

May 14, 1982

Mr. Jennings B. Thompson  
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Attorneys at Law  
One Riverway, Suite 2420  
Houston, TX 77056

Dear Mr. Thompson:

Administrator Ray Barnhart, Federal Highway Administration, has asked us to respond to your letter of April 12 to him which was accompanied by a letter of April 5 from Major Butler concerning the SURE-LOCK mechanical joint.

Specifically, Mr. Butler's letter requested a review of test data from Southwestern Laboratories to determine whether or not the joint complies with §192.273 of Part 192, Title 49 of the Code of Federal Regulations, a general safety standard for joining pipe by means other than welding. The report from Southwestern Laboratories includes data on hydrostatic tests and tensile tests with Grade B ERW pipe, and states that the test results meet American Petroleum Institute requirements. It appears that the connection is capable of producing a joint that can withstand the contraction and expansion forces and external and internal loads mentioned in §192.273(a), and that it is gastight as required by §192.273(b). However, actual compliance with §192.273 would depend on proper installation of the connection by a pipeline operator or his contractor under field conditions, a matter which we cannot judge based upon the test results alone.

Our determination whether the mechanical joint meets §192.273 is not necessary for Mr. Butler to market the product. This standard is written in performance language, allowing the pipeline operator flexibility in choosing the best joining methods to achieve pipeline safety. It is not our policy to endorse proprietary methods or products that meet the applicable requirements of the Federal standards. The selection and use of particular joining methods are ultimately the pipeline operator's responsibility.

We hope this answers your request. If you need further clarification of the Department's pipeline safety regulations or their enforcement, you may wish to contact Melvin A. Judah, Acting Associate Director for Pipeline Safety Regulation, Materials Transportation Bureau (MTB), telephone number 202-426-2392, or Robert F. Aubry, Chief of the MTB Southwest

Regional Office of Operations and Enforcement, telephone number 713-226-5476.

Sincerely,

Howard Dugoff