April 5, 20

The Honorable Sam Graves
Chair, Committee on Transportation and Infrastructure
United States House of Representatives
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member, Committee on Transportation and Infrastructure
United States House of Representatives
Washington, DC 20515

Dear Chairman Graves and Ranking Member Larsen,

The undersigned organizations represent construction contractors, manufacturers, distributors and other service providers, pipeline operators, labor unions and others engaged in construction of underground facilities, and have a vested interest in pipeline safety. As the House Transportation and Infrastructure Committee develops the next Pipeline and Hazardous Materials Safety (PHMSA) reauthorization measure, we offer the perspective from the industries responsible for planning, building and repairing distribution and transmission pipeline infrastructure across the country.

Ensuring for a safe worksite is fundamental to the pipeline industry, and damage prevention to underground facilities is critical in achieving that goal. The PIPES Act of 2020 included language that would require operators of gas distribution pipelines to identify and manage traceable, reliable, and complete records, *including* maps and other drawings. Accurate mapping of underground facilities essential to accurate and timely locating, and use of geographic information systems (GIS) is the most effective way to identify and document a wide range of data about the underground infrastructure in a given area.

GIS can create, manage, visualize, analyze, and map different layers of data by creating maps and scenes related to underground facilities. GIS connects data to a map, integrating location data with a range of limiting information regarding the subsurface facilities in that area, and it allows for layering of data tied to geographic points. Rather than restricting the user to limited features on a static map, GIS mapping allows for viewing customizable combinations of data layers in a single dynamic tool.

Referencing and integrating data within a spatial context (GIS) helps provide pipeline operators with a definitive view or “digital twin” of their pipeline systems for optimized asset knowledge management. Ensuring the use of readily available GIS mapping technologies to the extent possible would be the most efficient way to identify and document the exact location of underground pipelines (as well as other subsurface infrastructure). This precise mapping system is an increasingly utilized to ensure for the accurate locating and marking of underground facilities.

While there is interest in the pipeline construction industry in requiring use of GIS mapping, we understand that a federal mandate would be problematic for certain pipeline operators, particularly for small operators and operators of pipelines subject to new or pending federal regulations. However, PHMSA offers funding opportunities that focus on a range of pipeline safety issues, including those that encourage the development of new technologies and help municipality and community-owned utilities improve and maintain safe pipeline infrastructure.

Specifically, PHMSA's Technical Assistance Grants (TAG) program provides funding for a broad range of activities, including improvement of safe digging programs. The undersigned organizations would support language in the next PIPES Act that would promote use of GIS mapping by distinguishing GIS as a priority in appropriate PHMSA grant programs.

Efficient GIS houses asset information, construction, inspection, integrity management, regulatory compliance, risk analysis, history, and operational data that many pipeline companies have deemed mission-critical to successfully managing natural gas, hazardous liquids, renewables and water pipelines. Knowing where pipelines are and what's around them is critical to pipeline safety, and GIS mapping offers the most effective way to document and update important data associated with the location of pipeline and other underground facilities.

We appreciate your consideration of this important issue as the 118th Congress begins its work in earnest, and we stand ready to provide information on these matters and work with the committee to provide sound energy policy at this critically important time.

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