

Congress of the United States

Washington, DC 20515

August 15, 2023

Tristan Brown
Deputy Administrator
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Deputy Administrator Brown:

We write in support of the Pipeline and Hazardous Materials Safety Administration's (PHMSA) proposed rule, "Pipeline Safety: Gas Pipeline Leak Detection and Repair," (88 FR 31890). As required by the Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020 (PIPES 2020), PHMSA proposed a new rule to improve the detection of gas pipeline leaks and accelerate the repair of leaking pipelines. Recent advances in gas sensing, data analytics, and mobile technology allow for PHMSA to require the use of gas leak detection solutions that perform significantly better than traditional methods, are commercially-available, and are easy to use without extensive specialized training.

In PIPES 2020, Congress passed bipartisan provisions to reduce leaks across the Nation's gas pipeline infrastructure. Fully implementing this rule will result in a significant reduction in greenhouse gas emissions and is a key feature of the U.S. Methane Emissions Reduction Action Plan. This rule will help to reduce annual methane emissions by as much as one million metric tons, equivalent to 25 million metric tons of carbon dioxide. On average, a pipeline rupture releases more than 1,000 metric tons of methane which, according to an Environmental Protection Agency (EPA) analysis, will trap 25 times more energy than a similar mass of carbon dioxide over a 100-year period. This rule also has the potential to help mitigate the near-term effects of climate change, such as extreme weather events and natural disasters, by substantially reducing the amount of methane emitted into the atmosphere.

There are currently more than 3.3 million miles of gas transmission, distribution, and gathering pipelines, over 400 underground natural gas storage facilities, and 165 liquefied natural gas facilities. This rule will update the outdated federal leak detection and repair standards to account for new technologies, increasing pipeline safety and helping to prevent the release of greenhouse gases. This rule will also help to create thousands of good-paying jobs inspecting, repairing, and replacing leaky gas pipelines.

We appreciate PHMSA's steadfast actions to meet this important congressional mandate and encourage you to continue to move this effort forward swiftly. The proposed rule requires pipeline operators to establish advanced leak detection programs aimed at detecting and repairing all gas leaks in a timely manner, increases the frequency of leakage surveys, and requires the use of commercially-available leak detection technology. Specifically, we support provisions in the proposed rule that:

- Revise the reporting minimum threshold to detect smaller leaks earlier, and further support lowering the leak reporting threshold to 500,000 standard cubic feet to align with the EPA's greenhouse gas reporting standards.
- Minimize intentional gas releases caused by maintenance, repair, and construction;
- Incentivize pipeline operators to use commercially-available equipment that can capture released methane for later use; and
- Establish more appropriate timeframes for the repair of all leaks, prioritizing these leaks by their risks to public safety and the environment.

We also encourage PHMSA to consider advanced performance standards for leak detection and measurement equipment that is capable of accounting for local meteorological conditions, such as wind velocity, distance from source, gas selectivity, and measurement time. In addition, PHMSA should consider requiring an increased level of measurement sensitivity.

Additionally, we support prescribing leakage survey frequency and leak detection equipment requirements for underground natural gas storage facilities (UNGSF). Given the catastrophic nature of potential UNGSF incidents, prescribing survey frequency and leak detection equipment requirements is vital to preventing the next catastrophic UNGSF failure. Past failures have caused significant damage to the environment and to human health including the:

- Aliso Canyon facility failure in 2015 which released 86 billion cubic feet (BCF) of natural gas and displaced 8,000 families, causing over one billion dollars in damages;
- Yaggy storage field in 2001 which released 143 BCF of natural gas;
- Moss Bluff facility in 2004 which released six BCF of natural gas; and
- Equitrans Midstream Corp. well blowout in 2022 which resulted in a release of one BCF of natural gas.

We also urge PHMSA to consider adding specific guidelines to the final rule that would limit the ability of operators to receive an exception to the rule's requirements. We encourage PHMSA to maintain the proposed rule's requirement that operators mitigate intentional emissions, such as blowdowns during maintenance activities and extreme weather.¹ We also support the proposed rule's requirement that operators publicly report all such activities.

Finally, we note that hundreds of thousands of miles of gathering lines exist in the United States, and many of these lines are in locations in which leaks would be hazardous to human health and the environment. Gathering lines contribute an outsized role in overall pipeline methane emissions. According to a study by the Environmental Defense Fund, the emissions from gathering lines in the Permian Basin were leaking 14 times more methane than the EPA's prior estimate.² Applying the final rule to regulated gas gathering pipelines and requiring that these pipeline owners submit data to the National Pipeline Mapping System will help ensure

¹ <https://www.texastribune.org/2023/07/19/texas-pipeline-heat-natural-gas-emissions-pollution-permian-basin/>

² Jevan Yu et al., *Methane Emissions from Natural Gas Gathering Pipelines in the Permian Basin*, ENVIRON. SCI. TECHNOL. LETT. (2022) <https://pubs.acs.org/doi/10.1021/acs.estlett.2c00380>.

these leaks are found and repaired as soon as possible and will expand damage prevention efforts resulting in an increase in pipeline safety.

We support your efforts to improve pipeline safety with this rule and encourage you to consider including the additional proposals in this letter to make the rule as effective as possible.

Sincerely,



Rick Larsen
Ranking Member
Committee on Transportation
and Infrastructure



Donald M. Payne, Jr.
Member of Congress
Ranking Member
Subcommittee on Railroads,
Pipelines, and Hazardous
Materials



Valerie P. Foushee
Member of Congress
Vice Ranking Member
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Colin Z. Allred
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Mark DeSaulnier
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Jesús G. "Chuy" García
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