

**Department of Transportation
Office of the Chief Information Officer**

**Supporting Statement
“National Pipeline Mapping System Program,”**

Docket No. PHMSA-2010-0246

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests the Office of Management and Budget (OMB) approval of revisions made to the currently approved information collection 2137-0596 entitled “National Pipeline Mapping System Program.” The existing authorization to collect mapping information under this OMB Control No. expires on March 31, 2020.

Part A. Justification

1. Circumstances that make collection of information necessary.

The Pipeline Safety Improvement Act of 2002 (Pub. L. 107–355), 49 U.S.C. 60132, “National Pipeline Mapping System,” enacted on December 17, 2002, requires, the operator of a pipeline facility (except distribution lines and gathering lines) to provide information to the Pipeline and Hazardous Safety Administration (PHMSA). Each operator is required to submit geospatial data appropriate for use in the National Pipeline Mapping System or data in a format that can be readily converted to geospatial data; the name and address of the person with primary operational control (to be known as its operator), and a means for a member of the public to contact the operator for additional information about the pipeline facilities it operates.

2. How, by whom, and for what purpose is the information used.

The data being requested is the first substantial update to NPMS submission requirements since the NPMS standards were developed in 1998. The NPMS is PHMSA's only dataset which tracks where pipe characteristics occur, instead of how much/how many of those characteristics are in PHMSA's regulated pipelines. PHMSA seeks to reduce duplication and will consider the impact on the tabular data submitted through the annual reports once the data elements described in this notice are being collected.

In PHMSA's last Congressional reauthorization, Section 60132(a) stated that PHMSA has the power to collect "any other geospatial or technical data, including design and material specifications, which the Secretary determines are necessary to carry out the purposes of this section. The Secretary shall give reasonable notice to operators that the data are being requested." The National Transportation Safety Board (NTSB) recommendation P-11-8 states that PHMSA should "require operators of natural gas transmission and distribution pipelines and hazardous liquid pipelines to provide system-specific information about their pipeline systems to the emergency response agencies of the communities and jurisdictions in which those pipelines are located. This information should include pipe diameter, operating pressure, product transported, and potential impact radius."

Specifically, the new data elements will:

- Aid the industry and all levels of government, from Federal to municipal, in promoting public awareness of hazardous liquid and gas pipelines and in improving emergency responder outreach. Currently, 787 Federal officials, 1,208 state officials and 4,791 county officials have access to the online mapping application. Providing these officials with an improved NPMS, containing system-specific information about local pipeline facilities, can help ensure emergency response agencies and communities are better prepared and can better execute response operations during incidents.
- Permit more powerful and accurate tabular and geospatial analysis, which will strengthen PHMSA's ability to evaluate existing and proposed regulations as well as operator programs and/or procedures.

- Strengthen the effectiveness of PHMSA’s risk rankings and evaluations, which are used as a factor in determining pipeline inspection priority and frequency.
- Allow for more effective assistance to emergency responders by providing them with a more reliable, complete dataset of pipelines and facilities.
- Provide better support to PHMSA’s inspectors by providing more accurate pipeline locations and additional pipeline-related geospatial data that can be linked to tabular data in PHMSA’s inspection database.
- Better support PHMSA’s research and development programs by helping to predict the impact of new technology on regulated pipelines.

Detailed information on specific attributes (data elements) follows:

Pipe diameter

Knowing the diameter of a pipeline can help emergency responders determine the impact area of a pipeline in the event of a release. This attribute also gives PHMSA the opportunity to gain a broader understanding of the sizes of pipe being operated in any given geographic region, and to further assess potential impacts to public safety and the environment.

Wall thickness

PHMSA analysts and inspectors identified this as a fundamental piece of descriptive information for pipeline risk. This information is especially critical for determining the relative risk of corrosion.

Commodity detail

This level of detail is required because of potential differences in leak characteristics, rupture-impacted hazardous areas and a pipeline's internal integrity. Emergency responders will also be able to better respond to pipeline incidents if they are prepared for the commodity which is being transported.

