

July 20, 1976

Mr. Raymond C. Black
Superintendent, Gas Division
City of Three Rivers
P.O. Box 398
Three Rivers, Texas 78071

Dear Mr. Black:

Your letter of April 22, 1976, requesting a waiver from compliance with 49 CFR 192.457, concerning corrosion control, is returned herewith.

The petition should be presented to the Texas Railroad Commission which has authority under the Natural Gas Pipeline Safety Act of 1968 to enforce and grant waivers from compliance with the Federal standards for intrastate gas pipeline facilities in Texas. Should the Commission decide to grant the waiver, we will review that decision in accordance with Sec. 3(e) of the Act.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

Enclosure

CITY OF THREE RIVERS

April 22, 1976

Department of Transportation
Office of Pipe Line Safety Operation
Washington, DC 20590

Gentlemen:

Now comes the City of Three Rivers, an Incorporated Community, in Live Oak County, State of Texas, which offers the following utility service, within bounds and adjacent area: water, sewers, garbage pick-up, and Natural Gas for Domestic and Industrial use, pleading that a waiver of regulations set forth by "Subpart 1-Requirements for Corrosion Control".

The Domestic System was constructed as a low pressure system (carring [sic] ounces of Pressure) consisting mostly of bare steel pipe located in some streets, but mostly in alley ways where possible. This pipe has been in the ground ranging from a few years up to fifty years, and is still in excellent condition. Most of the new construction consists of P.V.C. Plastic. (Low Pressure System only) The Low Pressure system is made up of 1" through 4" pipe.

There is about a mile of moderately high pressure line in the system (60 to 70 lbs.) within the City limits. This for industrial use, and about a mile and one-half to five District regulators strategically located to insure a balanced pressure over the entire low pressure system. The system is layed [sic] out in such a manner should anyone or more regulators fail, pressure would be maintained on the system sufficiently so as not to lose [sic] the load in any area. Each regulator has on the downstream side an automatic relief valve to insure against over pressure.

The City of Three Rivers is a small town, less than 2,000 population, and no conjested [sic] population areas: Both Commercial and Domestic.

The public is served with diligence. No gas service is installed without giving the premices [sic] a through [sic] inspection to see that customers lines and appliances are in safe condition.

In case service interruption should occur in any area all meters in the affected area are closed at the meter until service has been restored on City Lines. Then customer service is restored one by one taking care that all appliances are working in a safe manner. If customer is not at home service is not restored until contact has been made.

For a number of years the City has, by contract with leak detection service companies, have run Flame-ionization Surveys. If leaks were found, repairs were made as soon as possible after each survey. Too, if leaks were located by other means, repairs were made in like manner.

The City has purchased a Flame-Pack, and plan [sic] to go over the system several times each year. The first survey has been completed and all leaks have been repaired or scheduled for repairs shortly.

The City had a survey by Cathodic Protection Service, of Houston and Corpus Christi, Texas, considering the possibility of installing Cathodic Protection on the City's System.

The projection life of protection was for ten years. The price of the installation was completely out of reach. Exceeding by far the Coat [sic] of the System.

This, with the elevated cost of gas, it would be impossible to impose a customers rate high enough to pay for the Cathodic Protection and the City gate cost of gas.

We propse [sic] through diligent use of the Flame-Pack and other methods, with immediate repair of all leaks, it will not be necessary that the City of Three Rivers be required to conform to the requirements set forth in "Subpart 1-Requirements of Carrosion [sic] Control."

Too, past experience has been that the City has not had a serious corrosion problem.

Therefore, the City of Three Rivers, Texas pleads that a waiver from Cathodic Protection for its City system be allowed.

Sincerely yours,

Raymond C. Black
Supt. Gas Division
City of Three Rivers

The City of Three Rivers owns and operates, (in conjunction with the City of George West, Live Oak County, Texas) an eleven mile gas supply line connecting with Houston Pipe Line Company of Houston, Texas near George West, Texas. This line consists of nine miles of 3" seamless steel pipe and about two miles of 4" Grade B Pipe. This line was tested when installed to 900 lbs. per square inch cold water pressure, and part to 1100 lbs. per square in.

Ten miles of this line was installed in 1946, and one mile in 1970. The one mile was to connect with our present source of gas supply, Houston Pipe Line Company near George West, Texas.

All of this line is coated and wrapped with standard pipe line coating.

Cathodic Protection was installed on this line in 1971, and is evaluated at regular intervals, by Cathodic Protection service of Houston and Corpus Christi, Texas.

Raymond C. Black
Supt. Gas Division
City of Three Rivers