

10/22/1998

Mr. Ronald S. Jorgensen  
Director, System Integrity and Environmental Affairs  
Questar Regulated Services Co.  
PO Box 45360  
Salt Lake City UT 84145-0360

Dear Mr. Jorgensen:

This responds to your petition dated June 22, 1998, for approval under 49 CFR 192.150(c) that a sphere launcher installed on transmission line JL #28 was impracticable to design and construct to accommodate the passage of an instrumented internal inspection device. Questar installed the "non-piggable" sphere launcher because of construction time constraints and the need to clear the line of liquid hydrocarbons.

The petition cites a lack of negative risk factors on the line, the current safe operation of the line, and the absence of any foreseeable need to smart-pig the line. However, the petition does not demonstrate any physical or operational problems that might have made the sphere launcher impracticable to design and construct to accommodate the passage of an instrumented internal inspection device. Reasons involving risk, safe operation, or the need to smart-pig a pipeline are not germane to the question of design and construction impracticability.

Therefore, we do not approve Questar's determination that the sphere launcher was impracticable to design and construct to accommodate the passage of an instrumented internal inspection device. Under 49 CFR 192.150(c), Questar has one year from the date of this letter to modify the installation to accommodate the passage of an instrumented internal inspection device.

Sincerely,

Richard B. Felder  
Associate Administrator for Pipeline Safety

LMFurrow:jmd:64046:10-1-98  
cc: DPS-1,2,10,Regions,TSI,StateMail