

June 16, 1975

MEMORANDUM

TO: Richard E. Marland
FROM: Jacquelin N. Miller
RE: Review of Department of Transportation,
Coast Guard, proposed rules relative to
Deepwater Ports

The proposed rules appear to be quite complete and adequate with respect to the construction and general operation of deepwater ports.

The two possible areas which appear to be somewhat lacking in coverage are: 1) the regulations governing maintenance, monitoring, and methods for leak detection along the pipeline connecting the platform with the onshore facility and 2) the design, maintenance, monitoring operation, etc. of the onshore facility. Perhaps these areas will be addressed more fully in the additional regulations to be promulgated in the future as cited in the "Background of the Proposal" pg. 19956 of the Fed. Reg. Vol. 40, No. 89 - Wednesday, May 7, 1975.

As a matter of interest, are similar regulations in force, or to be promulgated, to cover deepwater ports within the territorial sea? We note that Section 149.753 covers the required lighting of floating hose strings. Why are the two sections of hose furthest from the SPM exempt from a lighting requirement? How long is a "section."

We appreciate the opportunity to have reviewed these proposed rules and will look forward to receiving any follow up documentation on this matter.

Jacquelin N. Miller
Assistant Specialist