

Mr. Harry E. Neel
Chairman
Texas Gas Association
P.O. Box 4300
Lago Vista, Texas 78645-0001

Dear Mr. Neel:

You have asked our opinion whether the Texas Railroad Commission is correct in its interpretation that the inspection and testing requirements of §192.739 apply to a pressure regulator designed in accordance with §192.197 that supplies gas to a master meter system.

For such a regulator to be subject to §192.739, it would have to come within the meaning of "pressure limiting station" or "pressure regulating station." These two terms are not defined in Part 192. However, they are defined in two widely accepted Industry documents, the ANSI B31.8 Code and the ASME Guide for Gas Transmission and Distribution Piping Systems. Under these industry definitions of a "pressure regulating station," it is clear that any regulator serving a downstream main is a pressure regulating station. While the drafters of the industry definition may not have had in mind regulators that serve mains in master meter systems, such regulators do meet the terms of the definition. Also, they function similarly to other regulators that are generally recognized to come under the definition. Thus, we support the Texas Railroad Commission's position that §192.739 applies to pressure regulator when they are used to supply gas to master meter systems.

We will initiate a rulemaking proceeding next year to specify more clearly the situations in which regulators are subject to the inspection and testing requirements of §192.739. We will welcome your participation in that proceeding.

Sincerely,

Richard L. Beam
Director
Office of Pipeline Safety