

August 23, 2019

U.S. Department of Energy
1000 Independence Ave. SW
Mailstop OE-20
ATTN: Office of Electricity, Guidance for Enhancing Oil and Natural Gas Resilience
Washington, DC 20585

Re: Guidance for Enhancing Oil and Natural Gas Resilience

Sent via email to oilandgas.resilience@hq.doe.gov

NACE International is pleased to respond to the U.S. Department of Energy RFI published in the July 9, 2019 Federal Register to gather "relevant consensus-based codes, specifications, and standards" and other pertinent materials which may provide guidance for enhancing the physical and operational resilience of oil and natural gas infrastructure relative to cyber, physical and weather threats. NACE International has been publishing industry consensus standards concerning corrosion control and mitigation for fifty years, since 1969. Corrosion presents a significant threat to all types of infrastructure including pipeline operations, fuel distribution and delivery services. While corrosion is caused by a material's interaction with its environment, corrosion may be accelerated by severe weather events.

NACE International's standards portfolio includes 176 standards and 70 technical reports. More than 300 technical committees comprised of over 4300 subject matter experts from over 20 countries lend their expertise to develop standards that help preserve the longevity of products and infrastructure. Utilizing an established process, NACE technical committees develop and maintain standard practices, material requirements, test methods and technical reports which support the needs of numerous industries including oil and gas infrastructure, electrical and utilities infrastructure, transportation infrastructure, and maritime. NACE International is accredited by the American National Standards Institute (ANSI) and as such adheres to *ANSI Essential Requirements: Due process requirements for American National Standards*, which includes provisions for openness, consensus, balanced decision-making, transparency, and due process. As the premier authority for corrosion control solutions, NACE's standards program is utilized by both private industry and government agencies to ensure safety and integrity of assets through design standards as well as maintenance and inspection.

The DOE is invited to consider the attached spreadsheet of over 50 NACE documents as relevant consensus-based standards and reports that may provide guidance for enhancing the physical and operational resilience of the oil and natural gas infrastructure.

NACE International appreciates the opportunity to provide comments and would be pleased to work with the DOE to provide additional information on the corrosion standards which might support the RFI for codes, standards, specifications and other guidance for enhancing the resilience of electric infrastructure systems against severe weather events. If you require additional information, please do not hesitate to contact me at Edward.manns@nace.org.

Sincerely,



Edward M. Manns
Director, Standards and Strategic Technical Initiatives
NACE International