



October 6, 2025

The Honorable Ted Cruz
Chairman, Senate Commerce, Science and Transportation Committee
554 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member, Senate Commerce, Science and Transportation Committee
554 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Todd Young
Chairman, Surface Transportation, Freight, Pipelines and Safety Subcommittee
554 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Gary Peters
Ranking Member, Surface Transportation, Freight, Pipelines and Safety Subcommittee
554 Dirksen Senate Office Building
Washington, DC 20510

Re: Markup of the Pipeline Integrity, Protection, and Enhancement for Leveraging Investments in the Nation's Energy to assure Safety Act of 2025 (PIPELINE Safety Act)

Dear Chairman Cruz, Chairman Young, Ranking Member Cantwell, and Ranking Member Peters:

GPA Midstream Association (GPA Midstream or the Association) commends your efforts within the Senate Commerce, Science, and Transportation Committee to mark up the Pipeline Integrity, Protection, and Enhancement for Leveraging Investments in the Nation's Energy to assure Safety Act of 2025 (PIPELINE Safety Act). We appreciate the Committee's willingness to act to reauthorize pipeline safety programs under the Pipeline and Hazardous Materials Safety Administration (PHMSA). The PIPELINE Safety Act progresses pipeline safety, but in a practical way.



GPA Midstream has served the U.S. energy industry since 1921. The Association 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.

Our members are an invisible link between raw natural gas and crude oil produced at the wellhead and the distribution of products to consumers for heating, electricity production, transportation, steelmaking, fertilizer production, plastics, high-tech devices, cosmetics, pharmaceuticals, and much more. And safety – of employees, contractors, and communities – is the highest priority for GPA Midstream member companies.

One of GPA Midstream’s priorities for reauthorization legislation was ensuring elimination of duplicative oversight of in-plant gas piping. Hazardous liquid in-plant piping is exempt by law from PHMSA regulation, but regulation of gas in-plant piping has lacked similar clarity. In-plant pipeline systems are typically low risk, operate at lower pressures, and are confined within plant boundaries or in short sections between adjacent plants. They are also within the jurisdiction of other robust safety programs, such as the Occupational Safety and Health Administration’s Process Safety Management standards. Aligning the treatment of gas and liquid in-plant piping would eliminate regulatory redundancy without compromising safety. We are grateful the PIPELINE Safety Act includes Sec. 213, “Transporting Gas,” a provision to remove this redundancy. Legislative certainty for the elimination of such unnecessary redundancy is critical.

GPA Midstream members support reauthorization of PHMSA’s pipeline safety programs, with the goal to ensure pipelines remain the safest method for transporting affordable, reliable, and sustainable energy, while also facilitating innovation and efficiency. We seek legislative and regulatory predictability and certainty, to enable prudent investment decisions for the benefit of communities and investors alike. GPA Midstream appreciates your leadership on this important issue and stands ready to serve as a resource as both Chambers move forward to a final bill.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is fluid and cursive, with a prominent initial 'S'.

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