



December 13, 2016

Via e-filing on www.regulations.gov

Docket Operations
U.S. Department of Transportation
Attention: Docket ID No. PHMSA-2016-0091 12000
West Building, Ground Floor, Room W12-140
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Comments of GPA Midstream on Interim Final Rule, “Pipeline Safety: Enhanced Emergency Order Procedures” (Docket ID No.: PHMSA-2016-0091)

The GPA Midstream Association (“GPA Midstream”) appreciates this opportunity to submit comments in response to the Interim Final Rule (“IFR”) issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA” or the “Agency”) on October 14, 2016.

GPA Midstream has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA Midstream is composed of over 100 corporate members that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as “midstream activities.” Such processing includes the removal of impurities from the raw gas stream produced at the wellhead as well as the extraction for sale of natural gas liquid products (NGLs) such as ethane, propane, butane, and natural gasoline or in the manufacture, transportation, or further processing of liquid products from natural gas. GPA Midstream membership accounts for more than 90% of the NGLs produced in the United States from natural gas processing.

Section 16 of the PIPES Act amended section 60117 of the pipeline safety laws, 49 U.S.C. 60117, to establish the new emergency order authority in subsection 60117(o). The new authority allows for the issuance of an emergency order when “an unsafe condition or practice, or a combination of unsafe conditions and practices, is causing an imminent hazard.” The IFR states that such authority allows “PHMSA to act quickly to address imminent safety hazards that exist across a subset or larger group of owners or operators of pipeline facilities.”

GPA Midstream has reviewed comments submitted by The American Petroleum Institute (“API”) and the Association of Oil Pipe Lines (“AOPL”). GPA Midstream is supportive of and in agreement with each concern raised by these Associations regarding the provisions in the IFR.

GPA Midstream appreciates the opportunity to submit these comments on PHMSA’s Interim Final Rule. We look forward to continuing to work with PHMSA as it continues to meet

its mandates from the PIPES Act. GPA Midstream is standing by to provide further information or answer any questions that PHMSA may have.

Respectfully Submitted,

Matthew Hite
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GPA Midstream Association