

4/24/98

Mr. Edward M. Steele
Chief, Gas Pipeline Safety Section
The Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, Ohio 43266-0573

Dear Mr. Steele:

This is in response to your letter to Richard Felder concerning a gas storage field operated by the Columbia Gas Transmission Corporation. You said the field, which is used in the pipeline transportation of gas in Ohio, lies beneath a water well that reportedly contains natural gas.

You asked if the storage field is an "interstate gas pipeline facility" subject to the federal pipeline safety law (49 U.S.C. 60101 *et seq.*). Because of its use in the pipeline transportation of gas, we believe the storage field is a pipeline facility subject to the federal pipeline safety law.

As such, the field would come under the law's definition of "interstate gas pipeline facility" if it is also subject to the jurisdiction of the Federal Energy Regulatory Commission under the Natural Gas Act (15 U.S.C. 717 *et seq.*). Since the Department's gas pipeline safety standards do not cover gas storage fields, we do not know if the field comes under the Commission's jurisdiction.

Next you asked if the Department has authority under 49 U.S.C. §60112 to decide if the storage field is a hazardous pipeline facility. Under 49 U.S.C. §60112, the Department has authority to decide whether any pipeline facility covered by the federal pipeline safety law is hazardous.

I hope you find this information helpful. If we can be of further assistance, please contact me at (202) 366-4565.

Sincerely,

Richard D. Huriaux, P.E.
Director, Office of Technology and Standards