

June 21, 1985

Mr. A. V. Spitser  
Hydrocarbon Transportation, Inc.  
2223 Dodge Street  
Omaha, NE 68102

Dear Mr. Spitser:

This refers to your June 7, 1985, letter which asks us to find under 49 CFR ?195.260(e) that valves are not justified on each side of a proposed reservoir in Cass County, Iowa, for two 8-inch LPG pipelines.

As provided by ?195.200 block valves would not be required by ?195.260(e) on your existing pipelines at their crossings of the proposed reservoir unless the pipeline crossings are to be replaced, relocated, or otherwise changed. However, if valves were required, we do not consider the reasons that "Hydrocarbon Transportation, Inc., does not want to install additional block valves in this area" and "the reservoir authorities do not want to pay for the cost of such installations" as sufficient justification to find that valves should not be installed. Valid reasons would explain why safety would not be jeopardized if the valves were not installed at the reservoir crossings.

Sincerely,

Richard L. Beam  
Associate Director for Pipeline  
Safety Regulation  
Materials Transportation Bureau