

Mr. T. K. Spalding, Director
Gas Pipeline Safety Division
West Virginia Public Service Commission
Charleston, West Virginia 25305

Dear Mr. Spalding:

This will acknowledge your letter dated January 14, 1972, regarding an interpretation of Paragraph 192.457(b), 49 CFR.

The information that Mr. DeLeon gave you over the telephone was in error. The word "found" is not interpreted to mean that the operator during some routine procedure discovers a leak or evidence of corrosion on his pipeline.

As set forth in Subparagraph 192.457(b)((3), for bare or coated distribution lines -

"The operator shall determine the areas of active corrosion by electrical survey or where electrical survey is impractical, by the study of corrosion and leak history records, by leak detection survey, or by other means.

The preamble to this Paragraph states, in part:

"The operator must conduct electrical surveys in areas where they are practical. In other areas he must make diligent efforts utilizing leak surveys, all available records such as corrosion and leak history records, or other appropriate methods, to discover active corrosion...."

Form the foregoing, the operator must conduct an electrical survey where practical to determine areas of active corrosion.

We are sorry that we gave you a wrong interpretation over the telephone. I trust that this will answer your particular question. If you have any further questions, please let us know.

Sincerely,

Joseph C. Caldwell

Acting Director
Office of Pipeline Safety