



November 10, 2025

Mr. Paul Roberti
Administrator
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Request for Removal of PI-23-0011, “Paradox Interpretation,” based on rescission of Advisory Bulletin ADB–2021–01

Dear Administrator Roberti:

On behalf of the GPA Midstream Association, I write to request action on PHMSA Interpretation PI-23-0011 (“Paradox Interpretation”), published on April 26, 2024, and currently posted on PHMSA’s website: <https://www.phmsa.dot.gov/regulations/title49/interp/pi-23-0011>.

In PHMSA’s recent notice rescinding Advisory Bulletin ADB–2021–01, the agency stated:

“For these reasons, PHMSA is rescinding ADB–2021–01—and any PHMSA policy statements, letters of interpretation, guidance documents, congressional testimony, and public statements that rely on or assert the reading of the section 114 mandate expressed in ADB–2021–01.” (Rescission Notice, footnote 57)

PI-23-0011 is an interpretation letter that asserts the same reading of the section 114 mandate expressed in ADB-2021-01. Therefore, this interpretation is no longer valid. However, the interpretation remains in PHMSA’s online database, which could create potential confusion.

To avoid misapplication of the rescinded policy, we respectfully request that PHMSA:

1. Confirm that PI-23-0011 has, in fact, been rescinded consistent with the rescission notice and footnote 57.
2. Remove PI-23-0011 from the public interpretation database.
3. Consider issuing a brief clarification to regional offices to ensure inspectors are not relying on outdated interpretations.



GPA Midstream greatly appreciates PHMSA's efforts to provide clarity and consistency in regulations and their implementation.

Thank you for your attention to this matter. We would be pleased to discuss further at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stuart Saulters
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