

**U.S. Department  
of Transportation**

**Research and  
Special Programs  
Administration**

May 10 1996

Mr. Virgil R. Spurgeon  
Regulatory Affairs Agent  
Phillips Alaska Natural Gas Company  
P.O. Box 1967  
Houston, TX 77251-1967

Dear Mr. Spurgeon:

This is in response to your letter of April 10, 1996, concerning the proposed addition of a liquefied natural gas (LNG) storage tank to be constructed at the Phillips/Marathon Oil Company Kenai LNG Plant. You asked whether the siting of an additional LNG storage tank within the existing facility would violate Subpart B of 49 CFR Part 193.

Rules governing the applicability of the siting, design, installation, and construction standards are set forth in §193.2005. Under that section, the addition of a new LNG storage tank to an existing LNG plant would not subject the existing LNG facilities at the plant to the siting, design, installation, or construction standards of Part 193.

The additional LNG storage tank would, however, be subject to the applicable siting, design, installation, and construction requirements of Part 193 (i.e., Subpart B-D).

If we can be of further assistance in this matter, please contact me or Mr. Mike Israni of my staff at (202) 366-4046.

Sincerely,

Cesar DeLeon  
Deputy Associate Administrator  
for Pipeline Safety