Mr. Robert F. Smallcomb, Jr. Director, Pipeline Engineering and Safety Division Massachusetts Department of Public Utilities 100 Cambridge Street Boston, MA 02202

Dear Mr. Smallcomb:

We have considered your letter of October 28, 1997, notifying us that the Massachusetts Department of Public Utilities has granted the Bay State Gas Company a waiver of compliance with 49 CFR 192.321(a) for plastic pipe across the Richard G. Kelley bridge on Oakland Avenue, Methuen, Massachusetts. The waiver will permit the installation of plastic pipe above ground inside a steel pipeline across the bridge. The installation will be protected against mechanical damage and ultraviolet radiation, and meet all applicable plastic pipe safety requirements apart from section 192.321(a).

We have no objection to the waiver. The circumstances are comparable to those of previous waivers we have approved permitting the installation of plastic pipe above ground on bridges.

Sincerely,

Richard B. Felder Associate Administrator for Pipeline Safety

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