

**Research and
Special Programs
Administration**

Mr. David L. Rauch
Executive Secretary
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Dear Mr. Rauch:

Your letter of February 23, 1996, and its supporting documents describe the Commission's approval of an application for waiver of 49 CFR §192.203(b)(2) by the Laclede Gas Company for its Missouri Natural Gas Company (MoNat) Division.

Section 192.203(b)(2) requires the installation of a shutoff valve in each takeoff line as near as practicable to the point of takeoff. The main purpose of this shutoff valve is for isolating takeoff lines, such as control lines, from the sources of gas pressure. For reasons set out in the application, MoNat is operating regulator stations that are not equipped with these shutoff valves.

All of MoNat's regulator stations are designed and built with the regulator between the station inlet and outlet isolation valves. The control line is connected to the station piping between the regulator and the outlet isolation valve. The applicant advises that this piping design adequately addresses any safety conditions requiring the isolation of the control line. Moreover, MoNat has operated the regulator stations without experiencing any problems or unsafe conditions.

The information in the application indicates that the installation of the required shutoff valves would be costly and would provide no additional safety benefit. Additionally, the location of the control line takeoff is consistent with the exception proposed for similar shutoff valves in our Notice of Proposed Rulemaking published on August 31, 1992 (57 FR 39572). Therefore, we believe that the lack of these shutoff valves is not inconsistent with pipeline safety. For these reasons, we do not object to the waiver as granted.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety
Agarnett:jmd:64046:4-18-96
cc: DPS-1,2,10,20,Regions,TSIEmail,StateMailing