

January 15, 1971

Mr. Lloyd W. Stephens
Chief Operating Engineer
Arkansas Western Gas Company
28 East Center Street
Fayetteville, Arkansas 72701

Dear Mr. Stephens:

This is in reply to your letter of December 8, 1970, stating several questions with regard to gas pipelines.

Question: We currently file two copies of Form DOT-F-7100.1-1 with the Arkansas Public Service Commission, and whenever telephone reporting is required, we call both their and your office. Is this correct? We understand we must also file Forms DOT-F-7100.2 and 7100.2-1, but we have not received any of these forms. We have already filed copies of our operating and maintenance plan with your office and the State office. Please advise if changes in this plan should be filed with both offices.

Answer: We have been notified by the Arkansas Public Service Commission that it does not, at this time, intend to certify under Section 5(a) of the Natural Gas Pipeline Safety Act of 1968 or reach an agreement with this Office under Section 5(b) of that Act. Therefore, after January 11, 1971, any reports required under the Department of Transportation must be telephoned to, or filed with, this Office. The annual report forms to which you referred were mailed subsequent to the date of your letter and should have been received by you by this time.

Question: I find no other reports that we are required to file. Please advise if this is correct.

Answer: No other reports are required to be filed at this time. Plans of inspection and maintenance are required to be filed under the requirements of 49 CFR, Section 192.17 not later than February 1, 1971.

Question: Please advise how extra copies of Title 49, Part 192, may be obtained.

Answer: We are enclosing 5 copies of Title 49 CFR, Part 192. Additional copies may be reproduced by you.

Question: 192.715(c) states a defective weld, which cannot be repaired by other stated methods, must be repaired by installing a full encirclement welded split sleeve of appropriate design. My question is whether it would be permissible to use these welded split sleeves and not X-ray welds whenever the expense or time delay of X-ray in short sections or tie-ins would be excessively expensive. Our problem is an X-ray truck is always over 100 miles and often 200 miles or more from the location. We must pay at least \$125.00 a day for a truck and generally must pay at least two days for any work. We can often make an emergency repair and have the line back in service before we could hope to obtain an X-ray truck.

Answer: The use of a welded full encirclement split sleeve for repair of a defective weld is limited to situations in which a repair cannot be made in accordance with paragraph (a) of (b) of §192.715. Paragraph (a) of §192.715 states that when it is feasible to take the segment out of service, repairs must be made in accordance with the requirements of §192.245. Paragraph (b) of §192.715 states that a repair may be made in accordance with §192.245 while the segment is in service, under certain tested conditions.

Since you refer to having "the line back in service" after making the emergency repair, we assume you refer to a situation in which it is feasible to take the segment out of service. Such a situation is covered by paragraph (a) of §192.715, and the provisions of §192.245 requiring inspection of the repair to ensure acceptability, apply.

Question: 192.309(b)(2)(ii) states more than 20 percent of nominal pipe diameter. I wonder if this is intended to be 2 percent?

Answer: The statement contained in this question is correct. A correction has been made to this section of Part 192 changing 20% to 2%.

If you have further questions, do not hesitate to ask.

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety