

DATE: March 5, 1986

SUBJECT: ACTION: Answer to Questions in 49 CFR Part 192 contained in Memorandum of January 13, 1986

FROM: Lloyd W. Ulrich  
Director, Alaska Natural Gas Pipeline Project, DPS-9

TO: Richard Sanders  
Manager, Pipeline Safety Division, DMA-607

I have discussed your four questions with the Standards Division (DPS-11) and Enforcement (DPS-30) and following is our response:

Question:

The first question deals with master meter operators and check meters. If a gas operator loans a meter to a master meter operator to be used as a check meter in aiding the master meter operator for a short period of time, does this extend the natural gas distribution operator's jurisdiction to the outlet swivel of this check meter since the meter belongs to the distribution company?

Answer:

No. The act and standards in 49 CFR Part 192 apply to persons who own or operate pipeline facilities. The distribution operator owns the loaned meter and would be responsible for it under the Act and standards. The distribution operator does not own or operate the master meter system and would not be responsible for any part of it other than the loaned meter.

Question:

If a distribution company establishes a lease agreement for check meters and provides these meters to a master meter operator, would this extend the distribution company's jurisdiction to the outlet swivel of the meter based on the service line definition?

Answer:

The arrangement is no different than in the first question except for the lease agreement. If any responsibility lies with the distribution operator it's only for the meter. The lease may actually have the effect of removing responsibility from the distribution operator.

Question:

Would pipeline working signs be required in close proximity of master meter facilities to meet 192.707(c).

Answer:

Under the regulations in section 192.707, master meter facilities are treated the same as other facilities, there is no exemption for aboveground lines in a master meter system. The standards on line marking in section 192.707 apply equally to master meter facilities and distribution operator facilities.

Question:

Many operators express concern in trying to meet DOT Code 192.721 -Distribution System: patrolling requirements. More specifically mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled at intervals not exceeding 4½ months. This specific (b) section brings up several questions as to what areas should be patrolled on the 4½ months but at least four times each calendar year. It has been our practice in the past to indicate creek crossing exposed, bridge crossings or aerial crossings, lines attached to buildings, or other structures where movement or loading could occur. Quite often operators disagree with our suggestions, and many feel this only is talking about aerial crossings.

Answer:

The term "in place" would include buried pipeline facilities which goes beyond just aerial crossings. Example of areas requiring the more frequent patrolling of section 192.721(b) would be landslide areas, mine subsidence areas and areas susceptible to wash outs after a heavy rain.

In general, the places to be checked must be determined by each operator based on its knowledge of the characteristics and problem areas of the system. The places you mentioned could require frequent patrol if it's reasonable to "anticipate" that movement or loading at those places could cause leaks or failure. The places an operator identifies, if any, should be noted in its O&M plan.