

August 11, 1976

Mr. Bruce Raddatz, P.E.  
Wilson & Company  
P.O. Box 28  
Salina, Kansas 67401

Dear Mr. Raddatz:

Your letter of June 29, 1976, requests an interpretation of Title 49, Code of Federal Regulations, Part 195, Transportation of Liquids by Pipeline, Section 195.248 regarding the cover over a proposed liquid pipeline crossing a channel. You state that, "It is my understanding that thirty-six (36) inches of cover between the top of the pipe and the channel flow line will be adequate." Inasmuch as the channel appears to be a "drainage ditch" within the meaning of Section 195.248(a), the requisite amount of cover would be thirty-six (36) inches for normal excavation, subject to Sections 195.210 and 195.248(b). The cover would not, however, be measured from the top of the pipe to the channel flow line. Consistent with the requirements of Section 195.248(a), which indicate that cover is measured between "the top of the pipe and ground level, road bed, or river bottom as applicable," the required cover would be measured from the top of the pipe to the bottom of the channel.

Thank you for your interest in pipeline safety.

Sincerely,

Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations

29 June 1976

Cesar DeLeon, Director  
Office of Pipeline Safety Operations  
2100 2nd Street SW  
Washington, D.C. 20590

Re: Hutchinson GVI Drainage Project - Interpretation of Part  
195, Title 49, Code of Federal Regulations  
WCEA File: 75-83

Dear Sir:

Enclosed are some preliminary typical sections and plan and profile sheets for the Hutchinson, Kansas GVI storm drainage system.

I visited with Frank Fulton on the telephone this afternoon concerning paragraph 195.248 "Cover over buried pipelines". It is my understanding that thirty-six (36) inches of cover between the top of pipe and the channel flow line will be adequate for any liquid pipeline crossing the proposed channel. Could you confirm this so utility relocations can begin.

WILSON & COMPANY

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Bruce Raddatz, P.E.