Comments received via website as of 10-26-2012 for Draft Report: Leak Detection Study

Date	Name	Organization	Comments
10/5/12	Elizabeth	Minnesota	Can external leak detection systems that detect liquid hydrocarbon releases be used in
	Skalnek	Office of	areas where prior leaks have occurred and the soil may retain residual hydrocarbon
		Pipeline	contamination?
10/5/10		Safety	G
10/5/12	Tony	Telvent USA,	Section 4.3.2: API 1155 has been withdrawn. Relevant sections of API 1155 are now
10/5/10	Collins	LLC	included in Annex C of the latest edition API 1130 dated September 2007.
10/5/12	Tony	Telvent USA,	Has any analysis been done to better define which LDS technology is best suited to which
	Collins	LLC	types of pipeline configuration and operating parameters? Where does statistical work best,
			where does RTTM work best for example? There is a lot of confusion in the market place
			when it comes to selecting the optimal performing solution that achieves the lowest risk for the operator for the optimal price for a particular pipeline and specific set of requirements.
			Often times the cheapest solution is not the most optimal and does not achieve the lowest
			risk that may have been expected. Unfortunately, this discovery is learned too late to do
			anything about it. Perhaps this is more of a commercial and contracting issue, but it does
			directly impact the overall objective of improving pipeline integrity.
10/19/12	Shane	Southwest	1. There are numerous places in the document in which specific performance levels (e.g.
10/15/12	Siebenaler	Research	"0.03 gpm") are provided, but these numbers are not sourced. These claims read as
		Institute	absolute fact instead of in the context as the result of one paper. References need to be
			added.
			2. Numerous "fact statements" (e.g. "This technology is effective") are, in most uses in
			this report, actually opinions. Changing them to add context such as, "This technology
			theoretically should be able to" is more correct.
			3. On page 4-3, there is a sentence: "The report is notable in that there are definite
			complaints from the technology suppliers over the issues identified in the appendix." That
			statement is very misleading (and also incorrect). The testing was performed based on
			configurations supplied by each vendor. After they reviewed the data, there were given an
			opportunity to say, "If we had instead changed parameter X to value Y, this is the change
			in results." It was simply an opportunity for them to give some context to their results.
			None of them complained about the quality of the results in the body of the report.
			4. On page 4-23, the authors are mixing-and-matching two different technologies and
			calling them the same thing. There are two types of discrete acoustic systems: negative-
			pressure wave and use of microphones. Most of this section of the report refers to the latter.
			However, statements about pairing the transmitters to filter noise only apply to the former.
			5. On page 4-24, DTS is said to be widely used in down-hole leak detection. That is not

			correct. DTS is used for well logging and gas lift applications; its use is in characterizing thermal profile in bore or annulus, not leak detection. 6. On page 4-39, there is a comment that DTS sensors rely on extremely small changes in temperature. That statement is incorrect. While some of them can detect small changes, what they are really eyeing a large changes in temperature. 7. Page 4-55 implies that fiber-based technologies do not need the cable installed close to the pipeline. A review of one of the PRCI reports referenced in this paper demonstrates that statement to be incorrect for temperature-based systems (that PRCI work did not evaluate distributed acoustic systems). 8. I would recommend staying away from hard cost numbers when comparing the technologies. Based on discussion during panel sessions at one of the two DOT forums this year, the costs are all over the map. Some people reading this report are going to take the numbers to be gospel, which they are not. 9. The bibliography is missing several papers that were referenced in the report. For example, two different PRCI reports were explicitly noted in the text, but only one appears in the bibliography. 10. There is inconsistency on references to specific vendors. Some CPM section refer directly to trademarked products, which that methodology is not used widespread in the report.
10/24/12	Richard Kuprewicz	Accufacts	Comments sent by email. See separate document uploaded to website
10/25/12	John Erickson	APGA	Comments sent by email. See separate document uploaded to website
10/26/12	Dan Regan	INGAA	Comments sent by email. See separate document uploaded to website
10/26/12	Philip Bennett	AGA	Comments sent by email. See separate document uploaded to website
10/26/12	Peter Lidiak	API	Comments sent by email. See separate document uploaded to website. Note that two separate comment documents are uploaded. One is a fairly high level document with joint API and AOPL comments, and the other provides more detailed, page-by-page comments from the cybernetics work group members.
10/26/12	Larry Hawthorne	ExxonMobil	Comments sent by email. See separate document uploaded to website