

May 27, 1993

Mr. K. A. McKnight
Safety Director
Seadrift Pipeline Corporation
P. O. Box 552
Victoria, TX 77903-0552

Dear Mr. McKnight:

We have considered your letter of May 17, 1993, in which you request a finding under 49 CFR 195.260(e) that valves are not justified on each side of certain water crossings. The finding is requested for a gas pipeline to be converted under §195.5 to hazardous liquid service.

Section 195.5 was established to permit a previously used steel pipeline to qualify for use in hazardous liquid service subject to 49 CFR part 195 without meeting the design and construction requirements applicable to new hazardous liquid pipelines. Under part 195, the valve location requirements of §195.260(e) apply to pipeline construction. Therefore, a gas pipeline being converted under §195.5 need not meet §195.260(e). Besides §195.5, the part 195 requirements applicable to converted pipelines are subpart B (accident reporting) and subpart F (operation and maintenance).

Sincerely,

Cesar DeLeon
Director, Regulatory Programs
Office of Pipeline Safety