Notice and Request for Comment - Continued Collection of Mapping Data

Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Docket No. PHMSA–2014–0092
Pipeline Safety: Request for Revision of a Previously Approved Information Collection—National Pipeline Mapping System Program (OMB Control No. 2137–0596).

Comments/Questions:

1. **Positional Accuracy**
   Vectren has no comment.

2. **Pipe Diameter**
   Vectren has no comment.

3. **Maximum Allowable Operating Pressure (MAOP)**
   PHMSA proposes operators submit the maximum MAOP or MOP for a pipeline segment in pounds per square inch gauge.

   Comment: Vectren is concerned with the security of critical system information and requests PHMSA ensure strict safeguards are put in place to keep the MAOP or MOP attribution confidential.

   Comment: It is the opinion of Vectren that MAOP attribute data is not necessary for risk-based audit prioritization if percent SMYS is submitted. Percent SMYS provides PHMSA with an indication of the stresses on the pipeline segment where MAOP does not.

4. **Pipe Grade**
   PHMSA asks for submission of the “predominant” pipe grade of a pipeline segment.

   Comment: To ensure the audience of the additional submitted data has accurate information, attributes such as pipe grade should not be generalized as the “predominant” attribute for the entire pipeline but rather submitted on a segment basis in the same manner other attributes are submitted, stored, and displayed in Geospatial Information Systems (GIS).

   Comment: It is the opinion of Vectren that pipe grade attribute data is not necessary for risk-based audits if percent SMYS is submitted. Percent SMYS provides PHMSA with an indication of the stresses on the pipeline segment and pipe grade would then be redundant.

5. **Percent Specified Minimum Yield Strength (SMYS)**
   PHMSA asks that hoop stress for pipelines be submitted calculated with “the highest operating pressure during the year” as a percentage of SMYS.

   Comment: Hoop stress and percent SMYS would be more appropriate if calculated using the Maximum Allowable Operating Pressure (MAOP) of the pipeline rather than highest operating pressure. Performing the calculation using the MAOP is more conservative and would burden operators less to comply.

Comment: Vectren is concerned with the security of critical system information and requests PHMSA to ensure there are strict safeguards put into place that keep the percent SMYS attribution confidential.

6. **Leak Detection**
   PHMSA proposes operators submit information on the type of leak detection system used.

   Comment: It is the opinion of Vectren that leak detection attribute data is not required to determine priority for a risk-based audit and that this information is best reviewed in the audit itself.

   Comment: PHMSA should allow for multiple types of leak detection methods if more than one is used. PHMSA also should better define each of the available methods presented in the draft operator standards document.

7. **Pipe Coating/Type of Coating**
   PHMSA proposes operators indicate the level of and types of coating on a pipeline segment.

   Comment: PHMSA should allow for an 'unknown' value for coating type.

   Comment: In Vectren's opinion, it should not be required for operators to submit segmented information with the type of coating. Submitting that a line is either bare, is effectively coated, or is not effectively coated is all PHMSA should require from operators to perform risk-based audits. It may also be important to understand if there is an effective cathodic protection system in place for the pipeline segment.

8. **Pipe Material**
   Vectren has no comment.

9. **Pipe Join Method**
   PHMSA proposes operators submit data on the pipe joining method.

   Comment: It is the opinion of Vectren that pipe join method attribute data is not required to determine priority for a risk-based audit and that this information is best reviewed in the audit itself. This information is best used during a likelihood of failure calculation done by the operators and is not required for PHMSA to prioritize operators for audits.

10. **Year of Construction/Installation**
    PHMSA asks for submission of the "predominant" year of original construction (or installation).

    Comment: Similar to pipe grade, to ensure the audience of the additional submitted data has accurate information, attributes such as year of construction should not be generalized for a pipeline but rather submitted on a segment basis in the same manner other attributes are submitted, stored, and displayed in GIS systems.

    Comment: PHMSA will need to allow for an 'unknown' value for year of construction/installation.

11. **Class Location**
    Vectren has no comment.

12. **High Consequence ‘‘Could Affect’’ Areas**
    PHMSA proposes hazardous liquid and gas transmission operators identify pipe segments that could affect HCAs as defined by 49 CFR 192.903 and 195.450.

    Comment: PHMSA should clarify and clearly delineate the data submission expectation for natural gas vs. hazardous liquids pipeline operators. For example, a natural gas pipeline release would not generally affect a sole-source drinking water area outside the Potential Impact Radius (PIR) due to its lighter-than-air and non-toxic characteristics.

13. **Onshore/Offshore**
    Vectren has no comment.

14. **Inline Inspection**
    PHMSA proposes operators indicate whether their system is capable of accommodating an inline inspection (ILI) tool.

