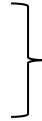


**BEFORE THE  
UNITED STATES DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
WASHINGTON, D.C.**

Pipeline Safety: Standards Update  
API RP 1170 and API RP 1171



Docket No. PHMSA-2025-0120

**COMMENTS IN RESPONSE TO  
“PIPELINE SAFETY: STANDARDS UPDATE— API RP 1170 AND API RP 1171”  
DIRECT FINAL RULE**

**FILED BY  
AMERICAN GAS ASSOCIATION**

September 2, 2025

The American Gas Association (AGA)<sup>1</sup> respectfully submits the following comments to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Direct Final Rule (DFR) published July 1, 2025, incorporating by reference the second editions of API Recommended Practices (RP) 1170 and 1171<sup>2</sup> (the RPs).

AGA commends PHMSA for its continued support in the development and evolution of industry consensus standards. The inclusive and transparent approach taken in updating the RPs reflects a shared commitment to enhancing public safety, reducing regulatory confusion, and aligning federal regulations with the latest technical advancements and operational best practices.

AGA supports the incorporation by reference of the second editions of the RPs, which reflect meaningful improvements in the design, construction, risk management, operation and maintenance, and integrity management of underground natural gas storage facilities. They are technically sound, practical, and consistent with the safety objectives of the Pipeline Safety Regulations.

AGA members are implementing or in the process of implementing the recommendations of the second edition of the RPs. Operators are investing considerable resources and effort into revising internal procedures, training personnel, and updating recordkeeping, all while balancing construction, maintenance and leading natural gas demand seasons.

AGA and its members thank PHMSA for its continued partnership in helping ensure the safety and integrity of the country's critical underground gas storage infrastructure. AGA looks forward to continuing collaboration with PHMSA on the safe and effective regulation of underground natural gas storage.

---

<sup>1</sup> AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers on the U.S., of which 95 percent — more than 74 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one-third of the United States' energy needs

<sup>2</sup> *Pipeline Safety: Standards Update – API RP 1170 and API RP 1171*, Docket No. PHMSA-2025-0120; Amdt. No. 192-141, RIN 2137-AF88 (90 Fed. Reg. 28086 July 1, 2025).

Respectfully submitted  
**Date: September 2, 2025**

A handwritten signature in black ink, appearing to read 'K Denbow', with a stylized, sweeping flourish at the end.

Kimberly Denbow  
Vice President, Security & Operations  
American Gas Association  
202-824-7334  
[kdenbow@aga.org](mailto:kdenbow@aga.org)