



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

MAY - 6 2014

Mr. Bill Collins
Devon Energy
333 W. Sheridan Ave
Oklahoma City, OK 73102

Dear Mr. Collins:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated October 10, 2013, you stated that Devon Energy is planning to construct a hazardous liquid pipeline in Wyoming for the transportation of supercritical state carbon dioxide from the Beaver Creek pipeline (which is a preexisting supercritical state carbon dioxide pipeline) to a production area where it will be injected into production wells. You asked whether the proposed pipeline would be regulated by PHMSA.

In a November 25, 2013, email to my staff you stated that the line section extending from the Beaver Creek pipeline to the header will be 2,101 feet long, 8-inch diameter steel pipe, and will have a maximum allowable operating pressure of 3,100 pound per square inch. You also provided a diagram of the proposed project. Based on the information you provided, the 2,101-foot section would be regulated under Part 195 requirements as would the header itself. PHMSA may need additional information such as flow diagrams to and from the compressor station and wellheads and the location of any pressure control devices to determine if any additional piping beyond the header would be subject to the Part 195 regulations.

If we can be of further assistance, please contact Tewabe Asebe of my staff at (202) 366-5523.

Sincerely,



John A. Gale
Director, Office of Standards
and Rulemaking

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.



Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, OK 73102-8260

Mr. Jeffrey Wiese
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
1200 New Jersey Ave., SE
Washington, DC 20590

Re: PHMSA Regulatory Interpretation

OCT 28 2013

10 October 2013

Dear Mr. Wiese:

Devon Energy is currently building a facility in Wyoming for the transfer of CO₂ to a processing facility en route to injection points in our Drilling and Production area. As this line will extend from a pre-existing CO₂ Jurisdictional Line, we would like to request a formal interpretation from PHMSA stipulating whether or not the new line would be Regulated, and if so, which sections.

Attached is a map featuring the facility and its supporting line (highlighted yellow). If you require additional information, please feel free to call.

Regards,

A handwritten signature in black ink, appearing to read "Bill Collins". The signature is fluid and cursive.

Mr. Bill Collins
EHS Professional
Devon Energy
333 W. Sheridan Ave
Oklahoma City, OK 73102
(405) 552-5057

Enclosures:

Map and Schematics of facility ("Big Sand Draw"), as well as proposed and pre-existing Jurisdiction Lines ("Beaver Creek Line").

Big Sand Draw Schematic

May 23, 2013

