

Mr. Carlos W. Higgins
Legal Counsel
Pipeline Safety and Engineering
Texas Railroad Commission
Drawer 12967, Capitol Station
Austin, Texas 78711

Dear Mr. Higgins:

This is in response to your letter of June 25, 1982, in which you request our opinion on several questions asked by Mr. William G. Dase, Jr.

His questions and our responses are as follows:

"a. Would the Fisher Type S203 Relief/Monitor gas regulator comply with the requirements of 49 CFR 192.199(g) when installed after March 12, 1971 in a new district regulator station without any additional pressure limiting, regulating, or relief devices?"

The answer is "no" since a single incident could damage all three devices incorporated in the Fisher Type S203 regulator.

"b. If the Fisher Type S203 Relief/Monitor were installed after November 12, 1970 to replace another regulator and relief device in an existing district regulator station, would the installation be subject to 192.199(g)?"

The answer is "yes" because although 192.199 is in Subpart D - Design, which applies primarily to facilities that are readied for service after March 12, 1971, Subpart D also applies to existing facilities that are replace, relocated, or otherwise changed after November 12, 1970.

"c. If the Fisher Type S203 Relief/ Monitor gas regulator does not comply in (a), would installation of barricades around the station satisfy the requirement?"

The answer is "no" since an explosion, one of the single incidents given as an example in 192.199(g), conceivably could damage all components of a single unit.

In answer to Mr. Dase's final question, we have no difference in opinion between the interpretation printed in Bulletin No. 72-3 and our answer to question "a".

You may also be interested in another interpretation on this subject which was presented in our Bulletin No.73-1, page 4. A copy of this Bulletin is enclosed.

Sincerely,
/signed\
Melvin A. Judah, Director