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Docket Management Facility  
US Department of Transportation  
1200 New Jersey Avenue SE. West Building  
Washington, DC 205090

RE: Pipeline Safety: Request for Revision of a Previously Approved Information Collection National Pipeline Mapping System (PHMSA-2014-0092)

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Intermountain Gas Company (IGC) is a natural gas LDC serving most of southern Idaho with approximately 330,000 customers. IGC operates nearly 290 miles of natural gas transmission pipelines, based on the 20% or more of SMYS criteria from Part 192.3, and over 11,000 miles of distribution main and service piping.

The Company currently submits data to NPMS electronically by extracting geospatial information and attributes from the Company's GIS system. While some of the new information requested by the NPMS is available in the current GIS system, other information is housed through paper records or other electronic databases and is currently not available in a geospatial format. IGC agrees that most of the information being requested is already required through the PHMSA annual reporting process; however, based on the amount of transmission pipelines that the Company operates and how the information is submitted in the annual report, the Company deems it impractical to allocate resources for transferring the new requested information into a geospatial format.

The following are the new NPMS requested items that the Company currently has in a geospatial format:

- Pipe Diameter
- Maximum Allowable Operating Pressure (MAOP)
- Pipe Material
- Year of Construction/Installation
- Class Location
- Year of Last Inline Inspection and Year of Last Direct Assessment
- Commodity Detail
- Abandoned Pipelines
- Mainline Block Valve Locations
- LNG Plants
- Pump and Compressor Stations

The following are the new NPMS requested items that the Company has available through other documentation or other electronic databases but not in a geospatial format:

- Pipe Grade
- Percent of SMYS
- Pipe Coating/Type of Coating
- Inline Inspection
- Year and Pressure of Original and Last Hydrostatic Test
- Wall Thickness

The following are the new requested items that may or may not be available and the Company has provided further comments:

- ***Positional Accuracy:***

PHMSA proposes that for pipeline segments located within Class 3, Class 4, High Consequence Areas (HCA), or “could- affect” HCAs, operators submit data to the NPMS with a positional accuracy of five feet. The degree of positional accuracy needed is more stringent and important in these areas because of the potential for greater consequence in the event of a pipeline incident. PHMSA further proposes that for all pipeline segments located within Class 1 or Class 2 locations, operators submit data to the NPMS with a positional accuracy of 50 feet. PHMSA believes that a large number of operators already have access to data with this degree of accuracy within their GIS systems. The current accuracy requirement of 500 feet does not allow PHMSA to effectively locate a pipeline to the degree needed to respond to environmental and integrity threats. It also hinders PHMSA in identifying special features on the pipeline that may be relevant for emergency response considerations. The new degree of accuracy will help emergency responders more effectively locate a pipeline to the degree needed to respond to environmental and integrity threats and help in emergency planning.

Comments:

IGC does not have GIS spatial data for Class 3 locations within the suggested five feet of accuracy. In order to do so, the Company would have to complete a GPS survey of these locations using GPS technology capable of providing accuracy within the five feet requirement. The company does not currently have any Class 4 locations. The Company does have access to HCA GPS data that could be considered accurate within five feet. The Company currently has approximately 104 miles of Class 3 transmission pipe. In order to maintain map continuity, the Company would likely need to GPS survey all 290 miles of transmission lines; this would also require mapping corrections where transmission piping connects to non-GPS distribution piping.

- ***Percent Specified Minimum Yield Strength (SMYS):***

PHMSA proposes operators submit information pertaining to the percent at which the pipeline is operating to SMYS. Specifically, operators would submit hoop stress caused by the highest operating pressure during the year as a percentage of SMYS. PHMSA uses the percentage of operating SMYS to determine low- and high-stress pipelines, class locations, test requirements, inspection intervals, and other requirements in the pipeline safety regulations.

Comments:

The Company has the predominant percent of SMYS for each section of transmission piping based on the specified MAOP. This is considered conservative as the Company operates its transmission piping at or below the listed MAOP. Recommend using the MAOP **OR** the highest operating pressure experienced during the past year. Providing the percent of SMYS based on operating pressure would require an extensive review of pressure data and accuracy of this information may be limited as pressure is primarily monitored at the source of pressure and the actual pressure experienced downstream is something less than what is monitored.

- ***Leak Detection:***

PHMSA proposes operators submit information on the type of leak detection system used. The type of leak detection used can drastically alter effective response times for operators and emergency responders. Knowing the type of leak detection system used during an incident will help emergency responders respond appropriately in the event of a release.

Comments:

Leak detection types are not available in GIS and would require manual data entry for each section of transmission pipe. The Company would also need further clarification on categories for leak detection types.

