



American
Petroleum
Institute



July 23, 2025

Submitted via pipeline interp submittal@dot.gov

Mr. John Gale
Director, Standards & Rulemakings Division
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

**Re: Comments on Razorback Gathering Company Interpretation Request
PI-25-0007**

Dear Mr. Gale:

The American Petroleum Institute (API),¹ GPA Midstream Association (GPA Midstream),² and the Interstate Natural Gas Association of America (INGAA)³ respectfully submit these comments in response to the above-referenced interpretation request filed by Razorback Gathering Company, LLC (Razorback or the Company) with the Pipeline and Hazardous Materials Safety Administration (PHMSA).⁴

In its request, Razorback seeks PHMSA's confirmation that the pipelines it acquired can be reclassified from transmission to either Type A or C gathering lines. API, GPA Midstream, and INGAA members will find value in how PHMSA responds to this request. Razorback states that "each of [its] pipelines are transporting gas from the furthestmost downstream gathering compressor station endpoint into another pipeline facility or transmission line."⁵ The request also provides a table with information related to the specific pipelines, including the years of pipeline construction and their lengths. There were no schematics attached.

Based on the information provided, API, GPA Midstream, and INGAA support Razorback's analysis and encourage PHMSA to agree with the approach proposed by the operator. Because the pipelines connect the furthestmost downstream point in a gathering operation to another downstream pipeline, the lines may be classified as incidental gathering pursuant to API RP 80, §§ 2.2(a)(1), as incorporated by reference in 49 C.F.R. § 192.7.

Razorback's table includes one segment, the Little Creek to NGPL Discharge PL, that is longer than 10 miles. However, it was constructed prior to May 16, 2022. Therefore, the section 192.8(a)(5) limitation on incidental gathering should not apply. This approach would also be consistent with PHMSA's recent

¹ For more information, visit www.api.org.

² For more information, visit www.gpamidstream.org.

³ For more information, visit www.ingaa.org.

⁴ <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2025-06/Razorback-Gathering-PI-25-0007-5-14-2025-Part-192-8.pdf>

⁵ *Id.* at 1.

notice of proposed rulemaking (NPRM) on incidental gathering published for comment on July 1, 2025.⁶ That NPRM proposes to codify the notice of limited enforcement discretion⁷ and clarify in the regulations that the 10-mile restriction does not apply to portions of an existing pipeline that had been designated as “incidental gathering” on or before May 16, 2022, and were subsequently relocated, replaced, or otherwise changed.⁸

While the Associations may share more in comments, generally, API, GPA Midstream, and INGAA support the NPRM, which formalizes PHMSA’s existing practice and provides regulatory clarity to operators of incidental gathering lines. API, GPA Midstream, and INGAA appreciate PHMSA’s consideration of these comments of the Razorback Gathering interpretation request.

Respectfully submitted,



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Interstate Natural Gas Association of America

⁶ Pipeline Safety: Codify Enforcement Discretion on Incidental Gathering Lines, 90 Fed. Reg. 28,597 (Jul. 1, 2025).

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; Technical Corrections; Issuance of Limited Enforcement Discretion, 87 Fed. Reg. 26,296, 26,297 (May 4, 2022)(The agency noted it would not enforce the 10-mile incidental gathering limitation for any line constructed before May 16, 2022 that is replaced, relocated or otherwise changed).

⁸ 90 Fed. Reg. at 28,597.