

**BEFORE THE
PIPELINE HAZARDOUS MATERIALS SAFETY ADMINISTRATION
UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Pipeline Safety: Request for Revision of a)	
Previously Approved Information Collection)	Docket No. PHMSA-2014-0092
National Pipeline Mapping System)	

COMMENTS OF SPECTRA ENERGY PARTNERS

The United States Department of Transportation’s Pipelines and Hazardous Materials Safety Administration (“PHMSA”) issued the above-captioned Request for Revision of a Previously Approved Information Collection – National Pipeline Mapping System (OMB Control No. 2137-0596) published in the Federal Register on July 30, 2014 (“Notice”).¹ In the Notice, PHMSA contemplates collecting additional data through the National Pipeline Mapping System (“NPMS”), improving the accuracy of data submitted to the NPMS and requiring NPMS submittals for additional pipelines.

Spectra Energy Partners, LP (“SEP”)² appreciates the opportunity to comment on this proposed revision to NPMS data collection. SEP owns and operates one of the largest natural gas pipeline networks in the United States, with over 12,600 miles of natural gas transmission pipeline. In addition, SEP owns and operates approximately 1,450 miles of crude oil transmission pipeline. As such, SEP shares PHMSA’s desire to improve the NPMS and make certain information more accessible to first responder and the public. SEP is committed to working with PHMSA and others toward attaining these goals. It is with this constructive spirit that SEP offers the following comments regarding the proposed changes to the NPMS.

¹ 79 *Fed. Reg.* 44,246

² SEP, a master limited partnership, owns the following pipelines and storage facilities located in the United States: Texas Eastern Transmission, LP; Algonquin Gas Transmission, LLC; Saltville Gas Storage Company L.L.C.; East Tennessee Natural Gas, LLC, Ozark Gas Transmission, L.L.C.; Big Sandy Pipeline, LLC; Bobcat Gas Storage; Express Pipeline, LLC and Platte Pipe Line Company, LLC; as well as interests in Maritimes & Northeast Pipeline, L.L.C.; Gulfstream Natural Gas System, L.L.C.; ; Egan Hub Storage, LLC; Steckman Ridge, LP; and the Southeast Supply Header, LLC. A wholly owned subsidiary of Spectra Energy Corp is the general partner of SEP.

General Comments

SEP supports a reasonable, practicable approach to improving the positional accuracy of the pipeline centerline submitted to the NPMS. Improving the positional accuracy of the NPMS data may help to better evaluate pipeline risk, improve emergency response and assist communities to make informed decisions for development near transmission pipelines. SEP also supports submittal of some additional pipeline attributes to the NPMS to assist PHMSA to perform risk assessments and other purposes stated in the Notice. However, SEP has significant concerns with the scope and content of PHMSA's Information Collection Request.

SEP believes the proposed accuracy requirement of five (5) feet for segments that could affect a high consequence area ("HCA") and for Class 3 and 4 Locations is unreasonable and unnecessary for pipeline safety. Further, PHMSA has grossly underestimated the cost that will be incurred by operators to achieve the proposed accuracy requirements, in particular the five (5)-foot accuracy proposed for segments that could affect HCAs and segments in Class 3 and Class 4 locations. SEP recommends a positional accuracy of +/- fifty (50) feet be applied to all transmission pipelines.

SEP contends the Notice is unclear if the location where pipe attributes change is subject to the positional accuracy requirements. The geospatial location of some pipeline attributes, such as coating type and yield strength, cannot be verified without excavating the pipeline. SEP urges PHMSA to recognize the impracticability of verifying positional location of some pipeline attribute changes.

Any requirement to improve the accuracy of pipeline positional accuracy will take time to achieve. SEP urges PHMSA to allow for an adequate period of time to achieve the improved accuracy for all pipelines. SEP believes that it could achieve a fifty (50) foot accuracy level for all its pipelines within ten (10) years, as the majority of SEP's pipelines can achieve this accuracy with in-line inspection ("ILI") tools equipped with inertial measurement units ("IMU"). However, SEP recognizes other operators have high percentages of pipeline that are not designed to accommodate ILI tools. Therefore, SEP recommends a fifteen (15) year timeframe to achieve a positional accuracy of fifty (50) feet for all transmission pipelines.

PHMSA has recognized that additional data submitted to the NPMS may result in duplicative data reporting. SEP appreciates PHMSA's efforts to minimize this duplicative reporting. However, SEP believes that the NPMS data collection will result in substantial duplicative data reporting because the proposed NPMS data is not to the level of detail that will allow elimination of current reporting, such as data submitted in the annual report.

