

**DEPARTMENT OF  
TRANSPORTATION**

**Research and Special Programs  
Administration**

[Docket No. 79-7W; Notice 1]

**Transportation of Natural and  
Other Gas by Pipeline; Petition for  
Waiver**

The Champlin Petroleum Company has petitioned the Materials Transportation Bureau (MTB) for a waiver from compliance with the cathodic protection requirements to Subpart I of 49 CFR Part 192, requiring the installation of cathodic protection on the Champlin owned gas gathering pipelines in the Wilmington, California, oil fields.

The Champlin Petroleum Company operates approximately 500 oil producing wells in the Wilmington Oil Field, which is located within the boundaries of the city limits of Los Angeles and Long Beach, California. Incidental to the production of oil, a total of approximately 1,600,000 cubic feet a day of natural gas is produced by these wells. This gas is transported from the casing of each well by a Champlin owned gas gathering pipeline that is operated at a vacuum through royalty meters to the pipelines of another company.

Most gas gathering pipelines operate at a positive pressure because the natural gas is generally produced in confined underground reservoirs that are pressurized naturally by geology; however, in the case of the Champlin gas gathering pipelines, the gas is dissolved in the crude oil and has little "natural" pressure. This makes it necessary to remove the gas from the oil at the wellhead by a vacuum gas collection system which maintains a negative pressure, or vacuum, within all of the gas gathering lines.

The Federal regulations in 49 CFR 192.3 define a "gathering line" as a pipeline that transports gas from a current production facility to a transmission line or main. Furthermore, the regulations do not apply to onshore gathering of gas outside of an area within the limits of any incorporated or unincorporated city, town, or village, and, any designated residential or commercial area such as a subdivision, business, or shopping center, or community development. It is because parts of the Wilmington Oil Field lie within the city limits of Los Angeles and Long Beach that Champlin's gathering lines in these incorporated areas are regulated by the provisions of 49 CFR Part 192.

The gas gathering pipelines upstream of the royalty meters are installed entirely on Champlin's property, and do not cross any public areas. The property where the pipelines are installed is entirely fenced to exclude the general public, and is uninhabited except for the Champlin employees that are on the property during working hours. The fencing to exclude the general public is installed under a requirement of local regulatory agencies, and Champlin expects that these local requirements will keep the property in which the gas gathering pipelines are installed permanently uninhabited.

Because of the negative pressure maintained in the gas gathering lines, any opening in a pipeline (e.g., a hole caused by corrosion) would cause air to enter the system rather than a leak of gas to the atmosphere. The gas received at the processing plant to Long Beach is monitored continuously for air content, and this monitoring permits early detection of any leak occurring on a Champlin owned gas gathering pipeline.

The majority of the gas gathering lines are installed above ground, but many thousands of feet of bare steel lines are underground. In the event of a leak occurring in the pipe, the system supplying the royalty meter is shut down until the pipeline is repaired. During 1977 and 1978, Champlin states that a total of 12 leaks occurred in the gas gathering pipelines due to external corrosion. These leaks were repaired at a cost of approximately \$200 each, or an average of only \$1,200 per year. The cost to install cathodic protection on the scattered buried portions of the gas gathering system is estimated to be \$290,000 with operating and maintenance costs of \$24,000 per year.

MTB is considering granting the requested waiver from the cathodic protection requirements of Subpart I of 49 CFR Part 192 for the following reasons:

1. The general public is excluded by fences from the incorporated, but uninhabited, parts of the cities [sic] where the gas gathering pipelines are located.
2. Because the pipelines operate at a negative pressure, any corrosion pits or holes will ingest air into the pipelines rather than exhaust gas; and, with a negative pressure, these gas gathering pipelines cannot rupture due to over pressure.
3. To further insure [sic] operating safety, the gas received at the processing plant through this pipeline system is monitored continuously for air content which permits early detection of corrosion holes in the gas gathering pipeline system. Upon confirmation of air at the processing plant, a check of the air con-

tent of the various royalty meters is made immediately to determine the exact location of the hole, and the defective pipe section is shut down until repairs are made.

