

Jun 9 1975

Mr. J. H. Glamser  
Vice President  
Oklahoma Natural Gas Company  
P.O. Box 871  
Tulsa, Oklahoma 74102

Dear Mr. Glamser:

This responds to your letter of April 23, 1975, asking whether in rebuilding a pipeline under the right-of-way of a public highway in a Class 1 location, a design factor of 0.50 or 0.60 should be used in the design formula in 49 CFR 192.105 for steel pipe.

Where steel pipe in a Class 1 location crosses without a casing, or makes a parallel encroachment on, a highway right-of-way, Section 192.111(b)(2) requires that a design factor of 0.60 or less be used.

In rebuilding the pipeline, the use of a design factor of 0.60 would satisfy Section 192.111(b)(2). The term "or less" in Section 192.111(b) should not be construed as requiring that a lower design factor, e.g., 0.50, be used in certain circumstances. Rather, the term "or less" permits the pipe at the operator's discretion, to be designed for greater strength than that provided by a design factor of 0.60.

We trust this satisfactorily answers your inquiry.

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety