

PI-81-0116

October 6, 1981

Mr. D. W. Solanas
U. S Dept. of the Interior
Geological Survey
Imperial Office Building
3301 N. Causeway Blvd.
Metairie, Louisiana 70010

Dear Mr. Solanas:

Mr. Aubry has asked that we respond to your letter of August 13, 1981, requesting written validation of Mr. Orrs opinion that 49 CFR 192.179(d) gives operators the option of installing automatic or manual shutoff valves.

We have considered the regulation at issue and its history set forth in Amendment 192-27 (41 FR 34606, August 16, 1976), and find that Mr. Orr's view is correct since the rule does not and was not intended to specify the type of valve to be used.

Should you have any further questions, you may call me at 202-426-2392.

Sincerely

Original Sign By
Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

United States Department of the Interior
Geological Survey
Imperial Office Bldg., 3301 N. Causeway Blvd.
P.O. Box 7944
Metairie, Louisiana 70010

August 13, 1981

Gentlemen:

The purpose of this letter is to document, in writing, the telephone conversation between your Mr. G. Orr and Mr. D. J. Steinmuller of this office on August 6, 1981. The intent of this telephone conversation was to ascertain an interpretation of Title 49 CFR Part 192.179 with regard to incoming transmission pipeline valves located on offshore, nonproduction, unmanned, and periodically inaccessible, gathering platforms.

As stated in Subsection (d), offshore segments of transmission lines must be equipped with valves or other components to shut off the flow of gas to an offshore platform in an emergency. The question that arose was whether these valves should be of automatic or manual operation. Upon presenting this situation to Mr. Orr of your office, he had stated that these valves could be either automatic or manual in nature.

Therefore, we are requesting that this interpretation be documented, in writing, and forwarded to this office so that a consistent policy can be established for future installations of this nature. Should further discussion be required, please contact Mr. D. J. Steinmuller of this office at FTS 680-9257.

Sincerely yours,

D. W. Solanas
Deputy Conservation Manager
Offshore Operations Support
Gulf of Mexico OCS Region