Texas Pipeline Association

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UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE SAFETY AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

PIPELINE SAFETY: REQUEST FOR REVISION OF A PREVIOUSLY APPROVED INFORMATION COLLECTION - NATIONAL PIPELINE MAPPING SYSTEM PROGRAM	§ § § § § §	**DOCKET NO. PHMSA-2014-0092**

COMMENTS OF THE TEXAS PIPELINE ASSOCIATION ON THE NOTICE AND REQUEST FOR COMMENTS ON REVISIONS TO AND RENEWAL OF THE NPMS

The Texas Pipeline Association (TPA) appreciates the opportunity to submit comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) in response to the Notice and Request for Comments on Revisions to and Renewal of the National Pipeline Mapping System (NPMS). PHMSA published the Notice in this docket in the Federal Register of July 30, 2014 and subsequently extended the deadline for comments to December 1, 2014. This docket represents in part a response by PHMSA to Section 6(a) of the Pipeline Safety, Regulatory Certainty and Job Creation Act of 2011 (2011 Reauthorization Act). Section 6 of the 2011 Reauthorization Act requires PHMSA to maintain a map of high consequence areas as described in 49 U.S.C. §60109(a) as part of the NPMS, excluding proprietary or sensitive security information. TPA and its members are supportive of enhancements to the NPMS and greater public awareness of pipelines as well as greater transparency for emergency responders. However, TPA believes that these goals can be best achieved through greater collaboration between PHMSA and industry in implementing enhancements to the NPMS.

TPA consists of over 48 gas and hazardous liquid pipeline operators within the State of Texas and one liquefied natural gas plant operator. TPA's members operate a majority of the natural gas and hazardous liquids pipeline mileage as well as most of the breakout tank farms within the State of Texas. TPA's members operating gas and liquid transmission pipelines, liquefied natural gas plants and breakout tank farms will be directly impacted by the proposed changes in the requirements for NPMS submissions.

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GENERAL COMMENTS

The expansion of the information proposed to be included in NPMS submissions is overwhelming. PHMSA's revisions expand the individual pipeline attributes from the existing 17 attributes for each pipeline segment to a potential of 52 individual attributes. Virtually every one of the attributes is required for a submission to be complete. In addition, PHMSA is requiring an enhanced centerline positional accuracy of 5 feet for pipeline segments in Class 3, Class 4 and High Consequence areas (HCA) and "could affect" HCA and 50 feet for pipeline segments in Class 1 and Class 2 locations. These requirements compare to a current requirement for centerline positional accuracy of 500 feet for all pipeline segments.

Underlying all of the attribute requirements is an assumption that operators have all of the information available necessary to format and submit all of the attributes for every pipeline segment with geospatial data. PHMSA should already be aware from the submissions on MAOP verification and the comments in response to various advanced rulemaking proposals and notices of proposed rulemaking that many operators do not have complete records for all of their pipeline segments. This should not be a surprise given that approximately 60% of the pipeline mileage in the country was constructed before 1970 when the first minimum federal pipeline safety standards were adopted. Prior to those standards, industry codes did not require records to be maintained for pipelines. TPA is supportive of PHMSA's efforts to move the industry to complete and verifiable records for every pipeline segment but that goal cannot be achieved overnight. Where records are missing, field work is usually required to fill the information and documentation gaps. That kind of work requires time and a level of funding beyond current regulatory requirements. Practical and workable approaches to achieving a more robust NPMS are discussed in the following specific comments section.

Likewise, the significant change in the centerline positional accuracy requirements for submissions to the NPMS will require additional time and funding. Many operators have enhanced the centerline positional accuracy of their mapping systems over time, but very few have reached a 5-foot accuracy for any significant portion of their systems. Based on conversations with other trade associations, it appears that most operators currently have centerline positional accuracies of approximately 200 feet. Achieving greater centerline positional accuracy will involve the coordinated work of line location crews, GPS crews and GIS technicians. It will also necessitate overcoming technical challenges in certain locations that impede enhanced accuracy to the levels sought by PHMSA. Before requiring all of this additional work and expense which will ultimately be borne by the customers of the pipelines, PHMSA should at least provide its rationale for selecting 5 feet and 50 feet as the goals for enhanced centerline positional accuracy within the NPMS as opposed to any other distances.

