JUL 31 2012

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

Dear Ms. Sames:

In a June 28, 2012, email to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you stated that members of the American Gas Association (AGA) are seeking clarification of PHMSA’s recent Advisory Bulletin regarding Verification of Records (ADB-12-06, Docket No. PHMSA-2012-0068). AGA’s question is whether a single quality document that contains the information needed to confirm a pipeline’s Maximum Allowable Operating Pressure (MAOP) or Maximum Operating Pressure (MOP) would satisfy the intent of the Advisory Bulletin.

The owner or operator of a pipeline must meet the recordkeeping requirements of Part 192 and Part 195 in support of MAOP and MOP determination. As you stated in your request, operators need to identify appropriate 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. Therefore, a single quality document that is traceable and complete, as evidenced by appropriate markings, would be acceptable.

I hope that this information is helpful to you. If I can be of further assistance, please contact me at 202-366-4046.

Sincerely,

John A. Gale
Director, Office of Standards and Rulemaking