

March 22, 1990

Ms. Mary L. McDaniel, P.E.  
Manager, Pipeline Safety  
Railroad Commission of Texas  
Capitol State - PO Drawer 12967  
1701 N. Congress  
Austin, Texas 78711-2967

Dear Ms. McDaniel:

We have considered the Commission's order of January 15, 1990, which granted the Bay City Gas Company a waiver from compliance with the burial requirements of 49 CFR 192.321(a) for segments of plastic pipeline that were installed in 1984 and 1985 above ground at three creek crossings. At each crossing, the segment is installed inside a steel casing, which is suspended from a bridge.

Because the plastic pipe is not exposed to sunlight and the casings are shielded from direct sunlight for periods of the day, the installations satisfy our most significant safety concerns. We are also pleased to note that as a condition of the waiver the gas company must survey each crossing at least three times a year for leaks and immediately notify the Commission should it discover a material defect at a crossing.

In view of the above and the Commission's public proceedings on the matter, we have no objection to the waiver and it may take effect as scheduled.

Because we are concerned about the long term performance of installations such as these, we would appreciate being informed of any leaks or defects that may be reported to you.

Sincerely,

George W. Tenley, Jr.  
Director  
Office of Pipeline Safety