

U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**Research and
Special Programs
Administration**

MAR - 7 1990

Mr. William C. Barbeau
Director
State of Minnesota
Office of Pipeline Safety
Market House
Room 130
289 East Fifth Street
St. Paul, Minnesota 55101

Dear Mr. Barbeau:

Thank you for your letter of January 17, 1990, concerning certain distribution lines in Minnesota that you referred to as "branch service lines."

Lines of this type have also been a concern of enforcement personnel in other States for reasons similar to those detailed in your letter. Recently, the Arizona Corporation Commission waived the requirements of 49 CFR part 192 pertaining to mains for lines serving no more than two adjacent single family dwellings. We approved the waiver and also scheduled a rulemaking proceeding to amend the Part 192 definition of "service line" to include piping like that covered by the Arizona waiver.

We intend for this future rulemaking to resolve as many of the compliance difficulties associated with branch service lines as we reasonably can without any loss of safety. In this regard, we will consider the potential problem areas detailed in your letter in putting together our rulemaking proposal.

Until the Part 192 regulations are changed to clarify their application to branch service lines, we concur with your decision not to cite operators for violating requirements governing mains that can be interpreted to apply to portions of branch service lines.

Sincerely,

George W. Tenley, Jr.
Director
Office of Pipeline Safety