

June 5, 1990

Mr. Kevin C. Bodenhamer  
Area Manager  
OXY USA Inc.  
Box 1225  
Hutchinson, KS 67504

Dear Mr. Bodenhamer:

We have reviewed your petition (P-90-2W) requesting a waiver from compliance with the testing requirements of 192.14(a)(4) and 195.5(a)(4) for a 6-inch steel pipeline carrying natural gas liquids that was constructed and hydrostatically tested in 1966. The petition states that OXY desires to covert [sic] the line to dual service for operation under both Part 192 and Part 195.

You stated that in view of the original testing and subsequent service, no additional risks will be imposed by not testing the pipeline. You also stated that testing the pipeline upon each frequent change in service would impose an undue hardship that could cost \$500,000 a year.

We must decline to grant the waiver for the following reasons: First, when a hazardous liquid pipeline is converted to gas service under 192.14, the operator lacks proof that the line complies with the current Part 192 material, design, and construction standards. To offset the risks inherent in lack of compliance with these gas pipeline safety standards, the conversion rule (192.14) requires that the line be strength tested as part of the conversion process to confirm its maximum allowable operating pressure. We established this test requirement with the knowledge that many pipelines to be converted under 192.14 would have been tested initially soon after construction. However, such testing was considered inadequate to qualify a pipeline for gas service because of the time elapsed since the initial test. There does not appear to be any reason, therefore, to treat OXY's pipeline any differently regarding the need for testing than other hazardous liquid pipelines that are converted to gas service under 192.14.

The second reason is that the conversion rules under 192.14 and 195.5 do not require testing each time a change in service occurs in a pipeline qualified for dual service. The conversion rules prescribe qualifications for initial operation in gas service of an existing pipeline not previously subject to part 192 and for initial operation in hazardous liquid service of an existing pipeline not previously subject to Part 195. Under Parts 192 and 195, once a pipeline qualifies for operation in gas or hazardous liquid service, it remains qualified for operation in that service regardless of the type of service in which it may be used subsequently. For example, if a pipeline that is qualified under Part 195 for hazardous liquid service, such as OXY's pipeline in the present case, is converted to gas service, it does not have to be requalified under Part 195 before being returned to hazardous liquid service. Any component installed in an existing pipeline after it is qualified for use in gas or hazardous liquid service must, of course, meet all applicable material, design, construction, and testing requirements in effect when the component is installed.

Sincerely,

George W. Tenley, Jr.  
Director  
Office of Pipeline Safety