

PI-70-0109

November 3, 1970

Mr. Richard A. Rosan
Senior Vice President
Columbia Gas System Service Corp
20 Montchanin Road
Wilmington, Delaware 19807

Dear Mr. Rosan:

Thank you for your letter of October 23, 1971, concerning application of Section 192.723 to leak surveys on customer service lines between the curb box and the customer meter.

Section 192.3, 49 CFR, of the new minimum Federal safety standards defines a service line as a distribution line that transports gas to a customer meter set assembly from a common source of supply. It is our contention that under this regulation the burden is on the operator to ascertain the safe condition of the customer service lines to which gas is delivered.

If we can be of any further assistance, do not hesitate to ask.

Sincerely,
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety