 3 decimal places (mileage)?

Answer: Rounding to three decimals is provided for mileage reporting only, to facilitate matching totals from one part to another part. Round to nearest whole mile where possible.

Brad **Asked:** Part M1 - Please provide examples of what should be reported as a failure in comparison to a leak or incident.

Answer: These are clarified in the form instructions:

Leaks are unintentional escapes of gas from the pipeline that are not reportable as Incidents under § 191.3. A non-hazardous release that can be eliminated by lubrication, adjustment, or tightening is not a leak. Operators should report the number of leaks repaired based on the best data they have available. For sections replaced but retired in place, operators should consider leak survey information to determine, to the extent practical, the number of leaks in the replaced section.

Failure is defined in ASME/ANSI B31.8S as a general term used to imply that a part in service: has become completely inoperable, is still operable but is incapable of satisfactorily performing its intended function; or has deteriorated seriously, to the point that it has become unreliable or unsafe for continued use. Failures that result in an unintentional release of gas should be reported as leaks.

Incidents are defined in § 191.3.

Kirk asked: Less than 20% SMYS is distribution, the data is included on the gas distribution annual report?

Answer: The report is for gas transmission system mileage. Do not report distribution mileage on this report. If a distribution system operator has transmission mileage operating at these pressures do report that mileage.

Laura **Asked:** The form becomes available and is due on June 15th?

Answer: The form deadline has been extended to August 15, 2011 for CY 2010 filing. The filing due in 2012 and after will revert back to the normal March 15 due date.

John **Asked:** If an offshore volume enters onshore piping at shore line, is the same volume to be shown under both offshore and onshore under Part C?

Answer: Report offshore volumes where they come onshore and can be measured cumulatively where possible. If there is not an onshore source for volume measurement where the offshore volumes come onshore, report cumulative offshore volumes. Use either source of measurement for reporting, but not both to avoid double counting.

Lisa **Asked:** Since gas transmission line can be defined by being equal to or greater than 20% SMYS, why is it in Part K that the "equal to 20% SMYS" is grouped with the "less than 20% SMYS"?

Answer: PHMSA agrees that most operators will have nothing to report in the "less than 20% SMYS" category, it is possible that some operators will have mileage to report here. See §192.939.

Lane **Asked:** What would you report pressures of plastics and composites for Part K? The reason for this question is that you can't calculate %SMYS for plastic or composites. Lane

Answer: Report plastics and composites under "All Non-steel Pipe" category.

Joan asked: We are a new owner of a transmission line and would like to know if it we have to report as a natural gas commodity or as other as we convey landfill gas? What commodity group should we put?

Answer: Report methane under the Natural Gas commodity choice.

Rafidah asked: We are gas gathering company. It was mentioned earlier, Report Regulated Mileage only (192.8 only).Does it mean Class 3 only?

Answer: Report regulated mileage only. Use the form sections for guidance. Sections that are blacked out are areas where class locations for gathering are not applicable. Where sections are not blacked out, report mileage for those classes as applicable for your company.

Kirk: On one of the slides it was indicated that we will be reporting on mileage for smys < 20%, our mileages for pipe <20% are reported on our "Distribution Annual Report", are these pipes considered Transmission??

Answer: No.

Joseph asked: On page 5 of the instructions for the form, the definition of interstate pipeline is repeated. Should one of the definitions be intrastate pipeline?

Answer: We agree, this was an error in the instructions and we have corrected it.

Brian asked: In section F, #4 is ICDA mileage ispected intended to mean only pipe that is physically inspected , for example in a 5 mile ICDA region, after critical angle determination, we may only look at approx. 12' of pipe to inspect the critical angles how would you list mileage inspected?

Answer. The region was 5 miles in the example, and the inspection validated the entire region so report the 5 miles.

Robert : From a question above - on the form Part C, there is a check-box for if you are a local distribution company and have transmission main in your system, then volumes of gas are not reported. Is that a correct interpretation?

Answer: Correct.

B J asked: This annual report covers both the Annual Report due March 15, and the IMP report due January and June? So IMP is only due once a year now?

Answer: Correct. Gas IMP biannual filing was discontinued after the August 2010 filing. The CY 2010 filing of the new revised gas transmission annual report moved the biannual filing onto the annual report, now filed only once with the filing of that annual report.

Pam asked: What is the status of the review of definitions/categories across all reports (i.e., Incident reports, annual reports, distribution reports, transmission reports, etc.)?

Answer: A broad stakeholder group will be formed later in CY 2011 to address needed changes on the gas distribution annual report at which times we should have consistency across incident reports and annual reports for definitions, failure causes etc.

