

May 13, 2015

The Honorable John Barrasso United States Senate 307 Dirksen Senate Office Building Washington, D.C., 20510 The Honorable Heidi Heitkamp United States Senate 110 Senate Hart Office Building Washington, D.C., 20510

Dear Senators Barrasso and Heitkamp:

GPA is the leading organization advocating for midstream operations. GPA has served the U.S. energy industry since 1921 as a non-profit trade association composed of 122 midstream energy companies that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as "midstream activities." Such processing includes the removal of impurities from the raw gas stream produced at the wellhead, as well as the extraction for sale of natural gas liquid products (NGLs) such as ethane, propane, butane and natural gasoline. GPA members account for more than 90 percent of the NGLs produced in the United States from natural gas processing. Gathering lines are the essential mode of transportation for GPA members operations who represent at least 85,197 direct jobs. GPA members processed approximately 50 billion cubic feet per day of natural gas in 2013, produced 937,591,000 barrels of NGLs in 2013, and own or operate at least 470 natural gas processing plants in the United States.

We want to thank you for your leadership on S.411, the *Natural Gas Gathering Enhancement Act*. This bill would set deadlines for, and expedite the permitting of, natural gas gathering lines located on federal land and Native American land. We recognize that the siting of natural gas gathering lines located on federal land and Native American land can be challenging due to permitting delays. Depending on the needed infrastructure, an inability to obtain required rights-of-way permits on federal or Native American lands can lead to venting and flaring of oil and gas wells whether or not the wells are located on federal land or Native American land. Expediting right-of-way permits on federal and Native American lands for natural gas gathering lines will reduce the need for venting and flaring and would thereby reduce emissions. Furthermore, expediting permits will increase economic development, provide a safe mode of transportation, and provide the needed energy infrastructure that is critical to ensuring America's energy security.

GPA supports S. 411 but believes the bill can be enhanced with two needed additions. We believe that these additions would be in line with the intent of the proposed legislation. The first is editing the definition of "gathering lines" to include all the lines that may be used for gathering. Specifically, our members frequently run up to three lines in their gathering line systems, one for natural gas, one for water, and one for oil. Our members need all three lines for their processing operations. Any effort to improve permit streamlining for natural gas operations on federal land and Native American lands would need to include all three lines for the permit streamlining to have the most impact since all three lines are needed for a gas

gathering system. The second edit we would suggest is improving the bill to make the term "compressor" plural. A number of our gathering systems run on multiple compressors so leaving the term "compressor" singular could potentially only address a portion of a gathering line.

Please feel to contact me at (202)279-1664 or <a href="mailto:mhite@gpaglobal.org">mhite@gpaglobal.org</a> should you have any questions or comments regarding the GPA's requested additions to S.411.

Respectfully submitted,

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Gas Processors Association