Re: AGA Request for Clarification of Advisory Bulletin (ADB-12-06) Regarding Verification of Records Establishing MAOP

Dear Mr. Wiese:

The American Gas Association (AGA) has reviewed the Advisory Bulletin (ADB-12-06, Docket No. PHMSA-2012-0068) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) in the May 7, 2012 Federal Register regarding Pipeline Safety: Verification of Records. As is our practice, AGA forwarded the Advisory Bulletin to its member companies. The Advisory Bulletin regarding transmission pipeline records was extremely important to AGA member companies that operate approximately 50,000 miles of transmission pipeline. AGA has received questions and concerns from its members regarding the Advisory Bulletin and is therefore seeking clarification.

The Advisory Bulletin helps to clarify what PHMSA considers an adequate record for establishing Maximum Allowable Operating Pressure (MAOP) and Maximum Operating Pressure (MOP) and also guides owners and operators to “consider the guidance in this advisory for all pipeline segments and take action as appropriate to assure that all MAOP and MOP are supported by records that are traceable, verifiable and complete.” The Advisory provides operators with additional guidance regarding PHMSA’s perspectives relative to the determination of Traceable Records, Verifiable Records and Complete Records. AGA believes that the Advisory Bulletin provides useful guidance for operators in confirming MAOP or MOP for transmission pipelines.

AGA has received questions from its members on whether a single, quality document that contains the information needed to confirm a pipeline’s MAOP or MOP is acceptable. AGA is aware of various examples of quality documents that contain this information. AGA believes that PHMSA intends for operators to identify appropriate Verifiable records that establish a high level of confidence regarding the pipeline’s MAOP or MOP, whether that record is a single quality record or information confirmed by other complementary, but separate, documents.

AGA is seeking clarification from PHMSA that a single quality document associated with a pipeline’s MAOP or MOP meets the intent of PHMSA’s advisory.

AGA and its members place safety as their top priority and have made considerable progress in confirming established MAOP or MOP on transmission lines. We appreciate the guidance that PHMSA has provided and request clarification on the narrow issue described above.

Respectfully submitted,

Christina Sames
Vice President, Operations & Engineering
American Gas Association