



June 23, 2026

Submitted via www.regulations.gov

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

Re: Pipeline Safety: Remote Monitoring of Hazardous Liquid Pipeline Rectifiers (Docket No. PHMSA-2026-1550)

Dear Mr. Palabrica:

The American Petroleum Institute (API),¹ Liquid Energy Pipeline Association (LEPA),² and GPA Midstream Association (GPA Midstream),³ collectively, the Associations, submit this letter in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA or the Agency) request for comments on its "Remote Monitoring of Hazardous Liquid Pipeline Rectifiers" Notice of Proposed Rulemaking (the NPRM).⁴ In the NPRM, PHMSA proposes to update its Part 195 corrosion control regulations to clarify that operators can conduct rectifier checks remotely as long as the operator also physically inspects each device at least once each year.⁵ As PHMSA notes in the NPRM, the Agency's corrosion control enforcement guidance already discusses the use of remote monitoring devices to read rectifiers, bonds, or test stations.⁶

¹ API represents all segments of America's natural gas and oil industry, which supports more than 11 million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. Our approximately 600 members produce, process and distribute the majority of the nation's energy, and participate in [API Energy Excellence®](#), which is accelerating environmental and safety progress by fostering new technologies and transparent reporting. API was formed in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency and sustainability.

² LEPA promotes responsible policies, safety excellence, and public support for liquids pipelines. LEPA represents pipelines transporting 97 percent of all hazardous liquids barrel miles reported to the Federal Energy Regulatory Commission. LEPA's diverse membership includes large and small pipelines carrying crude oil, refined petroleum products, NGLs, and other liquids.

³ 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.

⁴ Pipeline Safety: Remote Monitoring of Hazardous Liquid Pipeline Rectifiers, 79 Fed. Reg. 22115 (Apr. 24, 2026).

⁵ *Id.* at 22116.

⁶ *Id.* citing PHMSA Part 195 Corrosion Enforcement Guidance (June 22, 2016) at 59.



The Associations support this proposal. PHMSA’s proposal will sync its Part 195 regulations with existing guidance and will provide regulatory certainty. API and the Liquid Energy Pipeline Association (collectively, the Joint Trades) filed comments on May 5, 2025, seeking flexibility in monitoring corrosion rectifiers.⁷ The Joint Trades had requested that PHMSA review section 195.573(c) to allow remote monitoring of rectifiers as long as an operator physically inspects the device on an annual basis.⁸ The Joint Trades sought these changes to provide consistency between Parts 192 and 195 regulations and to accommodate advances in technology.

In the NPRM, PHMSA also seeks comments on whether it should frame the section 195.573(c) obligation, by (1) “periodically calibrated or checked for accuracy”; (2) from relevant consensus standards; or (3) as proposed in the NPRM.⁹ The Associations support the proposed language in the NPRM which clearly acknowledges that rectifiers can be checked remotely and operators who choose to use remote monitoring capabilities must physically inspect their devices at least once per year.

The revisions proposed in the NPRM provide meaningful clarity to the regulations and reduce unnecessary costs consistent with Executive Order 14192, *Unleashing Prosperity through Deregulation*.¹⁰

The Associations appreciate the opportunity to submit this comment letter and support PHMSA’s modernization of pipeline safety regulations to improve alignment between regulatory requirements and current industry operations, best practices, and consensus standards.

⁷ American Petroleum Institute and the Liquid Energy Pipeline Association, “Comments on Ensuring Lawful Regulation: Reducing Regulations and Controlling Regulatory Costs,” (May 5, 2025) at 8.

⁸ *Id.*

⁹ Pipeline Safety: Remote Monitoring of Hazardous Liquid Pipeline Rectifiers, 79 Fed. Reg. 22115, 22116 (Apr. 24, 2026).

¹⁰ *Unleashing Prosperity through Deregulation*, Executive Order 14192, 90 Fed. Reg. 9,065 (Feb. 6, 2025).



Sincerely,

A handwritten signature in blue ink that reads "Andy Black".

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