

April 6, 1992

Mr. W. N. Hall
Associate Petroleum Engineer
Dome Pipeline Corporation
Plaza Center One
P.O. Box 1430
Iowa City, IA 52244-1430

Dear Mr. Hall:

This is in response to your letter of November 7, 1991, concerning the recordkeeping requirements of ?195.404(c)(3). The letter asks whether magnetic media (computer hard drive or diskettes) may be used in place of hard copies to record and maintain the required records.

Section 194.404(c)(3) requires that each operator maintain a record of each inspection and test required by Subpart F. Records must be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer. Section 195.404(c)(3) does not prohibit operators from maintaining the required records on magnetic media. Also, original hard-copy (paper) records need not be retained after their conversion to magnetic media. However, like the original hard copy records, magnetic media records must contain sufficient information to comply with the recordkeeping requirements of ?195.404(c)(3).

We trust that this adequately responds to your request. We are sorry we were not able to answer your letter sooner. However, please let us know if we can be of further assistance.

Sincerely,

/signed/

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety