

December 15, 1998

Mr. Joel C. Larkin  
Manager  
Operations Integrity Department  
Exxon Pipeline Company  
PO Box 2220  
Houston, TX 77252-2220

Dear Mr. Larkin:

I am responding to your letter of July 27, 1998, notifying us, under 49 CFR 195.8, that Exxon Pipeline Company is transporting crude oil in its Hawkins Field Gathering System through pipe made of fiberglass. You said that starting in 1988 the fiberglass pipe was installed to replace steel pipe in sections of the system with corrosion problems.

Because the safety standards in Subparts C through F of Part 195 apply only to pipelines made of steel pipe, the notice requirement of § 195.8 gives us an opportunity to assess transportation of hazardous liquid in non-steel pipelines to determine if the transportation would be unduly hazardous. Based on the material, design, construction, and operational data you provided, I have determined that the transportation of crude oil as described in your letter is not unduly hazardous.

Sincerely,

Richard B. Felder