Pipe Material

Knowing the pipe material helps PHMSA determine the level of potential risk from excavation damage and external environmental loads. These can also be factors in emergency response planning.

Pipe grade

This information is essential in issues regarding pipe integrity, and is a necessary component in determining the allowable operating pressure of a pipeline.

Pipe Join Method

PHMSA analysts and inspectors would use this information to identify high-risk joining methods and will be used in PHMSA's risk rankings and evaluations. These models are used to determine pipeline inspection priority and frequency.

Seam Type

This information is used to determine which type of integrity management inspection assessment should apply, is important for risk analysis due to certain time-dependent risky seam types (e.g. LFERW), and is used to confirm MAOP/MOP.

Onshore/Offshore

As there is no universally accepted onshore/offshore boundary, comparisons between the NPMS (PHMSA-generated) offshore mileage statistics and operator-generated annual report offshore mileage statistics frequently do not match. This collection will allow PHMSA to standardize and compare the statistics for regulatory purposes.

Inline inspection (yes/no)

PHMSA considers inline inspections of pipelines to be better, safer, and more cost effective than other inspection methods. Knowing this information will help PHMSA determine the percentage of the pipeline industry already employing this practice. ILI information is also useful for tracking progress related to NTSB recommendations P-15-18 and P-15-20 which recommend that all natural gas transmission pipelines be capable of being in-line inspected and that PHMSA “identify all operational complications that limit the use of in-line inspection tools in piggable pipelines.”

Class location

Class location is based upon the number of dwellings within 220 yards on either side of the pipeline in a one-mile segment level. This information is a critical measure of population risk, and is necessary to ensure that integrity management rules are properly applied to high-risk areas. Survey requirements vary based on class location, and this data is valuable for prioritizing, planning, and conducting inspections.

Gas HCA segment

Gas transmission operators must identify High Consequence Areas (HCAs) as defined by 49 CFR §192.903 and §195.450. Pipe segments can be classified as affecting a populated area, an ecologically sensitive area, or a sole-source drinking water area. This information will help emergency responders identify pipelines with greater potential for significant damage. Additionally, these attributes identify pipelines subject to integrity management procedures. PHMSA has explicit statutory authority to map high-consequence assets under 49 U.S.C. 60132(d). Gas operators are only expected to submit information on whether or not that segment is an HCA segment as defined in § 192.903.

Segment could affect an HCA

Operators must identify pipe segments which could affect High Consequence Areas (HCAs) as defined by 49 CFR 192.903 and 195.450. Pipe segments can be classified as affecting a populated area, an ecologically sensitive area, or a sole-source drinking water area. This information will help emergency response planners identify pipelines with greater potential for significant damage. Additionally, it identifies pipelines subject to

integrity management procedures. PHMSA has explicit statutory authority to map high-consequence assets under 49 U.S.C. 60132(d), and NTSB recommendation P-15-5 states that PHMSA should “revise the submission requirement to include HCA identification as an attribute data element to the National Pipeline Mapping System.” This information will be secured by limiting access to government officials to mitigate potential security risks. Because of its unique sensitivity, the Drinking Water USAs will be marked as SSI.

FRP sequence number

Hazardous Liquid operators must submit the Facility Response Plan control number and sequence number for applicable liquid pipeline segments. Access to the relevant facility response plan sequence number through NPMS would be beneficial to first responders in an emergency situation, especially in areas with multiple pipeline facilities. Furthermore, this would greatly reduce the workload of regional offices and even operators tasked with ensuring compliance with response plan regulations. Mapping the FRP sequence numbers allows PHMSA and its partners to identify gaps in compliance, assists with facility response plan reviews and approvals, and enables PHMSA to determine the applicable FRP for any given pipe in the NPMS. Since applicable liquid operators are required to have this information, PHMSA believes it should be minimally burdensome to submit it.

Abandoned pipelines

All gas transmission or hazardous liquid pipelines abandoned after the effective date of this information collection would be required to be part of an operator’s NPMS submission. This information is important for PHMSA inspections, particularly to enforce proper abandonment procedures. PHMSA inspectors have identified incidents in the past involving lines which had been mischaracterized as abandoned. This is a critical integrity management issue as abandoned lines are central to excavation hazards. This data is also necessary to aid PHMSA in evaluating response plans as PHMSA's response to issues with abandoned lines may differ from the responses to active lines. Additionally, there is a high level of public interest in this information.

Pump and compressor stations

Pump and compressor stations are vulnerable areas, and emergency responders and planners need to know their locations for adequate emergency planning. Proximity to a compressor station has also been known to influence the level of stress on nearby segments, making this information valuable for prioritizing inspection resources. Additionally, the stations are often referenced as inspection boundaries for PHMSA's inspectors. Regarding security concerns, this information will be marked as SSI, and PHMSA notes that this information is already available in commercial datasets.

Breakout tanks

Operators are required to submit breakout tank data. As PHMSA regulates these tanks, knowing their locations and attributes is essential. This data will be used to help inspectors locate individual tanks because a tank farm may contain both breakout tanks and other tanks.

Positional accuracy

Hazardous liquid pipeline operators must submit data with a positional accuracy of +/- 50 feet. Gas transmission operators must submit data at +/- 50 feet accuracy for all segments which are in a Class 2, Class 3, or Class 4 area; are within a HCA or have five or more buildings intended for human occupancy or an identified site (See 49 CFR §192.903); within its potential impact radius. All other gas pipeline segments must be mapped to a positional accuracy of +/- 100 feet. The current accuracy requirement of 500 feet dates from 1998, when GPS technology was much less advanced than it is today. Sub-meter accuracy today is standard with GPS devices. The current accuracy requirement does not allow PHMSA to effectively locate a pipeline to the degree needed to respond to environmental and integrity threats. Many pipelines may be present within a 500-foot corridor. It also prevents PHMSA from identifying special features on the pipeline that may be relevant in emergency response. The new positional accuracy requirements will allow PHMSA to improve its emergency response efforts and effectively locate a pipeline to the degree needed to respond to environmental and integrity threats.

Percent SMYS

Commenters argued that PHMSA can calculate this data element with the MAOP/MOP attribute plus pipe grade. However, this is not true in all cases. Where the allowable operating pressure differs from the actual operating pressure, or when the pipe is of unknown or unlisted specification, percent SMYS cannot be calculated. This data element is valuable to PHMSA as it helps show where the pipe material is stressed. PHMSA has a need to see where this attribute changes from year to year to help with risk ranking and inspection planning. PHMSA also uses percent SMYS to determine low and high stress pipelines, class locations, test requirements, inspection intervals, and other requirements found in the pipeline safety regulations. Information regarding SMYS is needed to determine whether a pipeline falls within cautionary ranges. Pipelines that operate at a higher percent SMYS require thorough analysis with risk ranking algorithms.

Decade of Installation

This information allows PHMSA to identify aging pipes that may be potential “weak links” in a system. Collecting this information geospatially allows PHMSA to run risk-ranking algorithms and target pipeline inspections.

Assessment Method and Assessment Year

The assessment method (reported as ILI = Inline Inspection, DIR = Direct Assessment Method, or PT = Hydrostatic Pressure Test) and assessment year provide valuable information on pipeline risk, and assist inspectors in researching whether an operator has been compliant with PHMSA regulations. This information is also valuable for decision support and research on the impact and burden of existing and future regulations.

Coated/Uncoated and Cathodic Protection (yes/no)

Understanding the level of coating and whether cathodic protection is in place helps PHMSA to assess pipe integrity and risk. A pipe’s coating relates to the level of protection from external corrosion a pipe has while in the ground.

