



June 23, 2026

Submitted via www.regulations.gov

Sayler Palabrica
Transportation Specialist
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

Re: Pipeline Safety: Integration of Innovative Remote Sensing Technologies for Right-of-Way Patrols on Gas and Hazardous Liquid Pipelines (Docket No. PHMSA-2025-0118)

Dear Mr. Palabrica:

GPA Midstream Association¹ (GPA Midstream) and the Interstate Natural Gas Association of America² (INGAA) (jointly, the “Associations”) submit these comments in support of the Pipeline and Hazardous Materials Safety Administration’s (PHMSA or Agency) Notice of Proposed Rulemaking (NPRM) entitled “Pipeline Safety: Integration of Innovative Remote Sensing Technologies for Right-of-Way Patrols on Gas and Hazardous Liquid Pipelines” published on April 24, 2026.³ In the NPRM, PHMSA proposes to clarify that the right-of-way-patrolling requirements are technology neutral, and that operators of gas transmission, hazardous liquids, and carbon dioxide pipelines can use remote sensing technologies, such as unmanned aerial systems and satellites, for compliance purposes.⁴

¹ GPA Midstream has served the U.S. energy industry since 1921 and represents more than 50 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as “midstream activities.” The work of our members indirectly creates or impacts an additional 470,000 jobs across the U.S. economy. In 2024, GPA Midstream members had an economic impact of \$191 billion through operating 502,900 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 342 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.

² INGAA is a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in North America. INGAA is comprised of 27 members, representing the vast majority of the U.S. interstate natural gas transmission pipeline companies. INGAA’s members operate nearly 200,000 miles of pipelines.

³ Pipeline Safety: Integration of Innovative Remote Sensing Technologies for Right-of-Way Patrols on Gas and Hazardous Liquid Pipelines, 91 Fed. Reg. 22,107 (Apr. 24, 2026).

⁴ *Id.*

The Associations strongly support the amendments proposed in the NPRM, as they would not only provide greater regulatory clarity by codifying existing Agency guidance,⁵ but also recognize advancements in technology and their application in pipeline safety. The Associations also applaud PHMSA's action to advance a rulemaking consistent with Executive Order 14192, *Unleashing Prosperity through Deregulation*,⁶ that would achieve significant cost savings without adversely impacting safety to the public or environment. PHMSA estimates that the annualized cost savings associated with this NPRM would be \$26.2 million,⁷ allowing industry to direct resources toward other safety-focused initiatives.

In response to PHMSA's request for comments on clarifying the patrol deadline, the Associations recommend that PHMSA use the date that the right-of-way patrol imagery and analysis information is delivered to the operator. This clarification would further ensure regulatory certainty.

The Associations appreciate the opportunity to submit this comment in support of PHMSA's NPRM.

Sincerely,



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⁵ See PI-21-0006 and PI-19-0005.

⁶ *Unleashing Prosperity through Deregulation*, Executive Order 14192, 90 Fed. Reg. 9,065 (Feb. 6, 2025).

⁷ 91 Fed. Reg. at 22,109.