

Mr. David Ries
President
MoGas Pipeline LLC
110 Algana Court
Saint Peters, Missouri 63376

Docket No. PHMSA-2008-0286

Dear Mr. Ries:

On October 16, 2008, you wrote to the Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting a special permit to waive compliance from PHMSA's pipeline safety regulations in 49 CFR §§ 192.14(a)(4) and 192.619(a)(2)(ii) for 24.6 miles of the 12-inch MoGas Pipeline natural gas transmission pipeline system located in Pike and Lincoln Counties, Missouri from Mile Post 80.38 to Mile Post 105.69.

Section 192.14(a)(4) requires a steel pipeline previously used in service not subject to Part 192 to be tested in accordance with Part 192 Subpart J to substantiate the maximum allowable operating pressure allowed by Part 192 Subpart L (192.601-192.629). The regulation in § 192.619(a)(2)(ii) for a pipeline converted to service requires a hydrostatic test of 1.25 times the maximum allowable operating pressure (MAOP) for Class 1 and 2 locations and 1.5 times the MAOP in Class 3 locations.

Upon careful consideration, PHMSA is declining to grant a special permit to MoGas Pipeline to operate at a MAOP based upon a hydrostatic test of 1.1 times the MAOP for the reasons set forth in the *Special Permit Analysis and Findings* document enclosed and posted in Docket No. PHMSA-2009-0286, in the Federal Docket Management System (FDMS) located at www.Regulations.gov.

My staff would be pleased to discuss this denial or any other regulatory matter with you. John Gale, Director of Regulations (202-366-0434), may be contacted on regulatory matters and Alan Mayberry, Director of Engineering and Emergency Support (202-366-5124), may be contacted on technical matters specific to this denial.

Sincerely,

Jeffrey D. Wiese
Associate Administrator for Pipeline Safety

Enclosure: Special Permit Analysis & Findings

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