

Mr. John A. Elliott
Director, Pipeline Division
New Mexico State Corporation
Commission
P. O. Drawer 1269
Sante Fe, New Mexico 87501

Dear Mr. Elliott:

This is in reply to your letter of January 3, 1973, in which you ask the following. "One of our L.P. gas operators has one hundred (100) customers. They are served from thirty-eight (38) separate tanks with no more than seven (7) on one tank. Are they required under Section 192.11 to meet the standards of Part 192?"

The requirements of section 192.11 are applicable, in pertinent part, to "a system that serves 10 or more customers." With respect to this particular section, the OPS considers a system to consist of a separate tank and the facilities serving the customers from that tank. The term "tank" also includes a tank group consisting of interconnected tanks. Thus, if a tank serves less than 10 customers, the associated system does not come within the regulation. The fact that an operator has two or more separate tanks serving a total of 10 or more customers does not bring the combined operation within the regulation, but any separate tank and facilities serving 10 or more customers constitute a system subject to the requirement.

If we may assist further in this matter, please call on us.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety