

October 5, 1992

Mr. F. Lee Avery  
President  
Big Inch Marine Systems  
Suite 100  
5650 Guhn Road  
Houston, TX 77040

Dear Mr. Avery:

This responds to your letter of August 24, 1992. You asked if mechanical connectors are acceptable for use in the repair of underwater pipelines under 49 CFR Parts 192 and 195.

Part 192 and 195 do not prohibit the use of mechanical connectors in the repair of gas, hazardous liquid, or carbon dioxide underwater pipelines. However, an operator's use of mechanical connectors is subject to applicable sections of the regulations.

For gas pipelines, methods other than welding used to join pipe must comply with Subpart F of Part 192, **Joining of Materials Other Than by Welding**. Also, pipeline repairs must comply with ? 192.711, **Transmission lines: General requirements for repair procedures**; and 192.717, **Transmission lines: Permanent field repair of leaks**. The Part 195 regulations do not specifically address pipe joining by methods other than welding, although all repairs must meet ? 195.422, **Pipeline repairs**.

I trust this adequately responds to your request.

Sincerely,

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety