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September 24, 2015

**Docket No. PHMSA-2014-0092**

US DOT  
PHMSA, PHP-20  
Attn: Amy Nelson  
1200 New Jersey Ave. SE  
Washington, DC 20590

**RE: Comments of Chevron Pipe Line Company on the Proposed Rulemaking “Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program” (OMB Control No. 2137-0596)**

Chevron Pipe Line Company (CPL) appreciates the opportunity to submit comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on the above-referenced proceeding issued August 27, 2015. Our comments also reflect discussion from the September 10, 2015 public meeting. CPL considers pipeline safety our top priority and by providing these comments, it demonstrates our willingness to work with PHMSA on continuous improvement.

CPL recognizes the diversity of stakeholder and interests engaged on this proceeding. In large part, we support comments made by the American Petroleum Institute/Association of Oil Pipe Lines (API/AOPL), American Gas Association (AGA) and the Interstate Natural Gas Association of America (INGAA).

CPL commends PHMSA for considering comments received regarding the 2014 proposal. Within the current request for comments, PHMSA addresses many concerns brought forth by commenters of the previous information collection request. CPL does not oppose proposed changes in many of the areas of this latest request for revision. However, concerns remain with PHMSA’s decision to move forward with collecting information on some of the attributes.

Please consider the following comments regarding these specific attributes outlined within the current proposal:

**(A) Positional Accuracy**

CPL understands and agrees with the need for improving spatial accuracy. However, this is a complex issue with broad interpretation as to which method ensures a pipeline is within a specific spatial accuracy tolerance. Therefore, CPL strongly recommends more dialogue on this topic to offer and ensure a consistent understanding among operators and regulators.

CPL suggests dialogue cover not only our concerns on this topic, but the concerns of other stakeholders as well. With that, CPL would like dialogue to provide clarification on things such as, segment or aggregate reporting levels, accuracy verification and consideration of variances for conditions which may change where pipeline are located.

PHMSA would greatly benefit from engaging stakeholders on this complex topic. CPL believes more clarity offered during the initial stages will better serve the purposes, reduce complexity and lessen the burden of all stakeholders.

**(H) Highest Percent Operating SMYS and (I) Maximum Allowable Operating Pressure or Maximum Operating Pressure (MAOP/MOP)**

PHMSA outlines two methods in the *Federal Register* and it is not clear which one PHMSA is proposing. In the original notice, dated July 30, 2014, PHMSA proposes operators submit hoop stress caused by the highest operating pressure during the year as a percentage of specified minimum yield strength (SMYS). In the subsequent notice, dated August 27, 2015, PHMSA states that it is proposing operators would submit hoop stress corresponding to the maximum operating pressure (MOP) or maximum allowable operating pressure (MAOP) as a percentage of SMYS, but then states that PHMSA intends to move forward with this attribute as originally proposed.

CPL agrees that the calculation made based on the MOP/MAOP of the pipeline would meet PHMSA's need as outlined in the notice. Whereas, by using the highest operating pressure over the last 12 months in the calculation may be due to fluctuations in operations and/or transportation needs on a particular pipeline. Please clarify which calculation PHMSA is proposing.

**(N) Class Location, (O) Gas HCA Segment, (P) Segment Could Affect an HCA, (W) Pump and Compressor Stations, (X) Mainline Block Valves, (Y) Gas Storage Fields and (Z) Breakout Tanks**

CPL, along with other commenters, continues to believe security risk is a concern with many of the attributes PHMSA is still considering moving forward with. CPL believes information divulged to PHMSA has the potential to serve a harmful intent. Additionally, information collected could contribute to the unintended consequence of providing confidential business intelligence to an audience not associated with regulatory oversight.

It is commendable that PHMSA has made efforts to justify collecting information on the above mentioned attributes. However, PHMSA has not provided adequate assurance, in any form, regarding safeguards to prevent this information from becoming available or accessible beyond the intended purpose. CPL requests, at a minimum, PHMSA demonstrate the capacity to manage collection, storage and use of this sensitive information in a way that is reflective of responsible confidentiality principles.

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CPL welcomes an opportunity to work with PHMSA and other stakeholders to address or alleviate security concerns associated with information collected for the above mentioned attributes. Greater clarification, both offered and considered, by all stakeholders would be valuable in assuring sufficient safeguards are in place.

Please contact me if you have any questions. CPL is available to provide more information or clarification on the points within our comment letter.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Molloy", written in a cursive style.

Stephen Molloy