August 16, 2023

The Honorable Pete Buttigieg, Secretary
The Honorable Tristan Brown, Deputy Administrator, PHMSA
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Attn: Docket No. PHMSA-2021-0039


Dear Secretary Buttigieg and Deputy Administrator Brown:

Methane pollution from natural gas pipelines is accelerating the pace of climate change and affecting the safety of communities across the country. We are calling on the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (“PHMSA”) to quickly finalize the strongest possible pipeline safeguards to improve community safety and cut methane emissions.

Natural gas pipeline leaks pose a safety risk to communities, contribute to the climate crisis by releasing the potent greenhouse gas methane, and result in lost and wasted product that is typically charged to ratepayers. Furthermore, pipeline infrastructure has a disproportionate impact on disadvantaged communities that can be remedied by more effective oversight. Last year, scientists found that leaks on local distribution pipelines tended to be located at higher densities in neighborhoods with more people of color and lower household incomes. Researchers have found that U.S. counties with more socially vulnerable populations tend to have a higher density of natural gas transmission and gathering pipelines—indicating that pipelines are part of the cumulative burdens faced by vulnerable communities.

As early as the 1990s, Congress authorized and directed PHMSA to set minimum pipeline safety standards that are protective of public safety and the environment. PHMSA has historically focused on risks to public safety side in its oversight of gas pipelines, but as awareness has increased of methane’s contributions to climate change as a potent greenhouse gas, PHMSA has recognized that fugitive and

---

operational methane releases from natural gas pipelines pose a significant environmental threat.⁶ And in the bipartisan PIPES Act of 2020, Congress further directed PHMSA to develop new standards for the use of advanced leak detection technologies and for minimizing releases of natural gas, with an emphasis on ensuring both public safety and environmental protection.⁷

The Proposed Rule contains much-needed protective standards that will require operators to find and fix more pipeline leaks, deploy advanced methane leak detection technologies, provide the public with more information about leaks to improve accountability and transparency, take significant actions to mitigate operational gas releases such as blowdowns and venting, and the proposal will expand the applicability of minimum safety standards to additional miles of gathering pipelines. PHMSA should finalize a rule that contains, or strengthens, these key components.

But there is more work to be done to ensure the strongest possible safety and environmental standards for gas pipelines, and to ensure that PHMSA fulfills Congress’ direction in the PIPES Act of 2020. Moreover, both well integrity standards and leak detection and repair standards must be addressed for Underground Gas Storage Facilities (UNGSF). PHMSA must do more to improve the Proposed Rule and finalize comprehensive standards that achieve the following:

- **Add clear and rigorous requirements for deploying advanced leak detection technology and capturing emissions from intentional releases.** Elements of the Proposed Rule grant significant discretion in the implementation of work practices and technologies, without adequate accountability to ensure that operators deploy the most effective solutions. There are available, effective technologies and practices that can maximize methane reductions and improve safety by finding more leaks with greater precision, and that can minimize blowdown emissions to the greatest extent possible.

- **Adopt clear and strong well integrity standards that include standards for infrastructure and monitoring to prevent leaks as well as leak detection and repair standards for UNGSF and associated pipeline infrastructure.** Proper well integrity is required to prevent significant failures leading to releases such as Aliso Canyon and Cambria of recent and a critical component of preventive and mitigative measures that must be prioritized. Recent updates to industry best practices have provided useful tools and guidelines that assist and require operators to develop and implement substantive well integrity assurance programs, especially regarding primary and secondary barriers. Guidance has been updated and clarified regarding risk management in all phases of UNGSFs design, construction, commissioning, operation and closure – the updated UNGSF guidance documents’ well integrity, monitoring (many methodologies are not only recognized but encouraged), repair and records documentation are very clear and directive with annual (or even shorter) timeframes that are much more rigorous than the current proposed frequency of upwards of seven years. These updates to best practices were proposed, vetted and adopted through a rigorous stakeholder process that included numerous large operators, state regulators, PHMSA, and civil society. PHMSA should therefore proceed to adopt clear and

---

⁶ See Proposed Rule at 31893-31906.
robust standards that ensure operators deploy the highest-performance technologies and best practices.

- **Expand applicability of protective standards to all gas gathering pipelines.** There are over 430,000 miles of U.S. onshore gas gathering pipelines, but the Proposed Rule would only require leak survey and repair practices for about 100,000 miles. PHMSA should further expand leak survey and repair standards, including the use of advanced leak detection, to all gathering pipelines. It is well documented that leaks and operational releases from gathering lines are a notable source of methane and other air pollutants.\(^8\)

- **Remove the proposed exemption for repairing leaks on pipe segments that are scheduled to be replaced in the next five years.** While PHMSA’s proposal provides a strong framework, allowing known gas leaks to persist for as long as five years can result in significant emissions – especially from older pipelines which tend to be leakier. The exemption in the Proposed Rule is not reasonable to protect safety and the environment. The proposal can be improved by only allowing operators to forego repairs on pipe segments that will be retired or replaced within the following year.

