

February 5, 1993

Mr. Bill Scaife
Amoco Production Company
Post Office Box 50879
New Orleans, LA 70150

Dear Mr. Scaife:

This is in response to Mr. H. C. Van, Jr's letter of January 18, 1993, concerning a question on the Interim Final Rule pertaining to Response Plans for Onshore Oil Pipelines, 49 CFR Part 194. He indicated:

"The term onshore oil pipeline needs to be more clearly defined. Does this interim final rule apply to onshore gas pipelines that carry minimal amounts of condensate along with the gas?

"Condensate forms in many gas transmission lines and is transported along with the gas. Inclusion of onshore gas lines under these rules would impart a significant burden on the industry to submit response plans by the February 18, 1993, deadline imposed by OPA 90."

Most gas gathering lines are connected to processing plants where heavier hydrocarbons are removed from the gas and sold separately. The small amount of condensates in such lines could not reasonably be expected to cause substantial harm to the environment. Therefore, oil spill response plans covering these gas gathering lines would not be required to be filed by February 18, 1993.

Downstream of such processing plants, the gas is in a condition fit for use by gas customers. Beyond the processing plant, the gas generally is transported in a transmission line for delivery to a distribution center or storage facility. Natural gas, depending on the volume of gas transported and temperature differentials, will form small amounts of light hydrocarbons or condensates while being transported in the transmission pipelines because of the recurring compression and subsequent pressure drops. Condensates so formed are likewise not considered to cause substantial harm to the environment and oil spill response plans would not be required to be filed by February 18, 1993.

I hope this responds fully to your inquiry.

Sincerely,

Cesar De Leon
Director Regulatory Programs
Office of Pipeline Safety