

Data OPS Collects but Does not Need

Roger Little

PHMSA

Annual Reports

- By State
 - Not seen as useful
 - Not as accurate as needed – false precision
 - State borders in GIS is improving but not accurate
 - Won't help PHMSA or NAPSRS determine state performance
 - Liquid by state more complex than gas since it is by Commodity
 - Keeping track of what to report-regulated/nonregulated adds complexity especially for gas

Annual Reports

- GIS opportunities to help reporting burden
- Maybe offer choices of annual report or GIS submission where conducive
- 90% of annuals are conducive to reporting by GIS
- XTO Energy provided a template of one of their systems identifying what annual report elements are conducive for GIS reporting along with the attributes collected for that system- potential pilot

Annual Reports- Parts F & G- IMP Info

- Of limited usefulness as collected
- Operators are reporting differently based on their unique interpretations of definitions and guidance
- E.g., a sleeve repair may be counted as 1 anomaly by some and multiple anomalies by others
- Guidance is confusing
- Info is not useful operator to operator or year to year
- 0 miles reported in HCAs but repairs in HCAs reported

Annual Reports- Parts F & G- IMP Info

- PHMSA should take a step back and identify what questions need to be answered; work with stakeholder group to recast the data collection to make it useful.
- Eg, track just immediate repairs, or how many miles are replaced? Simplify it?
- Clarify guidance and definitions

Annual Reports Gas- SMYS section

- New reporting by SMYS across 3 categories required with short deadline- not clear how PHMSA will use the info. Another stakeholder group might help improve the reporting.
- Data quality will be poor- further back in time you go the poorer records were kept
- Regulations changed over time
- => potential for public to misinterpret the information

Annual Reports Gas- SMYS section

- Need to identify which buckets reported were suspect based on old/missing/guessed info
- Notification of other technology- the requirement to have to submit the extensive record review information SLOWS DOWN the approval process for using new technology. That background info becomes useless based on the new technology also.

Annual reports

- Volume info useless and problematical for both liquid and gas

Incident/Accident info

- Validation could be improved
- Data generally seen as useful
- “Time to Make Safe” data and valve spacing reporting data looks suspicious in some reports
- Why is cost of gas lost required instead of volume of gas lost? – **actually, both are collected on GD and GTGG**