BEFORE THE
PIPELINE HAZARDOUS MATERIALS SAFETY ADMINISTRATION
UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Pipeline Safety: Request for Revision of a Previously Approved Information Collection National Pipeline Mapping System	)))	Docket No. PHMSA-2014-0092

COMMENTS OF SPECTRA ENERGY PARTNERS

The United States Department of Transportation's Pipelines and Hazardous Materials Safety Administration ("PHMSA") issued the above-captioned Request for Revision of a Previously Approved Information Collection – National Pipeline Mapping System (OMB Control No. 2137-0596) published in the Federal Register on August 27, 2015 ("Notice").[1] The Notice addresses many of the comments to the previous proposal[2] for collecting additional data through the National Pipeline Mapping System ("NPMS"), improving the accuracy of data submitted to the NPMS and requiring NPMS submittals for additional pipelines.

Spectra Energy Partners, LP ("SEP")[3] appreciates the opportunity to comment on this revised proposal for NPMS data collection. SEP owns and operates one of the largest natural gas pipeline networks in the United States, with over 12,600 miles of natural gas transmission pipeline. In addition, SEP owns and operates approximately 1,450 miles of crude oil transmission pipeline. As such, SEP shares PHMSA's desire to improve the NPMS and make certain information more accessible to first responders and the public. SEP is committed to working with PHMSA and others toward attaining these goals. It is with this constructive spirit

[1] 80 *Fed. Reg.* 52,084

[2] 79 *Fed. Reg.* 44,246

[3] SEP, a master limited partnership, owns the following pipelines and storage facilities located in the United States: Texas Eastern Transmission, LP; Algonquin Gas Transmission, LLC; Saltville Gas Storage Company L.L.C.; East Tennessee Natural Gas, LLC, Ozark Gas Transmission, L.L.C.; Big Sandy Pipeline, LLC; Bobcat Gas Storage; Express Pipeline, LLC and Platte Pipe Line Company, LLC; as well as interests in Maritimes & Northeast Pipeline, L.L.C.; Gulfstream Natural Gas System, L.L.C.; ; Egan Hub Storage, LLC; Steckman Ridge, LP; and the Southeast Supply Header, LLC. A wholly owned subsidiary of Spectra Energy Corp is the general partner of SEP.

that SEP offers the following comments regarding the revised proposal for NPMS data collection.

General Comments

SEP continues to support a reasonable, practicable approach to improving the positional accuracy of the pipeline centerline submitted to the NPMS. Improving the positional accuracy of the NPMS data may help to better evaluate pipeline risk, improve emergency response and assist communities to make informed decisions for development near transmission pipelines. SEP also continues to support submittal of some additional pipeline attributes to the NPMS to assist PHMSA to perform risk assessments and other purposes stated in the Notice.

SEP commends PHMSA for making revisions to the proposed NPMS data collection to address comments to the previous notice (dated July 30, 2014). SEP fully supports PHMSA's decision to drop a number of attributes from the proposed data collection. SEP also fully supports the revised accuracy requirements as defined in the Notice. These revisions to the proposed data collection will make the data collection and submittal more practicable and significantly reduce the cost of implementation, with no measureable decrease in pipeline safety or the usefulness of the data.

SEP appreciates PHMSA's efforts to simplify the proposed NPMS data submittal. However, SEP believes several provisions of the proposed data collection are still overly burdensome and complex, and can be further simplified by incorporation of SEP's suggested revisions described in these comments.

Timing of Initial Submittals

SEP supports PHMSA's proposal for collection of the new data in three (3) phases over three (3) reporting years. This phased-in approach will allow operators to gather and organize the required data in an effective, efficient manner. SEP believes the language in the Notice is unclear with regards to the year when the Phase 1 data would need to be submitted. The phrase "first submission year following the effective date" could be interpreted in different ways, and thus should be clarified. It will take operators time to develop their systems to enable submittal of the data. SEP believes a reasonable, practicable approach would be for the Phase 1 data to be submitted in March 2018 (assumes a 2016 effective date). SEP supports this timeframe, and requests PHMSA to clarify this in the final NPMS data submittal requirements.

Submittal of Attributes on a "Predominant" Basis

The revised proposal continues to require the operator to report some attributes on a "predominant" basis (pipe grade and decade of installation). The other attributes must be

submitted based on the "actual"[4] attribute (wall thickness, class location, HCA, pressure test, etc.). The Notice defines "predominant" as "90 percent or higher of the pipeline segment being submitted to the NPMS". This approach can create several problems for some operators, as described below.

