

February 22, 1971

Mr. M. Cassaway
Manager, I.U.C. Gulf, Inc.
P. O . Box 6439
New Orleans, Louisiana 70114

Dear Mr. Cassaway:

This is in reply to your letter of December 9, 1970, concerning the interpretation of 49 CFR, Section 195.404 and Section 195.412(b), relating to inspection of pipelines and asking whether the inspection procedures described by you are adequate.

The purpose of these regulations is to require inspection for changes in surrounding conditions which may jeopardize safe operation of the pipeline and such inspection should consider both possible damage resulting from natural phenomena and navigation.

It is our interpretation that the steps described in items 1 thru 4 of page 2 of your letter would meet the requirements of the regulations in most instances.

If you have further questions, do not hesitate to ask.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety