

December 6, 2018

Dave Murk  
Manager, Pipelines  
Midstream and Industry Operations  
American Petroleum Institute  
1220 L Street, NW  
Washington, DC 20005

Matthew Hite  
Vice President of Government Affairs  
GPA Midstream Association  
229 1/2 Pennsylvania, SE  
Washington, DC 20003

U.S. DOT Docket Management System  
Docket No. PHMSA-2011-0023  
U.S. Department of Transportation  
West Building Ground Floor  
Room W12-140  
1200 New Jersey Ave., SE  
Washington, DC 20590

**RE: Correction to Joint Position Paper of the American Petroleum Institute and GPA Midstream Association on “Pipeline Safety: Safety of Gas Gathering Pipelines,” RIN 2137-AF38**

On December 4, 2018, the American Petroleum Institute (API) and GPA Midstream Association (GPA) submitted a joint position paper on the Pipeline and Hazardous Material Safety Administration’s (PHMSA) proposed changes to the federal safety standards and reporting requirements for gas gathering pipelines. Please be advised that the proposed regulatory text for 49 C.F.R. § 192.9(c) on page 19 contained a typographical error.

Consistent with the joint industry comments submitted previously submitted on June 6, 2018, the proposed regulatory text should read as follows:

**§ 192.9 What requirements apply to gathering lines?**

\* \* \* \* \*

(c) *Type A lines*. An operator of a Type A, Area 1 regulated onshore gathering line must comply with the requirements of this part applicable to transmission lines, except the requirements in §§ 192.5(d), 192.13, 192.67, 192.127, 192.150, 192.205, 192.227(c), 192.285(e), 192.319, 192.461(f), 192.465(f)-(g), 192.473(c),

192.478, 192.485(c), 192.493, 192.506, 192.607, 192.613(c), 192.619(e)-(f), 192.624, 192.710, 192.711, 192.712, 192.713, 192.714, 192.750, and in subpart O of this part. However, an operator of a Type A, Area 1 regulated onshore gathering line in a Class 2 location may demonstrate compliance with subpart N by describing the processes it uses to determine the qualification of persons performing operations and maintenance tasks.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Murk".

David Murk  
Pipeline Manager, Midstream  
American Petroleum Institute  
1220 L Street, NW 900  
Washington, DC 20005

A handwritten signature in black ink, appearing to read "Matthew Hite".

Matthew Hite  
Vice President of Government Affairs  
GPA Midstream Association