The financial and time burden of this significant expansion of the NPMS should not be underestimated. One TPA member, and certainly not the largest in terms of pipeline mileage, has estimated that it will require approximately 10 years to fill-in all information gaps necessary for a complete and accurate submission to the NPMS in accordance with

this proposal. The cost for achieving that completeness is approximately $300 million. In addition, it is estimated that entering and formatting the attribute data for the attributes that are not currently in the GIS System will take that member approximately 4 years. The entry and formatting estimate is based on 5 minutes for each missing attribute and does not include any estimated time to re-format or validate the attributes that are currently in the system and represent twice as many entries. Clearly, this proposal is very significant to transmission pipeline operators and will impose a significant burden on industry resources beyond the other initiatives that PHMSA is currently pursuing.

Rather than engage in a notice and comment approach to improvements in the NPMS, TPA would encourage PHMSA to utilize a more collaborative approach as was used in the initial design of the NPMS. The Joint Government/Industry Pipeline Mapping Quality Action Team proved to be an effective means to achieve a consensus on the requirements for the NPMS. TPA believes that a similar collaborative approach for these enhancements would accomplish PHMSA's goals in a shorter time period through a more efficient process at an overall lower cost burden. A collaborative approach would also permit a final resolution concerning which attributes are necessary to accomplish PHMSA's risk analysis goals as well as what is the centerline positional accuracy that should be achieved. A working group would be the best vehicle to addressing all of the technical issues related to various levels of accuracy and arriving at an appropriate balance between burdens and benefits in this effort. Such a collaborative approach worked well in the past and should do the same for this current effort.

SPECIFIC COMMENTS

Positional Accuracy

TPA recommends a three-phased approach to achieving enhanced centerline positional accuracy in NPMS. Because of the resources and time required to meet PHMSA's goals of 5 feet in Class 3 and Class 4 and HCA as well as 50 feet in Class 1 and Class 2, it will be impossible to satisfy those goals with the initial submission to NPMS of December 31, 2015 data in March of 2016. Therefore, TPA suggests that the initial submission be used to provide a statement of the level of positional accuracy that is reflected in the operator's submission. This would give PHMSA and the public a clear indication of the precision of the data that is being viewed. Limiting the initial submission to the current accuracy of an operator's data would allow operators' time to budget and plan for the additional work necessary to move to greater centerline positional accuracy. Based on conversations with other trade associations, TPA believes that most operators would be able to report an accuracy of 200 feet or better for most of their pipelines in the initial submission.

Because PHMSA is seeking to increase its ability to conduct risk analysis, to assist emergency responders in their planning efforts and to increase public awareness, TPA recommends that the next phase of enhanced centerline positional accuracy focus on Class 3, Class 4 and HCA locations. These are the areas with the greatest potential to impact the greatest number of people. In keeping with PHMSA's emphasis on the use of risk-based approaches in designing its pipeline safety initiatives, targeting the next phase of NPMS enhancements on Class 3, Class 4 and HCA locations is a logical next step and addresses the areas of greatest potential risk. TPA suggests an accuracy goal of 50 feet

for this phase with the 2019 submission as the deadline. This should give operators sufficient time to plan budget and execute on any work needed to obtain the additional accuracy. Because some of these areas will present the greatest challenges in obtaining enhanced positional accuracy, allowing operators 4 full years to complete this phase is reasonable. During this phase, the positional accuracy requirement for Class 1 and Class 2 locations would remain the best available accuracy that an operator has for each segment. In many cases, the accuracies for these Class 1 and Class 2 pipeline segments will be improving over time as well.

The final phase of the effort to achieve enhanced centerline positional accuracy would require all pipeline segments to be at a centerline positional accuracy of 50 feet or better by the 2023 submission. Of course, if operators are able to obtain a centerline positional accuracy of less than 50 feet, they will submit that greater accuracy. There are generally greater mileages in pipeline segments located in Class 1 and Class 2 locations, so the additional 4 years to complete this phase is not unreasonable. In addition, these pipeline segments generally present an overall lower risk to the public than the pipeline segments covered by Phase 2 of TPA's proposal.

