February 17, 2016

Via e-filing on www.regulations.gov

Docket Operations, M-30
U.S. Department of Transportation
Attention: Docket ID No. PHMSA-2016-0016
West Building, Ground Floor, Room W12-140
1200 New Jersey Ave., SE
Washington, DC 20590-0001

Re: Comments of GPA Midstream on Interim Final Rule, “Pipeline Safety: Safety of Underground Natural Gas Storage Facilities” (Docket ID No.: PHMSA-2016-0016)

The GPA Midstream Association appreciates this opportunity to submit comments in response to the Interim Final Rule (IFR) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) on December 19, 2016.

GPA Midstream has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA Midstream is composed of nearly 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. A number of GPA Midstream members also own or operate underground natural gas storage facilities.

Underground storage of natural gas is an essential component of our nation’s energy system. Our nation’s significant storage capacity enables storage operators and utilities to reliably offer clean natural gas to consumers throughout the year in a cost-efficient manner and without interruption.

GPA Midstream Association has reviewed and supports comments submitted jointly by the American Gas Association (AGA), the American Petroleum Institute (API), the American Public Gas Association (APGA), and the Interstate Natural Gas Association of America (INGAA) on PHMSA’s IFR establishing for the first time Federal pipeline safety regulations for underground natural gas storage facilities.
GPA Midstream appreciates the opportunity to submit these comments on PHMSA’s Interim Final Rule. GPA Midstream is standing by to provide further information or answer any questions that PHMSA may have.

Respectfully Submitted,

Matthew Hite
Vice President of Government Affairs
GPA Midstream Association