May 24, 2025

Office of Pipeline Safety (PHP–30)

PHMSA

U.S. Department of Transportation

1200 New Jersey Avenue SE.

Washington, DC 20590–0001

To Whom It May Concern,

This is a request for a written regulatory interpretation concerning PHMSA’s MAOP reconfirmation requirements in §192.624.  This request involves three (3) questions numbered below.  In each case, the following details apply to the transmission pipeline segment in question:

·       Date pipeline segment installed: 1960

·       Length of pipeline segment: 6 miles

·       Pipe nominal outside diameter: 10.750”

·       Pipe nominal wall thickness: 0.250”

·       Pipe yield strength (grade): 42,000 psi

·       Design factor: 0.50 (Class 3 location)

·       Longitudinal joint factor: 1 (seamless pipe)

·       Temperature derating factor: 1 (less than 250 degrees)

·       Design pressure: 976.74 psig, determined in accordance with §192.105

·       Post construction test pressure: 840 psig

·       Highest actual operating pressure during the 5 years preceding 11/12/1970: 650 psig

·       Highest actual operating pressure during the 5 years preceding 10/01/2019: 300 psig

·       Established MAOP: 650 psig (33.27% of SMYS) in accordance with §192.619(c)(1) [“grandfather clause”]

·       Current maximum actual operating pressure: 300 psig

·       All records required to establish the MAOP are traceable, verifiable, and complete.

·       Pipeline is located entirely in a Class 3 location.

·       Pipeline operator is a local distribution company.

·       Pipeline is located downstream from a distribution center that is connected to an interstate transmission company.

·       Pipeline does not transport gas from, within, or to a storage field, storage facility, or gathering pipeline.

·       In 2020, the pipeline operator determined that this pipeline segment, along with another three (3) miles of transmission pipeline segments, required MAOP reconfirmation in accordance with §192.624.

·       The questions listed below describe actions/options that are being considered to take place in 2026.

1.      If the operator abandons this pipeline segment in place, would this action satisfy the requirement of completing at least 50% of the pipeline mileage by July 3, 2028, in accordance with §192.624(b)(1)?

2.      If the operator lowers this pipeline’s MAOP to 385 psig (19.71% of SMYS) and changes the pipeline’s designation from transmission line to distribution main, would this action satisfy the requirement of completing at least 50% of the pipeline mileage by July 3, 2028, in accordance with §192.624(b)(1)?

3.      If the operator lowers this pipeline’s MAOP to 600 psig (30.71% of SMYS) and changes the pipeline’s MAOP determination method from §192.619(c)(1) [“grandfather clause”] to §192.619(a)(2) [test pressure divided by 1.4], would this action satisfy the requirement of completing at least 50% of the pipeline mileage by July 3, 2028, in accordance with §192.624(b)(1)?

Each of the three (3) actions described in the questions above effectively changes the conditions in a manner that renders the pipeline segment no longer applicable to the MAOP reconfirmation requirements in §192.624(a).  MAOP reconfirmation is not required on an abandoned pipeline, a distribution main, nor a transmission line with a MAOP established under §192.619(a)(2) using TVC records.

However, none of the three (3) actions in the questions above are listed among the six (6) prescribed methods to reconfirm a pipeline’s MAOP in accordance with §192.624(c).  As a result, it is unclear whether any of these three (3) actions that are being considered would count toward satisfying the 50% completion requirement specified in §192.624(b)(1).

Your answers and comments addressing these three (3) questions will be greatly appreciated.

Thank you,

Bernie Fussell

300 Kenwood Drive

Lexington, SC 29072

Email: fussellbernie@gmail.com

Mobile: 803-331-6353