

Mr. Ben J. Fink  
Virginia Corporation Commission  
Box 1197  
Richmond, Virginia 23209

Dear Mr. Fink:

This is in reply to your letter of September 24, 1979, in which you ask if the use of a wire seal on a closed service line valve constitutes a "locking device or other means designed to prevent the operating of the valve by persons other than those authorized by the operator," as envisioned by Section 192.727, Abandonment or inactivation of facilities, paragraph(d)(1), and if it does not, what does?

A wire seal or any other type of locking device that can be removed or made ineffective by using ordinary household tools such as a screwdriver or pliers would not prevent the opening of such a service line valve by persons other than those authorized by the operator. Therefore, a wire seal would not meet the requirements of Section 192.727(d)(1).

There are available several types of patented devices that would meet the requirement of Section 192.727(d)(1) that can be used with various designs of service line valves. These devices require a special tool or key to release the valves. The tool or key would be available only to the operator or those authorized by the operator for use in operating the valve.

We trust that this satisfactorily answers your inquiry.

Sincerely,

Cesar DeLeon  
Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau