



September 12, 2025

**Submitted via regulations.gov**

Office of Management and Budget  
Desk Officer for the Office of the Secretary of Transportation  
725 17th Street NW  
Washington, DC 20503

**Re: Docket No. PHMSA–2025–0021: Information Collection Activities**

Dear Sir or Madam:

The GPA Midstream Association (GPA or GPA Midstream) respectfully submits these comments in response to the Pipeline and Hazardous Materials Safety Administration’s (PHMSA or the Agency) Notice and Request for Comments (Notice) announcing its intent to forward its proposed changes to the incident reporting instructions to the Office of Management and Budget (OMB) for review.<sup>1</sup> GPA has served the U.S. energy industry since 1921. GPA Midstream is composed of approximately 50 corporate members that directly employ over 57,000 employees that are engaged in the gathering, transportation, processing, treating, storage and marketing of natural gas, natural gas liquids (NGLs), crude oil, and refined products, commonly referred to in the industry as “midstream activities.” In 2023, GPA Midstream members operated 507,000 miles of pipelines, gathered 91 Bcf/d of natural gas, and operated more than 365 natural gas processing facilities.

GPA supports PHMSA’s proposal to revise its reporting instructions to clarify how operators should handle intentional gas releases. As PHMSA acknowledged in the Notice, GPA and other trade associations filed detailed comments on this topic in 2021.<sup>2</sup> GPA continues to support the requested clarifications that events not associated with equipment failure or malfunctions should not be reportable. If a relief valve or emergency shutdown device relieves gas through the intended pathway, then the relief valve has functioned as designed and therefore should not be a reportable incident.

GPA also supports PHMSA’s conclusion that these revisions will result in a more accurate representation of incident data, allowing both operators and regulators to better identify and address safety concerns. GPA appreciates the opportunity to review and comment on the proposed changes to PHMSA’s reporting instructions.

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<sup>1</sup> *Pipeline Safety: Information Collection Activities*, 90 Fed. Reg. 30,933, 30,934, [Notice and Request for Comments](#) (Aug. 13, 2025).

<sup>2</sup> <https://www.regulations.gov/comment/PHMSA-2019-0172-0006> (Feb. 17, 2021).



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is fluid and cursive, with a large, prominent initial "S" and a long, sweeping horizontal line extending to the right.

Stuart Saulters  
Vice President, Federal Affairs  
GPA Midstream Association  
6060 S. American Plaza St E  
Suite 700  
Tulsa, Oklahoma 74135  
[ssaulters@gpamidstream.org](mailto:ssaulters@gpamidstream.org)