

American Gas Association

- Founded in 1918, represents more than 200 local energy companies that deliver clean natural gas to more than 177 million Americans nationwide.
- Members deliver 94% of the natural gas in the US
- Today, natural gas meets more than one-fourth of the United States' energy needs.



Areas of Agreement

- Security of Information
- Feasible Positional Accuracy Requirements
- Removal of Unnecessary Attributes
 - Available through inspections
 - Obtainable through other data submittals
 - Not needed at a national or state level for pipeline safety oversight or at a local level by emergency responders, public officials and the public

Areas of Concern

- Timeline to meet the proposed requirements
- Collection of attributes that are not needed:
 - For federal or state pipeline safety oversight
 - By emergency responders to prepare and execute response operations
 - By public officials or the public for pipeline awareness
- Recognition of the significant burden that will be placed on operators and the inability of many to meet the proposal
- Lack of justification for collecting certain attributes and ignoring the extensive feedback that has been provided by the PAC, through the 11/14 workshop and in the responses to the original proposal

Attributes Requested in Original Proposal

1. Diameter
2. MAOP/MOP
3. Pipe Grade
4. % SMYS
5. ~~Leak Detection~~
6. Pipe Coating
7. Coating Type
8. Pipe Material
9. Pipe Joining Method
10. Yr. Constructed/ Installed
11. Class Location
12. HCA/Could Affect
13. On/Offshore
14. ILI Capabilities
15. Yr. of Last ILI
16. ~~Yr. of Last DA~~
17. Yr. of Orig./Last Hydro
18. Pressure of Orig./Last Hydro
19. Commodity Detail
20. ~~Special Permit~~
21. Wall Thickness
22. Seam Type
23. Abandoned Pipelines
24. ~~Offshore Gathering Lines~~
25. ~~Install Methods for PLs Xing water >100'~~
26. Liquid Facility Response Plans
27. ~~Throughput~~
28. Mainline Block Valve Type/Locations
29. Storage Field Locations/Type
30. ~~Refinery/Gas Processing/Treatment Plant Locations~~
31. Breakout Tanks
32. LNG Plant Locations
33. Pump & Compressor Stations

Remaining Attributes in Revised Proposal

Support those in blue, green covered by blue, do not support red

1. Diameter
2. MAOP/MOP
3. Pipe Grade
4. % SMYS (based on MAOP)
5. Pipe Coating
6. Coating Type
7. Pipe Material
8. Pipe Joining Method
9. Yr. Constructed/ Installed
(Now Decade of Installation)
10. Class Location
11. HCA/Could Affect
12. On/Offshore
13. ILI Capabilities
14. Yr. of Last ILI
15. Yr. of Orig./Last Hydro
16. Pressure of Orig./Last Hydro
17. Commodity Detail
18. Wall Thickness
19. Seam Type
20. Abandoned Pipelines
21. Liquid Facility Response Plans
22. Mainline Block Valve Type/
Locations (but only those
designated as emergency valves)
23. Storage Field Locations/Type
24. Breakout Tanks
25. LNG Plant Locations
26. Pump & Compressor Stations

Note: 14 attributes

PHMSA's Request for MAOP and % SMYS

- AGA Supports the collection of attributes indicative of risk on a PL:
 - (High / Low) Stress Designation: Leak v. Rupture
- In addition, AGA supports the collection of:
 - Class Location
 - Pipe Diameter
- The following attributes are only relevant in that they are used to calculate % SMYS, therefore are unnecessary & burdensome:
 - MAOP
 - Pipe Join Method
 - Nominal Wall Thickness
 - Pipe Grade

Note: %SMYS is calculated by operators using the established MAOP.
Requesting the “Highest Operating %SMYS” is not consistent
with common industry practice.

Narrowing of Positional Accuracy

AGA & INGAA Proposal		PHMSA Proposal	
Initial Submission to Modified NPMS Request			
Submission of Best Current Available Accuracy		± 50 Feet	± 100 Feet
Over 7 Years		3 Years or Less	
70% of Pipeline Miles * To be managed by the pipeline operator	All other gas pipeline segments	<i>Class 2, 3, 4; or within a HCA or its PIR contains: (1) one or more buildings intended for human occupancy (2) an identified site (3) a right-of-way for a designated interstate, freeway, expressway, or other principal 4-lane arterial roadway</i>	All other gas pipeline segments
± 50 Feet	± 100 Feet	± 50 Feet	± 100 Feet

A phased approach less than 7 years does not allow for synergies to be realized between integrity management in-line inspection and other assessments and narrowing of the positional accuracy of operator's GIS.

Align Attribute Submission with Other PHMSA Initiatives

Note: Some requested attributes are linked to on-going PHMSA rulemakings. The timeline for compliance for the Final Rule and the NPMS submission should be aligned.

- **Safety of Gas Transmission and Gathering Lines Rule**
 - Seam Type
 - Year & Pressure of Original Hydrostatic Test
 - Year & Pressure of Last Hydrostatic Test
 - Year of Last ILI
 - In-Line Inspection Capabilities
- **Rupture Detection and Valves Rule**
 - Emergency Mainline Block Valve Locations

Final Thoughts

- The significance of the proposal has been essentially ignored.
- There is full support for the modernization of the NPMS and the collection of additional attributes, but we cannot support what has been proposed.
- PHMSA asked stakeholders for a reasonable solution and one has been provided. Our recommendation allows PHMSA and state regulators the ability to do a high level risk assessment and provides emergency responders and local officials information to better execute response operations.
- Yesterday, Chairman Hart promoted collaboration on challenging issues and prioritization. We support that approach for the NPMS.



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