

February 20, 1974

Mr. Richard L. Valent  
Wyoming Public Service Commission  
Supreme Court Building  
Cheyenne, WY 82002

Dear Mr. Valent:

Thank you for your letter of February 8, 1974, asking if we have approved the 12th or 13th edition of API 1104 in connection with §§192.225 and 192.227.

Item II.A.8 of Appendix A to Part 192 indicates that only the 11th edition of API 1104 has been incorporated by reference in the standards. We recognize the problems associated with referencing an early edition of a specification of which a later edition is published but not approved for use under Part 192. As a consequence, we have reviewed the 12th edition and will soon propose by notice in the Federal Register that this edition also be incorporated by reference. Review of editions published later than those already referenced to check for changes in requirements is a time-consuming process; and our review of the 13th edition is not yet completed.

I trust this satisfactorily responds to your question.

Sincerely,

\signed\

Joseph C. Caldwell  
Director  
Office of Pipeline Safety