The Notice specifies many of the proposed attributes are to be reported by "segment". Operators may consider a segment to be a length of pipe with unique attributes, a pipeline from one compressor/pump station to the next, or an entire pipeline with a unique designation, such

as line number or line name. SEP encourages PHMSA to provide a clear definition of a “segment” to assure consistent reporting by all operators.

A number of security related concerns have been expressed relating to the proposed data collection. SEP encourages PHMSA to work with the Transportation Security Administration (“TSA”) and other interested stakeholders to assure these security concerns are addressed.

PHMSA states the proposed data collection is needed to assist emergency responders to prepare for and respond to pipeline emergencies. SEP believes the proposed positional accuracy of five (5) feet and many of the proposed pipeline attributes are not needed by emergency responders. SEP believes the following enhancements would provide more benefit to emergency responders and would be relatively simple to implement.

1. The NPMS currently includes phone numbers for a general information contact and a contact for the NPMS submittal. SEP urges PHMSA to include the operator’s 24-hour emergency number to allow emergency responders to contact the operator in the event of a possible pipeline incident.
2. SEP recommends PHMSA develop a training program for the Public Safety Access Points (“PSAP”) to include education on recognizing potential pipeline incidents and how to use the NPMS to identify the possible operator involved.
3. Many emergency responders have GPS-enabled smart phones or tablets. SEP encourages PHMSA to develop a NPMS app for these devices that could assist the responder to quickly identify pipelines in the vicinity of an incident, product transported through those pipelines and the emergency phone number for those operators.

PHMSA should encourage operators to continually improve the accuracy of their NPMS submittals. To that end, PHMSA should not initiate enforcement actions against an operator for submitting revised data to NPMS.

Finally, SEP contends several of the proposals in the Notice exceed the scope of a data collection effort, and are more appropriate for a rulemaking. Further, a few of the proposals appear to go beyond PHMSA’s jurisdictional authority, and therefore should not be included in NPMS data collection.

Comments to Specific Requirements

1. Positional accuracy

SEP supports a reasonable, practicable approach to improving the positional accuracy of the pipeline centerline submitted to the NPMS. Improving the positional accuracy of the

NPMS data may help to better evaluate pipeline risk, improve emergency response and assist communities to make informed decisions for development near transmission pipelines. SEP also supports submittal of some additional pipeline attributes to the NPMS to assist PHMSA to perform risk assessments and other purposes stated in the Notice.

SEP believes the proposed accuracy requirement of five (5) feet for segments that could affect an HCA and for Class 3 and 4 Locations is unreasonable and unnecessary for pipeline safety. SEP believes the base maps used to overlay pipeline data will have an accuracy of thirty (30) feet to fifty (50) feet. To require pipeline location to be more accurate than the base map will only lead to a false sense of accuracy and will not improve pipeline safety. Further, PHMSA has not provided an explanation of how a positional accuracy of five (5) feet will improve emergency response or public awareness. In response to an Interstate Natural Gas Association of America (INGAA) survey, a majority of emergency response officials have stated they do not need a five (5) foot positional accuracy for their emergency response planning purposes³. SEP recommends a positional accuracy of +/- fifty (50) feet be applied to all transmission pipelines.

SEP contends PHMSA has vastly underestimated the cost that will be incurred by operators to achieve the proposed accuracy requirements, in particular the 5-foot accuracy proposed for segments that could affect HCAs and segments in Class 3 and Class 4 locations. SEP does not agree with PHMSA's statement that many operators already have this level of accuracy. SEP has worked with other INGAA members, most of which have stated they cannot verify the accuracy levels specified in the Notice. In INGAA's comments to the Notice, INGAA estimates the cost to achieve the accuracy levels specified in the Notice for gas transmission pipelines would be approximately \$820 million for INGAA members alone⁴. Additionally, having different positional accuracy requirements for high and low population areas will create an ongoing cost to meet the more stringent positional accuracy requirements for newly identified HCAs and new Class 3 and 4 areas.

Any requirement to improve the accuracy of pipeline positional accuracy will take time to achieve. SEP urges PHMSA to allow for an adequate period of time to achieve the improved positional accuracy for all pipelines. An effective method for establishing geospatial position of pipelines would be through the use of in-line inspection ("ILI") tools with inertial measurement units ("IMU"). This technology could only be utilized for pipelines that are designed to accommodate passage of ILI tools. The use of ILI technology should be deployed as operators complete reassessments of pipeline segments in HCAs. SEP believes that it could achieve a fifty (50) foot accuracy level for all its pipelines within ten (10) years, as the majority of SEP's pipelines are capable of accommodating ILI tools. However, SEP recognizes other

³ See Comments of the Interstate Natural Gas Association of America, filed separately.

