

May 26, 1993

Mr. Marti Marek
Manager, Compliance and Operations Audit Staff
Southwest Gas Corporation
P.O. Box 98510
5241 Spring Mountain Road
Las Vegas, NV 89193-8510

Dear Marti Marek:

I am sorry to have taken so long to respond to your letter of November 23, 1992. You asked whether meter turn-on operations must be included within an operation and maintenance plan under 49 CFR 192.605.

We received a letter on this subject from Dan Weaklend of the Arizona Corporation Commission (enclosed). We are of the same opinion as Mr. Weaklend that the plan must cover turn-on operations. However, it is §192.605(a), not §192.605(b), that requires inclusion of the operations within the plan.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety

Enclosure