"Connection for Oil, Gas & Environment in the Northern Tier, Inc."
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December 1, 2014

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE.
West Building, Room W12-140
Washington, DC 20590
http://www.regulations.gov/

Re: Docket PHMSA-2014-0092 Pipeline Safety - Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program

Dear Sir/Madam:

Connection for Oil, Gas and Environment in the Northern Tier, Inc., C.O.G.E.N.T. focuses on Pennsylvania's five county region of Bradford, Sullivan, Susquehanna, Tioga and Wyoming Counties. C.O.G.E.N.T. is a resource for landowners and communities alike striving to find and advocate for a balance that supports public health and safety, community and the environment with the needs of industry. There are approximately 183,000 souls in the five county 3,987 square mile region, a region that hosts over 40% of Pennsylvania's unconventional natural gas wells. Unconventional gas well sites, gathering and transmission pipelines, and facilities have been located within and around our rural, farmland and forested communities, nearby family homes, schools and local hospitals. Because of these facts, we take a keen interest the proposed revised information collection for the National Pipeline Mapping System.

Among the issues of primary concern to C.O.G.E.N.T. is regarding pipeline safety. We are so concerned about pipeline safety, that we pursued and were awarded a $50,000 PHSMA Technical Assistance Grant to train our Region's first responders for high intensity, low frequency events of pipeline emergencies. Our concerns

regarding pipeline safety extend well beyond PHMSA regulated pipelines. In fact, our region is currently hosting a growing density of large diameter, high pressure gathering lines that rival transmission pipelines and perhaps well over 90% of these gathering lines are routed within non-jurisdictional, un-regulated Class 1 Area locations. Our Region is also challenged with pipeline mapping as not all counties have the resource to necessarily do the mapping, and not every operator is providing as built data downloads for every gathering line. Add to that the difficulties that occur because some gathering systems change ownership on practically an annual basis.

Pennsylvania has been very unresponsive to implementing basic pipeline safety measures which includes the fact that once again, in the recently ended legislative session, Pennsylvania has failed to close the exemptions to the Commonwealth's one call statute. The lack of action on a very basic and most needful pipeline safety measure very strongly indicates the lack of regard for public safety, which also extends to the hands-off position taken to regulate the Class 1 Area gathering line locations. Therefore, while beyond the scope of this comment period, we would not want to be remiss in advocating that PHMSA proceed post haste with moving forward to regulate the nation's unregulated Class 1 Area location gathering lines. Pennsylvania is not the only state in such a precarious position relative to the current unconventional shale gas and oil boom. Further, the March, 2014 INGAA Foundation Report, *"North American Midstream Infrastructure through 2035: Capitalizing on Our Energy Abundance"* has noted that more than 500,000 miles of new pipeline and almost 17 million horsepower for new compression and pumping capabilities will be needed for gas, NGL, and oil gathering and transport through the year 2035. More than 60 percent of this build-out will be for natural gas gathering and transport with oil and NGL accounting for the remainder. Additionally, pipes with a diameter of greater than 24 inches will account for more than 40 percent of the pipeline and gathering line investments. The majority of new pipeline miles are attributable to gathering gas, oil and NGLs. The 2012 and 2014 GAO Reports have

indicated the public safety shortcoming in the lack of adequate and sufficient pipeline safety regulations on Class 1 Area unconventional gathering pipelines. During the pipeline boom which continues to take place within our Region, un-regulated construction methods and un-regulated pipeline materials continue to be utilized within this non-jurisdictional Class 1 Area gathering line build-out. Our Region, has become the nation's proving grounds for methods and materials that otherwise could not be utilized on the nation's similarly sized and pressured transmission pipelines. Thus, we are once again, urging PHMSA to act on this most important matter. We are also urging PHMSA to extend the mapping revisions to include unconventional Class 1 Area location gathering lines since the impact in the case of failure has no significant variance to what would be experienced on a Class 1 Area location transmission pipeline.

Positional Accuracy: We recommend the revisions that PHMSA is requesting. The present 500' parameter is very inadequate based on the pipeline build-out projections through 2035. County and municipal planners need adequate information to prevent communities from encroaching on pipelines. Emergency responders need information on hazards and their accurate locations. These two items are a matter of public safety. Closing the gap from 500' to 5' in urban and 50' in rural locations is a necessary step in the right direction.

Pipe Diameter, MAOP, Pipe Grade, Leak Detection, Pipe Material, Year of Construction/Installation, Class Location, High Consequence "Could Affect" Areas, Year of Last Inline Inspection and Year of Last Direct Assessment, Year and Pressure of Original and Last Hydrostatic Test, Commodity Detail, Special Permit, LNG Plants, Pump and Compressor Stations: We recommend the revisions that PHMSA is requesting. This is basic information that on occasion local and county government and the public needs to know. First responders will also greatly benefit by access to such basic information. They need to know what to expect when responding to a pipeline failure. Just recently, we received a request

from a university located within Pennsylvania that is embarking on a statewide pipeline mapping project and wanted to include some of this information and they wanted to know where it could be obtained. The university having this information would greatly assist local and county governments as well as the general public. We are seeing more and more people opposed to pipelines or weary to say the least. Part of the fuel feeding this opposition is the lack of transparency by the industry and regulators. Providing such information will go far in creating transparency and facilitating dialogue concerning pipeline safety. We request that not only does the industry provide this information to PHMSA, but that PHMSA go a step further in making this information available to the public. We are seeing that communities have hosted historically located facilities where there has been so slight an impact the general public was not even aware that the facility was within their border. Now, with the shale boom, some facilities are being expanded and new facilities are being proposed. If the public had an understanding and reference that they already had facilities within their communities, the transparency may facilitate discussions on improvements rather than outright opposition.

Percent Specified Minimum Yield Strength (SMYS), Pipeline Coating, Pipe Join Method, Onshore/Offshore, Inline Inspection, Wall Thickness, Seam Type, Abandoned Pipelines, Installation Method if Pipe Crosses Body of Water Greater Than 100 Feet in Width, Facility Response Plans, Throughput, Mainline Block Valve Locations, Storage Field Locations and Type of Storage, Refinery Locations/Gas Process/Treatment Plant Locations, Breakout Tanks: We recommend the revision PHMSA is requesting. As the regulator, this is information that should've been supplied by industry from the get go. This information is needful for PHMSA to have adequate oversight and enforcement capabilities regarding pipeline safety.

Offshore Gas Gathering Lines: We recommend this requirement be extended to include Onshore Class 1 Area Gathering Lines. With the mileage of non-

jurisdictional onshore gathering lines, it is foolhardy to wait for a problem to require non-jurisdictional onshore gathering line operators to make NPMS data submissions. With this addition, we recommend the revision PHMSA is requesting.

In conclusion, we fully support PHMSA's request for the revised requirements regarding data collection for the NPMS. We further support some of this information as noted above being provided in a format accessible by the interested/affected public. We duly note that regulators and industry are not necessarily agreeable to providing the public with information they deem pertains to critical infrastructure as a matter of homeland security and possible terroristic threats. We would counter that at least in our Region, significant to shale gas resources world-wide, the lack of this information is by no means of any safeguard to protecting this infrastructure or the nearby public. The density of the build-out is such that those seeking to do harm do not in any way find this build-out camouflaged on either the ground or by aerial views. On the other hand, providing such information in a public viewing format will provide for opportunities for greater public participation and input that will create a safer and a more effective national pipeline network.

Thank you for the opportunity to submit comment regarding the revisions to the data collection for the NPMS.

Best Regards,

Emily E. Krafjack
President