



VIA ELECTRONIC FILING

December 4, 2020

Mr. Alan Mayberry
Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: Docket No. PHMSA-2019-0199, *Pipeline Safety: Midstream Facilities Frequently Asked Questions*; 85 Fed. Reg. 70124 (Nov. 4, 2020)

Dear Mr. Mayberry:

On November 4, 2020, the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a notification and request for comments in the *Federal Register* in the above-captioned proceeding (Notice). The Notice indicated that PHMSA was making available, for public comment, a draft set of frequently asked questions (FAQs) concerning federal oversight of midstream processing facilities. PHMSA asked that those comments be submitted within 60 days, no later than January 4, 2021.

Pursuant to 49 C.F.R. § 190.319, and consistent with 49 C.F.R. § 5.41, the the American Petroleum Institute, Association of Oil Pipe Lines, GPA Midstream, Interstate Natural Gas Association of America, and American Gas Association (“Commenters”) respectfully request that PHMSA extend the original comment deadline by 45 days, until February 18, 2021. The Commenters believe there is good cause for an extension given the inherent complexity of the FAQs, in that they affect both hazardous liquids (Part 195) and gas (Part 192), as well as to allow additional time to develop a coordinated set of comments that reflect the efforts of the various industry stakeholders potentially affected by the FAQs. The Commenters note that there is no indication that granting the extension would adversely affect the rights of any other interested parties or impair PHMSA’s ability to discharge its obligations under the Pipeline Safety Laws or Regulations. Furthermore, allowing additional time for development of fulsome public comment would be consistent with the public interest.

The undersigned thank you for your consideration of this request. Please contact us if you have any questions whatsoever in this regard.

Respectfully Submitted,



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