

March 12, 1992

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

Dear Mr. Steele:

I am responding to your letter of January 28, 1992, asking to what extent the regulations in 49 CFR Part 192 apply to a gas pipeline system operated by SBM, Inc., at a landfill in Gahanna, Ohio. The landfill system consists of a network of vacuum lines that collect gas from various wells in the landfill, a compressor station at the end of the collection lines, and two pressurized lines that transport gas downstream from the compressor station to industrial customers.

Part 192 applies to pipeline facilities and the transportation of gas, except certain gathering of gas offshore or in rural areas (see §192.1). Section 192.3 defines "transportation of gas" as "the gathering, transmission, or distribution of gas by pipeline or the storage of gas, in or affecting interstate or foreign commerce." A "gathering line" is defined as "a pipeline that transports gas from a current production facility to a transmission line or main." Based on these definitions, Part 192 does not apply to production facilities.

In the landfill system, the vacuum lines and compressor station are used to extract gas from the landfill. These facilities are, therefore, production facilities, and are not subject to Part 192.

The pressurized lines are used to transport gas directly to consumers from the production facilities. These lines, therefore, are not production facilities or gathering lines. They are either "transmission lines" or "distribution lines" under the definitions of those terms in §192.3. Thus, in the landfill system, the jurisdiction of Part 192 covers only the two pressurized lines downstream from the compressor station.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety