

**BEFORE THE
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Notice and Request for Comment) Docket No. PHMSA – 2012-0024
Pipeline Safety: Information Collection Activities,)
Revision to Gas Transmission and Gathering)
Pipeline Systems Annual Report, Gas)
Transmission and Gathering Pipeline Systems)
Incident Report, and Hazardous Liquid Pipeline)
Systems Accident Report)

Comments of Paiute Pipeline Company

Paiute Pipeline Company (Paiute) herein submits its comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) for the Notice of Public Comment in Docket No. PHMSA–2012-0024 concerning proposed revisions by PHMSA for “Pipeline Safety: Information Collection Activities, Revision to Gas Transmission and Gathering Pipeline Systems Annual Report, Gas Transmission and Gathering Pipeline Systems Incident Report, and Hazardous Liquid Pipeline Systems Accident Report.”

Paiute operates 860 miles of interstate transmission pipeline in the state of Nevada. It also operates the H.G. Laub Liquefied Natural Gas (LNG) Plant, located near Lovelock, Nevada. Paiute is a wholly-owned subsidiary of Southwest Gas Corporation, which is a member of the American Gas Association (AGA) and supports the comments submitted by AGA.

I. Paiute General Comments

Paiute appreciates and supports PHMSA’s efforts to improve pipeline safety. Paiute has reviewed the scope of the proposed revisions and provides the following comments.

Revision to Gas Transmission and Gathering Pipeline Systems Annual Report

Paiute agrees with the proposed changes to Parts A, B and E. The elimination of data entry fields and the addition of calculated values will reduce the time required to populate the transmission annual report.

Paiute is not impacted by the proposed changes to Parts C and D and cannot comment at this time on whether the change will require additional time to populate the report.

Paiute recommends that the instructions for Parts F and G be clarified. The proposed instructions for this section read: "*Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than Zero.*" As written the instructions are not clear and may be misinterpreted. Paiute is also unclear on why the additional sections Part F6 are being added (pipe replacement and abandonments within an HCA). This inclusion appears to be repetitive of other information already collected in the report. Paiute has provided this information in Parts F2.b, F2.c, F3.b, F3.c, F4.b. and F4.c. Paiute suggests that the transmission annual report instruction be revised to include replacement and abandonment as reportable "repair" requirements in the existing fields and eliminate the proposed fields in Part F6.

Paiute will not require additional time to populate the information required by the proposed changes to Parts H, I, J, L, M, N and O and the proposed addition of Part P.

The addition of Parts Q and R is significant. The amount of effort involved to collect and quantify the data in the manner requested by the annual transmission report is substantial. Operators maintain MAOP records in various formats (e.g. spreadsheets, databases, word documents, and hardcopy files) that meet the requirements of §192.619, but are not broken out in the manner required by Part Q. The proposed reporting will require data collection for all transmission pipelines; beyond Class 3 and 4, and HCAs in Class 1 and 2 as required by the Pipeline Safety, Regulatory Certainty, and Jobs Creation Act of 2011 (Act). Making these changes to the 2012 annual report (to be filed March 15, 2013) already requires operators to compile the necessary information four months in advance of the deadline noted in the Act. Simultaneously expanding the scope of the required information is burdensome and not cost effective. Paiute anticipates that the time required to provide this additional information will be approximately 180 man hours for the initial report. Paiute recommends collecting only the information specified in the Act, and extending the due date for the 2012 annual report to July 3, 2013.

For Part R, additional clarification is needed on the criteria to be used for "not able to accommodate the passage of instrumental internal inspection devices". Transmission pipelines may be able to accommodate the passage of an inline inspection tool, but may be unpiggable due to system configuration, size, pressure of the line, capacity constraints, intrastate transmission systems embedded within distribution systems, and other operational limitations. Absent a clear definition, the information provided by operators will be of little value.

Additionally, Part R asks for mileage on post-construction pressure tests of at least 125% of the MAOP. Clarification is needed as to why Part R does not start with at least 110% of the MAOP in accordance with §192.619(a)(2)(ii). Implying that only a 125% of MAOP test is acceptable is inappropriate and may cause undue concern to a lay person

reading this publically-available information. In addition, the report should allow for reporting tests using any acceptable medium, not just water. Paiute recommends revising Part R to collect test information that meets the requirements of §192.619.

Revision to Gas Transmission and Gathering Pipeline Systems Incident Report

The proposed change is not significant and does not pose a burden to Paiute.

II. Conclusion

Paiute appreciates the opportunity to submit its comments for the Notice of Public Comment in Docket No. PHMSA–2012–0024, “Pipeline Safety: Information Collection Activities, Revision to Gas Transmission and Gathering Pipeline Systems Annual Report, Gas Transmission and Gathering Pipeline Systems Incident Report, and Hazardous Liquid Pipeline Systems Accident Report.”

Respectfully submitted,

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By: _____

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