Gas Storage Fields

Under 49 U.S.C. § 60102(a)(2), the Secretary of Transportation has the authority to “proscribe minimum safety standards for pipeline transportation and for pipeline facilities.” Pursuant to 49 U.S.C. § 60101(a)(19), “pipeline transportation” means “transporting gas and transporting hazardous liquid”; under 49 U.S.C. § 60101(a)(21)(A), transporting gas is defined as “[t]he gathering, transmission, or distribution of gas by pipeline, or the storage of gas, in interstate or foreign commerce.” (emphasis added). Pursuant to 49 U.S.C. §§ 60101(a)(19), 60101(a)(21)(A), and 60102(a)(2), PHMSA has the authority to set forth minimum safety regulations for pipeline transportation, which includes the storage of gas. PHMSA therefore elects to continue to include this data element within the NPMS.

Mainline Block Valves

Valve location can assist emergency responders when working with pipeline operators during an emergency, and it is useful to PHMSA inspectors and partners to identify vulnerable points along a pipeline. This data element is critical to review of the Integrity Management Plan P&M measures, Facility Response Plan (FRP) review, and inspection planning, particularly when pipelines that are not horizontal directional drilled cross water bodies greater than 100 feet wide.

Because check valves are Emergency Flow Restriction Devices (EFRDs), information about check valves is critical to PHMSA’s ability to assess an operator’s worst case discharge, emergency response times, and blow-down times. PHMSA’s Emergency Support and Security division will use this data element to double-check the drain down volume variable used in calculating the pipeline worst case discharge volume in Facility Response Plans.

3. Extent of automated information collection.

As of September 30, 2007, pipeline operators may no longer submit paper maps. The data must be submitted electronically to PHMSA via the National Pipeline Mapping

System National Repository. PHMSA advises operators to refer to the NPMS operator standards manual for guidance on acceptable formats and specifications.

4. Efforts to identify duplication.

There is no duplication, as the information requested is not required by any other source. Each response is unique and information derived from one may not be inferred to another.

5. Efforts to minimize the effects on small business.

PHMSA expects impacted operators to be large and small businesses and therefore the requirement may impact small businesses. PHMSA works with any entity, including small businesses, which may have a problem submitting data to help them find the best way to submit the requested information in an acceptable format.

6. Impact of less frequent collection of information.

PHMSA would not be able to appropriately and properly assess the status and related location considerations without the proposed information collection. Less frequent information collection could compromise the safety and economic viability of the U.S. pipeline system.

7. Special circumstances.

No special circumstances apply with this regulation.

8. Compliance with 5 CFR 1320.8.

PHMSA has published a series of notices in the Federal Register over the past few years regarding the proposed changes to this information collection. PHMSA published the first 60 Day Notice (79 FR 58863) on September 30, 2014. PHMSA followed that notice

with another 60 Day Notice (80 FR 52084) on August 27, 2015. PHMSA published a 30-Day Notice (81 FR 40757) on June 22, 2016, in response to which, PHMSA received several comments. A summary of the comments received, along with PHMSA's responses, is included with this information collection request.

9. Payments or gifts to respondents.

The disbursement of payment and gifts is not applicable to this information collection.

10. Assurance of confidentiality.

PHMSA does not have the authority to guarantee confidentiality.

11. Justification for collection of sensitive information.

It is essential for PHMSA and its partners to know where pipelines are located in order to accurately respond to emergencies and safety issues concerning pipelines. Information that has been categorized as either SSI or for government users only is shared only with qualified government entities and is not made available to the public.

12. Estimate of burden hours for information requested.

PHMSA estimates that this information collection affects a community of 1,346 operators who are currently submitting mapping information. A breakdown of the burden estimate by category is listed below:

PHMSA estimates that this information collection affects a community of 1,346 operators who are currently submitting mapping information. PHMSA will collect the required data elements in three phases. Phase 1 data will be collected the first submission year after the effective date, Phase 2 data will be collected the second submission year after the effective date, and Phase 3 data will be collected in 2024.

