

January 4, 1971

Mr. James B. Williams
Utilities Engineer
Alabama Public Service Commission
P.O. Box 881
Montgomery, Alabama 36102

Dear Mr. Williams:

This is in reply to your letter of December 22, 1970, concerning 49 CFR, Section 192.625, odorization of gas.

If the line involved is operated at 20% or more of SMYS, under 49 CFR, Section 192.625 as amended, there is requirement for odorization. If it is operated at less than 20% SMYS you may initiate a waiver proceeding under Section 3(e) of the Natural Gas Pipeline Safety Act.

Thank you for your interest in pipeline safety.

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety