

March 17, 1971

Office of Pipeline Safety
Department of Transportation
400 Sixth Street, S.V.
Washington, D. C. 20590

Gentlemen:

RE: Compliance with 49 CFR 192.607

Pursuant to the requirements of 49 CFR 192.607(a) "Initial determination of class location and confirmation or establishment of maximum allowable operating pressure", this Corporation has reviewed its entire pipeline system to determine the existence of any pipeline with a maximum allowable operating pressure that will produce a hoop stress in excess of 40 percent of SMYS.

Based on the definitions of maximum allowable operating pressure contained in 49 CFR 192.619 "Maximum allowable operating pressure: steel or plastic pipelines", all pipelines operated by this Corporation are stressed to less than 40% SMYS at maximum allowable operating pressure.

Very truly yours,

Charles A. Bolz
Vice President