

PI-81-0102

April 8, 1981

Mr. Ronald B. Miller
Williams Brothers Engineering Company
50 Briar Hollow Lane
Suite 300 W
Houston, Texas 77027

Dear Mr. Miller:

In response to your letter of March 19, 1981, I have enclosed a copy of Amendment 195-13, which established §195.5, "Conversion to service subject to this part."

In the first column on page 2 of the enclosure, the paragraph beginning with "Notice 77-3" emphatically states that "a new pressure test is mandatory for all converted pipelines." This statement is accompanied by a reasoned explanation of why this requirement was adopted under 195.5. therefore, conversion of the 1979 gas pipeline to interstate liquid service will require a new pressure test in accordance with subpart E of Part 195.

Sincerely,

SIGNED

Melvin A. Judah

Acting Associate Director for

Pipeline Safety Regulation

Materials Transportation Bureau

Williams Brothers Engineering Company
50 Briar Hollow Lane
Suite 300 W
Houston, Texas 77027

March 19, 1981

Mr. B. Furrow
Office of Pipeline Safety Regulation
400 7th St. S.W.
Washington, D.C. 20590

Dear Mr. Furrow:

Based on a phone conversation with you on 16 March, 1981, discussing the D.O.T. Title 49 Part 195.5, Williams Brothers Engineering Company would appreciate an interpretation of this situation.

195.5 (a)(4) states, "The pipeline must be tested in accordance with the Subpart 'E'...". The pipeline in question was installed and tested in 1979 and records are available for verification according to Subpart 'E'. The pipeline is being converted from 192 to a HVL line. Will this 1979 pipeline have to be retested under Subpart 'E' even though it was originally tested by 195 rules?

We would appreciate an interpretation of the D.O.T. regulation. If any questions arise, please contact the undersigned.

Very truly yours,
WILLIAMS BROTHERS ENGINEERING COMPANY
Ronald B. Miller
Senior Project Engineer