



September 8, 2026

Submitted via www.regulations.gov

Sayler Palabrica
Transportation Specialist
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590-0001

Re: Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines (Docket No. PHMSA-2025-0019)

Dear Mr. Palabrica:

On July 8, 2026, the Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) published its *Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines* Notice of Proposed Rulemaking (the NPRM).¹ GPA Midstream Association (GPA Midstream) appreciates the opportunity to comment on the NPRM addressing repair criteria and related pipeline safety requirements.

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.

GPA Midstream appreciates PHMSA's ongoing efforts to review and modernize regulations, and in this case, repair criteria requirements. As integrity assessment tools and data analytics continue to evolve, combined with further industry operating experience, regulations should likewise be updated to ensure they remain practical, risk-informed, and aligned with current technical capabilities. Modernized requirements can enhance safety outcomes while ensuring regulatory certainty for operators.

¹ *Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines*, 91 Fed. Reg. 42,272 (Jul. 8, 2026).

GPA Midstream generally supports PHMSA's objective of ensuring its repair criteria requirements are appropriately focused on conditions that present the greatest safety significance while providing operators with sufficient flexibility to use validated engineering analyses, improved inspection technologies, and risk-based decision-making processes. Regulatory requirements should promote effective integrity management and timely remediation of safety-significant conditions without creating unnecessary administrative burdens or unintended implementation challenges.

While GPA Midstream does not offer specific comments on the NPRM, we encourage PHMSA to carefully consider the technical feedback submitted by affected operators and industry organizations, including the American Petroleum Institute, the American Fuel & Petrochemical Manufacturers, and the Interstate Natural Gas Association of America.

GPA Midstream appreciates PHMSA's continued engagement with stakeholders throughout this rulemaking process and its efforts to modernize pipeline safety regulations. We look forward to continued collaboration with the Agency to advance safety, reliability, and operational effectiveness across the nation's pipeline infrastructure.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Saulters", with a stylized flourish at the end.

Stuart Saulters
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