

April 22, 1993

Mr. Michael P. Hogan
Assistant Vice President and Chief Engineer
Northern Illinois Gas
P.O. Box 190
Aurora, IL 60507-0190

Dear Mr. Hogan:

I am responding to your letter of February 1, 1993, regarding the pressure testing requirements of Subpart J or 49 CFR part 192. You asked us to confirm the following interpretation: "A tie-in or replacement section of bare steel pipe to be operated at less than 100 psig is exempt from the pressure testing of this Subpart if it does not include a field made butt-weld other than the 'final tie-in joints'."

We have reviewed the pertinent part 192 standards but, unfortunately, cannot confirm your interpretation. Steel pipe installed as a replacement to be operated at less than 100 psig is subject to the pressure testing requirements of Subpart J.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety