

June 11, 1997

Mr. Terry Fronterhouse  
Chief, Pipeline Safety Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85701

Dear Mr. Fronterhouse:

This is in response to your letter of March 14, 1997, in which you seek our concurrence of your grant of waiver from the provisions of 49 CFR Part 192.707(c) to the Duncan Rural Services Corporation. Section 192.707(c) requires that line markers be placed and maintained along each section of a main and transmission line that is located aboveground.

Your request concerns gas distribution lines that are classified as mains (rather than service lines) because they transport gas from a main to multiple customers. At the building wall the main rises aboveground and connects to a single privately-owned manifold with multiple customer meters. Under the provisions of § 192.707(c) a line marker would be required at the location of the aboveground transition of the main to the meter manifold.

These installations are similar to those described in your letter of May 23, 1996, and our response of July 22, 1996, in which we concurred with your grant of waiver to Graham County Utilities, Inc. Moreover, we have concurred with similar waivers granted by other state pipeline safety commissions. Our rationale is that the aboveground transition of these gas mains to the meter manifold is similar to that of typical service risers that are not subject to § 192.707(c).

Consequently, in view of these similarities and your conclusion that the absence of the line markers will not jeopardize public safety, we have no objection to the waiver.

Sincerely,

Richard B. Felder  
Associate Administrator  
for Pipeline Safety

cc: AGarnett  
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