

December 18, 2024

Mr. Tristan Brown
Deputy Administrator
Pipeline and Hazardous Materials Safety Administration
(PHMSA)
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. PHMSA-2023-0134, National Environmental Policy Act Implementing Procedures; Proposed Categorical Exclusions

Dear Deputy Administrator Brown,

Pursuant to 49 C.F.R. §§ 190.309 and 190.319, the American Public Gas Association, the American Gas Association, the American Petroleum Institute, the GPA Midstream Association, the Interstate Natural Gas Association of America, and the Liquid Energy Pipeline Association (the Associations) are writing to request a comment extension for PHMSA's Request for Comment regarding its proposal to establish new categorical exclusions and agency implementing procedures consistent with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ).

The Associations believe it is important to provide clear and comprehensive comments to PHMSA regarding the agency's NEPA implementation procedures given the recent D.C. Circuit Court of Appeals ruling on *Marin Audubon Society v. the Federal Aviation Administration* on November 12, 2024¹. During the December holiday season, the appropriate subject-matter-experts at the Associations have limited availability, making it challenging to provide meaningful comments on this important issue.

For these reasons, the Associations respectfully request a comment extension of 46 days to February 25, 2025.

Thank you for your consideration of this request. Please contact us if you have any questions.

Respectfully submitted,
American Public Gas Association
American Fuel and Petrochemical Manufacturers
American Gas Association
American Petroleum Institute
GPA Midstream Association
Interstate Natural Gas Association of America
Liquid Energy Pipeline Association

¹ *Marin Audubon Society v. Federal Aviation Administration*, Department of Transportation and the National Park Service, U.S. Department of Interior. (D.C. Circuit 2024).

<https://media.cadc.uscourts.gov/opinions/docs/2024/11/23-1067-2084381.pdf>

cc: Alan Mayberry, Associate Administrator (via email)
Massoud Tahamtani, Deputy Associate Administrator for Policy & Programs (via email)
Shakira Mack, Director Natural Gas Distribution Infrastructure Safety & Modernization
(NGDISM) Grant Program (via email)



Erin Kurilla
EVP, VP of Advocacy & Operations
American Public Gas Association
201 Massachusetts Avenue, NE
Washington, D.C. 20002
(202) 905-2904
ekurilla@apga.org



Stuart Saulters
Vice President of Federal Affairs
GPA Midstream Association
660 S American Plaza St E
Tulsa OK 74513
ssaulters@gpamidstream.org



Alan M. Chichester
Senior Director
Safety, Operations, & Engineering
American Gas Association
400 North Capitol Street, NW
Washington, D.C. 20001
achichester@aga.org



Joan Dreskin
Senior Vice President & General Counsel
Interstate Natural Gas Association of America
25 Massachusetts Ave NW, Suite 500N
Washington, D.C. 20001
jdreskin@ingaa.org



Dave Murk
Senior Director, Pipelines, Midstream
American Petroleum Institute
200 Massachusetts Ave, NW, Suite 1100
Washington, D.C. 20001
(202) 682-8000
murkd@api.org



John Stooddy
Vice President, Government & Public Relations
Liquid Energy Pipeline Association
900 17th Street NW, Suite 600
Washington, D.C. 20006
(202) 292-4509
jstooddy@liquidenergypipelines.org