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Docket Management System  
U.S. Department of Transportation  
Docket Operations, M-30  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

**Subject:** Comments by Northern Natural Gas Concerning the Proposed Revision to the Information Collection for the National Pipeline Mapping System

Dear Pipeline and Hazardous Materials Safety Administration:

In reference to the notice of inquiry that was published July 30, 2014, in the Federal Register concerning a request for revision of a previously approved information collection for the National Pipeline Mapping System, Northern Natural Gas offers the attached comments, summarized below, for your consideration.

- Northern Natural Gas believes the Pipeline and Hazardous Materials Safety Administration should maintain the existing attributes collected for the National Pipeline Mapping System as the current system continues to provide members of the public appropriate contact information for pipelines as authorized by the 2002 Pipeline Safety Act. Additionally, Northern Natural Gas believes the use of the existing annual Department of Transportation mileage report data and on-site audits provide the Pipeline and Hazardous Materials Safety Administration sufficient data within a system-specific context as needed for risk ranking pipeline operators.
- Northern Natural Gas believes the Pipeline and Hazardous Materials Safety Administration should maintain the existing attributes collected for the National Pipeline Mapping System in consideration of the work accomplished by the integrity management programs to properly account for accuracy in high-consequence areas and also should consider expanding the existing requirement to Class 3 and Class 4 locations.
- Northern Natural Gas believes the inclusion of the proposed additional attributes and the associated maintenance of this data would be burdensome for operators and regulators to maintain and would not add significant value to the public or to state and local emergency response planning. For example, the 16 general attributes may apply

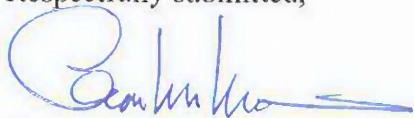
to a single pipeline, but the proposed, expanded list of 42 attributes may split the same line into hundreds of segments if the pipe had any maintenance history or modifications.

- The National Pipeline Mapping System should be able to cite the mileage and the percentage of total mileage that are within 50 feet already. Providing this information to the industry would justify or negate increasing the position accuracy requirements beyond what is required in the National Pipeline Mapping System.
- Northern Natural Gas believes the proposed required positional accuracy of 50 feet for all pipelines and 5 feet for pipeline segments located within Class 3, Class 4 and high-consequence areas are not consistent with any survey accuracy quality standard or aerial photography standards. Although this level of accuracy may not have been intended in the proposed revision, the outcome is that pipelines will have a positional accuracy of  $\pm 3.3$  feet or  $\pm 30$  feet. The cost for Northern Natural Gas to obtain this survey accuracy has a preliminary estimate of \$15 million.
- Northern Natural Gas believes encouraging contact and collaboration between pipeline operators and the public, developers and emergency responders is in the best interest of all parties in ensuring communities are prepared and can execute response operations during incidents.
- Northern Natural Gas believes that providing excavators with more information on the size or pressure of a pipeline through the National Pipeline Mapping System would undermine the efforts of One Call legislation. Third-party damage is the leading cause of natural gas pipeline incidents and often times, the root cause is failure of the excavator to contact the state One Call center.
- Northern Natural Gas believes the Pipeline and Hazardous Materials Safety Administration should provide pipeline operators information on how it is working within the framework of the National Infrastructure Protection Plan to protect sensitive security information regarding critical infrastructure. Answers to the proposed expanded attributes already are submitted in a tabular format by state in the annual mileage report to the Department of Transportation. The concern of pipeline operators is how increased amounts of electronically transmitted data increase the overall security risk to a greater number of pipelines and facilities.
- Northern Natural Gas also has security concerns regarding open access to the pipeline attributes in a mapping environment, specifically how individuals or organizations could use that data to adversely target pipeline assets. Much of the requested data in the information collection already exists in the public domain with the ultimate goal being pipeline safety; however, the attribute data being proposed for inclusion on the National Pipeline Mapping System provides potential adversaries with location-specific, technical information that would increase the probability an attack could be successful.

The points listed above are explained further in the attached document.

Thank you for the opportunity to submit comments on these proposed changes to the previously approved information collection for the National Pipeline Mapping System. Northern Natural Gas looks forward to continuing to work with the Pipeline and Hazardous Materials Safety Administration and other key stakeholders to address the best ways to increase pipeline safety using a technically based approach based on solid risk management principles.

Respectfully submitted,



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