

PI-81-0108

July 10, 1981

Mr. Louis C. Baldacci, Jr.  
Vice President  
The Peoples Gas Light & Coke Co.  
122 South Michigan Avenue  
Chicago, IL 60603

Dear Mr. Baldacci:

This refers to your letter of April 22, 1981, in which you request a determination that a particular pipeline that now transports naphtha from the Union 76 refinery to an SNG plant may be used to transport alternately naphtha and refinery gas.

The applicable Federal regulations governing the transportation of naphtha by pipeline in interstate commerce are set forth in 49 CFR Part 195. Regulations governing the pipeline transportation of gas in or affecting interstate commerce are in 49 CFR Part 192. These regulations do not preclude a pipeline from being used in the manner you have proposed, provided the applicable requirements of each set of regulations are met.

In this regard, the pipeline need not meet each design and construction requirements of Part 192, that would otherwise apply to a pipeline newly readied for gas service, if it is qualified for use under the conversion rules of §192.14. Note that this section would require that the pipeline be pressure tested under Subpart J, even though it has been tested previously under Part 195. The MAOP for gas service would be determined under §192.619 based on the new pressure test.

The regulations do not require notification of the proposed changeover.

Sincerely,  
SIGNED  
Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau