

February 24, 1972

Mr. W. E. Huddleston
1700 Skyline Drive
Bartlesville, Oklahoma 74003

Dear Mr. Huddleston:

In your letter of January 10, 1972, to Mr. Heverly, you asked about the responsibility for monitoring interference compensating bonds under various conditions.

"Wherein the relatively high protective potentials maintained by operator 'A' in the vicinity of a crossing with operator 'B' has necessitated the attachment of a compensating bond to eliminate cathodic interference to the latter:

Case 1. The pipeline owned by operator 'A' is a gas pipeline; the line owned by operator 'B' is not a gas pipeline."

The gas operator is responsible for assuring that each interference bond whose failure would jeopardize structure protection is checked at intervals not to exceed two months, per Section 192.465(c) of the gas pipeline safety regulations. Obviously, failure of the compensating bond would not jeopardize protection of the gas pipeline owned by operator "A," but it would certainly jeopardize the integrity of the pipeline owned by operator "B," not a gas pipeline. The intent to not adversely effect operator "B's" pipeline is brought out in Section 192.473(b) which requires a gas operator to install an impressed current type cathodic protection system or galvanic anode system so as to minimize any adverse effects on existing adjacent underground metallic structures. Where necessary, a compensating bond may be considered as a means of minimizing adverse effect on another adjacent underground metallic structure.

If the pipeline owned by operator "B" was under cathodic protection and carried hazardous materials, petroleum, or petroleum products in liquid form, operator "B" would also be required to conduct tests at intervals not exceeding 12 months to determine that cathodic protection on

operator "B's" pipeline was adequate in accordance with Section 195.416(a) of the liquid pipeline safety regulations.

I trust this clarifies this section.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Jan. 10, 1972

Mr. L.F. Heverly,
Office of Pipeline Safety,
400 6th Street SW
Washington, D.C. 20590

Dear Mr. Heverly:

Will you kindly advise which pipeline operator would be responsible for monitoring interference compensating bonds under the following described circumstances---wherein the relatively high protective potentials maintained by operator "A" in the vicinity of a crossing with operator "B" has necessitated the attachment of a compensating bond to eliminate cathodic interference to the latter: Case 1. The pipeline owned by operator "A" is a gas pipeline; the line owned by operator "B" is not a gas pipeline. Case 2. The pipeline owned by operator "A" is not a gas pipeline; the line owned by operator "B" is a gas pipeline. Case 3. Both pipelines are gas pipelines. Case 4. Neither pipeline is a gas pipeline.

I have heard a number of engineers discuss the foregoing described circumstances and apparently without sufficient knowledge of the regulations to resolve the questions. Accordingly, you might possibly wish to include your reply in the monthly Advisory Bulletin.

Yours very truly,

William E. Huddleston