Little Rock
Rogers
Jonesboro
Austin
MitchellWilliamsLaw.com

Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.



Walter Wright, Jr. wwright@mwlaw.com (501) 688.8839

Inspection and Enforcement Priorities/Office of Pipeline Safety: Pipeline and Hazardous Materials Safety Administration July 17th Memorandum

08/01/2025

The Pipeline and Hazardous Materials Safety Administration Office of Pipeline Safety ("OPS") issued a July 17th memorandum titled:

Inspection and Enforcement Priorities ("Memorandum").

The Memorandum was transmitted from Linda Daugherty, Acting Associate Administrator for Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, to the Office of Pipeline Safety Staff.

OPS states that the purpose of the Memorandum is to establish the inspection and enforcement priorities OPS. The stated objective is to focus OPS's inspection and enforcement priorities on:

... areas that provide the greatest positive impact to pipeline safety...

The Memorandum states that OPS would then be:

...better positioned to fulfill its statutory mission and avoid wasting valuable resources on efforts that produce minimal benefits or that are based on unduly broad, novel, or strained application of the pipeline safety laws or regulations.

The Memorandum is stated to have been developed through:

- Analysis of incident and accident data.
- Inspection and investigation findings.
- Input from staff and other stakeholders.

The priorities reflected in the Memorandum are stated to constitute the current policies, practices, and procedures of the United States Department of Transportation and therefore guide OPS's efforts in:

- Conducting inspections and investigations.
- Initiating enforcement actions.

The Memorandum also encourages states with certifications to regulate the safety of intrastate pipeline facilities to follow these inspection and enforcement priorities in implementing their pipeline safety programs.

The inspection and enforcement priorities detailed in the Memorandum are listed as follows:

- Priority 1: Incidents and Accidents.
- Priority 2: High and Moderate Consequence Areas.
- Priority 3: Control Room Management and Leak Detection.
- Priority 4: Damage Prevention.
- Priority 5: Transactions and Due Diligence.

A copy of the Memorandum can be downloaded $\underline{\text{here}}.$