PI-71-0122 December 9, 1971

Mr. Roland V. Cobb Collins & Ryan, Inc. Dupont Boulevard Millesboro, Delaware 19966

Dear Mr. Cobb:

This refers to your correspondence with this office dated November 1, 1971, requesting information concerning 49 CFR part 192 – Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards.

The sections referred to when answering each question should not be interpreted to imply that they are the only sections governing the question.

Question No. 1: As an L.P. gas supplier how many customers are we allowed to hookup on one underground or aboveground gas tank?

Our regulations do not limit the number of customers that may be served from on tank. However, Section 192.11 requires that if you have ten or more customers you shall meet the standards under part 192 and of NFPA stands Nos. 58 and 59. In the event of a conflict, the requirements of this par prevail.

Question No. 2: How many inches below ground should underground lines be placed, the lines being $\frac{3}{4}$ " to 1 $\frac{1}{2}$ " in diameter?

Section 192.327 prescribes the minimum cover for transmission lines and mains and Section 192.361 prescribes the minimum cover for service lines. You may also wish to refer to Section 192.3 for the definition of transmission line, main and service line.

Question No. 3: May we, if necessary, run gas lines under a road in a park that the road is maintained solely by the park owner and not by the state or town?

The geographic location of pipelines is not specified by our regulations. The location is by agreement between the operator and the property owner. Our regulations do specify certain requirements of facilities in specific locations. The road as described in your letter would not be considered as a public place as referenced in 192.11(a). However, if your system has ten or more customers then it would come under our regulations and appropriate regulations would apply to all the facilities including those in the road.

Question No. 4: What type (Galv. Or Copper) lines are recommended to be used underground?

The Department does not make recommendations as to what type of material to use, but after the selection of the material by operator the regulations do specify certain requirements for specific materials.

Question No.5: Is there any regulation as to how often and underground system has to be checked for leaks?

Section 192.705 prescribes the patrol program for transmission pipelines affecting safety and operation. Section 192.721 prescribes the frequency of patrolling mains for consequent hazards to public safety. Section 192.723 prescribes for periodic leakage surveys in its operation and maintenance plan.

Question No. 6: For example: a system has 9 customers on it. It is required that each customer must have a cut off valve other than the central one on the tank?

This question is similar to question No.1. If you have ten or more customers the applicable requirements of part 192 apply to the facilities. Section 192.179, 192.181, 192.363, and 192.365 prescribe requirements for valves.

Sincerely,
Original signed by:
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Collins & Ryan, Inc. Dupont Blvd.

November 1, 1971

Mr. Joseph C. Caldwell Acting Director Pipe Line Safety Office 400 6th Street S. W. Washington, D. C.

Dear Mr. Caldwell:

In reference to our telephone conversation on the above date, please forward to my attention the answers to the following questions.

- (1) As an L. P. Gas supplier how many customers are we allowed to hookup on one underground or above ground gas tank?
- (2) How many inches below ground should underground lines be placed the lines being 3/4" to 1 1/2" in diameter?
- (3) May we, if necessary, run gas lines under a road in a park that the road is maintained solely by the park owner and not by the state or town?
- (4) What type (Galv. or Copper) lines are recommended to be used underground.
- (5) Is there any regulation as to how often an underground system has to be checked for leaks?
- (6) For example: A system has (9) nine customers on it. It is required that each customer must have a cut off valve other than the central one on the tank?

Please let me hear from you on the above questions as soon as possible.

Very truly yours, COLLINS & RYAN, INC. Roland V. Cobb