



February 10, 2015

Railroad Commission of Texas  
P.O. Box 12967  
Austin, Texas 78711-2967

Submitted at: [www.rrc.state.tx.us/about-us/resource-center/forms/proposed-form-changes/proposed-form-amendments-pipeline/](http://www.rrc.state.tx.us/about-us/resource-center/forms/proposed-form-changes/proposed-form-amendments-pipeline/)

RE: Proposed Revisions to Form T-4 – *Application for Permit to Operate a Pipeline in Texas*; T-4B, *Pipeline Transfer Certification*

The Gas Processors Association (GPA) appreciates the opportunity to submit comments to the Railroad Commission of Texas (Commission) on the proposed revisions to the T-4 Forms.

GPA has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA is composed of 130 corporate members 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.

GPA believes that the proposed T-4 Form accurately reflects the intent of the rule revision and appreciates the Commission's expediency in revising the form.

We believe the Commission might benefit from including additional contact information, apart from the owner, for the entity that is responsible for construction, operation and maintenance of the pipeline.

We would also like to request that you entertain the addition of a second sentence to **1.(d)(i)** as follows: "*Provide the contact information for the individual who can respond to any questions concerning the pipeline's classification.*"

Thank you again for the opportunity to comment. Please do not hesitate to contact me if you have questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Sutton', is written over a white background.

Mark Sutton  
President  
Gas Processors Association