**Background:** The Pipeline Safety, Regulatory Certainty and Job Creation Act of 2011 Section 23.a.1 states that,

“(1) IN GENERAL – The Secretary of Transportation shall require each owner or operator of a pipeline facility to conduct not later than 6 months after the date of enactment of this section, a verification of the records of the owner or operator relating to interstate and intrastate gas transmission pipelines of the owner or operator in class 3 and class 4 locations and class 1 and class 2 high-consequence areas.

(2) Purpose – the purpose of the verification shall be to ensure that the records accurately reflect the physical and operational characteristics of the pipelines described in paragraph (1) and confirm the established maximum allowable operating pressure of the pipelines. (3) Elements – the verification process under this subsection shall include such elements as the Secretary considers appropriate.”

In response to the congressional mandate in Section 23.a.1, PHMSA added a new section, Part Q, to the Gas Transmission and Gathering Annual Report. This section requires operators to evaluate and report by June 15, 2013 the method(s) used for determining transmission pipeline MAOPs for those lines in the class locations and HCAs as identified in the Act. There are approximately 300,000 miles of natural gas transmission pipelines in the United States and a significant portion of these lines were installed prior to federal pipeline safety regulations being codified in 1970. Therefore, it is anticipated that there will be some gaps in the MAOP records. AGA’s issue paper *Understanding the MAOP Record Verification Process* explains the principle that incomplete records for reporting does not equate to insufficient data for confirmation of MAOP. In summary, the paper explains that record completeness for post-1970 pipelines is governed by 49 CFR 192.517 Records, while the adequacy of records for establishing pipeline MAOP is governed by §192.619 Maximum allowable operating pressure: Steel or plastic pipelines.

**American Gas Association (AGA) Position:** Section §192.619 provides operators with methods by which to establish or reconfirm a pipeline segment’s MAOP and operators must comply with these code provisions while gathering MAOP records. AGA is confident that pipeline operators established MAOPs for transmission pipelines based on one or more of the methodologies defined in §192.619: AGA does not believe rulemaking is needed to establish interim actions for operators to begin addressing gaps in MAOP records. Rulemaking is a time consuming process, which takes years to complete and the legislation seeks confirmation as expeditiously and economically as possible. Pipeline safety regulations include flexibility to reconfirm MAOPs by several methods. For example, if there are gaps in the pressure test records, the regulation allows the gaps to be addressed by using design data that is available or by obtaining information through direct examinations of the pipeline. Pipeline safety regulations also provide for additional or accelerated safety enhancements, such as increased patrols and leakage surveys.

There may be a wide range of circumstances regarding incomplete records because of the varying record retention practices used by member companies during the several decades that these pipelines were installed, particularly prior to the inception of the federal pipeline safety code in 1970. There are operators that may be missing records for only a few hundred feet of pipe due to replacements made for specific projects, such as municipal sewer or grading projects. Design records, work orders or personal knowledge may provide the necessary information to confirm the physical and operational characteristics of the pipeline segment. There are circumstances where operators acquired transmission pipelines via acquisitions or mergers where there may be a few miles of pipe segments with incomplete records. In these more complicated situations, operators may use existing pipeline regulations to make conservative assumptions regarding the MAOP, implement field inspection procedures to supplement known information, while also evaluating longer term plans for testing, replacement, or rehabilitation of the pipe segment. By working with federal and state regulators pipeline operators can proactively address the segments where the MAOP records are incomplete.

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