



Happy New Year!

Welcome to the first Gas Circuit Rider newsletter for 2012. Every January brings the requirement to think about year end reporting and this year there are a few things that are different than in the past. Here's a brief review:

1. MNOPS is now requiring intrastate gas operators to complete the Voluntary Damage Report and Emergency Response Reporting forms. Copies of the forms and instructions are in the MNOPS Holiday Mailing.
2. For the second year, annual reports must be completed on-line. When you do the annual report, I strongly encourage you to save a copy as a .pdf file and email it to your inspector or the MNOPS response email address instead of faxing. This is a good way to show that you have indeed sent it to MNOPS.
3. MNOPS wants copies of your written DIM Plans submitted by February 15.
4. Operator ID's must be verified by June 30, 2012 on the PHMSA website. NOTE: I have checked on how to complete this at the PHMSA website and as of today it states that "system functionality" to perform this validation will be "available in late March 2012".

If you have not received the MNOPS Holiday Mailing, or if you have questions about any of these items, feel free to contact me. I strongly encourage you to give me a call if you have any questions about your DIM Plans before you submit them to MNOPS.

You can access the site for completing annual reports and mechanical fitting failure reports [here](#). Hopefully it will work smoother than it did last year. Please, take the time to enter accurate information into your annual reports. It will make inspections go smoother.

Contact information:
Jim Ramnes
MMUA Gas Circuit Rider
612-801-1768
Email me at jramnes@mmua.org

Code Corner

The Code Corner has discussed 192.617 (investigation of failures) in the past. The MNOPS Holiday cover letter states "the following recommendations were incorporated into standard inspections". One of the items mentioned is "Review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617..."

Here's what we have covered in the past regarding compliance with this code section:

First, you need to have a procedure. This means these investigations should follow a set pattern. In most cases this would be satisfied by using a form to ensure all required questions are asked and documenting what is done to prevent it from happening again.

Second, what failures should be analyzed? GPTC guidance tells us that "Failure investigations should be conducted for incidents as defined in 191.3. An operator should also consider investigating any other failure that enables an operator to establish patterns that might be occurring on its pipeline system." (My underline)

At a minimum, you should have written documentation of your investigation of 191.3 incidents and leaks caused by excavation damage.

Notes

- Each location I track OQ records for should have received an email detailing what is needed for 2012. If you haven't please contact me.
- Hopefully the inspection scheduling process will begin in January, so we can get dates arranged. More info will follow.
- Tom Prew, MNPOPS Senior Engineer, has left MNOPS for a new opportunity. Good Luck Tom! He will be missed.