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April 10, 2011

Ms. Cynthia Quartermain Administrator U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration East Building, 2nd Floor 1200 New Jersey Ave., SE Washington, DC 20590

Re: Invitation to attend the April 18, 2011 Pipeline Safety Executive Forum

Dear Ms. Quartermain:

The Gas Piping Technology Committee (GPTC) is a consensus group made up of representatives from: the distribution, transmission and manufacturing sectors of the natural gas industry; the National Association of Pipeline Safety Representatives (NAPSR), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the National Transportation Safety Board. We currently have 104 members.

Since 1970, the GPTC has been providing valuable guidance to the natural gas industry. Our primary purpose is to assist operators in complying with the performance requirements of the Federal pipeline safety regulations (49 CFR, Parts 191 and 192). We do this by publishing the "Guide for Transmission and Distribution Piping Systems" (the Guide).

The Guide includes the current Federal pipeline safety regulations together with recommended practices developed by the members of the GPTC. The Guide provides "how to" supplementary information relative to each section of the pipeline safety regulations. In addition, the GPTC recommends proposed changes to Parts 191 and 192 and responds to Notices of Proposed Rulemaking.

The American National Standards Institute has accredited the GPTC and assigned it the designation ANSI/GPTC Z380. The American Gas Association is the Secretariat for the committee.

It's no coincidence that the Guide was originally published in the same year as the pipeline safety regulations. It was at the Office of Pipeline Safety's request that the (then known as) Gas Piping Standards Committee develop recommended practices to help operators comply with the performance regulations that were to be issued in 1970.

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More recently, PHMSA and NAPSR requested that the GPTC develop guidance to assist operators in complying with the Distribution Integrity Management Program (DIMP) rule. This guidance material, developed by a task group that included many NAPSR and PHMSA non-GPTC representatives, as well as long-standing committee members, was published as an appendix to the Guide in parallel with the new regulation.

In addition to the DIMP guidance, the Guide contains many other sections that provide recommended practices for the installation, operations, and maintenance of distribution and transmission pipelines, as well as emergency response and public education. There are several sections of the Guide devoted to transmission integrity management, corrosion control, and pressure testing; and a separate cast iron pipe appendix.

Every natural gas piping system is unique and has different operating conditions, materials, and environments. The Guide acknowledges that there is no one-size-fits-all approach by providing many examples and lists of options for operators to consider and apply to their distinctive set of circumstances.

Your letter acknowledges the technical expertise and independent perspectives of the GPTC members. The GPTC provides a unique opportunity to come together and discuss pipeline safety from all of those perspectives, given the wide variety of the members' industry and regulatory experience. The GPTC will continue to work with PHMSA and other stakeholders, as we have in the past, to develop and publish guidelines that contribute to the safety of natural gas distribution and transmission pipelines.

Thank you for the invitation to attend the Pipeline Safety Executive Forum. I look forward to exploring ways to improve pipeline safety and what role GPTC might play in supporting those efforts. Please feel free to contact me if you need additional information.

Sincerely,

Marti Marek

Marti Marek GPTC Chair