PIPELINE ATTRIBUTES

Before discussing the individual pipeline attributes that PHMSA is proposing be submitted through the NPMS, TPA would like to discuss its security concerns related to this information. Just as PHMSA will get a more detailed understanding of individual pipeline segments after the submission of the additional attributes, so could others who might seek to do harm to the pipelines or the public through the use of this information. Even though PHMSA will not make all of the attribute information public, the collection of all of this information in a single location certainly increases the overall vulnerability of the data. In addition, the provision of access to this data source by public officials and emergency responders significantly increases the vulnerability of the data through multiple routes of access. As public officials and emergency responders download portions of the database for their particular use, the security of their computer systems and databases become additional sources of security concern that PHMSA cannot directly monitor or control.

To address these issues, PHMSA must provide the highest levels of data security possible even when the data is being handled by non-PHMSA individuals. In addition, the security of the systems housing this data for the NPMS must have the highest levels of protection from hacking or other forms of unauthorized cyber-access. PHMSA should consider designating the most sensitive elements of the NPMS as Protected Critical Infrastructure Information (PCII) and the remainder of the data Sensitive Security Information (SSI). Without adequate security, the benefits of an enhanced NPMS may be offset by the harm caused through unauthorized access to this data.

As proposed in the revised Operator Standards Manual for the NPMS (Revised Manual) prepared in connection with the July 30, 2014 Notice, virtually all of the attributes will be required for a complete submission. Only those attributes not related to all pipelines are proposed to be omitted from the required category for submission completeness. This

will likely lead to a large number of submissions being rejected as incomplete or operators filling in attributes with placeholder information in order to make submissions where attribute information is missing. As mentioned earlier, approximately 60% of the pipeline mileage in the nation was constructed prior to the 1970 requirement for records retention. While operators are already working to fill information gaps under a number of proposed safety initiatives, that work will not be finished by the deadline for initial submissions under these enhanced requirements. Therefore, TPA also suggests that PHMSA create phases for the attribute requirements so that operators will have reasonable amounts of time to complete filling their records gaps and PHMSA will have adequate time to insure the security of the security sensitive data.

Attributes with No Security Concerns but Needed for Risk Evaluations

PHMSA has stated that one of the main objectives for enhancing the NPMS is to allow PHMSA to conduct its own risk evaluations of pipeline segments for inspection prioritization and frequency. TPA suggests that the following attributes will generally be readily available for most operators, are attributes needed for the types of risk evaluations PHMSA is seeking to improve, and do not pose security concerns. These attributes should be required for the 2016 submission of December 31, 2015 information.

Pipe Diameter

Many operators already have the nominal pipe diameter in their GIS systems and any data entry or formatting required for NPMS submission should be minimal.

Pipe Coating/Type of Coating

TPA believes that the presence or absence of an effective coating and the presence or absence of cathodic protection are the necessary data elements for risk evaluation. This information should be readily available to operators for their pipeline segments. While there is some value in knowing the type of coating on a pipeline segment; it is not critical to risk evaluation and may not be available for all pipeline segments. Unless PHMSA agrees that the coating type attribute is not needed, the attribute for coating type should not be a required field for a complete submission until the 2019 submission for Class 3, Class 4 and HCA locations and 2023 submission for Class 1 and Class 2 locations.

Pipe Material

Most operators already have the pipe material for segments in their GIS systems or have the information readily available. The data entry burden for this attribute should be minimal other than the impact of greater segmentation of pipelines due to the increased number of attributes.

Year of Construction / Installation

To eliminate potential confusion on this attribute, TPA recommends that this attribute be changed to the year the pipeline segment was placed in service. Because pipeline construction projects can span multiple years and PHMSA's current description of this attribute is "predominant year of original construction," additional analysis of construction records might be necessary to accurately complete the attribute as proposed. On the other hand, the year placed in service is generally recorded in the plant accounting records of pipelines and should be readily available. TPA's suggestion should reduce the burden of submission compared to the current description.

Special Permit

While TPA sees little value in this attribute for risk evaluation outside of an actual inspection and no value in this attribute for the general public or emergency responders, it is not an excessively burdensome addition to the NPMS attributes.

Commodity Detail

This attribute may be of benefit to emergency responders by reinforcing or supplementing the information shared by operators in their required public awareness communications with emergency responders. Assuming emergency responders utilize the NPMS to confirm or refresh their understanding of the commodities being transported in their areas, they will be better equipped to provide the proper firefighting materials and techniques during responses to incidents, as well as appropriate hazardous material containment and clean-up methods. This attribute should be readily available to operators and the data entry burden should be minimal.

Seam Type

Seam Type is one of the attributes that is part of the ongoing rulemaking efforts related to integrity verification. TPA doubts that all operators will have this information on all pipeline segments. As transmission pipeline operators continue their integrity verification activities, they will eventually be able to provide the Seam Type for all pipeline segments submitted to the NPMS. While this information would definitely assist PHMSA in its risk evaluations, PHMSA should not make this a required field until the time deadline for integrity verification efforts is known and operators have reached that deadline. At this time, TPA supports excluding this attribute from NPMS submissions.

Abandoned Pipelines

PHMSA suggests that this attribute will help address excavation damage and is in some manner a critical integrity management issue. TPA would respectfully respond that identification of abandoned pipelines in the NPMS will not be a factor in reducing excavation damage. The excavation damage prevention programs do not utilize the NPMS for line location activities, and TPA cannot see how abandoned pipeline segments impact integrity management for lines currently in service. Although TPA sees little value in submitting abandoned lines to the NPMS, PHMSA has minimized the impact and burden on operators by limiting the submissions to those pipe line segments abandoned in the just completed calendar year. Adding this attribute to the NPMS submissions may not add value but the burden of adding the attribute will not be burdensome.

In TPA's opinion, none of the following attributes presents a significant security risk or a significant burden to operators to include in NPMS submissions, provided sufficient time is given to prepare the initial submissions. The most sensitive of the following attributes is high consequence area (HCA) information, but the 2011 Reauthorization Act specifically requires PHMSA to collect this data as part of the NPMS. If there are security concerns over HCA information, PHMSA can place restrictions on the public availability of the information.

Class Locations

High Consequence Areas (HCAs)

Offshore/Onshore

Breakout Tanks

Pump and Compressor Stations

Attributes with Significant Security Concerns

Because of security concerns related to the following attributes, TPA urges PHMSA to delay any requirement that these attributes be submitted to the NPMS until these security concerns are resolved. Even if security concerns are addressed, TPA recommends that these attributes not be made available to the public or emergency responders and be limited in availability to PHMSA for its risk evaluation purposes.

Percent Specified Minimum Yield Strength (% SMYS)

The proposed description of this attribute bases the % SMYS calculation on the highest operating pressure of a pipeline segment during the last year. this description will require each operator to track the operating pressure on many discrete segments of pipeline that are not currently monitored individually or to make assumptions of the highest operating pressure on a pipeline segment based on operating pressures at upstream or downstream monitoring points. This description will also force operators to confirm or recalculate the % SMYS on each pipeline segment each year because the highest operating pressure on a segment will vary from year to year. This will significantly increase the burden of compliance and the related cost. TPA recommends that this attribute be described as the % SMYS for a pipeline segment based on its established MAOP. This would allow operators to submit the attribute and leave it unchanged until a subsequent change in the operating conditions of the pipeline segment that would either increase the stress on the pipeline segment or permanently reduce the stress on the pipeline segment.

If TPA's suggestion on this attribute is accepted, there would no longer be a need for the separate LOW STRESS attribute.

TPA is concerned about the disclosure of this attribute because it will give individuals desiring to do harm to the pipeline system a roadmap to the pipeline segments operating at the highest stress levels. These would likely be the pipeline segments where the least amount of effort would be needed to create a disruption in the system.

Maximum Allowable Operating Pressure (MAOP)

While every pipeline segment is required to have an MAOP, TPA does not believe that this attribute is as accurate a predictor of risk for a particular segment as the % SMYS attribute. An operator is not required to set a pipeline segment's MAOP at the highest pressure allowed. For example, a replacement segment may qualify for a higher MAOP than the remainder of the pipeline. Unless there are pressure control devices separating the segment from the remainder of the pipeline, the operator may choose to just match the MAOP of the remainder of the pipeline to avoid potential over pressuring due to a misunderstanding of the overall pipeline's pressure limitations. TPA is not recommending that this attribute be eliminated from the NPMS submissions because this attribute would enhance transparency for the public.

Although MAOP is not as clear an indicator of the stress on a pipeline segment, it does give an indication of where a breach of the pipeline could do the greatest damage to the area surrounding the pipeline. For this reason, TPA requests that PHMSA delay requiring submission of this attribute to the NPMS until the security concerns can be addressed and resolved.

