



American  
Petroleum  
Institute



March 20, 2024

Alan K. Mayberry  
Associate Administrator for Pipeline Safety  
Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
United States

RE: Docket No. PHMSA-2021-0039  
Pipeline Safety: Gas Pipeline Leak Detection and Repair  
Gas Pipeline Advisory Committee Meeting

Mr. Mayberry:

The GPA Midstream Association (GPA) and American Petroleum Institute (API) are writing to you as the Designated Federal Officer (DFO) for the Gas Pipeline Advisory Committee (GPAC). The GPAC is scheduled to hold a public meeting on March 25, 2024, to continue its review of the proposed rule in the above-captioned proceeding, Pipeline Safety: Gas Pipeline Leak Detection and Repair, 88 Fed. Reg. 31,890 (May 18, 2023).

On March 18, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) posted the slides that PHMSA intends to present at the meeting on its website.<sup>1</sup> On page 17 of the slides, PHMSA makes the following statement in discussing 49 U.S.C. § 60132, the statute that authorizes the National Pipeline Mapping System (NPMS) program:

*Similarly, while the mandate for NPMS regulations in 49 U.S.C. 60132 does not explicitly mention gathering pipelines, PHMSA has broad safety authority to apply those regulations to additional types of pipelines.*

GPA and API note that the foregoing statement is not accurate. Section 49 U.S.C. § 60132(a) explicitly references gathering lines (and distribution lines) in providing an exception from the obligation to submit information to the NPMS. To ensure that accurate information is

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<sup>1</sup> <https://primis.phmsa.dot.gov/meetings/MtgHome.mtg?mtg=169>.

presented to the GPAC, GPA and API are respectfully requesting that PHMSA revise the slide or, in the alternative, present the language of 49 U.S.C. § 60132 in its entirety.

Sincerely,

A handwritten signature in black ink that reads "Matthew Hite". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

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Matthew Hite  
Senior Vice President of Government Affairs  
GPA Midstream Association

A handwritten signature in blue ink that reads "Dave Murk". The signature is stylized and cursive, with a large loop at the end.

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Dave Murk  
Senior Director, Pipelines  
Midstream and Industry Operations  
American Petroleum Institute