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GAS INDUSTRIES, Natural Gas Edition, February 1976, "Columbia Gas Likes Butt Fusion Joining With Polyethylene Pipe," Eugene J. Escolas, Columbia Gas Distribution Companies.

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INTERPRETATIONS OF REGULATIONS

Relates to 49 CFR, §192.105 and §192.111

Question: In rebuilding a pipeline under the right-of-way of a public highway in a Class 1 location, should a design factor of 0.50 or 0.60 be used in the design formula in 49 CFR 192.105 for steel pipe?

OPSO Interpretation:..."Where steel pipe in a Class 1 location crosses without a casing, or makes a parallel encroachment on, a highway right-of-way, Section 192.111(b)(2) requires that a design factor of 0.60 or less be used.

"In rebuilding the pipeline, the use of a design factor of 0.60 would satisfy Section 192.111(b)(2). The term 'or less' in Section 192.111(b) should not be construed as requiring that a lower design factor, e.g., 0.50, be used in certain circumstances. Rather, the term 'or less' permits the pipe, at the operator's discretion, to be designed for greater strength than that provided by a design factor of 0.60."

Relates to 49 CFR, §192.3

Question: Under the Natural Gas Pipeline Safety Act, at what point in an LNG peak-shaving facility does jurisdiction begin?

OPSO interpretation:..."Except for the change in state, LNG is identical to natural gas and consequently is within the definition of the term 'gas' in the Act (49 USC 1671(2)).

Pipeline facilities used in the transportation of gas are subject to the jurisdiction of the Act. The 'transportation of gas' is defined in the Act as meaning 'the gathering, transmission or distribution of gas by pipeline or its storage in or affecting interstate or foreign commerce' (49 USC 1671(3) emphasis added). Thus, an LNG peak-shaving facility is within the intended coverage of the term 'pipeline facilities' and, therefore, is in its entirety subject to the jurisdiction of the Act."

Relates to 49 CFR, §192.51

Question: Is it the intent of Section 192.63 to include nipples and fittings used in meter sets--even those downstream of the regulator with operating pressure of 7" W.C.?

OPSO Interpretation:..."As stated in Paragraph(a) of Section 192.63 and Section 192.51, each valve, fitting, pipe, or other component used in a pipeline to which Section 192.63 applies must meet the marking requirements of that Section. The fittings in a meter set are expressly covered by Section 192.63; as components of a pipeline, nipples are also subject to the marking requirements.

"Your question indicates some doubt about the jurisdiction of Part 192 over pipelines downstream of a regulator. As indicated by the definition of 'service line' in Section 192.3, the jurisdiction of Part 192 extends to (and includes) a customer meter or the connection to a customer's piping, whichever is farther downstream. This jurisdictional limit is irrespective of the location of a regulator or the gas pressure involved."

Relates to 49 CFR, §192.63

Question: At what point does a violation of Section 192.63 occur--when an unmarked fitting is purchased, when it is placed in warehouse stock, or when it is actually used in a gas system?

(Continued)