



December 2, 2024

Rules Coordinator  
Office of General Counsel  
Railroad Commission of Texas  
P.O. Box 12967  
Austin, Texas 78711-2967

Comments submitted online at [www.rrc.texas.gov/legal/rules/comment-form-for-proposed-rulemakings](http://www.rrc.texas.gov/legal/rules/comment-form-for-proposed-rulemakings)

Comments submitted by electronic mail to [rulescoordinator@rrc.texas.gov](mailto:rulescoordinator@rrc.texas.gov)

**RE: *Comment to RRC on Proposed amendments to 16 TAC §1.201, relating to Time Periods for Processing Applications and Issuing Permits Administratively***

### **Background**

The Texas Pipeline Association (TPA or Association) hereby submits the following comments regarding Texas Railroad Commission's (RRC or Commission) proposed changes to 16 TAC §1.201 relating to Time Periods for Processing Applications and Issuing Permits Administratively approved at the October 15, 2024, conference. These comments are submitted on behalf of the Association and do not necessarily reflect the opinions of any individual TPA member. Commission Staff requested comments by December 2, 2024; therefore, these comments are timely filed.

The TPA is the largest state trade association in the country representing solely the interests of the Texas intrastate pipeline industry. TPA consists of nearly forty members who, collectively, engage in the gathering, processing and transport of natural gas and liquid hydrocarbons through more than 475,000 miles of pipelines across Texas. In 2022 alone this network generated over \$60.5 billion in economic output.

### **Comments**

With the stated purpose of ensuring that "the table in §1.201(a) ... reflect current permits, operating division names, and permit processing time periods," these comments are in line with that goal.

Specifically, the entry regarding 3.70 (SWR 70) “Permit to Operate a Pipeline” as written is unclear whether the 21-day Initial Review Period and the 15-day Final Review Period are meant to be taken in the aggregate and potentially exceeding 30 days, or if it meant to indicate that each period may take no longer than the specified time, and in no event shall the aggregate exceed 30 days. It is the understanding of the Association that Commission staff intends for the maximum period for approval to remain 30 days. TPA recommends a modification to the table to reflect this intention.

Thank you for the opportunity to provide comments. If you have any questions, please reach out to Jennifer O’Neill at [jennifer.oneill@texaspipelines.com](mailto:jennifer.oneill@texaspipelines.com) or 512.478.2871.

Sincerely,

A handwritten signature in cursive script that reads "J. O'Neill". The signature is written in black ink and is positioned to the left of the typed name.

**Jennifer Coffee O’Neill**  
VP Governmental Affairs & General Counsel  
Texas Pipeline Association