

June 24, 1975

Mr. R. I. Snyder  
Executive Vice President  
Southern California Gas Company  
Box 3249 Terminal Annex  
Los Angeles, California 90051

Dear Mr. Snyder:

This responds to your letter of May 15, 1975, asking us to reconsider an interpretation published in the July 1974 issue of the Advisory Bulletin. That interpretation provides that in uprating steel pipelines operated at 100 psi or more with hoop stresses less than 30 percent SMYS to a pressure permitted by Section 192.619(a)(2)(ii), a pressure test must be performed.

We have reviewed the arguments presented in your letter and feel that the interpretation is correct. We would like to point out however that the pressure test required in uprating to a maximum allowable operating pressure permitted by Section 192.619(a)(2)(ii) need not be a hydrostatic test. The test may be conducted with the gas being transported.

We appreciate your interest in pipeline safety.

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety