

Mr. Douglas B. Wyatt  
Looper, Reed, Ewing & McGraw Incorporated  
Attorneys  
Suite 1717  
Nine Greenway Plaza  
Houston, Texas 77046

Dear Mr. Wyatt:

Your letter of July 20, 1989, asks what protection other than minimum burial under §192.319(c) may be required to protect offshore pipelines against the potential hazards listed in §192.317(a).

Section 192.317(a) requires operators to provide a reasonable level of protection for offshore pipelines against the anticipated effects of each listed hazard that could threaten the pipeline. Depending on the nature and level of the risk perceived, the protection might include any one or combination of the following, based on sound engineering judgment; deeper burial, anchorage, greater wall thickness, added flexibility, heavy concrete coating, or any other measure considered necessary to protect the pipeline against foreseeable damage.

I trust this information is helpful to you.

Sincerely,

/signed/

James C. Thomas  
Acting Director  
Office of Pipeline Safety