

October 11, 1994

Barney V. Dotson  
Prudhoe Bay Field Manager  
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P.O. Box 196612  
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Dear Mr. Dotson:

Following your presentation on September 2, 1994, we considered the applicability of the safety regulations in 49 CFR Part 195 to BP's pipeline systems on the North Slope. The typical system consists of pipelines that begin at production wells and run to a manifold building where they are joined into a larger pipeline. At this building, the flow in each pipeline is alternately routed to a test separator used to meter the gas, oil, and water produced from the wells. All separated fluid is recombined before moving to the larger pipeline. The larger pipeline extends to a separation facility that permanently divides the transported fluid into its gas, oil, and water components. From the separation facility, each fluid component is transported separately by pipeline, the oil component going to the Trans-Alaska Pipeline.

With certain exceptions, the regulations in 49 CFR Part 195 apply to the transportation of hazardous liquid and carbon dioxide by pipeline in or affecting interstate or foreign commerce. The exceptions relevant to the North Slope systems include offshore production (§ 195.1(b)(5)), onshore production (§ 195.1(b)(6)), rural petroleum lines (§ 195.1(b)(4)), and certain low-stress pipelines (§ 195.1(b)(3)). Based on the definition of "production facility" in § 195.2, we have concluded that the portion of the system between the wells and the outlet of the separation facility constitutes production that is excepted under § 195.1(b)(5) or § 195.1(b)(6).

If the pipeline between the separation facility and the Trans-Alaska Pipeline is 8 inches or less in nominal diameter, it is a gathering line as defined in § 195.2. As a gathering line, it would come under the exception in § 195.1(b)(4) to the extent it traverses a "rural area," which is also defined in § 195.2. If the pipeline is more than 8 inches in nominal diameter but is a "low-stress pipeline" as defined in § 195.2, it may come under the exception in § 195.1(b)(3). This exception covers low stress pipelines that do not transport a highly volatile liquid and that are located in a rural area outside a waterway that is navigable in fact and currently used for commercial navigation.

We appreciated meeting with you and other members of the BP staff. Please let me know if we can provide any further assistance regarding the Part 195 regulations.

Sincerely,

Cesar De Leon  
Deputy Associate Administrator for  
Pipeline Safety