

December 9, 1971

Mr. Bill Barry  
Staff Engineer  
Pioneer Natural Gas Company  
Post Office Box 511  
Amarillo, Texas, 79105

Dear Mr. Barry:

This is in reply to your letter of October 22, 1971 in which you requested an opinion as to how to qualify a pipeline installed in a Class 3 location in 1956. You have quoted material from the preamble to the Federal safety standards issued in August 1970 and an opinion set forth in the Office of Pipeline Safety Advisory Bulletin of September 1971. This material is not regulatory, and we must look to the specific regulation on class location to answer your inquiry.

Section 192.607 of the Federal safety standards is designed to assure that all existing pipelines are operated at a pressure commensurate with their present class locations as of April 15, 1971. It requires a study of all existing pipelines and refers to the provisions of Section 192.611 to assure that confirmation or revision is accomplished after the study is completed. Section 192.609 is directed at class location changes which take place after April 15, 1971. This section also relies on Section 192.611 to assure that proper confirmation or revision takes place once a change in class location becomes apparent.

The "grandfather" clause in Section 192.619(c) permits continued operation of pipelines at existing operating pressures. However, this paragraph also refers to Section 192.611 and thus is qualified by the requirements for confirmation or revision to the extent that the higher pressures are not commensurate with the existing class location of the pipeline. The opinion quoted in the OPS Advisory Bulletin explains this relationship between the "grandfather" clause and the operating pressures provided for under Section 192.611. In that opinion, only pipelines that are presently in Class 1 locations would be exempt from having to be confirmed or revised in accordance with Section 192.611 if the operating pressure is not commensurate with the class location.

As you may know, Section 192.607 and 192.611 were amended, effective September 7, 1971, to extend the time for confirmation or revision of these maximum allowable operating pressures.

We trust that this will clarify any questions that you might have. If there is still a problem, please contact me.

Sincerely,  
/signed/

Joseph C. Caldwell,  
Acting Director