

PI-92-0107

October 13, 1992

Mr. E. Scott Smith
Gas Pipeline Safety Branch
Kentucky Public Service Commission
Post Office Box 615
Frankfort, KY 40602

Dear Mr. Smith:

Your letter of July 10, 1992, requests an opinion concerning the applicability of 49 CFR 192.465 to jurisdictional sections of a buried gathering line. You asked whether the term "in its entirety", as cited in 49 CFR 192.455(a)(2), limits the applicability of § 192.465 to pipelines that are cathodically protected over their full length.

We agree with your interpretation that § 192.465 requires the cathodically protected jurisdictional sections to be tested once each calendar year, even if the remainder of the gathering line is not protected. The phrase "in its entirety," as cited in 49 CFR 192.455(a)(2), embraces only pipelines or sections of pipeline that are subject to 49 CFR Part 192. A line does not have to be cathodically protected from end to end if part of the line is non-jurisdictional; only the jurisdictional portion requires cathodic protection. Thus, jurisdictional sections of gathering line that must be protected under § 192.455(a)(2) must be tested in accordance with 49 CFR 192.465.

We trust that this responds satisfactorily to your request.

Sincerely,
Original Sign By
Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602

July 10, 1992

Mr. Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety
400 7th Street, S.W., Room 8417
Washington, D.C. 20590

Dear Cesar:

Please provide us an interpretation of how the wording "in its entirety" is applied in the case described in our attached correspondence with Ashland Exploration, Inc. We feel that a buried gathering line in a Class 3 area is required to be cathodically protected and that the pipeline under cathodic protection must be tested once each calendar year, but with intervals not exceeding 15 months to determine whether the cathodic protection meets the requirements of 192.463 per 192.465.

Ashland Exploration contends that this requirement applies to a pipeline in its entirety whether it is in Class 3 or not and that the pipeline is only required to be monitored every 3 years.

Your early response will be greatly appreciated since Ashland needs to know the resolution of this question before entering into a contract for cathodic protection in the very near future as indicated in its response.

Thank you for your help in this matter.

Sincerely,
E. Scott Smith, Manager
Gas Pipeline Safety Branch