

PI-83-0103

February 16, 1983

Mr. Richard E. Ransom
Smith, Ransom & Gilstrap Law Offices
Suite 1, Rio Grande Valley Bank Building
501 Tijeras Avenue, N.W.
Albuquerque, New Mexico 87103

Dear Mr. Ransom:

This responds to your letter of February 3, 1983, regarding the applicability of 49CFR 192.503 and 192.511 to a segment of a service line that is returned to service after replacement due to construction damage.

Although we have not previously addressed the question, of whether §192.511 applies only when a service line is newly installed or completely replaced, we think it is clear from the wording of §192.503(a) that the test requirements of §192.511 must be met any time a segment of an existing service line is replaced for any reason.

The docket file (OPS-3) which contains the rulemaking record (including public comments) to adoption of §§192.503 and 192.511 (35 FR 13248, August 19, 1970) is available for viewing and copying in the Dockets Branch Room 8426, Nassif Building, 400 Seventh St. S.W., Washington, D.C. 20590. There are also two files of correspondence relating to these two rules which you may view and copy in my office, Room 8101, at the same address.

Sincerely,

Original signed by:

Richard L. Beam

Associate Director for

Pipeline Safety Regulation

Materials Transportation Bureau

Smith, Ransom & Gilstrap Law Offices
Suite 201
Rio Grande Valley Bank Building
501 Tijeras Avenue, N.W.
Albuquerque, New Mexico 87103

February 3, 1983

Department of Transportation
400 Seventh Street S.W.
Washington, D.C. 20590

RE: Request for Information on Access to Interpretations, Recommendations or Other Comments on Natural Gas Pipeline Safety Regulations and Practices

Gentlemen:

This Law Office represents the personal representative in the matter of the deaths of six victims of a natural gas explosion and fire which occurred in Portales, New Mexico, on June 28, 1982. (See NTSB--PAR--83--1, PIPELINE ACCIDENT REPORT--THE GAS COMPANY OF NEW MEXICO, NATURAL GAS EXPLOSION AND FIRE, PORTALES, NEW MEXICO, JUNE 28, 1982.)

Applicable to this matter are certain federal standards for the location and elimination of potentially hazardous leaks when a new segment of pipeline is returned to service after replacement due to construction damage. Of particular interest are the test requirements of federal standards 192.503 and 192.511.

I would appreciate a response from some knowledgeable person within the Department of Transportation as to whether there is a means to access existing interpretations, applications, recommendations or other agency and industry comments regarding these regulations.

More specifically, Southern Union Gas Co. takes the position that a service line pressure test is required only with a new installation or complete replacement (or retirement) of an existing service, and that a service line pressure test is not required when only a segment of pipeline is returned to service after replacement due to construction damage. What documentation would exist in support of or in opposition to that position? How may a member of the public have access thereto?

Very truly yours,
Richard E. Ransom