Mainline Block Valve Locations and Type

TPA does see the value of including some mainline block valve locations in the NPMS. That value is limited to those valves designated as emergency valves because those are the valves that operators will be using to respond to any incidents requiring the shutdown of the pipeline segment. Location information on mainline emergency block valves would be useful for PHMSA in its risk evaluation prioritization efforts. However, first responders do not need access to this information because they are not qualified to operate these valves and do not have the knowledge necessary to understand the downstream and upstream impacts of closing a particular valve. Any value from this information would be limited to response planning which would also require the assistance of the operator to determine the time from closure to a rendered safe status for responders to move on site.

Similarly, the type of valve operation is of limited value. Even for risk evaluation purposes, PHMSA's own study on automatic and remotely controlled valves indicates that there are other factors impacting a risk determination other than the method of valve closure. TPA does not oppose inclusion of this information in the NPMS submissions, but believes that it should not be disclosed to the public due to the potential for harm if used for unauthorized closure of valves.

Finally, TPA sees no value in providing the type of valve in NPMS submissions. It has little, if any, value in risk evaluation prioritization and should not be a required attribute in NPMS submissions.

TPA does recommend that these attributes not be required until security concerns are addressed. Mainline valve locations would give those desiring to disrupt pipeline operations the necessary information on where to focus their efforts. Until PHMSA can assure industry that its security for databases and computer systems is adequate, there is great risk in placing all of this information in one location.

Pipeline Attributes Needing Further Discussion

TPA does not believe the following attributes are necessary for PHMSA to perform a risk analysis on pipeline systems, are of much, if any, value to emergency responders or should be required attributes for NPMS submissions.

Throughput

TPA believes there is no value in adding this attribute to the NPMS for risk evaluation, emergency response planning or to identify shortages and implement contingency plans for potential widespread pipeline service. Average daily throughput is not a measure of pipeline capacity or a predictor of shortages. The availability of storage, line pack, operational flexibilities and daily variations in actual throughput render this attribute meaningless to

PHMSA and State regulators for the purposes asserted by PHMSA for requiring this attribute. TPA strongly urges PHMSA to eliminate this attribute as a requirement for NPMS submissions.

Because of the segmentation of pipelines by the addition of all these attributes, it will be difficult in many instances for an operator to determine the average annual throughput for discrete pipeline segments without the addition of many meters. Such segmentation also requires consideration of how to account for bi-directional flow on pipeline segments. Intrastate pipelines are often more reticulated than most interstate pipelines and are subject to directional flow changes from day-to-day and occasionally intraday.

Wall Thickness & Pipe Grade

Wall thickness and pipe grade are not needed for PHMSA to perform a risk evaluation on pipeline segments. These attributes are redundant and unnecessary for risk assessment because the submission of the % SMYS attribute effectively incorporates these two attributes. TPA recommends that this attribute be eliminated as a required component of NPMS submissions.

Leak Detection

The method of leak detection on a pipeline segment has virtually no significance in determining the risk of the pipeline segment. Because pressure monitoring points are usually not frequent enough to provide precise leak locations and are generally not sensitive enough to detect leaks unless they are ruptures, even SCADA systems have little impact on the risk of pipeline segments. PHMSA's reports on leak detection systems and remote controlled and automatic shut-off valves indicate that leak detection by itself is not a significant influence on risk. This should not be a required attribute for submission to NPMS.

Pipe Join Method

Pipe joining methods are usually dictated by the pipe material, except in the case of very old pipe segments. For transmission pipeline segments, the predominant method of joining pipe is going to be welding. This attribute would be of little value in any risk evaluation of pipe segments, and even that limited value would not justify the effort needed to collect and format this information for inclusion in a submission to the NPMS. TPA strongly urges PHMSA to eliminate this attribute as a part of the required elements of a NPMS submission.

Inline Inspection

TPA does not consider a pipeline segment's inline inspection capabilities of significant value in performing risk evaluation prioritization. However, TPA does recognize the value of enhanced transparency to the public of knowing

whether a particular pipeline segment can be assessed through inline inspection. While TPA would not include this attribute in NPMS submissions, if PHMSA desires to require this attribute in NPMS submissions, it should be forthright about the limited benefit of such information.