- The length of a segment can become a very dynamic attribute, subject to change any time there is a modification of any kind. For larger systems, it will be an intensive work effort to make sure each "segment" has at least 90% of the specific attribute. Any change in a segment, such as a pipe replacement or recoating project, could then have an effect on upstream and downstream segments. The analysis required to identify all segments that meet the 90% threshold could be a significant effort that would have to be repeated every year.
- Each of the attributes to achieve the 90% threshold may result in a different segment length depending on the attribute. Reporting different segment lengths for the different attributes will become a significant administrative burden for some operators, and may be confusing to the users of the data.
- Requiring reporting of the "actual" attribute for some attributes and reporting other attributes as "predominant" may create confusion. For example, reporting the "actual" pipe wall thickness and the "predominant" pipe grade will lead to a misunderstanding of risk. There will be segments of pipe that have short sections of thinner wall pipe with a higher grade than the predominant grade. The thin wall pipe will be reported, but only the predominant pipe grade would be reported.

For these reasons, SEP urges PHMSA to allow operators the option to either submit all pipe attributes on an "actual" basis, or submit the pipe grade and decade of installation on a "predominant" basis. This will allow operators the flexibility to submit data in the most effective and efficient manner, based on their unique data systems.

Annual Submittals

SEP proposes that operators be allowed to submit a complete updated dataset each year, rather than including only new or changed data with a Revision Code. Tracking all changes made to the datasets would be an excessive administrative burden, as a significant amount of data will change each year to account for facility changes and data corrections.

Data for new pipelines, pipe replacements and other changes will take some time after completion to input into the appropriate datasets to allow submission to the NPMS. Thus the data for projects completed late in the year may not be available to be reported by March of the

[4] For the purposes of these comments, SEP defines "actual" as requiring reporting each time an attribute changes.

following year. SEP urges PHMSA to recognize this fact in the final NPMS submittal requirements.

Revision Code

The NPMS currently includes a field to indicate if a change in the pipe was spatial, jurisdictional, or attributional. At the NPMS Technical Workshop on November 18, 2015, it was stated that spatial changes were of most importance and attribution changes were not a priority. With the number of new attributes proposed, it would be a heavy burden on operators to track all attribute changes and lead to greater segmentation of the data, especially on attributes that could change annually like Class and HCA. SEP recommends eliminating the Revision Code for attribute changes altogether, or, at a minimum, specifying the attributes for which change detection reporting would be required.

Cost of Implementation

SEP believes PHMSA has not properly accounted for all the costs that will be incurred to meet the requirements described in the Notice. SEP believes PHMSA has significantly underestimated the annual burden of compliance. Furthermore, PHMSA has not addressed the cost for confirming geospatial location, data gathering and changes to existing data systems to facilitate the new requirements. SEP believes these costs will be significant. SEP estimates its cost for the work to be able to comply with the new requirements and to demonstrate that compliance will be approximately $2.3 million.

Emergency Response Enhancements

In the Notice, PHMSA states the proposed data collection is needed to assist emergency responders to prepare for and respond to pipeline emergencies. SEP agrees that more accurate geospatial positioning, product information, and some of the proposed attributes can assist emergency responders to better prepare for pipeline emergencies and to enhance their response. The Notice proposes significant changes to the NPMS, and SEP believes many emergency responders will need to be trained on those changes. SEP encourages PHMSA to develop a NPMS training program specifically for emergency responders to promote a consistent understanding. SEP believes a consistent training program that could be used in different venues will be much more effective than each operator trying to develop their own NPMS training program for emergency responders.

The NPMS currently includes phone numbers only for a general information contact and a contact for the NPMS submittal. SEP urges PHMSA to add the operator's 24-hour emergency number to allow emergency responders to contact the operator in the event of a pipeline incident.

Enforcement

Finally, SEP believes PHMSA should encourage operators to continually improve the accuracy of their NPMS submittals. To that end, PHMSA should not initiate enforcement actions against an operator for correcting data and submitting revised data to NPMS.

Comments to Specific Requirements

A. Positional accuracy

SEP supports the revised positional accuracy for onshore pipelines, as defined in the Notice. SEP believes most or all of its onshore pipelines already meet these accuracy requirements. However, SEP recognizes that operators will need to be able to demonstrate the specified positional accuracy. For piggable pipelines, in-line inspection tools are an effective means of verifying the geospatial position of the pipeline. For non-piggable lines, one method to confirm the geospatial position and demonstrate compliance would be to locate and mark the pipelines and conduct GPS surveys. The results of these surveys would then be input into the operator's geographic information system (GIS).

