



November 18th, 2019

Chairman Frank Pallone
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, D.C. 20515

Chairman Peter DeFazio
Committee on Transportation and
Infrastructure
2165 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Pallone and DeFazio:

I am writing to offer Environmental Defense Fund's strong support for the legislation you have introduced, HR 5120, the "Safe, Accountable, Fair and Environmentally Responsible (SAFER) Pipelines Act of 2019."

As introduced, the bill is a classic "win-win" that puts in place important new protections for both public safety and the environment. It gives the Pipeline and Hazardous Materials Safety Administration (PHMSA) strong direction to act in the safety interests of citizens living in both urban and rural areas. By requiring new rules to prevent, detect, fix, and report natural gas leaks, it will make a vital contribution to our nation's efforts to conserve resources, protect energy consumers, and prevent the worst impacts of climate change, all while making communities safer.

Methane, the primary component of natural gas, is a bad climate actor, more than 80 times as damaging to the atmosphere as carbon dioxide over the first 20 years following its release. The oil and gas supply chain is the largest industrial source of methane in the U.S., and preventing, detecting, and fixing natural gas leaks are some of the most cost-effective actions we can take right now to slow the rate of climate change.

Again, many of the protections in this bill will also enhance public safety by minimizing natural gas leaks that could otherwise pose hazards to communities and families.

There are many valuable provisions in the bill, several of which are especially worth highlighting here:

Pipeline Mapping. It seems odd, but PHMSA does not know where all the pipelines in this country are located. The bill requires the agency to gather detailed information about those lines, especially the hundreds of thousands of miles of gas gathering lines crisscrossing the nation. (Gathering lines carry gas from production facilities to generally larger, transmission lines.) Mapping them will allow PHMSA and state and local governments to better educate the public; improve performance and oversight of leak detection and repair; equip first responders; and prevent public safety and environmental disasters.

Leak Detection. The bill requires pipeline operators to use the latest technology to find and repair leaks, including the use of sensors capable of measuring leaks in parts per billion. One of the most significant pipeline safety and environmental developments in recent years has been the rapid evolution of highly sensitive Advanced Leak Detection technologies, including data analytics that can predict risk and find the leakiest infrastructure. These technologies, increasingly available in commercial products and tools, enable the detection of methane leaks with a sensitivity 1000 times greater than legacy systems. They provide the means for operators to target resources to the leakiest and riskiest segments of above- and below-ground pipelines. The sensors are available to pipeline operators in hand-held instruments and in mobile platforms, including vehicle- and aerially mounted configurations. Moreover, the software on which they rely can be linked to geographic information and to other data sets and algorithms that enhance speed and accuracy while lowering costs.

Gathering lines. The bill requires PHMSA to issue new rules requiring the application of advanced leak detection requirements to all gas gathering lines in populated areas, as well as to lines with diameters of at least 8 inches in rural areas. There are currently more than 435,000 miles of natural gas gathering lines. With the ongoing boom in U.S. natural gas development, another 300,000 miles of new onshore gathering lines, much of it under high pressure, are expected over the next 20 years. The vast majority of gathering infrastructure, which likely has been the cause of hundreds of safety incidents, is largely unregulated. In fact, there currently is no requirement for reporting releases and safety incidents from this unregulated infrastructure. At present, neither PHMSA, state regulators, nor the public has the data necessary to assess and mitigate the risk to safety from our nation's expanding gathering systems. As mentioned above, the capabilities of methane detection technology available today reinforce the argument for extending PHMSA jurisdiction and regulation to gathering lines. The technology is available. It is cost-effective and will save lives, avoid property damage, and conserve enormous amounts of natural gas that otherwise would be wasted.

The bill has a number of other extremely important provisions, including the requirement for the use of Best Available Technology to prevent leaks during pipeline maintenance and repair new reporting and leak repair requirements for "large [natural gas] loss events;" and codification of EPA's 2016 methane rule for new and modified sources of oil and gas methane emissions.

Taken together, these and other provisions in the bill will make important contributions to improving both the safety and environmental performance of our nation's burgeoning natural gas infrastructure. The bill represents a valuable contribution to the effort to make the rapid development of America's natural gas resources as safe, as environmentally responsible, and as accountable as it can be.

We thank you for introducing the bill, and we look forward to working with you and with the other members of the committee in moving it forward.

Sincerely,



Elizabeth Gore
Sr. Vice President, Political Affairs
Environmental Defense Fund

CC: Ranking Member Representative Sam Graves, Ranking Member Representative Greg Walden