Mr. Charles R. Kenow Administrator Office of Pipeline Safety Minnesota Department of Public Safety 444 Cedar Street St. Paul MN 55101-5147

Dear Mr. Kenow:

We have considered your letter of March 13, 1998, notifying us that the Minnesota Office of Pipeline Safety has granted the Minnegasco company a waiver from complying with 49 CFR 192.309, 192.485, 192.487, and 192.713(a) when repairing imperfections and damages in steel pipe. The waiver permits repair with Clock Spring<sup>®</sup> wrap, a composite material that is tightly wound and adhesively bonded to pipe.

We have no objection to the waiver. It is consistent with a similar waiver we granted operators of interstate gas transmission lines (60 FR 10630; February 27, 1995).

Sincerely,

Richard B. Felder Associate Administrator for Pipeline Safety LMFurrow:jmd:64046:4/23/98 cc: DPS-1,2,10,20,Regions,TSI,StateMailing