



June 23, 2026

Submitted via www.regulations.gov

Mr. Robert Jagger
Senior Transportation Specialist
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: INGAA and GPA Midstream Association's Comments on the Notice of Proposed Rulemaking, "Removing Unnecessary Provision for Material Properties Verification During MAOP Reconfirmation" (Docket No. PHMSA-2026-1549)

Dear Mr. Jagger:

The Interstate Natural Gas Association of America (INGAA)¹ and GPA Midstream Association (GPA Midstream)² (jointly, the Associations), submit these comments in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA or the Agency) Notice of Proposed Rulemaking (NPRM) titled "Removing Unnecessary Provision for Material Properties Verification During MAOP Reconfirmation" published on April 24, 2026.³ In the NPRM, PHMSA proposes to revise 49 CFR § 192.624 by clarifying when material verification tests of pipe cut out at pressure testing manifold sites are required for maximum allowable operating pressure (MAOP) reconfirmation activities.⁴ Specifically, PHMSA states that operators choosing to use the pressure test method for MAOP reconfirmation are only required to test the pipe materials cut out from the test manifold sites if the required records are not available.⁵ The Associations had identified this

¹ 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 and serve as an indispensable link between natural gas producers and consumers.

² 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.

³ Pipeline Safety: Removing Unnecessary Provision for Material Properties Verification During MAOP Reconfirmation, 91 Fed. Reg. 22,101 (Apr. 24, 2026).

⁴ *Id.*

⁵ *Id.*

issue in their comments filed in response to the U.S. Department of Transportation's Request for Information.⁶

The Associations appreciate PHMSA's review of its comments and the Agency's efforts to clarify the § 192.624 requirements. The Associations support PHMSA's NPRM as it removes ambiguity and an unnecessary compliance step.

Respectfully submitted,



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⁶ INGAA Comments on Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs, Docket No. DOT-OST-2025-0026-0872 (May 5, 2025).