

PI-73-0105

March 15, 1973

Mr. Guy W. Griggs, P.E.  
Vice President, Associated Engineering Consultants Incorporated  
2828 Bammel, Suite No. 107  
Houston, Texas 77006

Dear Mr. Griggs:

Your letter of February 23, 1973, addressed to our Houston office has been referred to this office for reply. In that letter you described a situation in which an area traversed by an existing crude oil pipeline is being developed as a subdivision. At three points within the subdivision where the pipeline crosses proposed streets, the pipeline will be lowered, cased, and vented. You ask whether, because of the changes to the pipeline at the street crossings, it is required that the entire existing pipeline within the subdivision be brought into conformity with the new construction requirements of Subpart D of Part 195.

As stated in §195.200, Subpart D prescribes requirements for constructing new pipeline systems with steel pipe and for relocating, replacing, or otherwise changing existing pipeline systems that are constructed with steel pipe.

The phrase "relocating, replacing, or otherwise changing existing pipeline systems," within the meaning of §195.200, has reference to relocation of, replacement of, or other changes to any segment of an existing pipeline system. The regulation does not mean that relocation, replacement, or other change affecting one segment of a pipeline requires upgrading a carrier's entire system to current new construction standards. Furthermore, in your situation, there appears to be no basis for defining a pipeline system as that contained within the boundaries of one particular subdivision.

With respect to the segments of the pipeline being changed as they go under the proposed streets, such segments are required to meet the requirements of Subpart D to the extent applicable.

Based on the situation as you have described it, there is no Federal requirement that the entire existing pipeline within the boundaries of a subdivision be upgraded to the construction requirements of Subpart D because three segments of that pipeline are changed or because a housing development is being built in the vicinity.

I trust this answers your inquiries. If you have further questions in this regard, please call on us.

Sincerely,  
Original signed by:  
Joseph C. Caldwell  
Director  
Office of Pipeline Safety

Associated Engineering  
Consultants Incorporated  
2828 Hammel, Suite No. 107  
Houston, Texas 77006

February 23, 1973

Department of Transportation  
201 Fannin, Room 315  
Houston, Texas 77002

Attention: Mr. Delafuente, P. E.

Re: Audubon Park Subdivision - Harris County, Texas  
New Concrete Street Crossings of Existing Pipeline

Dear Sir:

I would like to confirm my phone conversation of 2/22/73 regarding the captioned project. You said that according to the rules and regulations by the Department of Transportation Hazardous Materials Regulations Board that the rules indicated under Title 49 Transportation refer to new pipeline construction.

In our situation, where we have an existing crude oil pipeline operating at approximately 200 psi with approximately 20 feet of cover, you stated this line will not be required to follow the rules for new pipeline construction if it is lowered and cased at street crossings only. This type of work is not considered alteration or modification that would cause the entire pipeline through the subdivision to have to conform to the rules for new pipeline construction. This type of work is just considered as "lowering".

Also, as we discussed there will be no dwellings or other buildings within 50 feet of the pipeline at any point within the subdivision. We would greatly appreciate your prompt attention in helping us get written confirmation of this matter due to the fact that our contracts have already been let for construction of utilities and streets and we would like to have this matter resolved and the work done well ahead of their schedule.

If we can be of any further help, or if you need additional information on this, please do not hesitate to call me.

Very truly yours,  
Guy W. Griggs, P. E.  
Vice President