

Mr. William F. Ryan
Vice President-Operations
South Jersey Gas Company
2001 Atlantic Avenue
Atlantic City, New Jersey 08404

Dear Mr. Ryan:

this is in reply to your letter of January 5, 1971, concerning the interpretation of three Section of 49 CFR, Part 192.

Your questions and our answers are as follows:

Question: Subpart A, Paragraph 192.3. Does the term "storage facility" as used in the definition for "transmission line" include an above ground water-sealed low pressure holder when gas pressure is no more than 15 inches water column?

Answer: The term "storage facility" as used in the definition of "transmission line" in Section 192.3 applies to all storage facilities, regardless of form or operating pressure.

Question: Subpart B, paragraph 192.63. If steel pipe is coated by a pipe coater, does the specified marking have to be placed in the coating by the pipe coater?

Answer: Method of compliance with Section 192.63 is to be determined by the operator. The marking should be such that it remains clearly visible until the pipe is installed. Where pipe is coated in a coating mill, in most cases this would require remarking of the pipe. It is acceptable if the marking is applied to the outside wrap of the coating.

Question: Subpart G: Does this subpart apply to distribution lines as well as transmission lines?

Answer: The scope of Section 192.301, Subpart G, limits its application only to transmission lines and mains. In this case this would be all pipelines covered by the definition of transmission lines and mains in Section 192.3.

Those distribution lines not falling within the scope of Subpart G are covered by the requirements of Subpart H Customer's Meters, Service Regulators and Service Lines.

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

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety