



August 2, 2026

Submitted via www.regulations.gov

U.S. Department of Transportation
Docket Operations
1200 New Jersey Avenue SE
Room W58-213, West Building, 5th Floor
Washington, DC 20590

Re: Comments in Response to FAA Section 2209 NPRM: Designation - Restrict the Operation of Unmanned Aircraft in Close Proximity to a Fixed Site Facility [Docket No. FAA-2026-4558]

To whom it may concern:

GPA Midstream Association¹ (GPA Midstream or the Association) appreciates the opportunity to comment on the Federal Aviation Administration's Notice of Proposed Rulemaking implementing Section 2209 of the FAA Extension, Safety, and Security Act of 2016.²

GPA Midstream members operate critical energy infrastructure that supports the regional, national, and global movement of natural gas, propane, butane, ethane, and other natural gas liquids. The infrastructure operated by our members is essential to U.S. energy security, economic growth, and manufacturing competitiveness. Unauthorized unmanned aircraft system (UAS) operations near critical infrastructure can create safety, security, operational, and emergency response concerns in the complex industrial environments where our members operate. It is critical to prevent unauthorized UAS activity, but not all UAS activity should be prohibited. Where GPA Midstream members use UAS for safe and effective operational purposes, those activities should remain permissible.

GPA Midstream especially requests FAA revisit the criteria for the natural gas subsector within the energy sector. We respectfully recommend that FAA revise that eligibility criteria to allow

¹ GPA Midstream has served the U.S. energy industry since 1921 and represents approximately 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 Designation: Restrict the Operation of Unmanned Aircraft in Close Proximity to a Fixed Site Facility, 91 FR 24650 (May 6, 2026).



consideration of facility-specific risk factors, rather than relying solely on a fixed threshold. There may be a need for a facility that processes less than 500 million cubic feet per day (MMcf/d) of natural gas to be granted a Unmanned Aircraft Flight Restriction (UAFR). FAA could look to other government agencies for guidance on what is a critical facility. For instance, the Transportation Security Administration (TSA) has criteria to determine critical facilities. Lower-throughput facilities may still be critical—for example, because of location, interconnectivity, product handled, proximity to populated areas, or role in regional energy reliability.

GPA Midstream also urges FAA to provide clear protections for any facility-specific information submitted as part of the UAFR application or review process. While FAA may need certain information, such information may include sensitive operational or commercial details. FAA should ensure that any submitted information is appropriately protected.

We strongly support the FAA's efforts to implement Section 2209 and establish a practical framework for protecting qualifying fixed-site critical infrastructure from unsafe or unauthorized UAS operations. A well-designed UAFR program will improve awareness among UAS operators and provide greater clarity regarding protected airspace. The FAA has an important opportunity to implement Section 2209 in a manner that strengthens protection of critical infrastructure while preserving safe and lawful UAS operations within the National Airspace System. The final rule should strike an appropriate balance among security, aviation safety, operational practicality, and continued innovation.

GPA Midstream also supports and commends the comments submitted by the American Fuel & Petrochemical Manufacturers (AFPM) and respectfully encourages the FAA to carefully consider the recommendations and perspectives outlined in their filing.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is fluid and stylized, with a prominent initial "S" and a long, sweeping underline.

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