

June 3, 1976

Mr. Larry E. Waldrop  
Administrator, Gas Pipeline Safety  
Alabama Public Service Commission  
P.O. Box 991  
Montgomery, Alabama 36130

Dear Mr. Waldrop:

This refers to your letter of March 24, 1976, in which you ask whether a 6-inch pipeline operated by Getty Oil Company, as described in a letter dated March 19, 1976, from Getty to the Commission, is classified as a gathering line or a transmission line for the purposes of 49 CFR Part 192.

The Getty letter describes a system in which gas is produced at several wells and transported by pipeline to a central processing facility where liquids and impurities are removed. After processing, the gas is transported in the 6-inch pipeline in question for 5 miles to the connection with a transmission line where it is sold to the transmission line operator.

As defined in Section 192.3, the term "gathering line" means a pipeline that transports gas from a current production facility to a transmission line or main. The term "transmission line" is defined, in relevant part, as a pipeline that transports gas from a gathering line or storage facility to a distribution center or storage facility. Under these definitions, the point at which a gathering line ends and a transmission line begins is unclear. It may be concluded, however, that when delivered to a transmission line, gas must be generally suitable for transportation to a distribution center or storage facility. Therefore, a gathering line may include any gas processing facilities necessary to initially prepare the gas for distribution or storage, such as a heater, dehydrator, or separator. A gathering line would end when the gas is to be prepared.

The pipeline in question extends downstream from a gas processing facility used to prepare the gas for sale to the transmission line operator. Since it does not contain any further processing facilities before the juncture with the transmission line, the 6-inch intervening line is merely a leg of a continuous transmission line which begins at the outlet of the processing facility. Ownership of the gas being transported or the fact that Getty's 6-inch line does not itself connect with a distribution center or storage facility is not determinative of the line's classification.

If we may be of further assistance, please let me know.

Sincerely,

Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations