National Pipeline Mapping System

Public Workshop
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Association of Oil Pipe Lines

API and AOPL support the modernization of NPMS

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Overarching Concerns

Commercially Sensitive Information

- Many of the attributes that have been proposed for inclusion in NPMS raise concerns about commercially sensitive or confidential information

Technological Capabilities

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

- The industry will need time to meet the requirements of the information collection request (ICR).

Phased Approach

- API and AOPL propose a phased approach to help the industry plan, budget, and carry out actions to address the ICR:

Phase 1 – 2016

Phase 2 – 2019

Phase 3 – 2023

Security Concerns

- The security of specific pipeline attributes on a segmented basis remains a critical concern, especially those that could underscore potential high consequence targets.
- A “one-stop-shop” increases the ability for adversaries targeting our nation’s infrastructure to pick the most disruptive targets.
- Information housed in a password-protected site still remains susceptible to attacks and security breaches.

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Security Levels

- Escalating security controls should be utilized in consideration of the specific sensitivity of the attributes:
  - Public (NPMS)
  - Pipeline Information Mapping Application (PIMMA)
  - Sensitive Security Information (SSI) and Confidential Business Information (CBI)

Specific Pipeline Attributes API and AOPL Support Moving Forward On

Pipe Diameter

- AOPL and API request that PHMSA clarify “nominal diameter of pipe segment” as predominant nominal diameter in a given segment.

- Phase Approach: Phase 1
- Security Classification: Public NPMS Viewer

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“Predominant”

API and AOPL suggest that PHMSA define the term predominant as follows:

“On a per mile basis, the most utilized pipe characteristic on a pipeline segment.”

(e.g., predominant coating type would be the coating that was used to the greatest extent as compared to other coatings)

Pipe Grade

- PHMSA should only collect information regarding the predominant pipe grade.

- Phase Approach: Phase 2
- Security Classification: PIMMA

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Leak Detection

- PHMSA should ensure that multiple leak detection methods are available for selection, that all current leak detection methods can be accounted for, and that newer technologies also can be easily incorporated into the system.

- Phase Approach: Phase 2
- Security Classification: PIMMA

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Pipe Coating

- PHMSA should clarify that it seeks only the predominant pipe coating type
- PHMSA should also align its coating types with commonly used names

- Phase Approach: Phase 3
- Security Classification: PIMMA

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Pipe Material

- PHMSA should clarify that it seeks only the predominant pipe material.

- Phase Approach: Phase 1
- Security Classification: NPMS Public Viewer

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Join Method

- PHMSA should clarify that it seeks only the predominant join method

- Phase Approach: Phase 2
- Security Classification: PIMMA

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Year of Construction

- PHMSA should clarify that year of repairs and replacements are not sought, and that only the original year of pipe construction is sought unless more than 50% of the segment has been replaced or repaired.
- Older pipe should be submitted by decade of construction, not the year.
- Phase Approach: Phase 1
- Security Classification: PIMMA

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Onshore/Offshore

- PHMSA should provide the shapefile for onshore/offshore designations. PHMSA should also provide advice on how to characterize pipe segments that cross both onshore and offshore locations.

- Phase Approach: Phase 1
- Security Classification: Public NPMS Viewer

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Inline Inspection (ILI)

- PHMSA should indicate on the PIMMA viewer that ILI is not suitable for all pipelines, and PHMSA should note for which pipeline segments ILI assessments are required versus voluntary.

- Phase Approach: Phase 1
- Security Classification: PIMMA

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Wall Thickness

- PHMSA should clarify it is seeking predominant wall thickness

- Phase Approach: Phase 1
- Security Classification: PIMMA

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Seam Type

- PHMSA should clarify it is seeking predominant seam type

- Phase Approach: Phase 2
- Security Classification: PIMMA

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Abandoned Pipeline

- Providing information about the location of abandoned pipeline would be achievable, if applied prospectively.

- Phase Approach: Phase 1
- Security Classification: Public NPMS Viewer

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Installation Method if Pipe Crosses Body of Water Greater than 100 Feet in Width

- Compilation of this attribute for existing pipelines would be extremely challenging. It would be more achievable if it was applied prospectively.

- Phase Approach: Phase 2
- Security Classification: PIMMA

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Facility Response Plan

- PHMSA should clarify that only the response plan number, and not the plan itself, is sought.

- Phase Approach: Phase 1
- Security Classification: PIMMA

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Breakout Tanks

- Breakout tank locations can be integrated into the NPMS system

- Phase Approach: Phase 1
- Security Classification: PIMMA

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GIS Positional Accuracy

- 5 foot accuracy across all pipeline segments is not achievable at this time with current technologies

- A 50 foot accuracy for all segments by 2019 is a more reasonable and achievable goal

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Conclusion

- PHMSA should consider technology capabilities, security and commercial concerns, and operator expense and resources when implementing its ICR.
- A working group comprised of PHMSA, state regulators, the public, and industry representatives would provide the proper forum to further discuss appropriate additions to NPMS.
- API and AOPL look forward to working with PHMSA to update the NPMS system.

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