



# Pipeline Safety Violation Trends

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# Presentation Overview



- Natural Gas Transmission/Gathering
  - Violation Count
  - Cited Violation
  - Remedial Action
- Distribution
  - Violation Count
  - Cited Violation
  - Remedial Action
- Hazardous Liquid
  - Violation Count
  - Cited Violation
  - Remedial Action

# Natural Gas Transmission/Gathering (1 of 3)



- 49 CFR 199.119(a)
  - Violation Count
    - CY 2023 – 0 violations
    - CY 2024 – 21 violations
  - Cited Violations:
    - The operator did not submit the annual management information system (MIS) report to PHMSA.
    - The MIS annual report was inadequate.
  - Remedial Action:
    - Provide documentation that MIS data was submitted or amended to.
    - Update procedures to ensure reports are submitted accurately and on time.

# Natural Gas Transmission/Gathering (2 of 3)



- 49 CFR 192.631(j)(1)
  - Violation Count
    - CY 2023 – 10 cited violations
    - CY 2024 – 19 cited violations
  - Cited Violations:
    - Not having records demonstrating compliance with control room regulations.
  - Remedial Action:
    - Submit procedures or updates for record keeping.
    - Submit documentation demonstrating activity was completed

# Natural Gas Transmission/Gathering (3 of 3)



- 49 CFR 191.17(a)
  - Violation Count
    - CY 2023 – 20 cited violations
    - CY 2024 - 8 cited violations
  - Cited Violations:
    - Failing to submit the annual report to PHMSA.
    - Failing to file the annual report no later than March 15
  - Remedial Action:
    - Include submission documentation in the plan of correction (POC).
    - Include procedural updates to ensure reports are submitted on time.

# Hazardous Liquid (1 of 3)



- 49 CFR 195.446(j)(1)
  - Violation Count
    - CY 2023 – 19 cited violations
    - CY 2024 – 18 cited violations
  - Cited Violations:
    - Not having records demonstrating compliance with control room regulations.
  - Remedial Action:
    - Submit procedures or updates for record keeping.
    - Submit documentation demonstrating activity was completed

# Hazardous Liquid (2 of 3)



- 49 CFR 195.402(a)
  - Violation Count
    - CY 2023 – 17 cited violations
    - CY 2024 – 14 cited violations
  - Cited Violations:
    - Not having Operation and Maintenance procedures
    - Not following Operation and Maintenance procedures.
  - Remedial Action:
    - Procedural documentation demonstrating procedure was created or updated.
    - Records demonstrating training has been conducted with personnel.

# Hazardous Liquid (3 of 3)



- 49 CFR 195.452(l)(1)(ii)
  - Violation Count
    - CY 2023 – 5 cited violations
    - CY 2024 – 13 cited violations
  - Cited Violation:
    - Failing to maintain documents to implement and evaluate the elements of the integrity management program.
  - Remedial Action:
    - Submit procedures or program updates for record keeping.
    - Submit documentation demonstrating activity was completed





- 49 CFR 199.119(a)
  - Violation Count
    - CY 2023 – 1 cited violations
    - CY 2024 – 46 cited violations
  - Cited Violations:
    - The management information system annual report was inadequate.
    - The operator did not submit the annual management information system (MIS) report to PHMSA.
  - Remedial Action:
    - Include submission documentation in the plan of correction (POC).
    - Update procedures to ensure reports are submitted accurately and on time.



- Title 16 8.209 (i)(1)
  - Violation Count
    - CY 2023 – 27 cited violations
    - CY 2024 – 31 cited violations
  - Cited Violation:
    - The operator did not file, a list of the steel service line or other distribution facilities replaced during the prior calendar year
    - The report must be submitted no later than March 15, for the preceding calendar year.
  - Remedial Action:
    - Submit documentation demonstrating a list of steel service line or other distribution facilities replaced during the prior calendar year.
    - Documentation demonstrating how the operator plans to meet regulatory timeframes.
      - Procedures
      - Work Order

## Distribution (2 or 3)



- Title 16 8.209 (i)(2)
  - Violation Count
    - CY 2023 – 35 cited violations
    - CY 2024 – 31 cited violations
  - Cited Violation:
    - The operator did not file an annual proposed work plan for removal or replacement for the current calendar.
    - Failing to file no later than March 15, for the current calendar year.
  - Remedial Action:
    - Submit documentation demonstrating an annual proposed work plan for removal or replacement has been filed for the current calendar year.
    - Documentation demonstrating how the operator plans to meet regulatory timeframes.
      - Procedures
      - Work Order

# Contact Information



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Thank you!!