

GAS DEL ESTADO
Normalizacion e Informacion Tecnica
ATTN: Ing. Roberto N. Artola
Alsina 1774
1088 Buenos Aires
Argentina

Dear Sr. Artola:

Thank you for your inquiry of October 2, 1979, (Reference NOTA GRIP/NT No.2373(regarding our pipeline safety regulation section 192.327(d).

The requirement of part (d) is such that the pipeline operator does not have a choice between subparts (1), (2), and (3), but may install a pipeline with less than the 24-inch minimum requirement provided all of the criteria are met as stated:

- (d) A main may be install with less then 24 inches of cover if the law of the State or municipality -
 - (1) Establishes a minimum cover of less than 24 inches;
 - (2) Requires that mains be installed in a common trench with other utility lines;
and
 - (3) Provides adequately for prevention of damage to the pipe by external forces.

The key items are the semicolons at the end of each subpart and the word "and" at the end of (2) which tie the three parts into one requirement.

We trust this answers your question satisfactorily.

Sincerely,

/signed/

Cesar DeLeon
Associate Director for

Pipeline Safety Regulation
Materials Transportation Bureau

DEPARTMENT OF TRANSPORTATION
400 6th. Street, S.W.,
Washington, D. C. 20590
ESTADOS UNIDOS DE NORTEAMERICA

Gentlemen,

RE: "192.327 Cover, paragraph (d):(1), (2) and (3)", of the Part 192, Title 49,
CODE OF FEDERAL REGULATIONS>

Has del Estado is a State Owned Utility in charge of the production, transport, commercialization and distribution of gaseous hydrocarbons (Natural Gas and LPG) all over the Argentine country. Our duties include the analysis and studies of standards and specifications to be complied with within the scope of our Company.

We ask you to inform us if a main might be installed with less then 24 inches of cover with only the first requirement, that is: "(d) A main may be installed with less than 24 inches of cover if the law of the State or municipality --

(1) Establishes a minimum cover of less than 24 inches;" or if the installation must carry out also with the requirement of paragraph (2) or with paragraph (3), or with both simultaneously.

Thanking you in advance for your all cooperation and hoping a prompt answer, we remain

Cordially yours,