



July 3, 2025

Submitted via regulations.gov

Brianna Wilson
Office of Pipeline Safety (PHP-30)
Pipeline and Hazardous Materials Safety Administration (PHMSA)
2nd Floor, 1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Advance Notice of Proposed Rulemaking (ANPRM): “Pipeline Safety: Amendments to Liquefied Natural Gas Facilities” 90 FR 18949 (05/05/2025)

Dear Ms. Wilson:

GPA Midstream Association (“GPA Midstream” or “GPA”) hereby submits the following comments in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA’s) Advance Notice of Proposed Rulemaking (ANPRM) entitled “Pipeline Safety: Amendments to Liquefied Natural Gas Facilities.” GPA respectfully requests that PHMSA consider these comments, as amendments to pipeline safety regulations governing liquefied natural gas (LNG) are considered.

GPA Midstream has served the U.S. energy industry since 1921 and represents more than 50 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 400,000 jobs across the U.S. economy. In 2023, GPA Midstream members had an economic impact of \$206.2 billion through operating more than 500,000 miles of pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 365 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.¹

GPA Midstream supports PHMSA’s initiative to modernize its Part 193 regulations, which have remained unchanged for over two decades.² As highlighted in the LNG ANPRM,³ Congress, the U.S. Government Accountability Office (GAO), and multiple industry trade associations have all called

¹ For more information, reference www.gpamidstream.org.

² PHMSA’s last revision of Part 193 occurred in 2004 with a handful of updates to certain standards incorporated by reference in 2015. *See* Pipeline Safety: Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments, 80 Fed. Reg. 168 (Jan. 5, 2015). However, many provisions of Part 193 date back to the 1980s.

³ Pipeline Safety: Amendments to Liquefied Natural Gas Facilities, 90 Fed. Reg. at 18,950 (referencing section 27 of the PIPES Act of 2016 and section 110 of the PIPES Act of 2020).

for updates to reflect advancements in technology, best practices, and operational experience. Originally introduced in 1972 as an interim measure,⁴ and later expanded in 1980 by PHMSA's predecessor, the Materials Transportation Bureau, these regulations were designed for an LNG industry that looked very different from today's.⁵ With significant growth in liquefaction capacity and the number of export facilities, the current regulatory framework no longer reflects the scale and complexity of modern LNG operations. Timely updates are essential to ensure safety, efficiency, and regulatory relevance.

Several GPA Midstream members have direct involvement in LNG operations and many provide the natural gas to facilities that export this important energy resource to our allies overseas. The varied nature of LNG operations and ensuring an export market exists is critical for PHMSA to consider. There are (1) large-scale (*i.e.*, baseload, import, and export); (2) small-scale; (3) peak shavers; and (4) temporary or mobile facilities. GPA Midstream encourages PHMSA to remember, given the key operational differences between large-scale, small-scale, peak shavers, and temporary and mobile facilities, a broad, "one-size-fits-all" approach is not always a workable solution.

GPA especially wants to commend the comments submitted by the American Petroleum Institute (API), Center for LNG (CLNG), the Interstate Natural Gas Association of America (INGAA), the American Gas Association (AGA), the American Public Gas Association (APGA), and the Northeast Gas Association (NGA). GPA Midstream appreciates the initiative of PHMSA to appropriately amend the regulations governing LNG.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Stuart Saulters', with a stylized, cursive script.

Stuart Saulters
VP, Federal Affairs
GPA Midstream Association

⁴ "Transportation of natural and other gas by Pipeline Minimum Federal Safety Standards: Liquefied Natural Gas Systems," 37 Fed. Reg. 21,638 (Oct. 13, 1972).

⁵ "Liquefied Natural Gas Facilities; New Federal Safety Standards," 45 Fed. Reg. 9,184 (Feb. 11, 1980).