



Panel 4: Impact of Exemptions on Pipeline Operations

PHMSA State One-Call Exemption Forum

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- **Our goal is zero incidents** - a perfect record of safety and reliability for the national pipeline system. *We will work every day toward this goal.*
- **We are committed to safety culture** as a critical dimension to continuously improve our industry's performance.
- **We will be relentless in our pursuit of improving** by learning from the past and anticipating the future.
- **We are committed to applying integrity management principles on a system-wide basis.**
- **We will engage our stakeholders** - from the local community to the national level - so they understand and can participate in reducing risk.



Impact to INGAA members



- Excavation Damage is the **Primary Cause** of Serious PHMSA Reportable Accidents (**Injury** or **Fatality**)
- A Natural Gas Transmission Pipeline Excavation Incident Can Cause in **Spectacular, Jarring** and **Tragic** Results
- Real Prevention of Excavation Incidents is a **Shared Responsibility**
- One Call Exemptions is **One Root Cause** in a Very Complicated Excavation Process

“INGAA supports PHMSA’s efforts to improve One Call enforcement. When it comes to damage protection there should be no exemptions, yet on numerous occasions INGAA members suffer excavation damage from municipalities, agricultural entities, railroads, or other groups of excavators that are not required to be members of their state One Call program or that do not have to contact their state One Call program before they dig. These exemptions are matters of state law, and if a state will not act consistent with pipeline safety PHMSA should have the tools to do so. As PHMSA moves forward in this docket, it should consider every state exemption a potential line hit.”

Top Concerns for Natural Gas Transmission Pipelines



- State Department of Transportation employees, affiliates and contractors have damaged natural gas transmission pipelines and are exempt in some state One Call Systems
- Municipal and County employees, affiliates and contractors have damaged natural gas transmission pipelines and are exempt in some state One Call Systems
- Agricultural entities, affiliates and contractors have damaged natural gas transmission pipelines and are exempt in some state One Call Systems
- Railroad entities, affiliates and contractors have damaged natural gas transmission pipelines and are exempt in some state One Call Systems

Excavation Damage Exemption Analysis



- Present Statistical Data to Understand Exemption Question
 - PHMSA Incident Reports (Lagging Indicator)
 - CGA DIRT Data (Lagging Indicator)
- Present Information to Understand Exemptions
 - CGA Compilation of One Call Laws & Regulations
 - State One Call Laws and Regulations
- These Data Sources Do Not Capture Explicit Exemption Information
- No Explicit, Composite Analysis has Been Conducted to Date

National Excavation Damage Exemption Data Proposal



- Data to Understand Excavator Category
 - PHMSA Incident Reports (with Exemption Data)
 - CGA DIRT Data (with Exemption Data)
 - ***One Call Tickets in non-exempt states (Leading Indicator)***
- Data to Understand Exemption Categories
 - Improved CGA Compilation of One Call Laws & Regulations
- Identify Excavator Activity, DIRT and Incident Data in Covered States to Identify Key Excavator Categories
- Covered States Provide Surrogate for Missing Data in Exempt One Call States

Recommendations

- INGAA recommends that national data be used to clarify the One Call exemption situation (*previous slide*)
- INGAA recommends that Excavation Damage Exemption data be recorded in
 - PHMSA Incident Reports
 - CGA DIRT Reports
- INGAA Recommends a “State Report Card”
 - Excavation Damage Exemption Analysis of State (Lagging Indicator)
 - National Excavation Damage Exemption Analysis (Leading Indicator)
 - Voluntary Participation of Excavation Exempt Categories (Leading Indicator)
- INGAA Recommends PHMSA prioritize efforts to change Excavation Damage Exemptions