

Mr. J. W. Nanney  
Design & Construction Engineer  
Pioneer Natural Gas Company  
P. O. Box 511  
Amarillo, Texas 79185

Dear Mr. Nanney:

In response to your letter of June 7, 1971, concerning the requirements of Part 192 of the Federal Minimum Safety Standards as they apply to testing of underground pipeline crossings of roadways and railroads, I wish to advise as follows.

The required test pressure for any segment of line is dependent upon the class location of that segment and the desired maximum operating pressure. The testing requirements of the regulations do not contain any special requirements for road or railroad crossings.

The regulation for pipe design, as detailed in Paragraph 192.111(b) and (c) do require a more restrictive design factor (K) for uncased pipelines crossing railroads and roadways or making a parallel encroachment on such right-of-way in Class 1 and 2 locations. Giving consideration to Subpart K - Uprating and Section 192.611, Change in class location, the operator may desire to test the stronger crossing pipe at the same stress level as the remainder of the pipeline. It is permissible to pretest the segment before this segment is installed to provide for such situations.

We hope this answers your question. If you have any further questions, please do not hesitate to ask.

Sincerely,

/signed/

Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety