



Jonny Jones
Chairman

D. Todd Staples
President

July 22, 2016

Office of Management and Budget
Attention: Desk Officer for PHMSA
725 17th Street NW., Washington, DC 20503

RE: Comments Concerning the Pipeline and Hazardous Materials Safety Administration's Request for Revision of a Previously Approved Information Collection—National Pipeline Mapping System Docket No. PHMSA–2014–0092

To Whom It May Concern:

The Texas Oil & Gas Association (“TXOGA”) is a non-profit corporation representing the interests of the oil and natural gas industry in the State of Texas. Founded in 1919 and currently representing more than 5,000 members, TXOGA is the largest and oldest petroleum organization in Texas. The membership of TXOGA produces in excess of 90 percent of Texas’ crude oil and natural gas, operates nearly 100 percent of the state’s refining capacity and is responsible for the vast majority of the state’s pipelines. The oil and natural gas industry not only produces the products we use every day; it anchors our state’s economy. In 2015 Texas’ oil and natural gas industry paid \$13.8 billion in taxes and royalties that directly fund our schools, roads and emergency services.

TXOGA appreciates the opportunity to submit comments in response to the “Request for Revision of a Previously Approved Information Collection - National Pipeline Mapping System (OMB Control No. 2137-0596)” (hereinafter “Notice”)¹ issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”).

The collection of data constituting security sensitive information warrants appropriate protections to ensure that certain information does not fall into the hands of bad actors. Therefore, TXOGA supports comments submitted by the American Fuel & Petrochemical Manufacturers in response to the Notice. More specifically, TXOGA believes that a more robust discussion of how PHMSA will address the security sensitive information issues identified by AFPM will better ensure that this information is sufficiently protected from unauthorized disclosure. TXOGA wishes to reiterate the earlier comments from other industry groups regarding the high cost burden of the new requirements. The requirements to report additional and more detailed data elements on a segment by segment basis will necessitate field investigations, new record keeping systems and additions to GIS, all of which will involve considerable expense. TXOGA believes, along with many prior commenters, that PHMSA greatly underestimated the expected cost burden of these revisions. TXOGA also supports AFPM’s suggestion that PHMSA form a

working group comprised of affected parties to consider the security and information disclosure impacts prior to requesting that OMB approve the proposed information collection request.

Once, again TXOGA wishes to thank PHMSA for considering its comments in response to the Notice and looks forward to continued involvement with your efforts. If you have any questions or want to further discuss these comments, please feel free to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Mari Ruckel". The ink is dark and the signature is fluid, with a long, sweeping tail on the letter "l".

Mari Ruckel
Vice President of Government & Regulatory Affairs