



April 8, 2015

Jeff Wiese
Associate Administrator, Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
Mail Stop: E24-455
(PHP-1 / Room E22-326)
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Use of Composite Materials

Dear Mr. Wiese:

The Gas Processors Association (GPA), a non-profit trade association, has 130 corporate members engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to as "midstream activities" in the industry. Our membership operates over 300,000 miles of gas gathering pipelines in the US. Providing PHMSA with a clear understanding of the midstream industry's desire to have an opportunity to comment on any proposal to further regulate onshore gas gathering lines and the option to use composite materials is the objective of this letter.

Advancements in technology have spurred not only a new opportunity to develop resources not previously economical to capture, but have furthered the development of new generation of pipeline materials for onshore applications using technology developed for harsh deep water offshore environments and adaption of materials developed for the aerospace industry. However, uncertainty surrounding PHMSA's intentions to regulate certain sectors of the industry or to what level of regulation, creates hesitation in infrastructure development. Not fully understanding PHMSA's position on the acceptance of these composite materials has hindered their more widespread use, even though they may provide risk reduction.

In August 2011, PHMSA issued an Advanced Notice of Proposed Rulemaking indicating areas within the regulations that it felt needed enhancement, clarity, or changes to address a change in perceived risk, particularly associated with the development of unconventional shale plays and the large diameter, higher pressure gathering lines related to those developments. In the ANPRM, PHMSA sought input regarding the appropriate risk factors for consideration should it decide to propose further regulatory oversight. The uncertainty created by the delay in publishing its Notice of Proposed Rulemaking titled "*Safety of Gas Transmission and Gathering Lines*" adds reluctance to use of these pipe materials in non-regulated service as well.

Many operators are using these materials in applications that are not transported-related, i.e. water and production flow lines, or in locations that will clearly never experience a class location increase to Class 2 or greater. However, many have expressed a desire to expand their use for a variety of reasons, such as the rapid installation ability and a smaller environmental impact footprint associated with the construction phase. Additionally, they provide superior resistance to internal corrosion threats.

It has been over 43 months since publication of ANPRM. Publishing the NRPM would provide industry an opportunity to see the proposal, gain insight regarding the direction PHMSA believes is necessary, and begin formulating the appropriate responses. It would also provide some level of certainty that pipes of a certain diameter and smaller are not targeted by regulation and that selection of pipe materials not yet recognized in the regulations are a safe investment from a regulatory perspective should an operator elect to exercise this option.

Broader acceptance of these materials in regulated service would task PHMSA with amending the regulations to recognize the use of composite materials. There is an "in-progress" work product under the auspices the American Petroleum Institute (API) for the development of an API Manufacturing Specification (API 15S). The Standard has been balloted for a second time and will soon face completion of the comment resolution process. PHMSA has been an active participant in the development of the standard with the possibility of Incorporating by Reference (IBR) the document upon satisfactory completion.

PHMSA has stated on several occasions, hearing from the "regulated industry" concerning their desire to use these products would help demonstrate the need to move forward with a rulemaking. We, the members of GPA, strongly support PHMSA moving forward with development of a rulemaking which recognizes pipe products manufactured in accordance with the Standard. A rulemaking of this nature would not impose regulatory burden, but provide additional "tools in the toolbox" enabling industry to install infrastructure that is based on sound engineering, removes the threat of internal corrosion, and has the potential to reduce the environmental impact of construction activities.

Respectfully,



Mark Sutton
President and CEO
Gas Processors Association

MFS/plp