In the Notice, PHMSA proposes that gas transmission operators submit data with +/- 50 feet positional accuracy for all pipeline segments within "a right-of-way for a designated interstate, freeway, expressway, or other principal 4-lane arterial roadway…within its potential impact radius."[5] SEP urges PHMSA to provide a complete dataset for those highways and roads for which this requirement would apply to remove the ambiguity from this requirement.

SEP believes the proposed NPMS data geospatial position accuracy requirements should not be applied to offshore pipelines. There are significant challenges in obtaining this level geospatial accuracy for offshore pipelines, and thus would be very costly to achieve. Many offshore gas transmission pipelines are not piggable, and thus ILI tools could not be used to provide geospatial position. Furthermore, most of the benefits of geospatial accuracy that apply to onshore pipelines do not apply to offshore pipelines. SEP urges PHMSA to require offshore pipeline geospatial position based on the operator's available data.

B. Pipe diameter

SEP supports PHMSA's proposal to require operators to submit pipe diameter to the NPMS. SEP agrees this is information needed by PHMSA and is good information for public awareness and emergency response.

[5] Revised ICR, at 4.

C. Wall Thickness

SEP does not oppose PHMSA's proposal to require submittal of pipe wall thickness to the NPMS.

D. Commodity Detail

SEP supports PHMSA's proposal to require submittal of the commodity type being transported in a pipeline. The type of commodity can be critical in emergency response situations. Since some pipelines may transport different commodities in batches, the NPMS must be able to accommodate submittal of multiple commodities in a given pipeline.

E. Pipe material

SEP supports PHMSA's proposal to collect data relating to pipe material. Pipe material can provide information relating to excavation damage and external loading risks.

F. Pipe Grade

SEP does not oppose PHMSA's proposal to collect pipe grade information. In some cases, the predominant pipe grade may not provide essential information on integrity issues, since the pipe grade in HCAs or Class 3 or 4 areas may not be the same as the predominant grade. Also, submitting this data on a "predominant" basis could be misleading. Pipe wall thickness changes, which will be submitted on an "actual" basis, often will align with pipe grade changes. Applying the "predominant" pipe grade to a thinner wall pipe that actually has a higher grade will result in an inaccurate risk assessment. SEP urges PHMSA to allow submittal of pipe grade either on a "predominant" basis or an "actual" basis. This will allow operators the flexibility to submit data in the most effective and efficient manner, based on their unique data systems.

G. Pipe Join Method

SEP does not oppose PHMSA's proposal to collect data relating to pipe joining methods. Pipe joining method can be an important factor in risk assessments.

H. Percent Operating SMYS

SEP does not oppose PHMSA's revised proposal to require operators to submit the operating percent SMYS based on the maximum operating pressure ("MOP") or maximum

allowable operating pressure ("MAOP") for each segment. Operating stress is an important factor in risk assessments.

I. Maximum Allowable Operating Pressure or Maximum Operating Pressure (MAOP/MOP)

SEP supports PHMSA's proposal to require operators to submit data on the Maximum Allowable Operating Pressure ("MAOP") or Maximum Operating Pressure ("MOP") to the NPMS. SEP agrees this is information needed by PHMSA and is good information for public awareness and emergency response.

J. Seam Type

SEP does not oppose PHMSA's proposal to submit seam type to NPMS. Seam type, along with time of construction and hydrostatic test history, are important factors in risk assessments.

K. Decade of Installation

SEP agrees with PHMSA's statement in the Notice that the age of the pipeline is an important consideration in risk-ranking algorithms and to relate pipeline attributes to surrounding geographical areas. However, SEP believes submittal of this data on a "predominant" basis could result in inaccurate risk assessments, especially where the "predominant" pipe is new, but the segment includes some older pipe. SEP believes submittal of the in-service year or decade of installation on an "actual" basis could better reflect actual risk. It may also be more efficient for operators to submit this data, as previously described.

SEP urges PHMSA to revise the reporting requirement to allow the operator to submit the decade of installation or the in-service year either on a "predominant" basis or an "actual" basis. This will allow operators the flexibility to submit data in the most effective and efficient manner, based on their unique data systems.

L. Onshore/Offshore

SEP supports PHMSA's proposal to require submission of data indicating if a pipeline is onshore or offshore. SEP recommends PHMSA issue a clear definition for "offshore pipelines" to facilitate consistent reporting between operators.

