

March 19, 1983

Mr. Milt Schneider
Gas Pipeline Safety Engineer
Colorado Public Utilities Commission
Department of Regulatory Agencies
500 State Services Building
1525 Sherman Street
Denver, Colorado 80203

Dear Mr. Schneider:

Enclosed is an interpretation issued in response to your letter of March 15, 1983.

Please note that your use of the term "service line" does not conform to the Part 192 definition, and therefore, the word "pipeline" has been substituted in the question. The pipelines you are concerned about are "customer piping" within the meaning of the "service line" definition in §192.3 and thus, not covered by Part 192.

Sincerely,

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Enclosure

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
MATERIALS TRANSPORTATION BUREAU

PIPELINE SAFETY REGULATORY INTERPRETATION

Note: This pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and as such, is binding only on the operator to whom the interpretation is specifically addressed.

SECTION: 192.3

SUBJECT: Mobile home park pipelines.

FACTS: In a mobile home park, natural gas is transported from mains owned by the utility company (in the utility easement) through company meters located at each individual lot line to buried pipelines owned by the park and then to the connector at each individual mobile home.

QUESTION: Are these pipelines subject to the requirements of Part 192? If yes, who is responsible for compliance activities?

INTERPRETATION:

Part 192 applies to pipelines used in the transportation of gas. In accordance with the definition of "service line" in §192.3, the pipeline transportation that is regulated by Part 192 does not go beyond the point where gas has been sold and delivered to a consumer.

In the example, gas is sold to each mobile home consumer when it passes through the meter. Where, though, do the consumers take delivery of the gas? Since the pipelines between the meters and the mobile homes are owned by the park, we presume the park leases the lots on which the mobile homes are located to the mobile home consumers. Because these pipelines are intended to benefit the consumers, it can also be presumed that each lease carries with it a right of the consumer to use the pipeline to

receive gas. We, therefore, consider the mobile home consumers to be receiving gas at the outlet of the meters. Thus, gas is both sold and delivered to a consumer when it leaves the meter, and Part 192 does not apply to the downstream piping.

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

March 15, 1983

Richard L. Beam, Associate Director
Pipeline Safety Regulation
Materials Transportation Bureau, DOT
400 7th Street Southwest
Washington, D.C. 20590

Dear Mr. Beam:

I respectfully request an interpretation of service line responsibilities.

In a mobile home park, natural gas is transported from mains owned by the utility company (in the utility easement) through company meters located at each individual lot line to buried service lines owned by the park and then to the connector at each individual mobile home.

Question: Are these service lines subject to the requirements of Part 192? If yes, who is responsible for compliance activities?

Your assistance would be appreciated.

Very truly yours,

Milt Schneider, P.E.
Gas Pipeline Safety Engineer