



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

**MAY 24 2011**

Mr. David Bohn  
Pipeline Compliance Specialist  
Duke Energy Field Services, LP  
370 17<sup>th</sup> Street  
Suite 2500  
Denver, CO 80202

Dear Mr. Bohn:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) you requested an interpretation of the Federal pipeline safety regulation 49 CFR § 192.171(d). You provided the following background information: Duke Energy Field Services (DEFS) operates a number of gas compressor stations in gathering service that are located within city limits and, therefore, are required to comply with the Federal pipeline safety regulations at 49 CFR Part 192. At such compressor stations, certain engines may use carburetors rather than fuel gas injection valves to provide a fuel-air mixture to the engine power cylinders. DEFS believes that this section of the pipeline safety rules may mean that engines with carburetors are not required to have automatic fuel gas shut-off valves.

You stated that in certain areas, DEFS has been asked to install automatic fuel gas shut-off valves on its carbureted engines as well as its fuel gas injection engines. You asked whether § 192.171(d) requires all engines at compressor stations to be equipped with automatic fuel gas shut-off valves, or whether this requirement is limited to fuel gas injection engines?

In response to your question, § 192.171(d) does specifically refer to compressor station gas engines that operate with pressure gas injection. It does not, however, use the term “fuel gas injection.” Based on the history, purpose and intent of the regulation, the term, “pressure gas injection” is a performance language term that is meant to cover all types of fuel gas delivery. The term “pressure gas injection” pre-dates Part 192 and was adopted from the wording of the Gas Transmission and Distribution Piping Systems, ASME Standard B31.8-1968. It references the fact that these engines operate using pressurized natural gas, usually taken from the compressor station’s suction or discharge headers (mainline pressure). Because this term is a general reference to the fact that these engines are fueled by gas; the source of which is line pressure and is not a reference to any particular delivery component of the engine, the required actions apply to all engines fueled by line gas.

The intention of 49 CFR § 192.171(d) is to extend safety in a manner which is not prescriptive. Therefore, it applies to all fuel gas methodologies that deliver pressurized fuel gas to all compressor station gas engines that were modified or installed after the applicable dates set forth in § 192.13. This assures the safe operation of all compressor station gas engines.

I hope that this information is helpful to you. If I can be of further assistance, please contact me at 202-366-4046.

Sincerely,

A handwritten signature in black ink, appearing to read 'John A. Gale', written in a cursive style.

John A. Gale  
Director, Division of  
Standards and Rulemaking

January 23, 2006

Certified Mail Return Receipt Requested 91 7108 2133 3931 5279 8585  
Pipeline Hazardous Material Safety Administration  
Office of Pipeline Safety  
Deputy Associate Administrator  
PHP 2  
400 Seventh Street, SW  
Washington DC. 20590-0001

Dear Mr. Willke:

Duke Energy Field Services, L.P. ("DEFS") hereby requests an interpretation of the pipeline safety standards set forth in 49 CFR 192.171 (d), which states:

*Each compressor station gas engine that operates with pressure gas injection must be equipped so that stoppage of the engine automatically shuts off the fuel and vents the engine distribution manifold.*

DEFS operates a number of gas compressor stations in gathering service that are located within city limits, and are therefore required to comply with the pipeline safety standards in 49 CFR Part 192. At such compressor stations, certain engines may use carburetors rather than fuel gas injection valves to provide a fuel-air mixture to the engine power cylinders. DEFS has interpreted this section of the pipeline safety rules to mean that engines with carburetors are not required to have automatic fuel gas shut-off valves. However, in certain areas, DEFS has been asked to install such equipment on its carbureted engines as well as its fuel gas injection engines. Does Section 192.171(d) require all engines at compressor stations to be equipped with automatic fuel gas shut-off valves, or is this requirement limited to fuel gas injection engines?

DEFS appreciates your attention to this request for interpretation. If you have any questions or would like to discuss this matter, please contact me at 303-605-1992.

Thank you for your assistance,  
DUKE ENERGY FIELD SERVICES, LP

David Bohn  
Pipeline Compliance Specialist