A breakdown of the burden estimate and the phase of submission for each requested attribute are listed below:

- **Pipe diameter – In GIS/ Phase 1/ 5,384 burden hours**

PHMSA estimates that it will take 1,346 operators 4 hours each to submit pipe diameter data for an **overall burden estimate of 5,384 {1,346 operators *4 hours} hours.**

- **Wall thickness – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Commodity detail – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Pipe material – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Pipe grade – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Pipe Join Method – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Seam Type – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Onshore/Offshore – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Inline inspection (yes/no) – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take

1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Class location – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Gas HCA segment – In GIS/ Phase 1/ 2,165 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA understands that some attributes do not apply to the entire community of pipeline operators. There are approximately 866 natural gas operators. Operators of gas pipeline systems are required to submit system-specific attributes. This includes Gas HCS segments. PHMSA estimates that it will take 866 gas operators 2.5 hours each to extract and submit this data for an **overall burden of 2,165 {866 operators * 2.5 hours} hours.**

- **Segment could affect an HCA – In GIS/ Phase 2/ 862.5 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA understands that some attributes do not apply to the entire community of pipeline operators. There are approximately 345 liquid pipeline operators. Operators of liquid pipeline systems are required to submit system-specific attributes. This includes segments that could affect an HCA. PHMSA estimates that it will take 345 liquid pipeline

operators approximately 2.5 hours each to extract and submit this data. This will result in an **overall burden of 862.5 {345 operators*2.5 hours} hours.**

- **FRP sequence number – Not found in GIS/ Phase 2/ 765 burden hours**
PHMSA does not expect this data attribute to be found in operators' GIS systems. As such, operators will not be required to submit this data until Phase 2 of this data collection. There are approximately 345 liquid pipeline operators who are required to submit system-specific attributes. These attributes include Facility Response Plans (FRP). PHMSA currently estimates that of the 345 liquid operators only 255 liquid operators will submit data on their Facility Response Plans. PHMSA estimates that it will take each of these operators 3 hours to extract and submit this data. This will result in an **overall burden estimate of 765 {255 operators *3 hours} hours.**
- **Abandoned pipelines – In GIS/ Phase 1/ 488 burden hours**
Based on past reporting trends, PHMSA anticipates 5 percent (approximately 61 operators) of operators will submit data on abandoned lines each year. PHMSA estimates that it will take each of these operators 8 hours to extract and submit the requested data associated with these lines which results in an **overall burden of 488 {61 operators *8 hours} hours.**
- **Breakout tanks – Often found in GIS/ Phase 1/ 10,768 hours**
PHMSA estimates that it will take operators 8 hours per attribute to collect, extract, and submit the data for an **overall burden of 10,768 {1,346 operators *8 hours} hours.**
- **LNG Plants – In GIS/ Phase 2/ 3,320 hours**
Currently 83 operators have identified that they have LNG plants within their system. PHMSA estimates that it will take these 83 operators 40 hours each to extract and submit data relating to the location of their LNG plants. This will result in an **overall burden of 3,320 {83 operators * 40 hours} hours.**

- **Positional accuracy – Often found in GIS/ Phase 3/ 872,025 overall burden hours/ 124,575 annual burden hours**

PHMSA will collect data on positional accuracy in Phase 3. Operators will have seven (7) years from the effective date of this collection to submit data on the positional accuracy of their center lines. Operators may choose to submit the data at once or in increments over the allotted period.

Positional Accuracy for Operators with 500 miles or more: PHMSA understands that larger operators will carry a higher burden than smaller operators due to the number of pipeline segments to be accounted for. 12% of operators (162 total) have pipeline systems greater than 500 miles. PHMSA estimates that it will take these large operators a year (or 2,100 hours) to extract and submit the data on positional accuracy. This results in an **overall burden of 340,200 hours {162 operators *2100 hours}** for operators with more than 500 miles of pipe.

