



June 30, 2025

Linda Daugherty  
Acting Associate Administrator for Pipeline Safety  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: PHMSA's Pending Interpretation Letter Fussell PI-25-0006

Dear Ms. Daugherty,

The Interstate Natural Gas Association of America (INGAA) and GPA Midstream Association (GPA Midstream) respectfully submit these comments in response to the regulatory interpretation request submitted by Bernie Fussell dated May 24, 2025, concerning Maximum Allowable Operating Pressure (MAOP) reconfirmation requirements under 49 CFR §192.624. INGAA represents the interstate natural gas pipeline industry,<sup>1</sup> and GPA Midstream represents those operators involved in gathering, transporting, processing, treating, storing, and marketing natural gas.<sup>2</sup> Our members are significantly impacted by MAOP reconfirmation requirements. We believe it is critical that PHMSA provide clear guidance on what actions constitute "completion" under §192.624(b)(1) to ensure consistent industry-wide implementation and compliance.

INGAA and GPA Midstream strongly support the position that each of the three scenarios presented in the interpretation request should count toward satisfying the 50% completion requirement by July 3, 2028, under §192.624(b)(1).

PHMSA has previously recognized that actions beyond those explicitly prescribed in rulemaking can satisfy regulatory milestones. The Pipeline Integrity Management in High Consequence Areas

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<sup>1</sup> For more information, visit <https://ingaa.org/>.

<sup>2</sup> For more information, visit <https://www.gpamidstream.org/>.

(Gas Transmission Pipelines) final rule<sup>3</sup> and FAQ 237<sup>4</sup> established that pipe replacement—though not originally identified among the four IM assessment methods—could be credited toward the requirement to assess 50 percent of covered pipeline mileage by December 17, 2007. Applying this same rationale, mileage confirmed safe through abandonment, reclassification, or pressure reduction supported by existing TVC pressure test records should be credited toward the 2028 milestone completion. This approach aligns with established PHMSA practices, accurately reflects genuine risk reduction efforts, and preserves operators' incentives to pursue the safest, most effective, and least intrusive compliance solutions.

Our detailed responses to each question from the interpretation are provided below.

### **Question 1: Pipeline Abandonment in Place**

**INGAA and GPA Midstream Position: Yes, this action should satisfy the completion requirement.**

When an operator abandons a pipeline segment in place, they have taken definitive action to address the MAOP reconfirmation requirement for that segment. Abandoned pipelines are not subject to 49 CFR Part 192 requirements, and operators established their initial baseline list of projects prior to July 1, 2021, as required in §192.624(b). By abandoning the pipeline, the operator has completed all actions required under §192.624 for that segment, effectively resolving the MAOP reconfirmation requirement. This proactive measure should count toward the 50% completion milestone.

### **Question 2: MAOP Reduction and Reclassification to Distribution Main**

**INGAA and GPA Midstream Position: Yes, this action should satisfy the completion requirement.**

Reclassifying the pipeline from transmission to distribution is not material to this question since MAOP has been reduced to below 30% SMYS and would remove the pipeline segment from the scope of §192.624(a)(2) applicability while maintaining safe operations. However, in answer to the specific question, reducing the MAOP to below 20% SMYS and reclassifying the pipeline from transmission line to distribution main represents a substantive, proactive approach to addressing MAOP reconfirmation requirements. This action removes the pipeline segment from the scope of §192.624 applicability while maintaining safe operations. The operator has completed

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<sup>3</sup> Pipeline Safety: Pipeline Integrity Management in High Consequence Areas (Gas Transmission Pipelines), 68 Fed. Reg. 69,778 (Dec. 15, 2003).

<sup>4</sup> PHMSA, *Gas Transmission Integrity Management FAQs*, FAQ 237 (April 2019 consolidated edition), p. 8: "The same applies to pipe in covered segments that operators replace. In this case, the operator may credit this mileage as 'assessed' for determining compliance with the 50 percent progress milestone."

all necessary actions under §192.624 for this segment by fundamentally changing its regulatory classification and operating parameters. This should count toward the 50% completion requirement.

### **Question 3: MAOP Reduction and Method Change**

**INGAA and GPA Midstream Position: Yes, this action should satisfy the completion requirement.**

Lowering the MAOP and changing the determination method from §192.619(c)(1) to §192.619(a)(2) constitutes completion of MAOP reconfirmation activities. Given that the records required by §192.517(a) are traceable, verifiable, and complete, the operator has taken proactive action to establish a compliant MAOP using acceptable regulatory methods. This demonstrates the operator has completed all actions required under §192.624 for this segment and should count toward the 50% completion requirement.

INGAA and GPA Midstream appreciate PHMSA's consideration of this important regulatory interpretation request. We respectfully urge PHMSA to confirm that each of the three scenarios presented should count toward the 50% completion requirement, as this interpretation aligns with the safety objectives of the regulation while providing operators with necessary flexibility in compliance approaches.

Sincerely,



Ashlin Bollacker  
Director of Pipeline Safety  
Interstate Natural Gas Association of America



Stuart Saulters  
Vice President, Federal Affairs  
GPA Midstream Association