- ***Pipe Coating/Type of Coating:***

PHMSA proposes operators indicate the level of and types of coating on a pipeline segment. The type of coating relates to the level of protection from external corrosion a pipe has while in the ground. Understanding the level of coating helps PHMSA assess pipe integrity and perform better risk assessments.

Comments:

Pipe coating types are not available in the Company's GIS system. Most coating information is available through other supporting documents. Populating the GIS system with coating types would require manual review of the supporting documentation. There is also a difference between mill applied coating and field applied coatings that can vary throughout a pipeline segment. This information is collected in for the Company's HCA's.

- ***Pipe Join Method:***

PHMSA proposes operators submit data on the pipe joining method. PHMSA uses this information to identify high-risk joining methods and will be used in PHMSA's risk rankings and evaluations, which are used as a factor in determining pipeline inspection priority and frequency.

Comments:

Pipe joining method is not available in the Company's GIS database. Company would need to know what level of detail would be required for this information

- ***High Consequence "Could Affect"***

Areas: PHMSA proposes hazardous liquid and gas transmission operators identify pipe segments which could affect HCAs as defined by 49 CFR 192.903 and 195.450. Pipe segments can be classified as affecting a populated area, an ecologically sensitive area, or a sole-source drinking water area. This information will increase the awareness emergency responders have of potential areas of significant impact.

Comments:

This information is not currently available in the Company's GIS system. The Company would need to have further detail on the required information and guidelines to determine what constitutes a "could affect" area. Areas that fit these criteria would need to be available electronically in order to populate the GIS database in a consistent manner.

• ***Inline Inspection:***

PHMSA proposes operators indicate whether their system is capable of accommodating an inline inspection (ILI) tool. PHMSA considers inline inspections of pipelines to be better, safer, and more cost-effective than other inspection methods. Knowing this information will help PHMSA determine the percentage of the pipeline industry already employing this practice and could help PHMSA address concerns related to NTSB recommendation P-11-17.

Comments:

This information is not currently available in GIS and would require manual data entry for each segment of pipe. The Company would also need to know the definition and guidelines for what PHMSA considers a line as qualified for using the inline inspection technique. Guideline information could include parameters for continuous length and if launchers or receivers are permanently installed. The Company has numerous sections of pipe that could be inspected by inline inspection if temporary equipment is installed. Similar information is currently provided in the annual report using a manual approach.

• ***Seam Type:***

PHMSA proposes operators submit data on the seam type of each pipe segment. This is a fundamental piece of information about a pipe that is used for risk rankings and evaluations, which are used as a factor in determining pipeline inspection priority and frequency. PHMSA understands that operators may or may not have the following attributes in their GIS systems and therefore, operators may need to do additional research to compile this information:

Comments:

The Company's GIS data does not include seam type information. There is limited supporting documentation for this requirement and further testing and sample would have to be completed in order to obtain seam types for each segment of transmission pipe. This information is collected for the Company's HCA's.

• ***Installation Method if Pipe Crosses Body of Water Greater Than 100 Feet in Width:***

Due to recent incidents involving washed-out pipelines, including the incident that occurred near Laurel, MT, PHMSA proposes operators submit data on the installation methods of pipe segments that cross bodies of water greater than 100 feet in width. This information will give pipeline inspectors the ability to verify the depth of cover of pipeline segments under water. PHMSA will also use this information in risk-ranking algorithms. Operators will be able to select from options such as open cut, trenchless technologies, pipe spans, etc.

Comments:

Method of installation is not available in the Company's GIS system. Populating the GIS data would require a manual review of all crossings meeting the 100 feet criteria. The method of installation wouldn't necessarily represent the current depth of cover; obtaining depth of cover information would require surveys of each crossing by reviewing the water crossing depth profile as well as the pipe depth profile.

- **Throughput:**

Throughput is used to denote a pipeline's capacity by stating the pipelines ability to flow a measured amount of product per unit of time. PHMSA proposes operators submit average daily throughput so States can better identify shortages and implement contingency plans for potential widespread pipeline service outages to maintain an uninterrupted flow of energy supplies.

Comments:

This information is not available through Company's GIS system. The Company's distribution system is used in conjunction with transmission piping and volume measurement locations are limited making it difficult to obtain an average daily throughput through each segment of transmission pipe. Obtaining these numbers would require a thorough review of the Company's gas modeling software coupled with known annual flows from gas source locations. In addition, throughput does not necessary represent pipeline capacity or how the Company can respond or operate the system in an emergency or outage situation.

We appreciate the opportunity to provide comments and we are committed to improving pipeline safety and the reliability of natural gas transmission pipelines.

Sincerely,

Tim Clark  
Vice President – Operations

