

PI-76-0100

January 19, 1976

Mr. John Bulla
R. A. Ransom Company, Inc.
1000 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Mr. Bulla:

Your letter of September 4, 1975, requests clarification of the responsibility for compliance with corrosion control and leakage survey requirements with respect to a pipeline owned by a public housing authority running between the housing authority's meter on an apartment building wall and a road right-of-way. From the right-of-way, the pipeline continues to a gas main operated by a public utility.

Under Section 8 of the Natural Gas Pipeline Safety Act of 1968 (49 USC 1677) and 49 CFR Part 192, a person who engages in the transportation of gas (operator) is responsible for compliance with Part 192 as to all pipelines used in that transportation. As indicated by the definition of the term "service line" in Section 192.3, an operator engages in the transportation of gas to the point where the sale and delivery of gas to a customer have occurred.

In the situation you describe, it appears that the public utility engages in the transportation of gas to the outlet of the meter. Therefore, as the operator, the public utility is responsible for compliance with the corrosion control and leakage survey requirements for the pipeline between the main and the meter. Whether the housing authority or the public utility bears the cost of compliance as to that portion of the pipeline not owned by the utility is a matter outside the jurisdiction of this Office.

We trust this satisfactorily responds to your inquiry.

Sincerely,
Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations