May 13, 1981

Mr. Robert L. Herbst Business Representative International Union of Operating Engineers 2929 South Jefferson Avenue St. Louis, Missouri 63118

Dear Mr. Herbst:

This is in reply to your letter dated April 24, 1981, in which you requested information concerning rules applicable to liquid pipe movement. The enclosed Code of Federal Regulations (49 CFR Part 195) applies to liquid pipelines. Section 195.424 applies to pipe movement specifically.

We hope this meets your needs.

Sincerely, Melvin A. Judah Acting Associate Director For Pipeline safety Regulation Materials Transportation Bureau April 24, 1981

International Union of Operating Engineers 2929 South Jefferson Avenue St. Louis, Missouri 03118

Director of Pipeline Safety Department of Transportation 2100 2nd St., S.W. Washington, D.C. 20590

Dear Sir:

This letter is in regard to safety precautions to be used when lowering or moving high pressure liquified pipelines.

I.U.O.E. Local 2 represents some employees of the Phillips Pipeline Company. The employees we represent are engaged in all maintenance and operations of the pipeline. The employees have been moving and lowering pipe to a deeper depth while being under operating pressure. It is to the employees interest that I know the precautions and safety laws that the Company has to comply with for the safety of the employees when lowering pipeline.

Kindly forward this information to me at the following address:

Robert L. Herbst, Business Representative I.U.O.E. Local 2 2929 So. Jefferson Ave. St. Louis, Mo. 63118

Sincerely, Robert L. Herbst Business Representative