



March 3, 2026

The Honorable Brett Guthrie
Chairman, House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
Ranking Member, House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Bob Latta
Chairman, Energy Subcommittee
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Kathy Castor
Ranking Member, Energy Subcommittee
2125 Rayburn House Office Building
Washington, DC 20515

Re: The House Energy and Commerce Energy Subcommittee hearing on "America's Energy Infrastructure: Authorizing Pipeline Safety"

Dear Chairman Guthrie, Chairman Latta, Ranking Member Pallone, and Ranking Member Castor:

GPA Midstream Association (GPA Midstream or the Association) commends your efforts within the House Energy and Commerce Energy Subcommittee to hold a hearing to discuss legislation to reauthorize pipeline safety programs under the Pipeline and Hazardous Materials Safety Administration (PHMSA). We appreciate the Committee's willingness to act, and we believe the discussion draft, "the Pipeline Safety Authorization Act of 2026," progresses pipeline safety, but in a practical way.



GPA Midstream Association 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.

Our members are an 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. And safety – of employees, contractors, and communities – is the highest priority for GPA Midstream member companies.

One of GPA Midstream’s priorities for reauthorization legislation was ensuring elimination of duplicative oversight of in-plant gas piping. Hazardous liquid in-plant piping is exempt by law from PHMSA regulation, but regulation of gas in-plant piping has lacked similar clarity. In-plant pipeline systems are typically low risk, operate at lower pressures, and are confined within plant boundaries or in short sections between adjacent plants. They are also within the jurisdiction of other robust safety programs, such as the Occupational Safety and Health Administration’s Process Safety Management standards. Aligning the treatment of gas and liquid in-plant piping would eliminate regulatory redundancy without compromising safety. We are grateful the discussion draft removes this redundancy. Legislative certainty for the elimination of such unnecessary redundancy is critical.

For pipeline safety regulations, GPA Midstream encourages the use of more performance-based measures, and less prescriptive regulations, to achieve safety goals. Performance-based measures consider relevant operating conditions and assessed risks to achieve meaningful safety priorities. Performance-based measures will also facilitate a longer-term reauthorization period for PHMSA’s programs, as they allow for evolving technological advancement and best practices proven by time and experience to achieve safety. We are grateful your discussion draft reauthorizes the programs until 2031, as opposed to other legislation introduced, which only reauthorizes the programs until 2029.



GPA Midstream members support reauthorization of PHMSA's pipeline safety programs, with the goal to ensure pipelines remain the safest method for transporting affordable, reliable, and sustainable energy, while also facilitating innovation and efficiency. We seek legislative and regulatory predictability and certainty, to enable prudent investment decisions for the benefit of communities and investors alike. GPA Midstream appreciates your leadership on this important issue and stands ready to serve as a resource as both Chambers move forward to a final bill.

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
Vice President, Federal Affairs
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