

Ms. Mary L. McDaniel, P.E.
Manager, Pipeline Safety
Railroad Commission of Texas
1701 N. Congress
Capitol Station
P. O. Box Drawer 12967
Austin, Texas 78711-2967

Dear Ms. McDaniel:

Thank you for your letter of May 5, 1989. We have reviewed your question, analyzed the issues involved, and by this letter provide our response.

Essentially, your question is whether an operator must odorize a gathering line that is totally located within a Class 3 area and connected to a transmission line is not odorized and cannot accept odorized gas.

Section 192.9, **Gathering Lines**, requires each gathering line to comply with the requirements of Part 192 applicable to transmission lines. In addition, §192.625(b)(1) exempts from odorization requirements transmission lines in Class 3 or 4 locations where at least 50 percent of the downstream length of line is in Class 1 or 2 locations.

Since the gathering line in question is regulated as a transmission line and feeds directly and only into the transmission line, downstream must be taken in this case to refer to the transmission line being fed by the gathering line. Thus, the gathering line would not need to be odorized.

I hope that this discussion has clarified the issue for you. If you have any further questions, please contact us.

Sincerely,

Richard L. Beam
Director
Office of Pipeline Safety