



American
Petroleum
Institute



January 12th, 2026

Submitted via pipeline interp submittal@dot.gov

Mr. Cameron Satterthwaite
Director, Standards & Rulemakings Division
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

Re: Comments on FlexSteel USA Request for Regulatory Interpretation (PI-25-0013)

Dear Mr. Satterthwaite:

The American Petroleum Institute (API),¹ GPA Midstream Association (GPA Midstream),² and the Interstate Natural Gas Association of America (INGAA)³ respectfully submit these comments in response to the above-referenced regulatory interpretation request filed by FlexSteel USA (FlexSteel) with the Pipeline and Hazardous Materials Safety Administration (PHMSA).⁴

In its request, FlexSteel asks for PHMSA to confirm that, for purposes of onshore gas and liquid gathering line classifications under 49 C.F.R. Parts 192 and 195, the outside diameter used in jurisdictional and regulatory determinations for steel-reinforced multilayer pipe should be based on the steel reinforcement layer, excluding the outer high-density polyethylene (HDPE) layer. API, GPA Midstream, and INGAA members are interested in how PHMSA responds to this request, given our collective members' operation of onshore gas and liquid gathering pipelines under 49 C.F.R. Parts 192 and 195.

API, GPA Midstream, and INGAA support the FlexSteel interpretation and believe it aligns with PHMSA's intent under the applicable regulations. The steel layer determines the capacity and therefore should serve as the sole basis of establishing the outside diameter of the pipeline. Clear requirements governing the use of composite pipe would encourage operators to use these types of materials more frequently, enhancing safety, integrity, and performance.

¹ For more information, visit www.api.org.

² For more information, visit www.gpamidstream.org.

³ For more information, visit www.ingaa.org.

⁴ <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2025-12/FlexSteel-USA-PI-25-0013-12-9-2025-Part192-8-and-195-2.pdf>

API, GPA Midstream, and INGAA continue to encourage PHMSA to accept advanced composite pipe as an approved material in its regulation. A modernized US pipeline network promotes resiliency and safety and will provide for the continuous delivery of energy to American consumers and industry, as well as our allies abroad.

Respectfully submitted,



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