

RAILROAD COMMISSION OF TEXAS

Oversight and Safety Division



NOTICE TO PIPELINE OPERATORS

Updates to T-4 Requirements

There are several important updates for T-4 requirements. They are as follows:

- **Form C-LTR POPS Cover Letter:** The December 2024 version is the most recent and is required.
- **T-4B Pipeline Transfer Certification:** The August 2024 version is the most recent and is required.
- **A Guide to Shapefile Submissions:** Version 2024.12.12 is the most recent.
- Amendments to 16 TAC 3.70 have been adopted as of December 9, 2024. The adoption notes can be found here: [https://texas-sos.appianportalsgov.com/rules-and-meetings?\\$locale=en_US&interface=VIEW_TAC_SUMMARY&queryAsDate=01%2F14%2F2025&recordId=222535](https://texas-sos.appianportalsgov.com/rules-and-meetings?$locale=en_US&interface=VIEW_TAC_SUMMARY&queryAsDate=01%2F14%2F2025&recordId=222535)
- Per 16 TAC 3.70(r)(1), operators with active intrastate natural gas gathering pipelines must amend their T-4 permits by **March 31, 2025**, to include the required attributes and indicate the appropriate Type of A, B, C, or R. Failure to do so could result in a \$5,000 penalty per permit in accordance with 16 TAC 3.70(p).
- Per 16 TAC 3.70(r)(2), 2025 renewal applications submitted for all intrastate gas permits must include an attestation statement regarding the natural gas gathering requirements.
 - To assist operators with the attestation statement requirement, a sample *Form C-LTR POPS Cover Letter* has been pre-filled with statements in the Additional Information section on page 3 of the form. Operators should delete the statements that do not apply. The sample 2025 Renewal C-LTR is available for download in the *Other Samples* section on this page: <https://www.rrc.texas.gov/pipeline-safety/pipeline-safety-forms/#PipelinePermitting>.

Updated resources can be found on our Permitting & Mapping web page here: <https://www.rrc.texas.gov/pipeline-safety/permitting-and-mapping/>.

If there are any questions, please contact us at POPS@rrc.texas.gov or (512) 463-6802.

Please Forward to the Appropriate Section of Your Company