

December 2, 1998

Mr. James P. Novacek, P.ER.
Facilities Engineer
Cabot Oil & Gas Corporation
400 Fairway Drive, Suite 400
Coraopolis, PA 15108-4308

Dear Mr. Novacek:

Thank you for your letter of November 10, 1998 asking whether a natural gas liquids processing plant located near Wayne, West Virginia, is subject to the jurisdiction of DOT/OPS. You said the plant is connected to inlet and outlet pipelines that are DOT/OPS jurisdictional intrastate transmission lines.

It appears that the function of the plant is to remove quantities of liquid hydrocarbons that have accumulated during the transmission of gas. Because this removal supports the transmission of gas, the plant is subject to our safety regulatory jurisdiction. Although we have no regulations that apply specifically to such processing plants, any facilities that are used directly in the transportation of gas by pipeline would be subject to applicable safety standards in 49 CFR Parts 192 and 199. In addition, we consider other facilities in the plant - those related more to processing and storage of hazardous liquid - as refining or manufacturing facilities that are exempt from the hazardous liquid pipeline safety standards in 49 CFR Part 195.

You also asked about the Process Safety Management regulations of OSHA. Because we do not administer those regulations, we cannot offer you an official opinion on whether they cover the plant. You should direct this inquiry to OSHA.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety