

**BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Pipeline Safety: Codify Enforcement Discretion	)	Docket No. PHMSA-2025-0113
on Incidental Gathering Lines	)	RIN: 2137-AF83

**COMMENTS ON
PIPELINE SAFETY: MEETING OF THE GAS PIPELINE ADVISORY COMMITTEE
(CODIFY ENFORCEMENT DISCRETION ON INCIDENTAL GATHERING LINES)**

**FILED BY
INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA
AMERICAN PETROLEUM INSTITUTE
GPA MIDSTREAM ASSOCIATION**

September 4, 2026

I. Introduction

On July 30, 2026, the Pipeline and Hazardous Materials Safety Administration (PHMSA) convened a meeting of the Gas and Liquid Pipeline Advisory Committees (the Advisory Committee Meeting) to review several notices of proposed rulemakings, including the *Pipeline Safety: Codify Enforcement Discretion of Incidental Gathering Lines* NPRM (the NPRM).¹ The Interstate Natural Gas Association of America (INGAA)², the American Petroleum Institute (API)³ and GPA Midstream Association (GPA Midstream)⁴ (jointly, “the Associations”) submit these comments for consideration.

II. PHMSA Should Codify its Enforcement Discretion

PHMSA proposes to codify its enforcement discretion for existing incidental gathering lines by limiting the 10-mile reclassification trigger in 49 C.F.R. § 192.8(a)(5) to “new gas gathering pipelines installed entirely [after May 26, 2022].”⁵ As discussed during the Advisory Committee Meeting, GPA Midstream strongly supports codifying this limited enforcement discretion.⁶ This proposal provides important regulatory certainty for operators and fulfills PHMSA’s commitment made in response to a petition for reconsideration of the 2021 Gas Gathering Final Rule.⁷ GPA Midstream agrees with PHMSA’s comments made during the Advisory Committee Meeting that while this amendment impacts a limited category of existing incidental gathering lines, it is critical to eliminate any confusion or delay of maintenance activities on account of a possible reclassification.⁸

¹ *Pipeline Safety: Codify Enforcement Discretion on Incidental Gathering Lines*, 90 Fed. Reg. 28,597 (Jul. 1, 2025).

² INGAA is a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in North America. Comprised of 28 members, it represents 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.

³ 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.

⁴ 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.

⁵ 90 Fed. Reg. at 28,600.

⁶ U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Liquid and Gas Pipeline Advisory Committees, Transcript (July 30, 2026) at 293:16-18.

⁷ *Pipeline Safety: Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-Pressure Lines, and Other Related Amendments: Response to a Petition for Reconsideration*, 87 Fed. Reg. 26,296, 26,297 (May 4, 2022).

⁸ See Transcript at 292:1-21; See also, Transcript, at 295:10-12.

III. Conclusion

The Associations commend PHMSA's continuing commitment to pipeline safety and appreciate the opportunity to comment on the proceedings of the GPAC meeting. The Committee endorsed the proposal unanimously, and the Associations urge PHMSA to finalize it as proposed.

Respectfully submitted,

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