

June 29, 1992

Mr. Ronald J. Boes  
Manager of Gas Systems  
Standards & Procedures  
Indiana Gas Company  
1630 North Meridian Street  
Indianapolis, IN 46202-1496

Dear Mr. Boes:

This responds to your letter of April 17, 1992, to Mr. Richard Sanders of the Transportation Safety Institute in which you ask if the 3/8" external line on the Sprague CL34-2 IMR regulator is a "static or control line" as set forth in Section 192.197.

The "static or control line" in Section 192.197(a)(6) is a line that runs from the regulator to the downstream side of the regulator used to communicate that pressure to the regulator. The 3/8" external tubing on the Sprague CL34-2 IMR is not a static or control line, but a supply line supplying high pressure gas from the inlet side of the regulator to the pilot to establish the set point; i.e., the outlet pressure of the regulator.

I trust that this has adequately responded to your question.

Sincerely,

Cesar De Leon  
Director  
Regulatory Programs  
Office of Pipeline Safety