PHMSA has agreed to allow operators up to seven (7) years to submit this data. With the actual burden being spread over a 7-year period, PHMSA estimates the **annual burden to collect this attribute to be 48,600 hours.**

Positional Accuracy for Operators with less than 500 miles: PHMSA estimates that 1,184 operators will submit data on systems cover less than 500 miles. PHMSA estimates that it will take operators of these smaller systems 3 months (525 hours) to extract and submit data on positional accuracy. This will result in an **overall burden 621,600 {1,184 operators *525 hours} hours.** As with the operators of large systems, PHMSA has agreed to allow operators of smaller systems up to seven (7) years to submit this data. With the actual burden being spread over a 7-year period, PHMSA estimates the **annual burden to collect this attribute to be 88,800 hours.**

- **Decade of Installation – In GIS/ Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Assessment Method – In GIS/ Phase 2/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Coated/Uncoated and Cathodic Protection – In GIS/Phase 1/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Assessment Year - In GIS/Phase 2/ 3,365 hours**

PHMSA believes this attribute is already being collected by pipeline operators through their GIS systems and that the burden of extracting this data from the GIS system and submitting to PHMSA is minimal. PHMSA estimates that it will take 1,346 operators 2.5 hours each to extract and submit this data for an **overall burden of 3,365 {1,346 operators * 2.5 hours} hours.**

- **Gas Storage Fields – Not Found in GIS/Phase 2/ 6,928 hours**

There are approximately 866 natural gas operators. Operators of gas pipeline systems are required to submit system-specific attributes. This includes Gas

Storage Field Location. PHMSA estimates it will take each of the 866 natural gas operators 8 hours per operator to extract and submit this data for an **overall burden estimate of 6,928 {866*8}hours.**

Majority of the requested attributes only need to be submitted once. After the initial submission, PHMSA only requires submission of any changes to the data due to changes in the system such a buying or selling segments, new construction, commodity changes, etc. PHMSA estimates that 30% of operators will fall into this category each year resulting in a 70% burden reduction in these categories during subsequent years. PHMSA estimates that there will be no burden reduction in subsequent years for Abandoned Pipelines because the burden estimate is based on the percentage of operators who abandon lines on an annual basis.

Because of this phased approach, PHMSA expects the overall burden of this collection in the first three years to be 486,625 hours. This will result in an *annual* burden average, during the first three years of this collection, of 162,208 hours. A breakdown of this estimation is listed in the table below:

Burden Year 1	Burden Year 2	Burden Year 3	3 Year Burden Average
193,220 hours	156,005 hours	137,400 hours	162,208 hours

Upon renewal of this collection, the estimated burden will be revised to include the remaining burden associated with the reporting of Positional Accuracy data during years 4-6.

A GIS team member is estimated to perform the extraction and uploading of the requested data at a rate of \$65 per hour. Based on the annual average of 162,208 hours, the total cost for this information collection over three years is \$31,630,625.00 {420, 516 hours * \$65 per hour}.

13. Estimate of total annual costs to respondents.

PHMSA does not anticipate any costs other than those detailed in question number 12.

14. Estimate of cost to the Federal Government.

There are infrastructure and labor costs associated with receiving, processing, storing, and disseminating the new geospatial data. PHMSA must modify its databases, scripts, and tools to accept and process the new data. Additional hardware and software may be required to store, process, analyze, and display the larger dataset. Programming is necessary to add the new data to the online mapping applications and to modify custom tools. More labor hours will be needed to process the data, perform change detection, and resolve issues. PHMSA estimates the cost of these modifications to be approximately \$1.1 million.

15. Explanation of program changes or adjustments.

PHMSA has found that the current data accuracy and minimal set of attributes included with NPMS submissions no longer meet its needs, and requires more accurate and complete information about a pipeline, LNG plant, or breakout tank. To increase data

accuracy, PHMSA is revising this information to collect additional information with a greater level of granularity. Changes to the currently approved burden estimates are described in the table below:

	Current	Proposed
Responses	1,343	1,346
Annual Avg. Burden	17,043 hours	162,208 hours

16. Publication of results of data collection.

There is no publication of this collection.

17. Approval for not displaying the expiration date for OMB approval.

PHMSA is not requesting approval to not display the OMB approval expiration date.

18. Exceptions to certification statement.

There are no exceptions to the certification statement.