

March 28, 1977

Mr. James A. Long
12596 Lomica Drive
San Diego, California 92128

Dear Mr. Long:

Thank you for your letter of February 1, 1977, concerning the applicability of the Federal gas pipeline safety standards (copy enclosed) to gas pipeline distribution systems in mobile home parks.

The standards are established under the Natural Gas Pipeline Safety Act of 1968 (the Act), and apply to the gathering, transmission, and distribution of gas by pipeline. The Federal gas pipeline safety standards have been available through the Office of Pipeline Safety Operations and various public and industry organizations since they were enacted.

Gas pipelines in a mobile home park are covered by the Federal standards if they are used to deliver gas to the persons who consume it, normally the tenants in the park.

This Office is responsible for enforcing compliance with the standards in California against systems in mobile home parks which are not operated by public utilities. In order to maximize the public benefit from our limited resources, however, our enforcement activities are primarily directed toward the major systems under our jurisdiction and to a far lesser degree systems in mobile home parks.

At present we have under consideration a petition for rulemaking to exclude systems in mobile home parks from the jurisdiction of the Federal standards because of alleged difficulties in compliance. Our main concern is whether this proposal would have an adverse effect on public safety. We do not yet have enough information to reach a conclusion and have requested the advice of the Technical Pipeline Safety Standards Committee, a Federal Advisory Committee established under the Act.

We appreciate your concern in this matter.

Sincerely,

James T. Curtis, Jr.

Enclosure

Mr. James A. Long
12596 Lomica Drive
San Diego, California 92128

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To whom it concerns:

I just heard about the gas line protection act that was passed back in 1968. It is cathodic protection to retard or prevent corrosion of gas pipe lines in the ground.

I own a small mobile home park and I-(and other Park owners I have talked to) don't now if it applies to our pipes-or is it only for the major pipe lines thru [sic] out the country-transporting gas under high pressure.

Pressure in mobile home parks is very low, and gas leakage (last line of hand written letter cannot be read) ... causing fires is mil. It costs quite a sum of money to have this work done, and the money is perhaps for nothing.

I would appreciate an answer to the question from one in authority.

Does this 1968 gas line protection law apply to mobile home parks???

I await your reply as I have had no notice of any sort from any governmental agency. Perhaps because it does not apply?

James A. Long
12596 Lomica Dr.
San Diego, California 92128

No mobile home park has ever received any notice from any governmental ... (again, last line of letter cannot be read.)