    Comment: This information is best used during a likelihood of failure calculation done by the operators and is not required for PHMSA to prioritize operators for audits. It is the opinion of Vectren that pipeline segmentation with attribution specifying inline inspection able or not able is not necessary for a risk-based audit prioritization. The inline inspection able and not able pipeline mileage is already submitted in the PHMSA annual report and can be determined from there the percentage of the pipeline industry already employing this practice.

    Comment: More appropriately, PHMSA should request data on pipelines that have been assessed and the assessment method. That would provide a more accurate representation of how much of the system has been examined by an assessment method.

15. **Year of Last Inline Inspection and Year of Last Direct Assessment**
    PHMSA proposes operators submit data detailing the year of a pipeline’s last corrosion, dent, crack or ‘‘other’’ ILI inspection. PHMSA also proposes to collect the year of the last direct assessment.

    Comment: It is Vectren’s opinion that the year and type of last inline inspection and year of last direct assessment are not required to determine priority for a risk-based audit.

16. **Year and Pressure of Original and Last Hydrostatic Test**
    PHMSA proposes to collect data on a pipeline’s original and most recent hydrostatic test years and pressures.

    Comment: It is the opinion of Vectren that year and pressure of original and last hydrostatic test attribute data is not required to determine priority for a risk-based audit.

17. **Commodity Detail**
    Vectren has no comment.

18. **Special Permit**
    Vectren has no comment.

19. **Wall Thickness**
    PHMSA proposes to collect data on the nominal wall thickness of a pipe.

    Comment: It is the opinion of Vectren that wall thickness attribute data is not necessary for risk-based audit prioritization if percent SMYS is submitted. Percent SMYS provides

PHMSA with an indication of the stresses on the pipeline segment and wall thickness would then be redundant.

20. **Seam Type**
PHMSA proposes operators submit data on the seam type of each pipe segment.

Comment: PHMSA should allow for an 'unknown' value for seam type.

21. **Abandoned Pipelines**
Vectren has no comment.

22. **Offshore Gas Gathering Lines**
Vectren has no comment.

23. **Installation Method if Pipe Crosses Body of Water Greater Than 100 Feet in Width**
Due to recent incidents involving washed-out pipelines, including the incident that occurred near Laurel, MT, PHMSA proposes operators submit data on the installation methods of pipe segments that cross bodies of water greater than 100 feet in width.

Comment: Vectren asserts installation method of pipe crossing body of water greater than 100 feet in width attribute data is not required for a risk-based audit.

24. **Facility Response Plan**
Vectren has no comment.

25. **Throughput**
PHMSA proposes that operators submit "average daily throughput".

Comment: Clarification is needed on exactly the data required, particularly since many companies are predominantly gas distribution and most of their transmission pipelines are integrated with the distribution facilities. It also should be clarified at what points on a pipeline system throughput be required.

Comment: Vectren requests PHMSA establish strict safeguards for the throughput attribution confidentiality.

26. **Mainline Block Valve Locations**
PHMSA proposes operators submit a geospatial point file containing the locations of mainline block valves, the type of valves, and the type of valve operators.

Comment: Vectren would want PHMSA to ensure there are strict safeguards put into place that keep the mainline block valve location and information attribution confidential

Comment: PHMSA should allow for an 'unknown' value for type of valve and type of valve operator attribute fields.

Comment: Vectren asserts the data on location or type of mainline block valves is unnecessary. The valve spacing requirements are already prescribed in regulations and first responders are not qualified to operate the valves or independently determine the consequences of closing a mainline block valve.

27. **Storage Field Locations and Type of Storage**
Vectren has no comment.

28. **Refinery Location/Gas Process/Treatment Plan Locations**
Vectren has no comment.

29. **Breakout Tanks**
    Vectren has no comment.

30. **LNG Plants**
    Vectren has no comment.

31. **Pump and Compressor Stations**
    Vectren has no comment.

32. **Other Questions:**

- **Question:** Currently, the public is able to access all of the submitted information on a county-by-county basis through the NPMS website. What information will the public be able to access through NPMS? If the proposed pipeline attribute data were submitted, Vectren would want PHMSA to ensure there are strict safeguards put into place that keep the additional pipeline attribution confidential.

- **Question:** Will PHMSA provide fixed domain values for all additional information requested in the NPMS submission? Fixed domain values should simplify the submission process and provide for a consistent format to do so. Because not all GIS systems, data models, and individual company domain values are the same, the absence of fixed domain values will create significant variability in the data reported.

- **Question:** Currently, operators submit some of this information in the PHMSA Natural Gas and Other Gas Transmission and Gathering Pipeline Systems annual report. Does PHMSA intend to decrease the content of the annual report so operators are not reporting duplicate information in different formats?

- **Question:** PHMSA states: “PHMSA understands that operators may or may not have the following attributes in their GIS systems and therefore, operators may need to do additional research to compile this information”. What amount of time will be given to operators to gather, organize, and incorporate this data to have it ready for submission?