

U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**Research and
Special Programs
Administration**

November 30, 1995

Mr. David R. Seaton
District Manager, Wichita Falls District
Texaco Pipeline, Inc.
P. O. Box 600
Wichita Falls, TX 76307

Dear Mr. Seaton:

This is in response to your request for the Research and Special Programs Administration's (RSPA) Office of Pipeline Safety approval of a waiver of compliance with the June 7, 1994, rule (59 FR 29379) - Pressure Testing Older Hazardous Liquid and Carbon Dioxide Pipelines. Specifically, you requested that the Basin Pipeline System, an interstate pipeline that transports crude oil from Jal, New Mexico, to Cushing, Oklahoma, be permitted to operate at its maximum operating pressures (MOPs).

In support of the waiver request, you noted that the line was hydrostatically tested at the time of construction, that an enormous economic burden (estimated at \$15 million) will be incurred by shutting down the line for testing (resulting in a negative impact on the crude oil industry in the region), that no seam failures have occurred in the last six years since MOPs were reduced to about 50% specified maximum yield strength, that only 10% of the Basin Pipeline System traverses sensitive areas, and that no external corrosion problems have been observed on the system.

RSPA recently published a notice of proposed rulemaking (60 FR 54328; October 23, 1995) extending by one year the time for compliance with the requirements to plan and schedule pressure testing of older hazardous liquid and carbon dioxide pipelines. This extension of time for compliance is in response to a petition from the American Petroleum Institute to apply a risk-based alternative to the required pressure testing of older pipelines. The extension of time will allow RSPA time to consider the petition. RSPA will announce its decision on the risk-based petition in the Federal Register.

Since the outcome of RSPA's decision on the risk-based alternatives to pressure testing will apply to the Basin Pipeline System, no action is being taken on your waiver request at this time.

Sincerely,

Richard B. Felder
Associate Administrator for
Pipeline Safety