

Aug 30 1985

Mr. Dan S. Ray
Natural Gas Consultant
Simmons J. Barry & Associates,
Consulting Engineers
P.O. Box 1751
Baton Rouge, LA 70821

Dear Mr. Ray:

Your letter of August 16, 1985, states "I need reassurance in writing that by-pass valves on a meter station to a single customer of intermediate size (3 or 4 MCF's per hour) are not required to be locked as per DOT regulations".

There is no requirement in 49 CFR Part 192 that a by-pass valve on a meter station, in a system where the gas pressure upstream of the meter essentially equals the customer's utilization pressure, be locked in the closed position. To comply with the requirements of §192.197 and §192.13, however, a by-pass valve on a meter station must be locked in the closed position if the gas pressure supplied to the meter station exceeds the customer's utilization pressure and the by-pass valve in the open position permits gas to by-pass the service regulator or other overpressure protection equipment. In the latter case, proper overpressure protection would not be provided unless the by-pass valve is locked in the closed position when not in use.

I hope that these comments provide the reassurance that you requested. If not, please contact me again.

Sincerely,

Robert L. Paullin
Director
Office of Pipeline Safety