

08-16-95

Ms. Mary L. McDaniel, P.E.  
Manager, Pipeline Safety  
Railroad Commission of Texas  
Transportation/Gas Utilities Division  
PO Box 12967  
Austin, Texas 78711-2967

Dear Ms. McDaniel:

Your letter of June 30, 1995, and its supporting documents describe the Commission's approval of an application by Mobil Exploration & Producing U.S. Inc., for wavier of 49 CFR § 195.306(c)(5).

Mobil is requesting authority to pressure test, using carbon dioxide as the test medium, two buried liquid carbon dioxide pipelines in rural Yoakum County, Texas. The lines transport carbon dioxide for injection and consist of four miles of 12.75-inch pipe and six miles of 6.625-inch pipe. The lines were installed and pressure tested in 1984, but their maximum operating pressures were not established under the requirements of § 195.406.

Section 195.306(c) allows carbon dioxide as the test medium provided that the provisions in paragraphs (c)(1) through (c)(5) are met. The information provided in your application indicates that the retesting will comply with all but the provision in paragraph (c)(5) that the pipe be new pipe. The alternative is to use water as the test medium, but pressure testing with water would require additional effort and expense to ensure its complete removal to prevent the formation of an acid that is corrosive to steel pipe.

In this instance, it is reasonable and economical to use carbon dioxide as the test medium. Additionally, the information in your application states that the lines are buried and that there are no houses or businesses within 600 feet of the pipelines. Therefore, we believe that the use of carbon dioxide as the test medium is not inconsistent with the pipeline safety regulations. For this reason, we do not object to the wavier as granted.

Sincerely,

Richard B. Felder  
Associate Administrator  
for Pipeline Safety