

October 1, 1992

Ms. Marti Marek
Manager/Compliance and Operations
Audit Staff
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, NV 89193-8510

Dear Ms. Marek:

This responds to your letter of July 29, 1992, requesting our interpretation of § 192.723(b)(2) of the Department of Transportation (DOT) Pipeline Safety Regulations. This rule requires operators to provide for periodic leakage surveys of distribution systems "at intervals not exceeding 5 years." You said that because of the absence of a definitive "due date" for conducting leakage surveys, state agencies and industry representative have expressed multiple interpretations of this requirement.

Under § 192.723(b)(2), each leakage survey may not be more than 5 years from the last one. Thus, in the 5th year after the date of the last leakage survey, the operator must conduct another leakage survey on or before the day that corresponds to that date.

I trust this adequately responds to your request.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline safety