

and provide sufficient space on the form.

Southwest stated that the additional request for latitude and longitude requires an increase in man-hours of approximately ten to thirty minutes using the website, depending on the location to research. Southwest finds the website non-user friendly and states that returned results were only marginally accurate because gas lines are not shown on base maps. Southwest believes these fields should be removed if they are not going to be significant in analysis.

APGA and Southwest question the value of collecting latitude/longitude data and its application for incident analyses.

RSPA/OPS Response: We have eliminated the request for projections and datum used in collecting latitude/longitude information. However, RSPA/OPS requests latitude and longitude information for the specific purpose of obtaining a location description to pinpoint the site of the incident. Without this information, RSPA/OPS would not be able to geographically locate most incidents.

Furthermore, RSPA/OPS is often requested by Congress to provide maps of gas pipeline incidents, necessitating this data collection. RSPA/OPS is also working to create risk-based tools to assist in targeting solutions where problems occur, to identify risks in highly-populated corridors, and to identify future risks in expected growth corridors. Latitude and longitude information further provides macro level information necessary to develop these risk-based tools.

RSPA/OPS is requiring latitude and longitude to be stated in decimal degrees with a minimum of five decimal places. No projection is required. Form instructions have been clarified to further explain how latitude and longitude should be reported. In the event operators lack GIS capability, latitude and longitude is readily available on the Internet. As APGA noted, and tests by RSPA/OPS confirm, trials to access the Tiger/Line were successful within ten minutes or less. Note, however, that operators are not required to use the Tiger/Line site. Many similar Internet tools are available that will facilitate provision of latitude/longitude coordinates.

Federal Land Incident

AGA and Southwest allege that it is the responsibility of RSPA/OPS to obtain federal land location, and not that of the operator. Definitions for "federal land" provided for the incident and annual reports are cited as

inconsistent. A recommendation was made to use the same definition in both instructions.

RSPA/OPS Response: RSPA/OPS requires Federal Land identification for incidents that occur on federal lands to comply with 30 U.S.C. 185. RSPA/OPS has revised the definition in the form instructions to state: "All lands owned by the United States except lands in the National Park System, lands held in trust for an Indian or Indian tribe, and lands on the Outer Continental Shelf."

Type of Leak or Rupture

AGA stated: "[t]ype of leak or rupture asks the operator for a puncture diameter in inches. There may be situations where the puncture is not circular in shape. If this data is to be used to calculate areas of the puncture opening, rectangular dimensions should also be sought for punctures that approach a rectangular shape."

RSPA/OPS response: It is not the intent of RSPA/OPS to restrict measurements to circular dimensions. For the purposes of this data collection, provide length in inches of a representational cross section of the leak or rupture, or diameter, whichever best suits the shape of the puncture. We further clarify this in the instructions.

Leak Reporting

APGA stated:

OPS asks operators to report the type of leak or rupture. The instructions for this section are confusing. In the instructions OPS includes a note to operators not to report leaks that are either inconsequential or incidental to the operation of the pipeline and which can be repaired under routine daily maintenance. Neither of these types of leaks would be involved in an incident, therefore would not be reported on the incident form under any circumstances. The instructions would be more clear if this note would simply state that the operator should only report information about the one leak that the operator has determined to be the proximate cause of the incident.

RSPA/OPS response: RSPA/OPS agrees with the comment and is clarifying the instructions accordingly.

Pinhole Leaks

Southwest comments:

* * * RSPA/OPS has not defined what constitutes a pinhole. If operators are left to interpret this, each operator will have its own definition of a pinhole—that will vary from operator to operator. This in effect will minimize the usefulness of any type of meaningful analysis because of the various criteria used to establish the date. Southwest suggests that RSPA/OPS define what constitutes a pinhole.

RSPA/OPS Response: RSPA/OPS agrees with the comment concerning the

need for a definition of "pinhole" and will define a "pinhole" as one that is hard to see with the naked eye characterized as being a small hole made as by a pin.

Consequences—Reporting Reasons

Connecticut commented on the section of the form titled "Consequences." The current report has a heading for the same type of information, titled "Reasons for Reporting." Those reasons align directly with criteria in 49 CFR Part 191—to make clear for reporting purposes why the Operator is reporting the incident. The proposed change in the section heading from "Reasons for Reporting" to "Consequences" substantially alters the meaning and causes confusion with the current report. Connecticut recommends the section heading be retained as "Reasons for Reporting." Additional recommendations include retaining all the areas under "Reasons for Reporting" as in the existing report and in alignment with Part 191 reporting criteria.

The two proposed additions, "gas ignited" and "evacuation," are not specific Part 191 reporting criteria and can be open to interpretation and confusion. Connecticut asks, "[i]f during a planned purging operation, an operator ignited and burned off gas, would that trigger a report, since "gas ignited" is now one of the "consequences, or if 3 people were evacuated from a home by the Fire Department because of a gas odor due to a pilot light out (non-jurisdictional), would that trigger a Report?"

RSPA/OPS response: All the items in this revised section are not triggers (*i.e.*, gas ignited and evacuation) for filing a natural gas distribution incident. The "Consequences" title has been adopted to align with the gas transmission form and the hazardous liquid accident form revisions that also adopted the revised heading for this section. A "reason for reporting" is readily discernable regardless of what the section heading is labeled. For consistency with the natural gas transmission and hazardous liquid incident and accident forms, RSPA/OPS therefore retains the proposed "Consequences" title for this section.

The "gas ignited" and "evacuation" events will not trigger a report filing, because these revisions do not change the reporting criteria.

Estimated Property Damage/Loss

AGA asks that cost of relighting gas services shut off due to incidents be included in the instructions for estimated costs because all property