

11/24/71

Mr. Walter S. Brown  
Safety Engineer  
Maryland Public Service Comm  
301 West Preston street  
Baltimore, Maryland 21201

Dear Mr. Brown;

We have reviewed your letter of November 19, 1971, and the petition for waiver from the Frederick Gas Company.

We would not oppose a waiver being granted to the Frederick Gas Company by the Maryland Public Service Commission based upon the information supplied to us provided there are provisions for adequate separation of the installation from habitation and there is compliance with all other requirements.

If the Maryland Public Service Commission grants the waiver the procedural requirements of Section 3(e) of the natural Gas Pipeline Safety Act of 1968 should be followed. However, as we do not object to the issuance of the waiver if the provisions of the petition and this letter are included, you may consider the notification provision of Section 3(e) satisfied. The waiver, therefore, may be made effective immediately.

Sincerely,  
Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety

PUBLIC SERVICE COMMISSION  
Engineering, DEPARTMENT  
301 WEST PRESTON STREET  
BALTIMORE, MARYLAND E1201-

November 19, 1971

Mr. Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety  
Department of Transportation  
Washington, D. C. 20590

Attention: Mr. Walter Kurylo

Dear Mr. Kurylo:

This is in connection with our phone conversation of November 18, 1971, concerning request of Frederick Gas Company to use a natural gas bottle-type holder to furnish temporary gas service to a new housing development now under construction near Frederick, Maryland.

As the utility desires to install this holder above ground, this involves the waiving the requirement of Rule 192.177(a)(3) stipulating that the holder be buried.

I understand this holder is about 40' long, so considerable expense would be required for such a short period of use.

As this temporary service would terminate in January 1972, the Maryland Public Service Commission has no objection to granting a waiver so long as all other requirements of Rules 192.177 and 192.179 are met.

A copy of Frederick Gas Company's letter is attached for your information. May we have your approval to grant this waiver as soon as possible?

Very truly yours,  
Walter S. Brown  
Safety Engineer

Frederick Gas Company  
924 East Street,  
Frederick, Maryland 21701

November 18, 1971

Mr. Walter S. Brown  
Safety Engineer  
Public Service Commission of Maryland  
301 West Preston Street  
Baltimore, Maryland 21201

Dear Mr. Brown:

The Frederic] Gas Company has accepted application to serve natural gas to a housing project called "Discovery" on Maryland Route 194 about 1/2 mile west of the intersection with Maryland Route 26 in Frederick County, Maryland.

Design, right-of-way acquisition, and construction have not progressed sufficiently for the Company to originate gas service as requested by the developer. The developer has requested natural gas service to a limited number of model homes during the week of November 22, 1971.

Frederick Gas Company proposes to supply natural gas by installing natural gas bottle type holders near the construction site, and to fill these bottle from a high pressure natural gas trailer limiting pressures to no more than 1000 psig. The bottles will be installed about 400 feet (scaled from a drawing, not a field measurement) from the closest structure. The proposed installation is a field expedient and should be removed by January 1972 when the permanent supply pipeline is estimated to be in service.

All elements of the proposed installation meet the requirements of the Federal Gas Pipeline Safety Standards. These standards, however, were developed for permanent installations and, therefore, call for the burying of the proposed installation under 36 inches of cover. Please refer to Section 192.177 ( 3 ) and Section 192.327.

In view of the temporary nature of this installation, we suggest it to be somewhat unrealistic to bury the installation and then in such a short time to uncover and remove it. We suggest that it seems safer in this instance not to be confronted with the uncertainty of uncovering this unit with power equipment when compared to simply hoisting it away.

Your counsel is solicited in our plan, and specifically, a variance is requested from Section 192.177 (3) and related Section 192.327 in the specific instance of this job only.

Thank you for your attention and counsel in this matter. We await your earliest reply.

Sincerely,  
James W. Freeman