

July 12, 1996

Mr. Jordan R. Janak, R.E.M.
Director, Regulatory Compliance
All American Pipeline Company
5500 Ming Avenue
Suite 300
Bakersfield, CA 93309

Dear Mr. Janak:

This is in response to your request for an interpretation whether pump unit drivers are included in the definition of "pipeline system" in 49 CFR 195.2.

The definition of "pipeline system" is limited to those pipeline facilities through which a hazardous liquid or carbon dioxide moves in transportation. The pump unit drivers do not have either a hazardous liquid or carbon dioxide moving through them so they are not a part of the "pipeline system." However, the pump unit drivers would come under the definition of a "pipeline facility."

If I can be of further assistance, please contact me.

Sincerely,

Richard D. Huriaux.
Director for Technology and Standards
Office of Pipeline Safety

Lloyd Ulrich: brw 202/366-4395 6/12/96
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A: Janak-pu.mp

