

As I indicated to you on the phone today, there is question on the part of some of our member companies as to whether or not they are affected by Section 192.17 of the Minimum Federal Safety Standards for Transportation of Natural and Other Gas by Pipeline, which calls for filing a plan for inspection and maintenance by February 1, 1971.

Specifically in question is the situation where a non-public carrier transports chemicals outside its own property in a pipeline owned by itself such as (1) between its own plants, (2) between one of its plants and a nearby supplier, and (3) between one of its plants and a nearby customer.

While the immediate need is for an interpretation applying to Section 192 for Transportation of Natural and Other Gas by Pipeline due to the February 1 deadline, there is a need also for an interpretation covering the above specified situation as it would apply to Section 195 for Transportation of Liquids by Pipeline.

Your early advise on this matter would be most appreciated.

Thank you.

Sincerely yours,

M. M. Hoover, Secretary
Engineering Advisory Committee