National Pipeline Mapping System

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API and AOPL support the modernization of NPMS

API and AOPL appreciate several of the changes in the revised ICR

- **Dropped Attributes**

- **Positional Accuracy**

- **Phased Approach for Data Collection**

- **Security Risks Assessed by Attribute**

Security Risks

API and AOPL remain concerned that PHMSA plans to continue with data collection for the following attributes:

- Pump and Compressor Stations
- Mainline Block Valves
- Gas Storage Fields
- MAOP/MOP

Security Risks

- The security of specific pipeline attributes on a segmented basis remains a critical concern, especially those that could underscore potential high consequence targets.

- Information housed in a password-protected site still remains susceptible to attacks and security breaches.

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"Predominant"

- PHMSA defined "predominant" under the decade of installation attribute as "90 percent or higher of the pipe segment being submitted to the NPMS."

- API and AOPL request that "predominant" is defined for other attributes in addition to decade of installation

Technological Capabilities

- Several of the pipeline attributes sought in the Notice require significant technological upgrades and shifts

- Need to further assess:
  - Utility of the information collected
  - Duplicative reporting
  - Benefit to emergency responders

Working Group

- API and AOPL suggest that PHMSA form a working group

- Include representatives from government and industry

Conclusion

API and AOPL look forward to working with PHMSA

to update the NPMS system