

Mr. Richard Tatlock, President
Coastal Research Corporation
30 Lancaster Street
Boston, Massachusetts 02114

Dear Mr. Tatlock:

This is in further response to your letter inquiry dated, September 27, 1971, concerning class locations and periodic updating and review. We trust that the following answers to your questions will resolve your problems.

Question: Would a 5" wide strip black and white map satisfy the Act's requirements>

ANSWER: If the strip map that you refer to is capable of supplying the needed information to determine the class location, then it would be satisfactory. The method of gathering the required information is not specified. The regulations are in terms of performance standards.

QUESTION: We are unclear exactly what is required for annual class location updating.

ANSWER: There is no requirement for an annual updating for the class location. Amendment 192-5 (copy enclosed) effective September 7, 1971, does require in §192.611(e)(2) that confirmation or revision of the maximum allowable operating pressure due to changes in class location that occur on or after July 1, 1973, must be completed within 18 months of the change in class location. This means that for operators having lines operating at or above 40% SMYS the operator must be constantly on the alert for changes in class location, and if necessary take action within 18 months of the change in class location. It does not mean that he may take action 18 months after he discovers such a change.

QUESTION: By what annual date is the class location updating required?

ANSWER: There is no particular date given. Section 192.613 requires continuing surveillance, and conformance to the applicable regulations.

QUESTION: Are class location maps required to be filed with either your office or State safety offices?

ANSWER: The Office of Pipeline Safety does not require that these be filed with any agency, although on intrastate lines some States may have such requirements. The Office of Pipeline Safety would expect such records to be available on request.

We are happy to have this opportunity to be of service. If you have any further questions, please contact us.

Sincerely,

/signed/

Joseph c. Caldwell
Acting Director
Office of Pipeline Safety

Enclosure