4. The cost to install cathodic protection on the scattered buried portions of the gas gathering system (Champlin estimates \$290,000), and the annual operation and maintenance costs of a cathodic protection system (Champlin estimates \$24,000) do not appear to have a corresponding safety benefit in view of the inaccessibility of the public and the fact that leaks do not release gas during normal operation of the pipelines.

Interested persons are invited to comment on the proposed waiver by submitting in triplicate such data, views, or arguments as they may desire. Communications should identify the docket and notice numbers and be submitted to the Dockets Branch, Materials Transportation Bureau, Department of Transportation, Washington, D.C. 20590.

All comments received before September 19, 1980, will be considered before final action is taken. Late filed comments will be considered so far as practical [sic]. All comments will be available for public review at the Dockets Branch of the Materials Transportation Bureau in Room 8426, 400 Seventh Street, S.W., Washington, D.C., between the hours of 8:30 a.m. and 5:00 p.m.

(49 U.S.C. 1672; 49 CFR Part 1.53, Appendix A of Part 1 and Appendix A of Part 106).

Issued in Washington, D.C., on August 11, 1980.

**Melvin A. Judah,**  
*Acting Associate Director for Pipeline Safety  
Regulation, Materials Transportation Bureau.*

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**DEPARTMENT OF  
TRANSPORTATION**

**Research and Special Programs  
Administration**

[Docket No. 79-7W; Notice 2]

**Transportation of Natural and  
Other Gas by Pipeline; Grant of  
Waiver**

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The Champlin Petroleum Company petitioned the Materials Transportation Bureau (MTB) for a waiver from compliance with the cathodic protection requirements of Subpart I of 49 CFR Part 192. The requested waiver would apply to Champlin Petroleum Company's Wilmington Oil Field gas gathering lines within the city limits of Los Angeles and Long Beach, California.

The petition stated that the gas gathering lines for which the waiver was requested operate at a vacuum to remove the gas from the crude oil at the wellhead. Also, the gas gathering lines are continuously monitored for air content to permit early detection of any leak in the gas gathering pipelines, and all detected leaks are promptly repaired.

In response to this petition, MTB issued a notice of a petition for waiver inviting interested persons to comment (45 FR 54930, August 18, 1980). In this notice, MTB stated that it was considering granting the requested waiver on the basis that the cathodic protection requirements of Subpart I of 49 CFR Part 192 are not necessary for public safety with regard to a gas gathering system operating under negative pressure.

One comment was received in response to the Notice. This comment supported the granting of the waiver because gas gathering lines operating at a negative pressure and continuously monitored for air would be quickly shut down in the event of a leak and would pose no hazard to the public. Furthermore, a gas pipeline operating at negative pressure would, in case of a leak, ingest air into the system rather than allow gas to escape, and that a pipeline operating at a negative pressure cannot rupture from overpressure, posing a minimum hazard to the public.

In consideration of the foregoing, MTB, by this order, finds that compliance with Subpart I, 49 CFR Part 192, is unnecessary under the circumstances set forth in the petition and that the requested waiver would not be inconsistent with pipeline safety. Accordingly, effective immediately, Champlin Petroleum Company is granted a waiver from compli-

ance with Subpart I, 49 CFR Part 192, for its gas gathering lines which are operated at a negative pressure in the Wilmington Oil Field within the city limits of Los Angeles and Long Beach, California, provided the methods of monitoring and maintenance, as further described in the petition, are followed.

(49 U.S.C. 1672; 49 CFR Part 1.53; Appendix A of Part 1 and Appendix A of Part 106)

Issued in Washington, D.C., on December 18, 1980.

**Melvin A. Judah,**  
*Acting Associate Director for Pipeline Safety  
Regulation, Materials Transportation Bureau.*

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