

Mr. M. L. Fegenbush
Director, Pipeline Safety
Railroad Commission of Texas
Capitol Station
P. O. Box 12967
Austin, Texas 78711-2967

Dear Mr. Fegenbush:

Your letter of July 13, 1984, supplying additional information concerning the waiver from compliance with 49 CFR §192.199(g) granted April 30, 1984, by order of the Railroad Commission of Texas to Lone Star Gas Company has been reviewed along with your April 30, 1984, letter forwarding the waiver.

A detailed study was made of the design of the Fisher S-203 pressure regulator and the design of the typical installations made by Lone Star Gas Company. In addition, a telephone conference call was conducted with Fisher Controls Company representatives that involved staff members of both the Office of Pipeline Safety Regulation and the Office of Operations and Enforcement of the Materials Transportation Bureau. This call clarified certain design features of the Fisher S-203 pressure regulator.

After consideration of these factors, I have determined the waiver granted by the Commission's April 30th order may take effect provided that:

- The waiver applies only to Fisher S-203 pressure regulators installed prior to April 30, 1984, by Lone Star Gas Company.
- A list specifically identifying each regulator station fitted with a Fisher S-203 pressure regulators to which the waiver applies is maintained by the Commission.
- Each of these aboveground regulator stations has adequate safeguards against outside force damage provided by site selection, barriers, or markers.
- If any part of those stations to which the waiver applies is modified, replaced, or relocated, the pressure relief or pressure limiting devices must comply with §192.199(g).

Sincerely,

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