

March 20, 1975

Mr. Joseph P. Kadlec, P.E.
Kadlec Associates
P.O. Box 100
Bartlesville, Oklahoma 74003

Dear Mr. Kadlec:

This responds to your letter of March 6, 1975, asking whether a gas company must comply with the corrosion control regulations in 49 CFR Part 192 with respect to a customer's line buried between the meter and the residence.

The jurisdiction of Part 192 over the distribution of gas by pipeline ends at the downstream side of a customer meter or at the connection to a customer's piping, whichever is farther downstream. The term "customer's piping" means piping owned by the customer.

Based on the foregoing, where a customer owns the line between the meter and the residence, the line is not subject to the requirements of Part 192. Alternatively, if the customer does not own the line downstream from the meter, the line is subject to the applicable requirements of Part 192. If the line is subject to Part 192, the gas company that uses the line to transport gas to the customer must comply with the safety requirements in Part 192 applicable to that line.

We appreciate your concern for pipeline safety.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety