



May 13th, 2025

Chairman Todd Young
185 Dirksen Senate Office Building
Washington, DC 20510

Ranking Member Gary Peters
554 Dirksen Senate Office Building
Washington, DC 20510

Re: Subcommittee on Surface Transportation, Freight, Pipelines, and Safety hearing titled “Pipeline Safety Reauthorization: Ensuring the Safe and Efficient Movement of American Energy”

Dear Chairman Young and Ranking Member Peters,

On behalf of GPA Midstream (GPA or the Association), we appreciate the opportunity to submit comments on this important hearing, which will review pipeline safety regulations and operations at the Pipeline and Hazardous Materials Safety Administration (PHMSA) and evaluate what policy priorities should be included in an upcoming PHMSA pipeline safety reauthorization. We are grateful for the Subcommittee’s work towards developing pipeline safety legislation.

GPA Midstream has served the U.S. energy industry since 1921 and represents more than 50 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as “midstream activities.” The work of our members indirectly creates or impacts an additional 400,000 jobs across the U.S. economy. In 2023, GPA Midstream members had an economic impact of \$206.2 billion through operating more than 506,000 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 365 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.



Safety is Paramount

Pipeline safety is the top priority of GPA's members. According to the US Department of Transportation, pipelines are the safest way to transport crude oil, refined products, and natural gas over the long distances necessary to deliver energy to everyone who needs it.¹ Midstream companies invest in technological advancements that significantly increase pipeline safety through monitoring operating conditions and product flows. GPA's members are focused on ensuring regulatory compliance and collaborate with other industry stakeholders on proactive, voluntary efforts to further the safety of their assets.

Unleashing American Energy

GPA is appreciative of the Subcommittee's support of pipelines playing a key role in unleashing America's energy independence and ensuring Americans have access to reliable and affordable energy. We look forward to working with all of Congress, as well as the Administration to restore American energy independence. Practical public policy can be implemented to allow for America's energy dominance.

Key Issues and Recommendations

1. Remove duplicative in-plant piping oversight

- GPA asks the Subcommittee to use this opportunity to align gas and liquid in-plant piping exceptions and confirm that all piping within a plant boundary qualifies as in-plant piping and should not be subject to PHMSA oversight.

Many GPA members operate processing, refining, and other types of plant facilities. These facilities include gas piping on plant grounds that serves plant facilities, or transfers gas among adjacent or nearby plants. While the US Code includes exemptions for hazardous liquid in-plant piping systems at production, refining, or manufacturing facilities, gas in-plant piping does not have the clarity of similar exemptions.

¹ "Data and Statistics Overview." PHMSA's Office of Pipeline Safety (OPS). <https://www.phmsa.dot.gov/data-and-statistics/pipeline/data-and-statistics-overview>.



In-plant gas piping systems are a low risk to the public, which supports their exemption from PHMSA regulation. The systems are mostly located within plant boundaries and often operate at lower pressures than cross-country, PHMSA regulated pipelines. Additionally, plant facilities are often subject to other safety regulatory programs, such as the Occupational Safety and Health Administration's (OSHA's) Process Safety Management (PSM) requirements.

2. Appropriate representation on the Gas Pipeline Advisory Committee (GPAC):

- GPA asks that the Subcommittee provide direction to PHMSA to ensure appropriate stakeholders are included in the conversation of regulatory actions that impact gathering and processing.

PHMSA utilizes two technical safety standards committees in its rulemaking efforts, and GPA is appreciative of how these groups support this work. However, during recent rulemaking efforts, which have had significant impacts on the gathering lines GPA members operate, there has been no representation from a stakeholder focused on operation of gathering lines.

Given the potential for certain rulemakings to substantially impact GPA members, either positively or negatively, representation should be afforded to an operator engaged in gathering and processing.

3. Longer Reauthorization Period:

- GPA requests the Subcommittee reauthorize PHMSA for a longer period.

PHMSA plays a critical role in ensuring the safe transportation of natural gas and liquids across the United States. Extending its authorization for a longer time would provide an opportunity for the regulator to complete Congressional mandates before being given other obligations. A longer reauthorization period could also unleash technology adoption and utilization of innovation. While innovation can happen quickly, there needs to be proper time allotted, whether for technology to advance or the market to adopt. Providing more time between reauthorizations will ensure technology can mature to a point for operators to be comfortable to incorporate in their



operations. Lastly, a longer authorization window allows industry stakeholders to gain experience and ensure compliance with new requirements, ultimately benefiting public safety.

Conclusion

Reauthorizing pipeline safety programs is vital for protecting our communities. GPA urges the Subcommittee to consider the recommendations outlined above to support PHMSA's work. Thank you for allowing us to provide this input, and we are happy to be a resource as the legislative process progresses.