

June 1, 1979

Ms. Kathleen O'Leary
Columbia Gulf Transmission Company
3805 West Alabama Avenue
Houston, Texas 77001

Dear Ms. O'Leary:

I am responding to your letter dated March 12, 1979, to Mr. George Orr, Office of Operations and Enforcement (Pipeline Safety), Houston, Texas, in which you question the applicability of 49 CFR 192.731, 192.739, and 192.743 to relief devices or regulators installed on piping systems or storage vessels not containing gas.

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 that may exist 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 192.195 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."

We trust this interpretation is helpful to you.

Sincerely,

/signed/

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

March 12, 1979

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

Re: 49 CFR §§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