

March 16, 1971

Mr. J. H. Lambdin
Professional Engineer
349 Glenway
Jackson, Mississippi 39216

Dear Mr. Lambdin:

This is in reply to your letter of February 16, 1971, concerning the applicability of the Natural Gas Pipeline Safety Act of 1968 to a line approximately 10 miles long operating at a pressure of 125 to 150 pounds, crossing various public and private rights-of-way and supplying only one customer, a public utility owned generating station.

The Natural Gas Pipeline Safety Act of 1968 (hereinafter called the Act), and the regulations contained in 49 CFR, Parts 191 and 192 would appear to be applicable to this facility. Section 2(3) of the Act defines "Transportation as gas" as "the gathering, transmission or distribution of gas by pipeline or its storage in or affecting interstate or foreign commerce...." (underscoring added). "Pipeline facility" as defined in Section 2(4) of the Act includes "any equipment, facility, or building used in the transportation of gas or the treatment of gas during the course of transportation."

It is our view, based on the legislative history of the Act, that even though the operation may be entirely within one State there is no question but that every element of a gas gathering, transmission and distribution line is moving gas, which is either in or affects interstate commerce.

We hope this answers your question, and if we can be of any further assistance, please let us know.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety