

July 9, 1992

Mr. G. G. Hohnstein
Central District Manager
Texaco Trading and Transportation, Inc.
5005 Business Park North Suite 200
Bakersfield, CA 93309

Dear Mr. Hohnstein:

This responds to your letter of June 17, 1992, asking whether the following pipeline facilities are subject to the safety standards in 49 CFR Part 195:

- (1) An 8-inch steel petroleum pipeline, identified as 8M-68, that runs between the Fellows Pump Station and the Olig Pump Station, passing through Derby Acres, a residential community of 336 people.
- (2) The Fellows Pump Station.

Based on Drawing No. 303-R-234 and your description of 8M-68, we have concluded that 8M-68 is a gathering line as defined in ?195.2. It is 8 inches in nominal diameter and transports petroleum collected from various production facilities.

Part 195 applies to pipeline facilities used in the transportation of petroleum. However, because of the exception in ?195.1(b)(4), Part 195 has only limited application to gathering lines. It applies only to (1) gathering lines or portions of gathering lines located outside rural areas, as defined in ?195.2; and (2) any part of a gathering line or associated pipeline facility located in a rural area that is necessary for a non-rural gathering line or portion of gathering line to comply with Part 195. With regard to 8M-68, Part 195 applies to the segment inside Derby Acres and to any facility outside Derby Acres that is necessary for the Derby Acres segment to meet Part 195 (e.g., pressure control devices at commodity receiving points).

As for the Fellows Station, its pipeline facilities are used in the gathering of petroleum. As such, the facilities are subject to the same jurisdictional limits as 8M-68. Since the station is in rural areas, Part 195 does not apply to any of its facilities except those that may be necessary for a nonrural gathering line or portion of gathering line to comply with Part 195. For

example, if the Fellows pumps were positioned to feed 8M-68, the associated pressure relief devices at Fellows would be subject to

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Part 195 if they are necessary to control pressure in the Derby Acres segment.

I hope you find this information useful. Should you need further clarification, please call me at (202) 366-1640.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety