



Questar Gas Company
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December 1, 2014

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 Gas Company (Questar Gas) provides retail natural gas-distribution service to over 950,000 customers in Utah, southwestern Wyoming and a small portion of southeastern Idaho. Questar Gas is a member of the American Gas Association (AGA) and operates over 830 miles of transmission pipelines which are included in its annual NPMS submittals. Questar Gas 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 Gas.

Questar Gas 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 Gas agrees with AGA's position and counter-proposal on reducing the required pipeline attributes that PHMSA is requesting and in using a phased-in approach to providing more accurate centerline locations. Specifically, Questar Gas agrees with the following points submitted in AGA's comments and counter-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 its 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%);

- c. Incremental accuracy improvements would be reported annually between 2017 and 2023.
2. Questar Gas requests that PHMSA reconsider security consequence associated with some of the attributes being requested. Questar Gas support the submittal of the following attributes that are considered to be a low security risk. These pipeline attributes would be submitted without any linear accuracy requirements by 2016:
 - a. Pipe Material;
 - b. Pipe Diameter;
 - c. HCAs;
 - d. Class Locations;
 - e. Low Stress - quantify pipelines operating at less than 30% SMYS;
 - f. Pipe Coated (Y/N);
 - g. Commodity Detail; and
 - h. Seam Type – if available
3. Provide the necessary security protections to keep access to sensitive data limited to only those with a need-to-know.

Questar Gas agrees with AGA's other comments and supports its position regarding costs, timing and burden to the industry as well as the delay or elimination of the requirement to submit all of the other attributes as outlined by AGA.

Continued discussion on these issues would be welcomed by Questar Gas. A working group or technical review committee as mentioned by AGA would be supported by Questar Gas to discuss the needs of an effective NPMS.

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

Sincerely,



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cc: Craig Wagstaff, Questar Gas (via email)
Abbie Magrane, Questar Corp. (via email)