

Mr. Charles H. Kent  
Panhandle Eastern Pipe Line Company  
P.O. Box 1348  
Kansas City, Missouri 64141

Dear Mr. Kent:

This responds to your letter of November 10, 1976, in which you ask two questions regarding the Federal gas pipeline safety standards in 49 CFR Part 192.

First, you ask whether the requirements of Sections 192.731, 192.739, and 192.743 concerning the maintenance of pressure relief devices and limiting stations apply to devices and stations which are not part of a "pipeline" as that term is defined in Section 192.3. As examples, you refer to devices and regulators which are used in gas compressor stations for purposes other than to relieve or limit gas pressure, such as devices or regulators on compressed air or fuel systems.

The word "pressure" in Sections 192.731, 192.739, and 192.743 restricts the applicability of those sections to devices or stations which serve to relieve or limit gas pressure. The sections do not apply to devices or regulators which are part of non-gas carrying equipment inside gas compressor stations.

This interpretation is based on the relationship between the words "pressure" and "gas" occurring throughout Part 192 and in particular in the requirements of Section 192.192 for installation of pressure control devices. Since under Section 192.3 the term "pipeline" encompasses all the gas carrying parts of an operator's systems, the pressure relief devices and limiting stations subject to Sections 192.731, 192.739, and 192.743 are those on a pipeline.

Secondly, you ask whether, in an aquifer storage field, gas pipelines running from the gas injection system to certain water removal wells are transmission lines. Under 40 CFR 192.3, the term "transmission line" means a pipeline other than a gathering line that ... "transports gas within a storage field." This definition is broad enough to apply to any pipeline carrying gas within the boundaries of a storage field. Therefore, since the lines in question are clearly not gathering lines, they are classified as transmission lines under Part 192.

Sincerely,

Cesar DeLeon  
Acting Director  
Office of Pipeline Safety Operations

Mr. Cesar DeLeon

Acting Director  
Office of Pipeline Safety Operations  
Department of Transportation  
Washington, D. C. 20590

Re: Interpretations of Part 192 Federal Pipeline Safety Regulations

Dear Mr. DeLeon:

Interpretations are requested regarding two aspects of the regulations. First is the application of Sections 192.731, 192.739 and 192.743. Do the requirements of these sections apply to miscellaneous relief devices and regulators which are not actually part of a "pipeline" as defined in 192.3? Examples are: relief valves and/or regulators used in compressor station compressed air systems, engine cooling water and lubrication systems, pneumatic safety control systems, engine fuel systems, space heating equipment fuel systems, fuel gas systems for gas heaters at pressure reduction stations, and fuel gas systems for heater-separators at well heads in storage fields.

The other question regards the definition of "transmission line" in a storage field. In some aquifer storage fields certain wells are used only to remove water from the storage formation during the injection season to increase the volume of the "bubble" available for gas. Small gas lines are installed from the gas injection system to these water removal wells to provide a gas lift for producing the water. The produced water and gas mixture is processed through a separator and the residue gas returned to the suction of the storage compressors for reinjection into the field. Are these lines serving the water removal wells considered to be transmission lines and subject to the jurisdiction of the Office of Pipeline Safety Operations?

Your consideration of these questions will be appreciated.

Yours truly,

Chas. H. Kent,  
Supervising Engineer