

Mr. Robert J. George
Senior Pipeline Engineer
Llano, Inc.
P.O. Drawer 1320
Hobbs, NM 88240

Dear Mr. George:

This responds to your letter of July 12, asking whether gathering system compressors are covered by the Federal gas pipeline safety standards in 48 CFR Part 192.

As more specifically set forth in §192.1, Part 192 applies to the transportation of gas and pipeline facilities, including the gathering of gas by pipeline offshore and to onshore gathering of gas by pipelines outside of rural areas. The term "pipeline" is defined in §192.3 to expressly include compressor units, and accordingly, compressors used in the transportation of gas would also fall within the definition of "pipeline facility." In applying the requirements of Part 192, §192.9 provides that gathering lines are treated as transmission lines. Thus, any compressor that is part of a gathering system that is subject to Part 192 would have to meet the pertinent requirements of Part 192 applicable to pipelines, pipeline facilities, and transmission lines, particularly the requirements of §§192.163-192.173 and §192.729-735 that relate specifically to compressors.

Sincerely,

Richard L. Beam
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

United States Department of Transportation
c/o Materials Transportation Bureau
Office of Pipeline Safety Regulations
400 7th St. Southwest
Washington, D.C. 20590

Attention: Mr. Mel Judah, Associate Director
for Pipeline Safety Regulations

Subject: Natural Gas Pipeline Gathering Systems Compressors

Reference: The Natural Gas Pipeline Safety Act Safety Standards

Dear Sir:

Please advise me by letter if gathering system compressors are included in or exempted from the safety standard written in response to the above referenced act.

My company, Llano. Inc., install, on a regular basis, gas engine compressors of horsepower ratings from 50 BHP to 150 BHP onto our system gathering lines. These compressors are for boosting gathering line pressures in rural areas only. The compressors are in a location until the producing wells are no longer economically justified to operate and then they are moved to new locations.

Joe Delafuente, Associate Chief, in your Houston Office discussed this with me by phone and requested that you be contacted for an official letter.

Thank you for your help.

Sincerely yours,

LLANO, INC.

Robert J. George
Senior Pipeline Engineer