

PI-72-0104

March 22, 1972

Mr. Russell A. Granton
C.M. Dining, Inc.
27 Garfield Street
Exeter, New Hampshire 03833

Dear Mr. Granton:

Pursuant to your telephone conversation with Mr. Frank Fulton on March 15, 1972, this will acknowledge the information that was discussed in this telephone call.

The jurisdiction of our regulations, as presently promulgated, extends to the outlet side of a customer meter. Therefore, the gas facilities that are downstream of the meter are outside the jurisdiction of the gas pipeline safety regulations.

We trust that this has answered your question. If we can be of further assistance, please let us know.

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

G.M. Dining, Inc
27 Garfield Street
Exeter, N.H. 03833

March 11, 1972

Department of Transportation
Office of Pipeline Safety
Federal Minimum Safety Standards
Washington, D.C.

Attn: Mr. Joseph Coldwell
Acting Director

Dear Mr. Coldwell:

Regarding our letter to you of February 28, 1972, (copy attached) we would very much appreciate hearing from you on this as soon as possible.

Thank you.

Sincerely,
Russell A. Granton
C.M. Dining, Inc.

March 10, 1972

Mr. Russell A. Granton
C. M. Dining, Inc.
27 Garfield Street
Exeter, New Hampshire 03833

Dear Mr. Granton:

This will acknowledge receipt of your letter dated February 22, 1972.

We are enclosing a copy of the minimum Federal safety standards for gas pipelines as you requested.

Your particular question is being reviewed by our Technical Division. You will be advised as soon as possible of the interpretation as it related to your specific question.

Sincerely,
Cesar DeLeon
Operation & Compliance Officer
Office of Pipeline Safety

February 28, 1972

Department of Transportation
Office of Pipeline Safety
Federal Minimum Safety Standards
Washington, D. C.

Attn: Mr. Joseph Coldwell, Acting Director

Dear Mr. Coldwell:

This company is in the wholesale propane business and frequently builds propane plants. Due to the extreme shortage of natural gas we have been called on several times recently to design and build propane plants to heat large buildings and, in five cases, have been requested to bid on propane plants for heating shopping centers. In one instance we proposed to build a propane plant to heat a shopping center with fifteen individual stores. These stores will be heated with roof top units. In order to keep the hazards of propane at a minimum we proposed to pipe underground from the tank to the building, go up the side of the building and secure the pipe to the inside of the parapet, put a meter on for each individual store and secure this to the parapet or the unit itself. In this manner there would be no propane pipe inside the building whatsoever.

The state of New Hampshire Public Utilities Commission has given us the green light as far they are concerned, but they have directed my attention to Section 192.11, Petroleum Gas Systems. I wish that you would give me an opinion on whether or not this is applicatory to this particular case, particularly concerning the openings on the building. My thinking is that in as much as there is no gas in the building an opening such as described in (1) would allow gas to enter the building in case of a rupture in the pipe or fittings. A prompt reply to this would be greatly appreciated.

Incidentally, we would like a copy of the Federal Minimum Safety Standards.

Sincerely,
Russell A. Granton
C. M. Dining, Inc.