⁴ See Comments of the Interstate Natural Gas Association of America, filed separately.

operators have high percentages of pipeline that are not designed to accommodate ILI tools. Therefore, SEP recommends PHMSA adopt a fifteen (15) year timeframe to achieve a geospatial accuracy of fifty (50) feet for all transmission pipelines.

2. Pipe diameter

SEP supports PHMSA's proposal to require operators to submit pipe diameter to the NPMS. SEP agrees this is information needed by PHMSA and is good information for public awareness and emergency response.

3. Maximum Operating Pressure

SEP supports PHMSA's proposal to require operators to submit the Maximum Allowable Operating Pressure ("MAOP") or Maximum Operating Pressure ("MOP") to the NPMS. SEP agrees this is information needed by PHMSA and is good information for public awareness and emergency response.

4. Pipe Grade

SEP does not support PHMSA's proposal to require operators to submit the "predominant" pipe grade to the NPMS. The predominant pipe grade will not provide essential information on integrity issues, since the pipe grade in HCAs or Class 3 or 4 areas may not be the same as the predominant grade. Furthermore, MAOP for gas transmission pipelines is also dependent on Class Location. Pipe in Class 2, 3 and 4 areas may be different than the predominant grade. Since the predominant grade does not provide sufficient information to address integrity issues or MAOP determination, PHMSA should not require operators to submit this data.

5. Percent Operating SMYS

SEP does not support PHMSA's proposal to require operators to submit the highest actual operating percent SMYS annually for each segment to the NPMS. In the Notice, PHMSA states *"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."* PHMSA regulations, however, explicitly require the use of MAOP or MOP, not highest actual operating pressure, to determine test requirements, inspection intervals, repair decisions, calculation of the Potential Impact Radius for HCA determination for gas transmission pipelines, and most other regulatory requirements.

Additionally, operating stress level is not used for class location determination. The MAOP/MOP of a pipeline would be a better indicator of a low stress or high stress pipeline.

Since PHMSA proposes to collect data on the MAOP/MOP for each segment, collecting data on the highest actual operating percent SMYS is not needed. Therefore, PHMSA should not require submittal of this data.

6. Leak Detection

SEP does not support PHMSA's proposal to collect information regarding the type of leak detection for pipelines through the NPMS for several reasons. SEP is not aware of any effective leak detection systems for gas transmission pipelines. SEP recognizes that leak detection systems may be effective for hazardous liquid transmission pipelines. PHMSA's suggestion that emergency responders would adjust their emergency response based on the type of leak detection system is unsupported. SEP's experience is that emergency responders rarely use the existing data in the NPMS, and adding the type of leak detection system would not affect their response to a pipeline emergency. Furthermore, once a pipeline incident is identified, knowledge of an operator's leak detection system would not assist the emergency responders. Their response would not be influenced by the type of leak detection system used by the operator.

Implementation of leak detection systems is a regulatory requirement for hazardous liquid pipelines. The type of leak detection system should be part of a PHMSA inspection, not a part of the NPMS data collection.

7. Pipe Coating Type and Level

SEP supports INGAA's comment⁵ that the NPMS data submittal would identify whether a pipeline is coated or uncoated and if the pipeline is under cathodic protection. This data is already submitted in the annual reports, and can be included in the NPMS submittal.

SEP does not support PHMSA's proposal to collect data on coating type and coating level. The coating type often changes frequently for a given pipeline based on when a specific length of pipe was installed. PHMSA has not defined coating level, so it is not possible to know if this data is even available. Therefore, coating type and coating level should not be part of the data submitted to the NPMS.

⁵ See Comments of the Interstate Natural Gas Association of America, filed separately.

8. Pipe material

SEP supports PHMSA's proposal to collect data relating to pipe material. Pipe material can provide information relating to excavation damage and external loading risks.

9. Pipe Join Method

SEP does not support PHMSA's proposal to collect data relating to pipe joining methods. Since some pipeline segments may have multiple joining methods, such as electric welds, acetylene welds, couplings, flanges etc., SEP contends submittal of this data to the NPMS would be complex and will provide little value.

10. Year of Construction

SEP does not support PHMSA's proposal for submittal of information regarding predominant year of construction. Operators are already required to submit the decade of installation by state for all transmission pipelines in the annual report. SEP believes submitting by predominant year to the NPMS will have little value in accomplishing PHMSA's stated goals, and will actually provide less detail than the data already being submitted in the annual report. There will be no way to determine year of construction for pipe in proximity to HCAs and Class 3 and 4 areas, since the pipe in these areas will likely have been replaced (for gas transmission pipelines) and thus not be the same as the "predominant" year of construction. This would severely limit PHMSA's ability to *"run better risk-ranking algorithms through pattern analysis are relating pipe attributes to surrounding geographical areas"*.

11. Class Location

SEP supports PHMSA's proposal for submittal of class location information through the NPMS. This can provide valuable information to PHMSA. SEP recommends an accuracy of fifty (50) feet for class location boundaries.

PHMSA's term "*segment level*" in this case is confusing. For many data elements in the Notice, SEP interprets a segment as a long length of pipe, such as from compressor station to compressor station⁶. However, "*segment level*" for class location implies the data must be submitted based on the location for each class location change. SEP supports submittal of data based on the geospatial location for each class location, but requests PHMSA to clarify this requirement.

⁶ PHMSA requires submittal of the "predominant" attribute for a segment for many data elements, implying a long length of pipe.

12. High Consequence “could affect” areas

SEP supports PHMSA’s proposal to submit data regarding pipeline segments that could affect an HCA. SEP recommends an accuracy of fifty (50) feet for HCA boundaries. SEP would also support submittal of data to specify if “Method 1” or “Method 2” was used to identify High Consequence Areas for gas transmission pipelines. SEP also believes that the positional accuracy of the polygons used to identify potential HCAs for hazardous liquid pipelines may not have the proposed accuracy specified in the Notice, and encourages PHMSA to address this issue.

13. Onshore/Offshore

SEP supports PHMSA’s proposal to require submission of data indicating if a pipeline is onshore or offshore. As PHMSA notes, there is no universally accepted definition of onshore or offshore pipelines. SEP recommends PHMSA issue a clear definition for “offshore pipelines” to facilitate consistent reporting between operators.

14. Inline Inspection

SEP supports PHMSA’s proposal to require submittal of data indicating if a pipeline is capable of accommodating in-line inspection (“ILI”) tools. SEP recommends PHMSA issue a clear definition of “ILI capable” to address the following issues:

- Should lines that use temporary launchers and receivers be considered ILI capable?
- Should lines that can be inspected with cable pull ILI tools be considered ILI capable?
- How would an operator report a new section of line that is “ILI capable” that is installed in a pipeline that is not ILI capable?

15. Year of Last Assessment

SEP does not support PHMSA’s proposal to require submittal data regarding year of last integrity assessment for pipeline segments that could affect an HCA. Since the date of the last integrity assessment may be different for different HCAs in a given segment (for direct assessments, pressure tests or other technology), or for assessments for different threats, it would be difficult to provide this data in a meaningful manner. This data is better discussed during PHMSA inspections.

16. Year and Pressure of the Original and Last Hydrostatic Test

SEP does not support PHMSA's proposal to require submittal of the year and pressure of the original and last hydrostatic test. SEP contends that each pipeline may have numerous individual hydrostatic tests based on when the pipe was installed, elevation and other factors, making this reporting extremely complex. SEP also notes that the PHMSA annual report already requires data for the mileage of pipelines that have received a Subpart J pressure test. The proposal to submit this data through NPMS is an unnecessary duplication of data and will provide little value.

17. Commodity

SEP supports PHMSA's proposal to require submittal of the product type being transported in a pipeline at a high level, such as crude oil, refined products, natural gas liquids or natural gas. The type of commodity can be critical in emergency response situations. Some pipelines may transport different specific commodities in batches. SEP would not support detailed commodity reporting as the specific commodity can change daily, and there would be no way for the NPMS provide the specific commodity being transported at any given time. Thus, specific commodity reporting would provide no benefit to PHMSA or emergency responders.

18. Special Permits

SEP supports PHMSA's proposal to require submittal of data relating to special permits. Many special permits include definitions for special permit segments and special permit inspection areas. PHMSA should clarify the submittal requirements for special permit segments and special permit inspection areas and assure the NPMS can accommodate PHMSA's requirements.

19. Wall Thickness

SEP does not support PHMSA's proposal to require submittal of wall thickness data to NPMS. Most interstate gas transmission pipelines have numerous wall thickness changes, creating a large amount of data to be submitted. Furthermore, the value of wall thickness data is of limited value in risk assessment, since the pipe grade is not being collected to the same level of detail.

20. Seam Type

SEP does not support PHMSA's proposal to require submittal of seam type data to NPMS. Many interstate gas transmission pipelines may have numerous changes in seam type, creating a large amount of data to be submitted.

21. Abandoned pipelines

SEP does not support PHMSA's proposal to include the location of abandoned pipelines in the NPMS submittal. PHMSA has not provided adequate justification for including this data. Both 49 CFR 192 and 49 CFR 195 specify requirements for abandonment of transmission pipelines, which include disconnection from any product source and purging of product out of the line to be abandoned. Once a pipeline is abandoned, it is unclear what pipeline safety regulations would apply. PHMSA's assertion that abandoned pipelines are at a higher risk for excavation damage is unsupported. SEP contends there is little risk from abandoned pipelines since they no longer contain product under pressure. PHMSA's assertion that abandoned pipelines are a "critical integrity management issue" is also unsupported. Abandoned pipelines contain no product and are no longer subject to integrity management regulations.

22. Offshore Gas Gathering lines

SEP does not operate any offshore gathering pipelines lines, so does not offer any comment on PHMSA's proposal to require submittal of data for these lines.

23. Installation method for water crossings

SEP does not support submittal of data relating to installation method for water body crossings. In many cases, this data is not readily available. Furthermore, this data would not accomplish PHMSA's stated goal of giving PHMSA inspectors a means to verify depth of cover for water body crossings. Depth of cover in water body crossings is an appropriate topic to discuss during PHMSA inspections, but not for the NPMS data collection.

24. Facility response plan control numbers

SEP supports PHMSA's proposal to include facility response plan control numbers in the NPMS submittal.

25. Throughput

SEP strongly opposes submittal of throughput data. This data is not within the jurisdiction of PHMSA. It is subject to the jurisdiction of FERC or the applicable state public

utilities commissions. Furthermore, this data is considered to be business confidential information by most pipeline operators.

PHMSA has not provided adequate justification for the collection of this data. The proposed data would not assist states to identify potential shortages or prepare for widespread outages, as PHMSA contends. The average daily throughput does not provide the available capacity in the pipelines, nor does it provide the amount of the capacity that is subject to contractual commitments that would be called on during widespread outages. In addition, average throughput would not provide any information on supplies that are available to those pipelines. Further, this information would not be able to identify pipelines that are temporarily out of service for integrity management work, maintenance or modifications during a period of widespread outage.

26. Block Valve Locations

SEP supports submittal of mainline block valve locations to NPMS. The location of block valves may provide PHMSA and emergency responders with meaningful information regarding *“the extent and severity of property damage and life-threatening risks during a high-consequence incidents.”*

27. Storage field locations

SEP strongly opposes submittal of storage field boundaries to the NPMS. The NPMS submittal already includes the pipelines to the individual storage field wells, thus including locations where emergency response may be required. SEP contends there are no emergency response implications for the storage field boundary. Additionally, data for the boundaries of storage fields may not be available, especially for depleted reservoir storage fields.

28. Refinery/Gas Processing/Treatment Plant Locations

SEP opposes submittal of the location of refineries, gas processing and gas treatment plants to PHMSA. These types of facilities are outside of PHMSA’s jurisdiction. SEP contends PHMSA does not have authority to use an expansion of an existing data collection to include facilities that are outside of PHMSA’s jurisdiction.

29. Breakout tanks

SEP supports PHMSA’s proposal to include breakout tank locations in NPMS submittals. PHMSA should clarify if the submittal is for each tank or the boundary of a tank farm.

30. LNG Plants

SEP supports PHMSA's proposal to include the location of LNG facilities in the NPMS submittal. The location of these facilities is important to emergency responders that may need to respond to an incident at these facilities.

SEP strongly opposes PHMSA's proposal to include data regarding daily average throughput in the NPMS submittal. Most operators consider this data to be business confidential. Furthermore, this data provides no value to emergency responders or the public.

31. Pump and compressor station locations

SEP supports PHMSA's proposal to include the location of pump and compressor stations in the NPMS submittal. The location of these facilities is important to emergency responders that may need to respond to an incident at these facilities.

Conclusion

SEP shares PHMSA's desire to improve the NPMS and make certain information more accessible to first responder and the public. SEP is committed to working with PHMSA and others toward attaining these goals. SEP appreciates the opportunity to comment on the proposed changes to the NPMS data collection, and urges PHMSA to address these comments in the final NPMS data collection requirements.

Respectfully submitted,



Rick W. Kivela
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