

**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)	Docket No. PHMSA-2014-0092
National Pipeline Mapping System)	

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 June 22, 2016 (“Notice”).¹ The Notice addresses many of the comments to the previous proposals² for collecting additional data through the National Pipeline Mapping System (“NPMS”), improving the quality and efficiency of data submitted to the NPMS. 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 that SEP offers the following comments regarding the revised proposal for NPMS data collection.

¹ 81 *Fed. Reg.* 407,57

² 80 *Fed. Reg.* 52,084 79. The original Notice was published on July 30, 2014 in *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.

General Comments

SEP commends PHMSA for implementing changes that make the submissions more practical and effective. 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 August 27, 2015). 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 appreciable 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 and efficient manner. SEP commends PHMSA for revising the Notice with regards to the year when the Phase 1 data would need to be submitted and giving operators up to seven (7) years to submit positional accuracy data in Phase 3. SEP believes that the timeframe as proposed in the Notice is a reasonable, practical approach and will give operators time to develop their systems to enable submittal of the data.

Submittal of Attributes on a "Predominant" Basis

The revised proposal requires operators 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 revised Notice defines "predominant" as "90 percent or more of the represented segment".

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

SEP supports the revised definition of “predominant” and commends PHMSA for revising the Notice to allow operators submit data on an “actual” or “predominant” basis. The revised NPRM makes it optional for operators to submit “predominant” values. SEP believes that this will give 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, as specified in Section 1.4.2 of the NPMS Operators Standards Manual 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 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

SEP commends PHMSA for modifying or dropping the following attributes, standards or components.

A. Positional accuracy

SEP supports the revised definition of positional accuracy for onshore pipelines, as defined in the revised Notice, to remove the reference layer for 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 believes that the revised definition will remove ambiguity from this requirement.

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).

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

⁵ Revised ICR, at 4.

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. Highest Percent Operating Specified Minimum Yield Strength

SEP supports 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.

C. Decade of Installation

SEP agrees with PHMSA's approach to modify this attribute as either actual or predominant, (90% or more of the represented segment), decade of installation. 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.

This will allow operators the flexibility to submit data in the most effective and efficient manner, based on their unique data systems.

D. Year of Last Corrosion, Dent Crack and Other ILI Inspections

SEP approves of PHMSA's approach to create a new attribute which streamlines the information in this data element and in the pressure test elements. The NPMS database must include an option for reporting pipelines that are not piggable.

E. Coated/Uncoated and Cathodic Protection

SEP supports PHMSA's proposal to require submittal of data regarding coated and uncoated pipelines. SEP commends PHMSA for removing the word "effectively" from the definition since the word 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 supports PHMSA approach to include coating as a simple "yes/no" attribute to avoid varying interpretations.

F. Type of Coating

SEP supports PHMSA's decision to drop the submittal of the type of coating.

G. Year of Original Pressure Test and Its Pressure

SEP supports PHMSA's proposal to drop this attribute and roll up the pressure test and ILI inspection elements under the new Assessment Method element.

H. Year of Last Pressure Test and Its Pressure

SEP supports PHMSA's proposal to capture the pressure test and ILI inspection elements under the new Assessment Method element.

I. Gas Storage Fields

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 commends PHMSA for making revisions to the storage field types. SEP does not oppose this proposal.

Retained Attributes

SEP supports PHMSA's approach to retain the certain attributes listed below. SEP offers the following comments to some of these retained attributes.

A. 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.

B. Wall Thickness

SEP supports PHMSA's proposal to require submittal of pipe wall thickness to the NPMS.

C. 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.

D. 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.

E. Pipe Grade

SEP agrees with PHMSA's proposal to collect pipe grade information. SEP commends PHMSA for allowing the submittal of pipe grade either on a "predominant" (90% of pipe segment) values or an "actual" value. SEP believes that this will allow operators the flexibility to submit data in the most effective and efficient manner, based on their unique data systems.

F. Pipe Join Method

SEP supports PHMSA's proposal to collect data relating to pipe joining methods and supports PHMSA's decision to include "unknown" as a choice. Pipe joining method can be an important factor in risk assessments.

G. Seam Type

SEP agrees with 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. SEP supports PHMSA's decision to include "unknown" as a choice.

H. Onshore/Offshore

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

I. Inline Inspection (Yes/No)

SEP supports PHMSA's proposal to require submittal of data indicating if a pipeline is capable of accommodating in-line inspection ("ILI") tools. SEP commends PHMSA for adding clarity to this attribute to denote whether a line is capable of accepting an ILI tool with currently available technology.

J. 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.

K. Gas HCA Segment

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.

L. Segment Could Affect a High Consequence Area

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

M. Facility Response Plan Sequence Number

SEP supports PHMSA's proposal to include facility response plan control numbers and sequence number, if applicable.

N. Abandoned Pipelines

SEP agrees with PHMSA's proposal to include the location of abandoned pipelines in the NPMS submittal.

O. Maximum Allowable Operating Pressure or Maximum Operating Pressure

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.

P. Pump and Compressor Stations

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.

Q. Mainline Block Valves

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.

R. Breakout tanks

SEP approves of PHMSA's proposal to include breakout tank locations in NPMS submittals; however, PHMSA should clarify whether the submittal is for each tank or the boundary of a tank farm.

S. Additional Liquefied Natural Gas Plant 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 commends PHMSA for modifying or dropping some attributes in the revised NPRM to address concerns raised. 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,

Rick W. Kivela

Rick W. Kivela
Director, Operational Compliance
Spectra Energy Partners, LP
5400 Westheimer Court
Houston, TX 77056

Dated: July 21, 2016

For further information please contact:

Rick Kivela
Director, Operational Compliance
Spectra Energy Partners
5400 Westheimer Court
Houston, TX 77056
(713) 627-6388
(713) 516-0190 (cell)
rwkivela@spectraenergy.com