- **Require operators to report information on hydrogen mixing.** In addition to the approximately 3 million miles of U.S. natural gas pipelines, federal gas pipeline standards apply to other gaseous pipelines, including about 1,500 miles of hydrogen pipelines. As hydrogen transportation demands increase in the face of significant investment, the importance of designing and operating hydrogen infrastructure to ensure safety and environmental protection will increase significantly—including the need to minimize leakage. The Proposed Rule does not address these emerging issues in full, and PHMSA should plan to conduct extensive community outreach and initiate a future rulemaking with a specific focus on hydrogen pipelines and storage facilities. In this rulemaking, however, PHMSA should require operators to publicly report information on any plans to mix hydrogen into natural gas pipelines. Natural gas companies are currently not required to notify regulators or the public when they mix hydrogen into natural gas pipeline systems. To maximize transparency and ensure community awareness and safety, operators should report these operations before they occur.

PHMSA should act expeditiously to complete this essential rulemaking, particularly since the agency is already behind schedule. The PIPES Act of 2020 directed PHMSA to complete this rulemaking by the end of 2021, and the White House [Methane Emissions Reduction Action Plan](https://www.whitehouse.gov/methane-emissions-reduction-action-plan/), issued November 2021, identified this rulemaking as a key policy to cut methane emissions.

Our members and communities are counting on PHMSA and the U.S. Department of Transportation to meaningfully address these concerns. In finalizing and improving its proposal, PHMSA should require operators to conduct frequent leak surveys, repair leaks promptly, deploy advanced technologies to find

---

and measure more leaks, and implement effective practices to mitigate emissions from blowdowns and venting. Your agency must act quickly to finalize rigorous, comprehensive standards for natural gas pipelines to improve public safety and cut methane pollution.

Thank you for your consideration,

Heidi Leathwood  
Climate Policy Analyst  
350 Colorado

Thomas Solomon  
Co-Coordinator  
350 New Mexico

Katie Huffling  
Executive Director  
Alliance of Nurses for Healthy Environments

V. Sean Mitchell  
MSN, APRN-BC  
Alliance of Nurses for Healthy Environments - Colorado

Dean Wilson  
Executive Director  
Atchafalaya Basinkeeper

Kristen Schlemmer  
Legal Director and Waterkeeper  
Bayou City Waterkeeper

Matthew Mehalik  
Executive Director  
Breathe Project

Isaac Brown  
Executive Director  
Center for Methane Solutions

Evey Mengelkoch  
Climate Fellow  
Change the Chamber

Michael Mullen  
ED/Riverkeeper  
Choctawhatchee Riverkeeper

Darin Schroeder  
Methane Legal and Regulatory Director  
Clean Air Task Force

Sean Jackson  
National Water Campaigns Coordinator  
Clean Water Action

Tamara Toles O'Laughlin  
Founder  
Climate Critical

Stefania Tomaskovic  
Coalition Director  
Coalition for the Environment, Equity, and Resilience

Lauren Goldberg  
Executive Director  
Columbia Riverkeeper

Virginia Palacios  
Executive Director  
Commission Shift
David Jenkins  
President  
Conservatives for Responsible Stewardship

Bridget Maryott  
Communications Director  
Cook Inletkeeper

Liz Anderson  
Lead Organizer  
Dakota Resource Council

Aileen Hull  
Community Engagement Coordinator  
Dayton Energy Collaborative

Morgan Brown  
Regional Organizer  
Defend Our Future

Andrew Black  
Reverend  
EarthKeepers 360

Lauren Pagel  
Policy Director  
Earthworks

Carolina Peña-Alarcón  
Program Manager  
EcoMadres

Erin Murphy  
Senior Attorney, Energy Markets & Utility Regulation  
Environmental Defense Fund

Alison L. Steele  
Executive Director  
Environmental Health Project

The Rev. Dr. Jessica Moerman  
President/CEO  
Evangelical Environmental Network

Caitlan Frederick  
Co-Chair  
FACE Intergenerational Justice (a co-initiative of the Institute for Governance & Sustainable Development and Center for Human Rights and Environment)

Kay Ahaus  
Spokesperson  
Greater Highland Area Concerned Citizens

Michele Langa  
Staff Attorney  
Hackensack Riverkeeper

Barbara Webber  
Executive Director  
Health Action New Mexico

Megan Kemp  
Advocacy Manager  
Healthy Air and Water Colorado

Scott Eustis  
Community Science Director  
Healthy Gulf

Kelly Bryson  
Grants Manager  
High Tide Foundation

Shanna Edberg  
Director of Conservation Programs  
Hispanic Access Foundation

German Ibanez  
Interim - Chair of HCM - Chair of Governmental Affairs Committee  
Houston Climate Movement

Dr. Junius Batten Pressey, jr.  
President / CEO  
Indiana Environment Clean Energy J40, Inc.
Patrick A. Nye
President
Ingleside on the Bay Coastal Watch Association

Bill Bradlee
Senior Organizing Director
Interfaith Power & Light

Vee Likes
Development Director
Kenwood Oakland Community Organization

Sandy Bihn
Executive Director
Lake Erie Waterkeeper

Earl Hatley
President
LEAD Agency, Inc.

