



July 28, 2025

Docket Management System
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor W12-140
Washington, DC 20590-001

The Independent Petroleum Association of America (IPAA) submits the following comments regarding PHMSA's advanced notice of proposed rulemaking (ANPRM) regarding Pipeline Safety Regulations. IPAA members are the primary producers of the nation's natural gas and oil, accounting for 90 percent of America's natural gas production and 83 percent of its oil output. Independent producers remain a driving force in our economy and support millions of jobs in the United States.

Although there are a variety of important issues facing independent producers regarding pipeline safety issues, IPAA wants to raise several specific issues outlined below:

1. Clarification of "Farm Tap" Definition in 49 CFR Part 192

PHMSA should formally define the term "farm tap" within 49 CFR Part 192. While the term is commonly used in the industry and referenced in PHMSA guidance documents, it does not currently appear in the regulatory text. The lack of a clear definition of "farm tap" in 49 CFR Part 192 creates confusion and regulatory uncertainty for operators of natural gas gathering and distribution systems. Currently, operators must guess whether a line supplying gas to an individual residence, agricultural facility, or commercial structure from a gathering or transmission line is a regulated "service line" or not.

This confusion has been highlighted in PHMSA's own guidance, including FAQs and advisory bulletins, but has yet to be formally resolved in rulemaking. Definitions vary by state and by inspector interpretation. Clarifying this language would improve consistency and reduce unnecessary burdens or misclassifications during inspections.

A clear definition will eliminate ambiguity and ensure operators understand which requirements apply to these small, low-pressure connections. It will also ensure appropriate safety standards are applied without creating a heavy regulatory burden for low-risk farm tap installations. Finally, uncertainty about whether or how a farm tap is regulated can lead to costly overcompliance or enforcement

actions. Providing a clear definition of “farm tap” will reduce the need for legal consultation, improve regulatory efficiency and lower costs for rural operators and customers alike.

2. Clarification of “Incidental Gathering” Definition and Applicability of API RP 80

PHMSA should clarify that the definition of “incidental gathering” in 49 CFR 192.8(a)(5) and its reference to API RP 80 is applicable to all gas gathering lines, not only to pipelines that are newly installed, replaced, relocated, or otherwise changed after May 16, 2022. The current wording has caused confusion and inconsistent enforcement in the field, particularly regarding legacy pipelines that meet API RP 80’s incidental gathering criteria.

The inclusion of “incidental gathering” as defined by API RP 80 is essential to identifying the functional endpoints of gathering systems. However, the current language in 49 CFR 192.8(a)(5) introduces ambiguity by stating that this definition only applies to new, replaced, relocated, or otherwise changed pipelines after May 16, 2022. This phrasing has led to confusion among operators and inspectors. Some PHMSA and state inspectors interpret this to mean that “incidental gathering” only applies if physical changes to the pipeline occurred after May 16, 2022.

PHMSA should clarify that “incidental gathering” may be applied retroactively if the operator properly classifies the line using API RP 80 definitions and supporting documentation. Revising 49 CFR 192.8(a)(5) to state that “incidental gathering” as defined in API RP 80 may be applied to any pipeline, regardless of installation or modification date, if it meets the technical criteria of API RP 80 is an important and needed improvement to the regulations.

3. Opposition to Leak Detection Requirements for Type C Lines in 49 CFR Part 192

The proposed rulemaking introduces mandatory leak detection requirements for Type C gas gathering lines in Class 1 and Class 2 areas under 49 CFR 192.9. These requirements mandate that Type C gathering lines “must be leak surveyed using leak detection equipment” even in Class 1 and Class 2 locations. This is inconsistent with current treatment of Type A transmission pipelines, which are subject to fewer requirements in similar or higher-pressure scenarios.

Per 49 CFR 192.9(c), Type A lines must comply with certain transmission regulations, but utilization of leak detection equipment is not required unless it is in a Class 3 or 4 location. The regulations state:

“An operator of a Type A line must comply with the requirements of this part applicable to transmission lines, except the requirements in 192.150 and subpart O.”

Meanwhile, 192.706, which governs transmission line leak surveys, requires leak detection only for “each transmission line in a Class 3 or Class 4 location.”

These new requirements create a regulatory disparity, where Type C lines at lower stress levels and lower public risk must utilize leak detection equipment, while Type A lines at higher pressure are exempt. This inconsistency is not logical and does not prioritize safety.

PHMSA should delete 192.9(e)(1)(vii) and remove all leak detection requirements for Type C pipelines in Class 1 and 2 areas. The current approach is burdensome and contradicts risk-based safety priorities in other parts of 49 CFR Part 192.

4. Clarification to Requirements for Notifying 911 or PSAP’s after a “notification of potential rupture” in 49 CFR 192.615(a)(8)

PHMSA should clarify that operators are required to notify the public safety answering point (PSAP) or other coordinating agency only after confirming a rupture or having a credible and specific location data indicating an imminent threat. Additionally, PHMSA should be required to coordinate with PSAPs and provide clear guidance and training on how to manage such notifications.

The current language in 49 CFR 192.615(a)(8) requires operators to “immediately and directly notify the appropriate public safety answering point (PSAP) or other coordinating agency, after receiving a notification of potential rupture.” This requirement is overly broad, particularly the expectation to notify 911 services based solely on a “potential rupture.”

Most 911 operators in rural areas are not prepared to respond to such notifications unless a specific address or confirmed emergency is available. In many rural areas, precise location data may not exist at the time a “potential rupture” is received. This results in confusion, miscommunication, and a waste of emergency resources, all before a verified rupture has even occurred. The term “potential rupture,” as currently used, creates legal and operational ambiguity. It also places the burden on pipeline operators to report an event that may ultimately turn out to be a non-issue and creates greater confusion for emergency operators working on unclear or incomplete information.

From a safety perspective, involving emergency services before an operator has confirmed and located an issue may hinder response efficiency by overwhelming resources with unverified events. Requiring immediate notification to 911 based

solely on a "potential rupture," often triggered by vague third-party reports, can lead to unnecessary dispatches, overreactions, and public alarm.

PHMSA should amend 192.615(a)(8) to require notification only after verification of rupture or confirmation of as significant threat with location certainty. We also urge the agency to work with national emergency response organizations to develop clear, nationwide protocols for handling pipeline-related notifications. Finally, we urge PHMSA to issue guidance to both operators and PSAPs to ensure effective, coordinated emergency communication based on verified data.

Thank you for your attention to these comments. The continued growth of America's oil and natural gas renaissance is essential and can be done with even greater efficiency and technological acumen and independent producers stand ready to help ensure America has a strong and vibrant energy economy for years to come.

Sincerely,



Daniel T. Naatz
Chief Operating Officer
Independent Petroleum Association of America