

Mr. R. C. Roland  
Pioneer National Gas Company  
P.O. Box 511  
Amarillo, Texas 79105

Dear Mr. Roland:

This is in response to your letter dated June 7, 1972, regarding interpretations of Section 192.327(a) and Section 192.113.

Regarding Section 192.327(a), your specific question asked that if there was 10" of normal soil and consolidated rock under take, would be required minimum cover for Class 1 location be (a) 28" or (b) 18" and for Class 2, 3, and 4 locations would it be (c) 34" or (d) 24"?

Answer: The required minimum cover for a buried transmission line under Section 192.327(a) if there is a combination cover of normal soil over consolidated rock, is either a total cover of 30 inches or an 18 inch cover of consolidated rock. Similarly, the Class 2, 3 and 4 locations and drainage ditches of public roads and railroad crossings that have a combination cover of normal soil over consolidated rock, must have a total cover of 36 inch or a 24 inch cover of consolidated rock.

Therefore, with reference to your specific question, the 18 inch of consolidated rock cover in example (a) meets our minimum requirements for a Class 1 location. The additional 10 inch of normal soil is in excess of this minimum requirement. The example (b) does not meet the minimum cover requirements of either a total cover of 30 inches or an 18 inch cover of consolidated rock. The 24 inch cover of consolidated rock in example (c) meets our minimum requirements for a Class 2, 3, and 4 locations. The additional 10 inches of normal soil are in excess of this minimum requirement. The example (d) does not meet the minimum cover requirements of either a total cover of 36 inches or a 24 inch cover of consolidated rock.

Regarding Section 192.331, your specific question asked if continuous weld pipe should be considered the same as ASTM-A53 furnace butt welded or API-5L furnace butt welded pipe for establishing a joint factor.

Answer: Yes, the longitudinal joint factor for ASTM-A53 furnace butt welded or API-56 furnace butt welded pipe should be used for continuous weld pipe.

We trust that this answers your particular question. If we can be of further service, please let us know.

Sincerely,

/signed/  
Joseph C. Caldwell, Director