

PI-73-0109

06-01-73

Mr. William C. Doll
Corrosion Associates, Inc
Box 303
Westminster, Colorado 80030

Dear Mr. Doll:

In our letter of February 5, 1973, we advised that the answer to your inquiry concerning responsibility for certain gas pipelines would depend on the revised definition of "service line" when it became effective. You had asked " who is responsible for the cathodic protection on a gas line after the line goes into the meter and back into the ground?"

The revised definition of "service line," published as Amendment 192-13 to Part 192, Title 49 of this Code of Federal Regulations (38 R.R. 9083), became effective May 10, 1973. The new definition reads as follows:

"Service line" means distribution line that transports gas from a common source of supply to (1) a customer meter or the connection to a customer's piping, whichever is farther downstream, or (2) the connection to a customer's piping if there is no customer meter,

A customer meter is the meter that measures the transfer of gas from an operator to a consumer.

Under the definitions of Part 192, an operator is a person who engages in the transportation of gas. The transportation of gas is regulated to the downstream end of the distribution system. Since a distribution system normally ends in a service line, the operator is the person responsible that a service line meets all applicable regulations.

Your question does not describe any particular situation so we assume you are referring to a usual case such as an individual customer meter serving a residential home.

Consistent with the new definition of "service line," if piping downstream of the meter is owned by the customer, such piping is not included within the definition and, therefore, is not covered by the regulations. In such case, the service line extending down to and including the meter is the responsibility of the operator. On the other hand, if any of the piping downstream of the meter is owned by the operator, such piping, down to the point where it connects to the customer's piping, is a service line and the operator is responsible for compliance with the applicable regulations including the cathodic protection requirements.

I trust this answers your question. If we may be of further assistance, please call on us.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Feb 5 1973

Mr. William C. Doll
Corrosion Associates, Inc.
Box 303
Westminster, Colorado 80030

Dear Mr. Doll:

This will acknowledge receipt of your letter of January 18, 1973, asking "Who is responsible for the cathodic protection on a gas line after the line goes into the meter and back into the ground?"

Since your question is not directed to a particular situation, the answer in certain cases will depend on what is included within the definition of "service line" as set forth in section 192.3 of the Federal pipeline safety standards. The Office of Pipeline Safety expects to issue in the near future a revised definition of "service line." We would, therefore, prefer to answer your inquiry consistent with the revised definition when it becomes effective.

If you have a question with regard to a specific situation, we will be pleased to respond.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety