

October 16, 1973

Mr. John T. Stanclift
114 Woodlawn Street
Geneva, OH 44041

Dear Mr. Stanclift:

Pursuant to my conference with you and Mr. Dick Murphy, Assistant to the General President of Service Employees International Union of the AFL-CIO, and Messrs, Byer and Meyers of Local 555 of the same union on September 27, 1973, we are responding to your further inquiry regarding our letter to you dated June 22, 1973.

Pursuant to our response to you in that letter, you further inquire that if the customer meter to a building is located inside the building, should the leak survey that is conducted pursuant to §192.723(b)(1) include the meter?

Section 192.3, 49 CFR, defines a service line as a distribution line that transports gas from a common source of supply to (1) a customer meter or the connection to a customer's piping, which ever is farther downstream, or (2) the connection to a customer's piping if there is not customer meter.

Pursuant to §192.723(b)(1), all service lines subject to the regulations as defined in §192.3, including the meter, must be included in the leakage survey conducted, regardless if they are located inside of a building.

We trust that we have answered your specific questions. If we can be of further assistance, please let us know.

Sincerely,

/signed/

Cesar DeLeon
Deputy Director
Office of Pipeline Safety