

October 1, 1975

Mr. David B. Falk
Dell, Craighill,
Fentress & Benton
888 Seventeenth Street, N.W.
Washington, D.C. 20006

Dear Mr. Falk:

This refers to your letter dated September 4, 1975, which we received on September 12, 1975, requesting an interpretation of the period required by 49 CFR 195.302(b) for hydrostatically testing a pipeline. Section 195.302(b) requires that the test pressure be "maintained for at least 24 hours." You ask whether the requisite period means 24 continuous hours or whether a cumulation of 24 hours is permitted.

The purpose of Section 195.302(b) is to require that the test pressure be maintained for a continuous 24 hour period to exhibit any leakage. There is nothing in the context of the regulation as a whole from which to infer a different meaning. More important, the effect of the test would be vitiated if it were conducted over different periods totalling 24 hours, with the concomitant relaxation of pressure and repressuring.

We appreciate your interest in pipeline safety.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations