

FROM: DeLeon, Cesar

TO: Huntoon, Ivan

DATE: 07/16/93

TIME: 1:39 PM

CC: DeLeon, Cesar

SUBJECT: Records for pressure tests - HVL lines

PRIORITY:

ATTACHMENTS:

Your July 14, 1993 draft letter to Mosteller regarding testing records that must be maintained to satisfy requirements of 195.406(a) (5) is O.K. Send it.

Your 7/14/93 fax attaching "Ulysses to Scott City Pipeline; Hydrostatic Test Daily Report; Ulysses to Holcomb Station" requested to know if this daily report complied with the requirements for "recording charts or logs" in 195.406(a)(5). No it does not, because it is a daily report of the hydrostatic testing, rather than the "recording" chart and log.

July 14, 1993

Mr. Glen Mosteller
Plant Manager
Trident NGL, Inc.
Jayhawk Plant
Route 1, Box 14D
Satanta, Kansas 67870

This letter is in response to Mr. Bodenhamer's request for a determination as to the requirements for testing records that must be maintained to satisfy the requirements of §195.406(a)(5) of the Regulations for the Transportation of Hazardous Liquids by Pipelines (Title 49 C.F.R., Part 195). Records pertaining to pressure testing of specific pipelines accompanied the April 28, 1993 request.

The regulation, as it pertains to your request, stipulates a requirement for the determination of maximum operating pressure for an onshore interstate HVL line constructed before January 8, 1971, and an onshore intrastate pipeline constructed before October 21, 1985, and not tested under Subpart E of Part 195. Section 195.406(a)(5) limits the maximum operating pressure based on a pressure test or previous operating pressure. The limitation is:

- a. 80% of the test pressure to which the pipeline was subjected for four or more continuous hours, or
- b. 80% of the operating pressure to which the pipeline was subjected for four or more continuous hours.

Additionally, the pressure test or the operating pressure, whichever is used, must be documented by recording charts or logs made at the time the test or operations were conducted.

Clarification of the requirements for documentation of the test pressure or operating pressure is found in the discussion of the final rule of the amendment to the regulations which provided this criteria for determination of maximum operating pressure, Amendment 195-17, Testing Highly Volatile Liquid Pipelines. A copy of this document is attached. It states:

"the final rules require carriers who wish to demonstrate that pipelines have been previously tested to 125 percent of MOP to use recording charts or logs made at the time the test was conducted."

Therefore, the documentation required must include the recording charts or logs of the pressures that were made over the 4-hour period during which the test or operation was conducted. A summary report or a declaration that the test or operation was conducted is not satisfactory documentation.

Based on our review of the records submitted, only those records which include a recording chart or a log documenting the pressures maintained over the 4-hour period would be acceptable. The chart or log must have been made throughout the duration of the 4-hour period. Charts and/or logs, as required by this rule, only accompanied the records for the pipelines identified as:

- a. Cheney - Hutchinson 6"
- b. Cheney - Wichita 6"
- c. Jayhawk - Hutchinson 8"
- d. Wilburton - Postle Hough 2"

Please let me know if you have any questions in regard to this matter.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety

Attachment