August 17, 2026

Submitted via www.regulations.gov
Ms. Angela Hill
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Pipeline Safety: Information Collection Activities (Docket No. PHMSA-2026-0529)

Dear Ms. Hill:

GPA Midstream Association[1] (GPA Midstream or the Association) respectfully submits these comments in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA or the Agency) Notice and Request for Comments (Notice) entitled "Pipeline Safety: Information Collection Activities."[2] Of relevance to GPA Midstream, the Notice proposes revisions to the incident and annual reporting forms for gas gathering and transmission pipeline systems, and the National Pipeline Mapping System.

GPA Midstream supports the Agency's efforts to eliminate duplicative data collections, clarify reporting instructions, and focus its information collection activities on data that directly supports pipeline safety oversight.

Proposed Changes to Annual Reports for Gas Transmission and Gathering Pipeline Systems

Part C

GPA Midstream agrees with PHMSA's proposal to delete Part C (Volume Transported in Transmission Lines) in the Gas Transmission and Gathering Annual Report. Not only is this information already accessible through other federal reporting requirements,[3] eliminating

[1] GPA Midstream has served the U.S. energy industry since 1921 and represents more than 45 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] Pipeline Safety: Information Collection Activities, 91 Fed. Reg. 36,946 (June 18, 2026).

[3] *Id.* at 36,949 (Volumes of gas transported is reported to the Federal Energy Regulatory Commission (FERC) on FERC Form 2 or 2A).

redundant requests for the same information across government is consistent with the Paperwork Reduction Act (the PRA) requirements. The PRA directs agencies to demonstrate that the information collected is necessary and not already accessible elsewhere. As required by 5 C.F.R. §1320.5(d)(1), an agency must demonstrate that it "has taken every reasonable step to ensure that [the information collection] ... is the least burdensome necessary for the proper performance of the agency's functions to comply with legal requirements and achieve program objectives."[4] GPA Midstream appreciates the Agency's willingness to review existing collections to determine if the information is still needed.

Part F

For the same reasons identified in Part C, GPA Midstream also supports PHMSA's proposal to no longer collect the number or miles of anomalies excavated in a calendar year.[5]

Part K

PHMSA proposes to collect "the miles of eligible Class 3 segments with MAOP confirmed or restored under 49 CFR § 192.624(a)(4)."[6] While GPA Midstream supports the Agency's approach to collect these miles, the Association seeks clarification that the reference should be 49 CFR § 192.6**11**(a)(4). There is no subsection (a)(4) currently codified in § 192.624.

Proposed Changes to Incident Reports for Gas Transmission and Gathering Pipeline Systems

GPA Midstream supports PHMSA's efforts to eliminate incident reporting elements that are duplicative. Of note, GPA Midstream supports the removal of the cost of gas released given that natural prices fluctuate.[7] The Association also supports the removal of whether the pipeline pressure on the system exceeded the maximum allowable operating pressure (MAOP),[8] since PHMSA can make that determination from other information reported in the same section of the incident report. Likewise, information regarding whether a controller or control room issues contributed to an incident is already required by 49 C.F.R. § 192.631(g)(1) and does not need to be included in the Incident Report.[9] Eliminating these instances of duplicative reporting reduces unnecessary administrative burdens, decreases the potential for the reporting of inconsistent or conflicting information, and would have no adverse impact on pipeline safety.

GPA Midstream does have concerns with several proposed changes to the Incident Report. First, PHMSA proposes to collect stray current density and on/off potentials as part of the Incident Report.[10] While cathodic protection criteria can typically be obtained from the most recent reading at a test station, stray current levels would not be known unless it was identified as a specific threat in the area. It would be burdensome for PHMSA to collect this information from all operators.

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[4] 5 C.F.R. § 1320.5(d)(1) and (d)(1)(i).
[5] 91 Fed. Reg. at 36,950.
[6] *Id.*
[7] *Id.* at 36,951.
[8] *Id.*
[9] *Id.*
[10] *Id.*

Second, GPA Midstream members are concerned about the collection of "bonded coating percentage." If disbonded coating is identified, the report requests a "bonded coating percentage," which is an estimate based on visual observations of the pipe within the affected area. Calculating a percentage is subjective and could lead to variability in interpretation, as different operators may assign different percentages to similar levels of coating disbondment. GPA Midstream is concerned that the collected data would not be useful to the Agency and therefore not satisfy the PRA requirements.

Third, GPA Midstream has reviewed the proposal to collect previous in-line inspection (ILI) tool indications as part of section J-1 in the Incident Report. PHMSA requests disclosure of whether an anomaly had been previously identified at the failure location (if the pipeline has previously been inspected using ILI). As proposed, the information collected may not be useful and could create confusion among the public or other stakeholders. PHMSA should consider additional clarifying questions such as whether the response reflects the original ILI report or any post-incident reanalysis.

Finally, the Notice references Part E as the location to collect the stray current data,[11] but it might be more appropriate to collect it in Part G-1.

Conclusion

GPA Midstream appreciates this opportunity to submit comments on the Notice.

Sincerely,

Stuart Saulters
Vice President, Federal Affairs
GPA Midstream Association

[11] *Id.*