

March 12, 1979

Mr. George Orr
Office of Pipeline Safety
Department of Transportation
6622 Hornwood Drive
Houston, Texas 77074

RE: 49CFR §§192.731, 192.739, 192.743

Dear Mr. Orr:

Pursuant to our conversation of this afternoon, I am forwarding a copy of a letter written by Marshall W. Taylor, Chief of the Central Region, Office of Pipeline Safety, interpreting the above referenced sections of Title 49, Code of Federal Regulations. In his letter Mr. Taylor states that "the requirements of §192.731, §192.739 and §192.743 do not apply to relief devices or regulations which are not installed in a piping system or storage vessels containing gas . . ."

Presumably, the Southwest Region interprets these regulations similarly; however, inasmuch as Columbia Gulf operates its pipeline system primarily in the Southwest Region and not the Central Region, please forward, at your earliest convenience, an opinion on the applicability of the above-referenced regulations to relief devices or regulators which are installed in piping systems or storage vessels not containing gas.

Thank you for your cooperation in this matter.

Sincerely,

Kathleen O'Leary