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Via www.regulations.gov and email

Mr. Jeff Wiese
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Pipeline Safety: Request for Revision of a Previously Approved Information Collection—National Pipeline Mapping System Program (OMB Control No. 2137-0596), Docket No. PHMSA-2014-0092.

Dear Jeff:

Questar Pipeline Company (Questar Pipeline) is a natural gas transmission pipeline and storage operator in the Rocky Mountain Region and is a member of the Interstate Natural Gas Association of America (INGAA). Questar Pipeline appreciates the opportunity to provide and respectfully submits comments in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA)'s proposed revision of its National Pipeline Mapping System (NPMS). Safety in all forms: environmental, occupational and health, and pipeline, remains a top priority for Questar Pipeline.

Questar Pipeline agrees that improvements to the NPMS are necessary and would enhance its utility and usability by PHMSA, emergency responders, city planners and pipeline operators. However, Questar Pipeline agrees with INGAA's position and proposal to reduce the required pipeline attributes that PHMSA is requesting, and to using a phased-in approach to providing more accurate centerline locations. Specifically, Questar Pipeline agrees with the following points submitted in INGAA's comments and proposal:

1. Require centerline mapping accuracy of mainline transmission pipe to be within 50' of actual location using the following schedule.
 - a. Actual centerline accuracy currently in our GIS by 2016;
 - i. Proposed reporting in the following categories:
 - ≤ 50 feet
 - 51 feet – 100 feet
 - ≥ 101 feet
 - b. 70 % of mileage within 50' accuracy and the remaining 30% within 100' by 2023. (Class 3 and 4 and HCAs will be covered in the 70%); and
 - c. Incremental accuracy improvements would be reported annually between 2017 and 2023.

2. Require only the following pipeline attributes to be submitted without any linear accuracy requirements by 2016 and each year thereafter.
 - a. Pipe Material;
 - b. Pipe Diameter;
 - c. HCAs (beginning and ending points existing at the beginning of reporting year);
 - d. Method used to determine HCA (Method 1 or 2);
 - e. Pipe Coated (Y/N);
 - f. Cathodically Protected (Y/N);
 - g. Is the segment piggable (Y/N);
 - h. Commodity type; and
 - i. Support AGA's proposal to quantify pipelines operating at less than 30% SMYS
3. Provide the necessary security protections to keep access to sensitive data limited to only those with a need-to-know.

Questar Pipeline also agrees with INGAA's other comments and supports its position regarding costs, timing and burden to the industry.

Questar Pipeline appreciates your consideration of these comments and the opportunity to submit our position.

Sincerely,



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cc: Allan Bradley, Questar Pipeline (via email)
Abbie Magrane, Questar Corp. (via email)