TR 23-18 – Establishing MAOP

2025 – November 5 – Editorial Section
Approved additions to §192.619. On 11/4/2025, O&M/OQ TG reviewed LB4-2025 results – 1 Disapproved vote; minutes state Disapproved vote resolved and sent to Editorial for review. Editorial approves with edit shown below in blue highlight. **Ready for Public Review.**

TR Number	**23-18**
Primary Reference	192.619
Purpose	To review and revise GM regarding the establishment of MAOP.
Origin/Rationale	There have been a number of changes to MAOP determination, including the addition of Type C gathering lines regulations, changes in test factors. GM needs to be reviewed to determine if any additional guidance is needed.
Assigned to	OMOQ

Note: *Revisions are shown in yellow highlight and red font.*

Section 192.619

(a) Operators of transmission and distribution pipelines installed prior to the November 1970 effective date of the current regulations:
  (1) The following records may be used to assist in establishing MAOP.
    (i) Test pressure charts.
    (ii) Job-specific pressure test plan or procedure.
    (iii) Notation of completion of pressure test requirements on as-built.
    (iv) Field notes or logbooks with details of testing.
    (v) Signed statement from employee or contractor who oversaw the pressure test, verifying successful completion of the test and the pressure that the pipeline was subject to during the test.
    (vi) Operating pressure records for the 5 years prior to the date the pipeline became regulated (i.e., SCADA, regulator, recording or chart data).
  (2) For a transmission pipeline with an MAOP established by §192.619(c) ~~(i.e., grandfathered)~~ ("grandfathered") that is required to reconfirm MAOP, see guide material under §192.624.

(b) Operators of transmission and distribution pipelines installed after the November 1970 effective date of the current regulations:
  (1) The following records should be used to assist in establishing MAOP.
    (i) Test pressure records as required by §192.517.
    (ii) As-built documentation indicating the pipe's attributes, such as minimum pipe yield strength, wall thickness, and diameter.
    (iii) Documentation from the pipe mill test reports, which confirm the specifications to which the pipe was manufactured.
    (iv) A bill of materials, purchasing requisition, or other documentation which contains the operator's specifications of the pipe and other materials such as valves and flanges as ordered from the manufacturer or ~~pipe~~ supplier.
  (2) For transmission lines, records used to establish MAOP after July 1, 2020, must be retained for the life of the facilities (§192.619(f)(1)). Operators of distribution and Part 192 regulated gathering lines should consider this guidance.

(c) Gathering lines:

  (1) Part 192 regulated gathering lines constructed of non-listed (§192.7 and Appendix B to Part 192) materials may have an MAOP established under §192.619(c) ("grandfathered").

  (2) Type A and B gathering lines and Type C lines greater than 16 inches in outside diameter constructed from the date the pipeline becomes subject to this part, should use the records in (a) above to establish MAOP.

  (3) Type A and B gathering lines and Type C lines greater than 16 inches in outside diameter

constructed after May 16, 2022, may establish an MAOP according to the guide material in section (b) above.

(4) Type C gathering lines greater than 12.75 inches but equal to or less than 16 inches may also establish MAOP using §192.619(a) or (c) unless one of the criteria of §192.9(f)(1) is met.

(5) In anticipation of an increase in class location on a Type R or Type C line, the operator might consider obtaining pressure charts or some other pressure documentation showing operating pressure to help establish MAOP under §192.619(c).

(i) The operator should consider shutting in wells or systems to allow the pressure to increase.

(ii) An alternate method would be to obtain the rock pressure or shut-in pressure of the well on the system since the pipeline could never exceed this pressure.

(~~a~~ d) Before adjusting the operation of a pipeline by increasing pressure within the limits of the pipeline segment's MAOP, but substantially above a historical long-term operating pressure, the operator should consider a review of the operating, maintenance, and testing history for the segment. See guide material under §§ 192.555 and 192.557. Pressure should be increased gradually at an incremental rate. The operator should consider conducting a leak survey when the pressure increase is concluded.

~~(b) Gathering lines constructed of non-listed (§192.7 and Appendix B to Part 192) materials may have an MAOP established under §192.619(c).~~

(~~c~~ e) When pipe segments with the following characteristics are considered for flow reversal or service conversion, caution should be exercised if pressure testing is planned.

(1) Grandfathered pipelines that operate without a Subpart J pressure test or where sufficient historical test or material strength records are not available.

(2) Low frequency electric resistance welded (LF-ERW) pipe, lap welded pipe, pipe with unknown seam types, and pipe with seam factors less than 1.0, as defined in §192.113.

(3) Pipelines with a history of failures and leaks, especially those due to stress corrosion cracking (SCC), internal or external corrosion, selective seam corrosion (SSC), or manufacturing defects.

(4) Pipelines that operate above Part 192 design factors (~~i.~~e.g., a pressure that produces a hoop stress above 72% SMYS per §192.619(c)).

(f) An operator determining an MAOP by using a maximum safe pressure according to §192.619(a)(4) must protect the pipeline segment with adequate overpressure protection (§192.619(b)). If overpressure protection is provided by a different operator, the operator of the protected segment must obtain the appropriate records to demonstrate overpressure protection (§192.739).

(~~d~~ g) See Guide Material Appendices G-192-9, G-192-9A, and G-192-10.