

PI-76-0114

Sep 16 1976

Ms. Joyce Ann Journey
Property Manager
Housing Services, Inc.
Landover Mall West, Suite 202
Landover, Maryland 20785

Dear Ms. Journey:

This responds to your letter of August 2, 1976, asking whether the piping downstream from a master meter constitutes a gas distribution system subject to 49 CFR Part 192 if none of the piping is exposed or underground.

A system which involves interior piping only (i.e., underground or exterior pipelines are not used to distribute gas) is not a master meter system subject to 49 CFR Part 192. The legislative history of the Natural Gas Pipeline Safety Act of 1968, under which 49 CFR Part 192 is issued, indicates that in authorizing the safety regulation of the distribution of gas by pipelines, Congress had in mind those distribution systems which are primarily located outside. Thus, interior piping is only subject to regulation when it is included in an operator's system which is otherwise located outside.

We trust this response is helpful to you.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

HOUSING SERVICES, INC.

August 02, 1976

Office of Pipeline Safety Operations
U.S. Department of Transportation
Washington, D.C. 20590

Gentlemen:

Pursuant to correspondence received regarding the "Natural Gas Pipeline Safety Act of 1968", there are many regulations governing operators and/or distributors of gas pipeline systems.

This office received a bulletin from the Department of Housing and Urban Development in July of 1976 requesting that all owners and management agents of HUD insured housing projects are not in violation of the Act.

Based on this HUD Information Bulletin (page No.1, Item No. 2), I do not consider us as an operator as none of our pipes are exposed or go under ground again after reaching the master meter.

After numerous telephone calls I was advised by the Federal Housing Administration to contact your office for the forms for certification for each of our properties, which are all apartment complexes.

Please advise if my conclusion is in any way incorrect. Your response will be appreciated.

Respectfully,

Joyce Ann Journey
Property Manager