PI-78-0105

Date: 8/14/78

Names: Robert D. Meredith, City Attorney, Leitchfield, Kentucky

Subject: Mr. Meredith's letter of July 24, 1978 (Control OPSR-41) Effect of location of service regulators on

liability.

Mr. Meredith's letter stats that the city (the operator) will install a customer meter up to 100 feet from the pipeline. Some of the potential customer is located as far as 1000 feet from the pipeline. To minimize the cost of service it is desirable to carry high pressure in the service line up to the houses before installing a service regulator. In an attempt to clarify several questions I called Mr. Meredith. I pointed out the definition of service line in 192.3 and that regardless of ownership the requirements of 192.197 establishes the requirements for control of pressure of gas delivered from high pressure distribution systems. He indicated that the main and service lines would be run with plastic pipe meeting the requirements of 192.59 where the distance to the house exceeds 100 feet the customer is going to own the service line beyond the meter and they will intend to locate the pressure regulator at or near the house. This will minimize the pipe size required and assure adequate pressure for proper operation of customer owned appliances. I pointed out that the outlet of the operator's service regulator would then be the connection to the customer owned piping and that regardless of ownership the facilities upstream of that point would be subject to part 192 and the operational responsibility of the gas operator.

Paul Cory, P.E.

Conclusion: Cancel Control OPSR-41. No further action required

Date: 8/15/78

Paul J. Cory, P.E Senior Engineer Meredith and Dinwiddie 80 Public Square P.O. Box 466 Leitchfield, Kentucky 42754

July 24, 1978

Office of Pipeline Safety Materials Transportation Bureau Department of Transportation Washington, D.C. 20590

Re: City of Leitchfield

Gentlemen:

The city of Leitchfield has recently constructed a natural gas transmission pipeline with an expected pressure of 100 lbs.

Customers along the line will need regulators. Our meters will be no further than 100 feet from our line, but the services will, in many cases, be over 1000 feet from the meter. Just where do we put our regulators for efficient and safe operation? What will be our liability if the regulators are installed by us near or by the residence? Should we require our customer to purchase and install the regulators?

These questions were referred to your Atlanta office, but it requested we take them up with your office.

Sincerely yours, Robert D. Meredith City Attorney