

U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**Research and
Special Programs
Administration**

October 9, 1995

Mr. Beryl Gamse
Consulting Engineer
McDowell Owens Engineering, Inc.
Suite 100
1075 Kingwood Drive
Kingwood, TX 77339

Dear Mr. Gamse:

I am responding to your letter of September 1, 1995, concerning application of the gas pipeline safety regulation in 49 CFR 192.317(b) to a liquid petroleum gas transmission line in a rural area. You asked what criteria can be used to determine if the pipeline is a "safe distance from the traffic" under §192.317(b).

I must first point out that pipelines carrying liquid petroleum gas in a liquid state are not subject to the regulations in 49 CFR Part 192. These regulations apply only to the pipeline transportation of certain hazardous materials in a gaseous state. Pipelines carrying liquid petroleum gas in a liquid state are subject to the safety regulations in 49 CFR Part 195.

As to §192.317(b), we have not adopted criteria to judge the safety of distances separating aboveground gas pipeline facilities from vehicular traffic. So a safe distance would be whatever a reasonable and prudent pipeline operator would conclude is safe under the circumstances, considering relevant factors such as the speed limit, the direction of traffic, the terrain, and any natural barriers.

Sincerely,

Richard D. Huriaux, P.E.
Director for Technology and Regulation
Office of Pipeline Safety