

Office of Pipeline Safety  
Room 315  
201 Fannin Street  
Houston, Texas 77002

ATTN: Mr. M. W. Taylor

Re: Hydrostatic Testing of Safety Relief Valves for use in Natural Gas Pipelines

Gentlemen:

Anderson, Greenwood & Co. is a manufacturer of safety relief valves used as over-pressure protection in natural gas pipelines. For some weeks we have been conducting hydrostatic tests on a prototype of each type, size and flange rating at test pressure of 150% of flange rating. We have been running these tests for 8 hours, and of course keeping appropriate recorder chart records.

We have been proceeding on the assumption that a safety valve is a "component other than pipe" being added to the pipeline as a described in 192.505(d). We also plan to prepare a standard certification that a prototype of all AGCO safety relief valves have been so tested, and are manufactured under a quality control system to comply with 192.505(d)(2).

Recently we have received a letter from Northern Natural Gas Co. (copy attached) expressing an opinion that a safety valve should be subjected to hydrostatic test per API-6D, and reference 192.145. The position of our company is that API-6D is a test for valves other than safety relief valves, and is by title not applicable to safety relief valves.

We ask that you give us a ruling on whether we are correct in our assumption that a safety relief valve can be tested under 192.505(d). Thank you very much.

Your very truly,

ANDERSON, GREENWOOD & CO.

G. Frank Bright, Sales Manager  
Safety Relief Valves