

MAR 28 1991

Mr. Myron B. Katz
Chairman
Oregon Public Utility Commission
351 W Summer St. NE
Salem, Oregon 97310-0335

Dear Mr. Katz:

Your letter of February 20, 1991 describes Commission approval of an application by CP National Corporation for a waiver of 49 CFR 321(a). Section 192.321(a) requires that plastic pipe in gas service lines be installed below ground level. The need for a waiver was necessitated by an Oregon Department of Transportation determination that the Del Rio bridge overcrossing on Interstate 5 north of Roseburg, Oregon should be raised 18 inches to prevent a major traffic accident. The 6-inch steel gas pipeline attached to the bridge must be removed to accommodate lifting equipment while the overpass deck is being raised.

CP National Corporation, the pipeline operator, proposes to suspend a 4-inch Aldyl A plastic gas pipeline on the outside of the overpass for a period less than 30 days while the bridge is being moved and reset. The 6-inch steel pipeline will be reinstalled after the bridge is raised.

Based on the information provided in the application for waiver submitted by CP National Corporation, we believe that use of a plastic gas pipeline above ground attached to the bridge for a 30-day period of time is not a danger to public safety. Accordingly, approval of the waiver is not inconsistent with pipeline safety. For this reason, we offer no objection to its approval.

Sincerely,
Original signed by
George W. Tenley, Jr.
Associate Administrator for Pipeline Safety

Oregon Public Utility Commission
351 W. Summer St. NE
Salem, OR 97310-0355

Cesar De Leon
Director of Regulatory Programs
Office of Pipeline Safety
US Dept of Transportation/RSPA
400 7th St SW Washington DC 10590

Enclosed is a letter to CP National from this Commission, approving the waiver they requested by telephone on February 12, 1991, and confirmed in writing on February 13, 1991.

I have enclosed a copy of their waiver request and the staff report and recommendations, which was presented at the open meeting held by the Oregon PUC on February 19, 1991, when the waiver was approved.

You will note that the relocation of gas facilities due to the raising of a bridge over the federal highway, Interstate 1-5, will start on February 26, 1991. The usual 60-day notice could not be given to you; however, your regional office was advised the day we received the telephone request, and I understand your office was notified the next day of the situation and your office suggested that we continue with the waiver request.

Myron B. Katz
Chairman
(503) 378-6611

Oregon Public Utility Commission
351 W. Summer St. NE
Salem, OR 97310-0355

Pete Paris, Vice Pres
CP National Corporation
PO Box 1709
Medford OR 97501

The waiver request to install a temporary 4 inch plastic line above ground submitted by Harvey L. Brown, P.E., by telephone on February 12, 1991, and confirmed by his letter on February 13, 1991, was approved in a public meeting by the Oregon Public Utility Commission on February 19, 1991.

A copy of this letter of approval is being sent to the federal DOT office, along with CP National's waiver request and staff's report that was involved in the public meeting, as formal notice to DOT that the Oregon PUC has approved the waiver request.

Since staff (Garabrant) has previously notified the Western Region DOT office by telephone, and no negative response was received after the Western Region contacted the federal office in Washington, D.C., it is not expected that the federal office of DOT will stay the approval given by the Oregon PUC.

In the future, please allow about 90 days when making these requests so the state has 30 days to process the request, and the federal DOT office has its full 60 days in which to disapprove or stay the decision of the state PUC.

Myron B. Katz
Chairman
(503) 378-6611

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: February 19, 1991

REGULAR AGENDA X

CONSENT AGENDA _____

EFFECTIVE DATE N/A

DATE: February 15, 1991
TO: Mike Kane, Assistant Commissioner Via Jerry Murray and Bill Warren
FROM: H.R. Garabrant
SUBJECT: CP National Waiver Request to Install a Temporary 4-Inch Plastic Natural Gas Line North of Roseburg, Oregon

SUMMARY RECOMMENDATION:

Approve the waiver as requested.

DISCUSSION:

On February 12, 1991, staff received a telephonic request from CP National (CPN) to allow a 4-inch plastic gas line to be temporarily installed above ground in a protected position on a bridge. This would be in violation of CFR 49, Part 192.321(a), which states that plastic pipe must be installed below ground level. The attached letter from CPN, dated February 13, 1991, describes the request in more detail.

Approval of this request is in the interest of public safety. The 1-5 Del Rio overpass bridge needs to be raised as soon as possible to prevent a major accident. Presently, bridge clearance is not adequate. The gas line must be temporarily relocated to accommodate the bridge-lifting equipment. The temporary installation of the 4-inch plastic line must not be delayed to ensure continuous supply of gas to customers in the area.

The Western Region Pipeline Safety Office (Overly) was notified by telephone on February 12, 1991. The chief of the Western Region (Ondak) indicated by telephone on February 13, 1991, that the Western Region Office had no objection, and they would notify the Washington, D.C., office by telephone suggesting that they telephone me their waiver approval or rejection. February 14, Western Region advised me by telephone to proceed with the waiver request. There appeared to be no objection at this time from the Washington, D.C., office.

STAFF RECOMMENDATION:

Staff recommends approval of CP National's waiver request on an emergency basis in order not to slow down the project of raising a bridge that does not have sufficient clearance over the I-5 freeway, which constitutes a public hazard greater than that of the temporary use of a plastic line for a short period of time.

Alltel
CP National Corporation
Energy Operations Office
201 West Sixth Street
P.O. Box 1709
Medford, Oregon 97501

13-Feb-91

Mr. H. R. Garabrant, P. E.
Sr. Utility Engineering Analyst
Gas unit/Energy Division
Public Utilities Commission of Oregon
Labor and Industries Building
Salem, Oregon 97310

Subject: Request for a waiver to install a temporary 4 inch plastic line above ground.

Dear Bob:

Per our phone conversation yesterday, CP National formally requests a waiver to install a temporary 4 inch Aldyl A plastic pipe above ground to replace a 6 inch steel distribution line that must be removed from a freeway overpass. This situation was brought about because the Del River Crossing on Interstate 5 about 5 miles north of Roseburg, does not have adequate clearance above the freeway. The Oregon Department of Transportation has elected to raise the deck of the overpass 18 inches, and parts of our existing line will be in the way of jacking equipment.

The existing line feeds 35 psig gas from our Winchester distribution regulator station to a 4 inch line going north along Old Highway 99 (serving 45 residential and 6 small commercial and light industrial customers) and to a 8 inch line going south to the Roseburg distribution system. During light load periods, all of this area can be fed from Rosenberg, but loads are too great to do this during the winter.

We have investigated many alternatives for serving loads on the east side of the freeway but this is the only mutually acceptable solution. Rescheduling the work during warm weather is not acceptable to the department of Transportation.

The temporary plastic line will hang on the out side of the overpass where it will be protected from traffic and construction equipment. It will be in service less than 30 days at a time of the year when ultraviolet exposure will be minimal and temperatures will be mild.

The Department of Transportation wants us to start removing the existing line on February 26th, so we do not have much time. They plan to complete the project by March 16th. At that time we will start reconnecting our 6 inch line.

Attached are a location map and a drawing of the overpass and gas lines. If I can provide additional information, please let me know.

Yours truly,
Harvey L. Brown, P.E.
Supervising Engineer