Ranjana Bhandari
Executive Director
Liveable Arlington

Cheryl Nenn
Riverkeeper
Milwaukee Riverkeeper

Charles Miller
Policy Manager
Missouri Confluence Waterkeeper

Celerah Hewes
National Field Manager
Moms Clean Air Force

David Caldwell
Broad Riverkeeper
MountainTrue

Robert Blake
Executive Director
Native Sun Community Power Development

Joan Brown
Executive Director
New Mexico & El Paso Interfaith Power and Light

Lynne Hinton
Conference Director
New Mexico Conference of Churches

Augusta Catherin-Sauer
Community Organizer
Northern Plains Resource Council

Gregory Remaud
NY/NJ Baykeeper

Garry Brown
Founder & President
Orange County Coastkeeper

Phyllis Blumberg
Lead Organizer
PA Jewish Earth Alliance

Alexandra Merlino
Executive Director
Partnership for Responsible Business

Peter Topping
Executive Director & Baykeeper
Peconic Baykeeper

Katherine Stahl
Community Organizer
Powder River Basin Resource Council

Alan Franklin
Political Director
ProgressNow Colorado

Adrian Shelley
Texas Director
Public Citizen
<table>
<thead>
<tr>
<th>Name</th>
<th>Title/Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emily Gonzalez</td>
<td>Director of Law and Policy, Puget Soundkeeper</td>
</tr>
<tr>
<td>Bill Schultz</td>
<td>Riverkeeper, Raritan Riverkeeper</td>
</tr>
<tr>
<td>Sean Gosiewski</td>
<td>Executive Director, Resilient Cities and Communities, MN, Resilient Cities and Communities</td>
</tr>
<tr>
<td>Barbara Jarmoska</td>
<td>Director, Responsible Decarbonization Alliance (RDA)</td>
</tr>
<tr>
<td>Sheila Serna</td>
<td>Climate Science and Policy Director, Rio Grande International Study Center</td>
</tr>
<tr>
<td>Glenn Schiffbauer</td>
<td>Executive Director, Santa Fe Green Chamber of Commerce</td>
</tr>
<tr>
<td>Mahyar Sorour</td>
<td>Director, Beyond Fossil Fuels Policy, Sierra Club</td>
</tr>
<tr>
<td>Robin Schneider</td>
<td>Executive Director, Texas Campaign for the Environment</td>
</tr>
<tr>
<td>Ben Tettlebaum</td>
<td>Director &amp; Senior Staff Attorney, The Wilderness Society</td>
</tr>
<tr>
<td>Heather Hulton VanTassel</td>
<td>Executive Director, Three Rivers Waterkeeper</td>
</tr>
<tr>
<td>Victoria Frankeny</td>
<td>Riverkeeper &amp; Staff Attorney, Tualatin Riverkeepers</td>
</tr>
<tr>
<td>Kate Hudson</td>
<td>Climate and Energy Advocacy Coordinator, Waterkeeper Alliance</td>
</tr>
<tr>
<td>Robin Broder</td>
<td>Acting Executive Director, Waterkeepers Chesapeake</td>
</tr>
<tr>
<td>Emily Hornback</td>
<td>Executive Director, Western Colorado Alliance</td>
</tr>
<tr>
<td>Erik Schlenker-Goodrich</td>
<td>Executive Director, Western Environmental Law Center</td>
</tr>
<tr>
<td>Gwen Lachelt</td>
<td>Executive Director, Western Leaders Network</td>
</tr>
<tr>
<td>Sarah Hunkins</td>
<td>DC Representative, Western Organization of Resource Councils</td>
</tr>
<tr>
<td>Joro Walker</td>
<td>Senior Attorney, Western Resource Advocates</td>
</tr>
<tr>
<td>Debra Buffkin</td>
<td>Executive Director, Winyah Rivers Alliance</td>
</tr>
<tr>
<td>Rev. Kimberly Koczan</td>
<td>Director, Wisdom's Well, llc</td>
</tr>
<tr>
<td>John Burrows</td>
<td>Director of Energy and Climate Policy, Wyoming Outdoor Council</td>
</tr>
</tbody>
</table>