M. Inline Inspection

SEP supports PHMSA's proposal to require submittal of data indicating if a pipeline is capable of accommodating in-line inspection ("ILI") tools. SEP recommends PHMSA issue a clear definition of "ILI capable" to address the following issues:

- Should lines that use temporary launchers and receivers be considered ILI capable?
- Should lines that can be inspected with cable pull ILI tools be considered ILI capable?
- How would an operator report a new section of line that is "ILI capable" that is installed in a pipeline that is not ILI capable?

N. Class Location

SEP supports PHMSA's proposal for submittal of class location information through the NPMS. This can provide valuable information to PHMSA and other stakeholders.

O. Gas High Consequence Area Segments

SEP supports PHMSA's proposal to submit data regarding gas pipeline segments that could affect an HCA. This can provide valuable information to PHMSA and other stakeholders.

P. Segment Could Affect an HCA

SEP supports PHMSA's proposal to submit data regarding hazardous liquid pipeline segments that could affect an HCA.

Q. Year of Last ILI

SEP does not oppose PHMSA's proposal to require submittal data regarding year of last in-line integrity assessment. The NPMS database must include an option for reporting pipelines that are not piggable.

R. Coated/Uncoated and Cathodic Protection

SEP supports PHMSA's proposal to require submittal of data regarding coated and uncoated pipelines. However, SEP strongly opposes use of the term "effectively coated". This term can be subject to various interpretations, and an operator could be subjected to enforcement actions if a PHMSA inspector determines the operator has not reported this attribute properly. SEP urges PHMSA to include coating as a simple "yes/no" attribute.

SEP also supports submittal of data to specify if a pipeline is under cathodic protection. This data should also be reported as a simple "yes/no" to avoid varying interpretations.

S. Type of Coating

SEP does not oppose PHMSA's proposal to require submittal of the type of coating.

T. FRP Control Number and Sequence Number, If Applicable

SEP does not oppose PHMSA's proposal to include facility response plan control numbers and sequence number, if applicable.

U. Year and Pressure of Last and Original Pressure Test

SEP does not oppose PHMSA's proposal to require submittal of year and pressure of last and original pressure test. This data is important for risk assessments. The current proposal would require submittal of data relating to the last pressure test as part of Phase 2 and the data relating to the original pressure test as part of Phase 3. SEP suggests that all hydrostatic test data be provided as part of Phase 3 to allow operators time to collect that data and input it into their data systems.

V. Abandoned Pipelines

SEP does not oppose PHMSA's proposal to include the location of abandoned pipelines in the NPMS submittal.

W. Pump and Compressor Station Locations

SEP supports PHMSA's proposal to include the location of pump and compressor stations in the NPMS submittal. The location of these facilities is important to emergency responders that may need to respond to an incident at these facilities.

X. Block Valve Locations

SEP supports submittal of mainline block valve locations to NPMS. The location of block valves may provide PHMSA and emergency responders with meaningful information regarding "*the extent and severity of property damage and life-threatening risks during a high-consequence incident*." SEP recommends PHMSA provide a clear definition of a "mainline block valve" to assure consistent reporting.

Y. Storage field locations

SEP believes there is little value to PHMSA's proposal to require submittal of storage field boundaries to the NPMS. The NPMS submittal already includes the pipelines to the individual storage field wells, thus including locations where emergency response may be required. SEP contends there are no emergency response implications for the storage field boundary.

While SEP believes there is little value in submittal of these boundaries, SEP does not oppose this proposal. To make the submittal practicable and consistent, the boundaries should be defined as the property boundary for salt cavern storage facilities and the storage reservoir boundary, including any protective buffer boundary, for depleted reservoir storage facilities.

Z. Breakout tanks

SEP does not oppose PHMSA's proposal to include breakout tank locations in NPMS submittals. PHMSA should clarify if the submittal is for each tank or the boundary of a tank farm.

AA. LNG Attributes

SEP supports PHMSA's proposal to include the location of LNG facilities in the NPMS submittal. The location of these facilities is important to emergency responders that may need to respond to an incident at these facilities.

Conclusion

SEP shares PHMSA's desire to improve the NPMS and make certain information more accessible to first responders and other stakeholders. SEP is committed to working with PHMSA and others toward attaining these goals. SEP believes incorporation of these comments will achieve the goals of the proposed NPMS data collection in a more effective and practicable manner.

SEP appreciates the opportunity to comment on the revised proposal for changes to the NPMS data collection, and urges PHMSA to address these comments in the final NPMS data collection requirements.

Respectfully submitted,

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