



December 8, 2025

Submitted via regulations.gov

Sayler Palabrica
Office of Pipeline Safety (PHP-30)
Pipeline and Hazardous Materials Safety Administration (PHMSA)
2nd Floor
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Advance Notice of Proposed Rulemaking (ANPRM): “Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines” Docket No. PHMSA-2025-0019

Dear Mr. Palabrica:

The GPA Midstream Association (“GPA Midstream” or “the Association”) respectfully submits the following letter in support of the American Petroleum Institute (“API”) and Liquid Energy Pipeline Association (“LEPA”) Cost Benefit Analysis in support of comments in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA’s) advance notice of proposed rulemaking (ANPRM) entitled “Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines.”

GPA Midstream is composed of approximately 50 corporate members that directly employ over 57,000 employees that are engaged in the gathering, transportation, processing, treating, storage and marketing of natural gas, natural gas liquids (“NGLs”), crude oil, and refined products, commonly referred to in the industry as “midstream activities.” In 2024, GPA Midstream members operated more than 500,000 miles of pipelines, gathered nearly 91 Bcf/d of natural gas, and operated more than 340 natural gas processing facilities. GPA Midstream members are the invisible link between raw natural gas and crude oil produced at the wellhead and the distribution of products to consumers for heating, electricity production, transportation, steelmaking, fertilizer production, plastics, high-tech devices, cosmetics, pharmaceuticals, and much more.

GPA Midstream members operate both gas and hazardous liquids pipelines, and pipeline safety is a top priority. The Association supports strong pipeline safety requirements as they are a key aspect of facilitating the integrity and reliability of the nation’s pipeline infrastructure. However, anomaly repair criteria are in significant need of reform. Current regulations compel operators to spend significant amounts of time and money investigating and repairing cracks, dents, and other anomalies even though evidence and experience show they present a minimal safety threat. PHMSA should modernize both 49 Code of Federal Regulations (“CFR”) Part



192 and Part 195 regulations to recognize the advancement in technologies and analytical techniques that have occurred since the regulations were put in place.

The cost benefit analysis submitted by API and LEPA should support modernization of the regulations. GPA Midstream asks that PHMSA consider this input in its proactive efforts to appropriately modernize the regulations governing repair criteria for pipelines. Do not hesitate to reach out if you have any questions.

Respectfully submitted,

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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