Lisa asked: How to report the volume from storage field?

Answer: Report delivery volumes out of storage, not volume receipts into storage.

Daniel asked: It is my understanding the definition of Offshore means beyond the line of ordinary low water along that portion of the coast of the United States that is in direct contact with the open seas and beyond the line marking the seaward limit of inland waters. A question came up about transmission main crossing larger rivers or bays.

Answer: Offshore lines are those that originate offshore with gas production offshore. A main crossing a larger river or bay would not be considered offshore unless the line originated offshore.

Lane asked: Is this new due date both transmission and distribution annual reports. Sorry, you may have said this earlier but missed it.

Answer: The 2011 filing for the CY 2010 gas distribution annual report was due March 15, 2011. The 2011 filing for the CY 2010 gas transmission annual report is extended to August 15, 2011.

Rosanne asked: Is the paper form PHMSA F 7100.2-1 (Rev. 01/2011) accurate or are there minor changes remaining? Company Computer updates are needed and I would like to have all changes for a one-time enhancement. This form that I referenced is downloaded from the PHMSA OPS Library website and appears to be more current than your hand outs for today's session.

Answer: The form distributed at the Webinar reflects all final changes and supplanted the Rev 01/2011 form, making the changes to parts K and L as discussed in the webinar.

Mark Asked: Will the presentation slides be available later?

Answer: Yes, the slides will be available on the PHMSA Website under the Library.

Todd Asked: Will you provide an XML template for data so that you can receive the report data electronically?

Answer: An XML template will not be available for the 2010 submission. PHMSA will look into providing this function for the 2011 submission.

Johnny Asked: Will fed send form to states for intrastate lines?

Answer: PHMSA will not send annual reports to the States.

Rodney Asked: We operate under an ID in Texas and the operator of recorder in LA; therefore do I need to file 2 different reports for each ID/state?

Answer: One annual report should be filed for each operator ID for each predominant commodity type.

Jack Asked: What should you do if you do not have an OPID yet, in-process?

Answer: Complete the "New Operator Registration" form located at https://opsweb.phmsa.dot.gov/cfdocs/opsapps/pipes/new_operator.cfm. This process may take a few weeks, so please obtain an operator ID as soon as possible.

Carol Asked: Can you have multiple users per operator id?

Answer: Each operator ID can have infinite users as long as each user uses a different email address during the registration process. Also, to avoid users from having to remember multiple

usernames and passwords, each user can have unlimited operator IDs associated to their username.

Lynn Asked: Do you have to enter and submit data in one session or can you save a partial entry and come back later to complete it?

Answer: Reports can be saved at any point and modified later. All saved reports can be found under the Saved Reports section on the left navigation bar. All saved reports will be listed by report year, commodity, date saved, etc ... The user will click on the row once to select the correct record, then click on the "edit" button above to continue editing the record. Only one draft report can be started for an operator ID for each commodity type, so if a user tries to start another report for that same commodity, they will receive a message that a draft report already exists. The error message will provide the draft report #. You should close the report you tried to start, go to Saved Reports, Gas Transmission and Gathering, then find the report either by locating the commodity or using the draft report #.

William Asked: Will the data collected by the form be available to the State Programs as soon as the operators submit the form?

Answer: No, operators should save an electronic copy of their submitted annual report and email it to the appropriate State(s). Operators can obtain an electronic copy by clicking on **Gas Transmission and Gathering** under *Submitted Reports*. Double click on the PDF icon (red icon) to either open or save the file.

Roger Asked: Will I be able to contact PHMSA as I've done in previous years?

Answer: Yes, operators may contact 202-366-8075 for assistance.

Marsha Asked: Will the new due date in 2012 be 3-15-12?

Answer: Yes, 2011 Gas Transmission and Gathering Annual Reports will be due on 3-15-2012.

B J Asked: link to sign up for the on-line training?

Answer: Operators may sign up for training by going to <http://opsweb.phmsa.dot.gov/webinars> There are four different sessions based on whether you are an interstate, intrastate, inter and intrastate operator, or a gathering operator.

Marsha Asked: Will there be a help line once the report is actually out to be used.

Answer: Yes, operators may call 202-366-8075 for assistance.

Rob Asked: The download of the new form is in pdf format. Is there an Excel version we can download?

Answer: We do not have an Excel version of the form. An Excel version will be available once the application is online. Once you start a report, an Excel version can be obtained under the Saved Reports section. Double click on the Excel icon and follow the instructions to save.
