

Mr. J. G. Osendorf, Utilities Engineer
Minnesota Highway Department
St. Paul, MN 55155

Dear Mr. Osendorf:

This is with regard to the telephone conversation between Mr. Van Alstine of your office and Mr. Cesar DeLeon of the Office of Pipeline Safety concerning §192.111, 49 CFR.

Mr. Van Alstine's interpretation of §192.111(b) is correct, that a steel pipe in a Class 1 location that crosses a public road without a casing must use a design factor of 0.60 or less in the design formula in §192.105. He is also correct in interpreting that a steel pipe in a Class 1 location that crosses a public road with a casing design in accordance with §192.105.

I trust that this has answered Mr. Van Alstine's particular question. If we can be of further assistance, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety