

July 20, 1993

Mr. J. N. Jagers  
Manager, Operations  
Amoco Production Company  
Northwestern U.S. Business Unit  
Amoco Building  
1670 Broadway  
Post Office Box 800  
Denver, CO 80201

Dear Mr. Jagers:

I am responding to your letter of May 26, 1993, concerning a plan to construct two 12-inch pipelines, designated A and B, to transport nitrogen and produced gas between two Amoco gas plants in southwest Wyoming. You asked whether the pipelines will be subject to the Department's pipeline safety regulations.

The Department's regulations applicable to gas pipeline transportation in or affecting interstate or foreign commerce are in Parts 191, 192, and 199 of Title 49 of the *Code of Federal Regulations*. These regulations, which apply to the transportation of natural gas or gas that is flammable, toxic, or corrosive, govern reporting, recordkeeping, design, construction, testing, operation, maintenance, and drug testing. I have enclosed a copy of the regulations for your use.

Your letter shows that pipeline A will transport nitrogen (with a trace of methane) until 1998, when it will transport nitrogen or produced gas. Pipeline B will transport nitrogen or produced gas until 1998, when it will transport only produced gas. Under these circumstances, Amoco intends to use both pipelines A and B, either at the outset or in the future, to transport produced gas, which is a gas covered by the regulations. Thus, both pipelines must be designed, constructed, and tested according to Part 192 requirements.

In addition, while the pipelines transport produced gas, they must meet Part 191, the operation and maintenance (including corrosion control) requirements of Part 192, and Part 199.

These requirements would not apply during the transportation of nitrogen, a gas not covered by the regulations.

Sincerely,

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety

Enclosure