Year of Last Inline Inspection and Year of Last Direct Assessment

This information provides no meaningful input to a risk evaluation prioritization. It does provide an indication of the timing of the last integrity assessment and the methodology utilized. At best, it will provide assurance to the public that the integrity of the pipeline segment has undergone an assessment and will alert PHMSA to the nature of the assessment and the time period remaining until the next required reassessment in HCAs. TPA recommends that these attributes not be an element in required NPMS submissions.

Year and Pressure of Original and Last Hydrostatic Test

TPA sees little value in requiring the original pressure test date and pressure in NPMS submissions. Because of the likelihood that most pipelines have had some replacement sections installed over time, the more useful and reasonable attribute to be submitted as part of the NPMS is the date of the last pressure test. While requiring the pressure used in the last pressure test is not unduly burdensome, that attribute has little value to any entity other than PHMSA, and is not a necessary element in conducting a risk evaluation prioritization. PHMSA can obtain the test pressure when it performs a safety inspection of the pipeline segment. Due to the numerous replacements of portions of pipelines that have occurred over the years, requiring this attribute will significantly increase the segmentation of pipelines. Each of the replacements will have had a separate pressure test, and the existence of a separate pressure test will automatically create a new segment even if all other attributes, except date placed in service, remain unchanged. This increased segmentation will increase the burden of NPMS submissions.

Installation Method if Pipe Crosses Body of Water Greater than 100 Feet in Width

The information collected through this attribute as described in the proposed draft NPMS Operator Standards Manual will not allow verification of depth of cover as stated in the notice. TPA sees little value in collecting this information through NPMS submissions. The method of original installation tells PHMSA very little about the current risk of the pipeline.

Facility Response Plan and Sequence Number

These attributes contribute no value to risk evaluation prioritization and provide the pubic and emergency responders no useful information. Unless

PHMSA can show the value of adding these attributes to the NPMS submission requirements other than the unsupported conclusory statements in the Notice and the Request for Comments, these attributes should not be added to the submission requirements.

Storage Field Location and Type

Many storage fields are classified as critical infrastructure and providing their location in a public database could create security issues. A point location without delineating the foot print of the storage field is the most that should be disclosed. This would address any public awareness concerns without revealing any detailed information. To date, PHMSA has only regulated the pipelines within underground storage facilities, not the wells and geologic structures themselves. Beyond the security concerns with these attributes, TPA does not think the Notice and Request for Comments is an appropriate venue through which to expand PHMSA's regulatory reach.

Refinery Locations/Gas Process/Treatment Plant Locations

PHMSA does not regulate refineries or gas processing plants and only has regulatory authority over treatment plants that are an integral part of a transmission pipeline system. Because of these regulatory limitations, these attributes should not be required in NPMS submissions. The purpose of the NPMS is not to provide the public or emergency responders information on facilities outside of the regulatory jurisdiction of PHMSA. These attributes should not be required for NPMS submissions.

LNG Plants

Locations of LNG Plants seem to be appropriate information to include in NPMS submissions provided the facilities are not designated as critical infrastructure. The additional detail sought beyond location and status appears to create potential risk for such facilities from those who would seek to do harm. TPA urges PHMSA to limit the attributes in the NPMS submissions to location and status.

Offshore Gas Gathering Lines

The proposal to require a new class of pipelines to make submissions to the NPMS is not appropriate within a notice and request for comments on an information collection authorization. Such an expansion should be the subject of a rulemaking in which all affected stakeholders can participate. There is no indication of this proposed expansion of the NPMS in the Notice until one reads over halfway through the attributes. This is insufficient notice to affected parties and PHMSA should withdraw this attribute from the current proposal and initiate a notice and comment rulemaking if it desires to pursue this expansion.

CONCLUSION

TPA has attempted through these comments to address it concerns with the expanded attributes that PHMSA seeks to require in NPMS submissions as well as the enhanced centerline positional accuracy requirements. TPA is supportive of enhanced transparency through the NPMS, but that transparency must be tempered by security concerns. TPA is ready and willing to engage with PHMSA on the necessary discussions to arrive at a final set of attributes for NPMS submission if PHMSA chooses not to utilize a government/public/industry work group as has been used in past NPMS revisions. If you have any questions, concerning these comments, please contact me at 512-478-2871 or Charles Yarbrough, Chair of the TPA Pipeline Safety Committee, at 214-206-2809.

Respectfully submitted,

TEXAS PIPELINE ASSOCIATION

By: _____

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