



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**DEC 20 2019**

Ms. Christina Sames  
Vice President, Operations and Engineering  
American Gas Association  
400 North Capitol Street, NW  
Washington, DC 20001

RE: Petition for Reconsideration for the Safety of Gas Transmission Pipelines: Maximum Allowable Operating Pressure Reconfirmation; Expansion of Assessment Requirements, and Other Related Amendments

Dear Ms. Sames:

On October 1, 2019, the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a final rule that amended the federal pipeline safety requirements to improve the safety of onshore gas transmission pipelines. On October 31, 2019, the American Gas Association, American Petroleum Institute, American Public Gas Association, and Interstate Natural Gas Association of America (the Associations) submitted a Petition for Reconsideration (Petition) pursuant to 49 CFR 190.335. In the Petition, the Associations requested that PHMSA (1) clarify that the recordkeeping requirement in § 192.5(d) only applies to transmission pipelines, and (2) limit the applicability of the maximum allowable operating pressure (MAOP) reconfirmation requirements in § 192.624(a)(1) to those pipeline segments that do not have a traceable, verifiable, and complete pressure test record in accordance with § 192.619(a)(2). For the reasons discussed below, PHMSA grants the Petition.

#### Request to Clarify the Applicability of the Record Keeping Requirements of § 192.5(d)

PHMSA grants the request in the Petition to clarify that the recordkeeping requirements in § 192.5(d) only apply to gas transmission pipelines. The recordkeeping requirements are applicable to those records that document current class location determinations and records demonstrating how an operator determined each class location. As proposed in the NPRM, it was PHMSA's intent to apply these requirements solely to gas transmission lines. This request simply aligns the final rule with that intent. PHMSA has determined that the request suggested in the Petition is appropriate and does not compromise safety.

#### Request to Limit the Applicability of § 192.624(a)(1)

In the Petition, the Associations requested reconsideration of § 192.624(a)(1), which defines a set of pipeline segments for which operators must conduct MAOP reconfirmation. Specifically, it

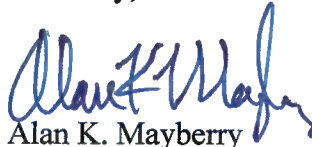
requires operators of certain transmission pipelines to reconfirm MAOP if records necessary to establish the MAOP in accordance with § 192.619(a) are not traceable, verifiable, and complete (TVC). The Associations requested that PHMSA revise § 192.624(a)(1) so that it does not apply where an operator already has records necessary to establish MAOP in accordance with § 192.619(a)(2) (i.e., pressure test records). The Associations stated that, without the specific reference to § 192.619(a)(2), it is unclear whether an operator must reconfirm MAOP when a pipeline segment already has a TVC pressure test record, but is missing other records under § 192.619(a)(1) or (a)(3). The Associations noted that this revision would align with a corresponding Gas Pipeline Advisory Committee recommendation and confirm that § 192.624(a)(1) does not require operators to reconfirm the MAOP of pipeline segments with a TVC pressure test record.

PHMSA grants the Associations' Petition to limit the applicability of the MAOP reconfirmation requirements of § 192.624(a)(1) to those pipeline segments that do not have a TVC pressure test record in accordance with § 192.619(a)(2). If operators are missing any material properties needed to confirm design pressure in accordance with § 192.619(a)(1), operators are required, during anomaly evaluations and repairs, to confirm those material properties in accordance with §§ 192.607 and 192.712(e) through (g). Any pipeline segments that have missing records that meet the requirements of § 192.624(a)(1) must meet all appropriate part 192 sections for any MAOP increases. PHMSA has determined that the petition request suggested in the Petition is appropriate for not requiring a § 192.624 reconfirmation when a TVC pressure test is confirmed for the pipeline class location and MAOP, and does not compromise safety.

PHMSA is in the process of drafting a formal response to this petition that will be published in the Federal Register in accordance with § 190.337. That document will include the amendments necessary to respond to the Petition and will clarify an operator's responsibility to opportunistically collect material property data when pressure testing as a function of MAOP reconfirmation and also as needed to evaluate anomalies and perform other integrity management activities.

Thank you for your Petition. If you require further assistance, please contact John A. Gale, Director, Standards and Rulemaking Division at 202-366-0434.

Sincerely,



Alan K. Mayberry

Associate Administrator for Pipeline Safety

cc: C.J. Osman, Interstate Natural Gas Association of America  
David Murk, American Petroleum Institute  
Erin Kurilla, American Public Gas Association