

Mr. Paul G. Espinosa
DOT Compliance & Pipeline Safety
Arkla Energy Resources
P.O. Box 21734
Shreveport, Louisiana 71151

Dear Mr. Espinosa:

We have considered your letter of May 8, 1989, in which you request permission to requalify welders under §192.229(c) by using a twice-a-year schedule instead of the 6-month interval the rule prescribes.

It is our policy not to grant a request for waiver of a gas pipeline safety standard unless the request is for a special situation, one that does not exist among gas pipelines in general. Because your proposed schedule would maximize the usefulness of, and add flexibility to, the welder qualification period, it would benefit all gas operators that are subject to §192.229(c). We, therefore, are treating your letter as a request to change §192.229(c) rather than as a request to waive the requirements of §192.229(c) in a special situation.

As such, the merits of your request will be considered in the review phase of a rulemaking proceeding we have scheduled to equalize the gas and hazardous liquid pipeline welding rules. Any change we propose to adopt for §192.229(c) will be announced in a notice of proposed rulemaking for this proceeding, which we plan to publish next year.

Sincerely,

/signed/

Richard L. Beam
Director
Office of Pipeline Safety