

**Research and
Special Programs
Administration**

May 8, 1995

Mr. George G. Persyn
Environmental and Regulatory
Compliance Department
Exxon Pipeline Company
P.O. Box 2220
Houston, Texas 77252-2220

Dear Mr. Persyn:

We have your FAX of February 9, 1995, pertaining to previous correspondence that requested (as required by 49 CFR § 195.8) our approval of the fiberglass piping in the non-rural portions of the Hawkins Field gathering system. Our letter of September 26, 1994, had approved the use and operation of the fiberglass piping in this situation and location contingent upon compliance with specified regulations which were set out in two enclosures. Enclosure 1 specified certain regulations under Subparts B, C, D, F, G, J, & L of Part 192. In a similar manner, Enclosure 2 specified certain regulations under Subparts A, B, C, D, & F of Part 195. Subsequently, your letter of November 1, 1994, requested exemption from compliance with certain specified regulations under Subparts D and F of Part 192 pertaining to steel valves and plastic pipe joints.

From information provided in your various communications, it is our understanding that:

1. Only 1.2 miles of this 17.0 mile low pressure crude oil gathering system is located in non-rural areas and thus subject to Part 195. Fiberglass pipe was selected to replace the previous steel pipe because of the considerable problems with internal corrosion.
2. Contrary to statements in Item 1 of your letter of November 1, 1994, your recent telephone conversation advised that the mainline valves in the 1.2 miles of fiberglass piping in the non-rural area are steel gate valves. These valves meet the requirements of API 6D and the applicable requirements of § 192.145 of Subpart D. Additionally, the valves are through conduit and will accommodate the passage of smart pigs.
3. Items 2 and 3 of your letter of November 1, 1994, advised that the fiberglass pipe has threaded joints rather than the heat fusion, solvent cement, and adhesive joints discussed under § 192.191 of Subpart D and §§ 192.281, 192.283, 192.285, & 192.287 of Subpart F. However, as shown in the specification sheets, which you have recently submitted, the pipe joints have a "triple seal" composed of coarse threads, a front O-ring, & a back

O-ring to provide a high pressure seal. You further advise that the triple seal joints have been performing satisfactorily in the rural 15.8 miles of this gathering system. The piecemeal replacements of the corroded steel pipe with these fiberglass piping materials began in 1989.

4. Your mark up of the specification sheets illustrates that the fiberglass pipe purchased for the gathering system is rated by the manufacturer for a static pressure of 1000 psi and a cyclic pressure of 600 psi. Your letter of August 19, 1994, states that: “the installed fiberglass pipe has been hydrostatically tested to 600 psi; the highest normal operating pressure will range between 100 and 150 psi; and the relief valves at all pumps are set at 300 psi. The pipe has been buried to a minimum depth of 48 inches; and a 6-inch wide magnetic warning tape has been buried above the pipe to aid in detecting its location and to serve as a warning to anyone digging over the pipeline”
5. Our letter and enclosures of November 1, 1994, approved the use and operation of the fiberglass pipe in the manner and location described in that correspondence. However, because we were not made aware of the threaded joints, you now are requesting our approval for their use before putting the 1.2 mile non-rural segment in service.

Based on information referenced above and in Exxon’s letter of August 19, 1994, we find in accordance with 49 CFR 195.8, that the use and operation of the fiberglass pipe and particular threaded joint in the described manner would not be unduly hazardous and the transportation may proceed as planned.

This approval is also contingent upon Exxon’s compliance with the enclosed regulations (Enclosures 1A and 2), except that the use of the above described threaded joint is permitted. This approval is for the non-rural fiberglass gathering line for the situation and location described above.

Sincerely,

Cesar DeLeon
Deputy Associate Administrator
for Pipeline Safety

Enclosures

cc: Mr. Jim Thomas, DPS-27
Director, Southwest Region
Office of Pipeline Safety