

November 14, 1977

Mr. Arie M. Verrips
Executive Director
American Public Gas Association
Suite 1115
2600 Virginia Avenue, N.W.
Washington, D.C. 20037

Dear Mr. Verrips:

We are responding to your letter of September 20, 1977, in which you ask whether the Federal gas pipeline safety regulations contain specific requirements governing the safety of a situation where a building is proposed for construction over the areas of an existing gas line.

If the building would change the Class location of the pipeline, as defined in Section 192.5 of the standards, then under Section 192.611, the operator would have to confirm or revise the maximum allowable operating pressure of the pipeline in accordance with the new Class location. Even if the Class location would not be changed, Section 192.613 would require that the operator take appropriate action to correct any unsafe operations that might be created by construction of the building.

We would be pleased to receive your views on the need for any additional specific requirements relating to the construction of buildings over the area of gas pipelines.

Sincerely,

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

September 20, 1977

Mr. Cesar DeLeon
Acting Director
Office of Pipeline Safety Operations
2100 Second, St., S.W. - Room 6226D
Washington, D.C. 20590

Dear Mr. DeLeon:

At our recent annual meeting held in Cincinnati, Ohio, a resolution was proposed calling for the institution of regulations by the Department of Transportation - OPSO regarding the construction of a building over a natural gas pipeline in place. For lack of complete information, the resolution was not introduced, however, we wish to inquire concerning the matter.

I have inquired at your office by telephone about this matter and this is to follow-up on the same.

The specific question is whether or not the regulations of the DOT include specifics for the treatment of a gas line in place whenever a building is proposed for construction over the area of the gas line position.

If such regulations do not exist, it would appear to us that the matter should be given serious consideration. We feel that regulations could be developed which would insure against safety hazards without encroaching upon land use rights or the right of pipeline routing.

For example: It would appear that regulations which would specify the method of encasement and/or structural procedures to prevent stress could be developed. The responsible party would then have the option of complying with the regulation or the re-routing of the line.

We would be pleased to visit with you further about this matter at your convenience.

Sincerely yours,

Arie M. Verrips
Executive Director