

**STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION**

P.O. BOX 991
MONTGOMERY, ALABAMA - 36102

March 10, 1975

Honorable Joe Caldwell, Director
Office of Pipeline Safety
Office of the Secretary of Transportation
Washington, D.C. 20590

Dear Mr. Caldwell:

Enclosed is a petition from Clarke-Mobile Counties Gas District of Jackson, Alabama, for a waiver to supply Courtaulds North America, Inc. with unodorized gas. This would involve, as you can see, only 1,456 feet of four-inch line. We would appreciate your immediate attention on this matter.

The State is willing to issue this waiver if it meets with your approval.

Hoping to hear from you in the near future.

Sincerely,

(signed)
Larry E. Waldrop
Administrator

LEW/jr

Enclosures

Enclosure to the incoming letter dated 03/10/75

Clarke-Mobile Counties GAS District
P.O. BOX 608 PHONE 246-2428 JACKSON, ALABAMA, 36545

February 28, 1975

Alabama Public Service Commission
P.O. Box 991
Montgomery, Alabama 36102

Gentlemen:

We are enclosing a drawing of a short section of four inch pipeline and humbly request that you grant us permission to operate this line without odorization.

The reason for this request is that the odorant in the natural gas will be detrimental to the operation of Courtaulds North America, Inc. plant. This company manufactures a synthetic fiber using natural gas as process gas. The odorant would remain in the fiber that they produce.

Your immediate attention to this problem would be greatly appreciated as we are operating with three to five miles of our system not odorized. Although, the two farm taps that serve two residences are equipped with a wick type odorizer.

Very truly yours,

(signed)
G. M. Coulter
General Manager

Enclosures
GMC/ap

For enclosure referenced above, see paper copy available in Office of Pipeline Safety file

Enclosure to the incoming letter dated 03/10/75

Clarke-Mobile Counties GAS District
P.O. BOX 608 PHONE 246-2428 JACKSON, ALABAMA, 36545

February 28, 1975

Mr. Jack Prather
Courtaulds North America, Inc.
P.O. Box 2648
Mobile, Alabama 36601

Dear Mr. Prather:

This letter is to inform you that on or before March 10, 1975, we will be forced to odorize the gas that you are now receiving. We realize that the odorant could possibly cause a defect in the material you are producing in your plant, but according to the Department of Transportation it is a "must" that we odorize the gas in the short section of pipe that serves your plant.

We feel sure that the Alabama Public Service Commission will grant us a special waiver to transport unodorized gas from the upstream side of our odorizer to your meter station without odorization. The reason this waiver can be granted is due to the class location and there will be no other customers served off this proposed line.

We are sending a copy of this letter, along with a request for permission to operate this short section of pipeline without odorization to Alabama Public Service Commission.

Sincerely yours,

(copy not signed)
G. M. Coulter

General Manager

cc: Alabama Public Service Commission

Enclosure

GMC/ap

No copy of the enclosure was in the file.

Enclosure to the incoming letter dated 03/10/75

COURTAULDS NORTH AMERICA INC.

POST OFFICE BOX 2648

MOBILE, ALABAMA 36601

March 4, 1975

Mr. Mike Coulter
Clarke-Mobile Gas Company
Jackson, Alabama

Dear Mr. Coulter:

This letter will serve as our formal application to you to supply us with non-odorised gas.

A portion of the gas supplied is used in a special drying application where the products of combustion are passed in an air-stream through a thick fibre bed. As you know the bed consists of a 6" layer of pure cellulose fibre and in this freshly precipitated state, it is one of the best, if not the best, absorption materials known.

The product is used in a range of personal and medical products which would be totally unacceptable to the market if any trace of odor existed. Although combustion would take care of most of the odorising product any slight trace would give rise to unacceptable risks with the product.

Accordingly, we must restate our position that odorised gas is unacceptable to us and request your assistance in maintaining the present clean gas flow.

Yours very truly,

COURTAULDS NORTH AMERICA, INC.

(signed)

Victor E. Baker, Site Manager

VEB:drb

April 3, 1975

Mr. Larry E. Waldrop
Administrator
State of Alabama
Alabama Public Service
Commission
P.O. Box 991
Montgomery, Alabama 36102

Dear Mr. Waldrop:

This responds to your letter of March 10, 1975, requesting our comments on a petition for waiver from compliance with 49 CFR 192.625 filed with the Commission by the Union Gas Company of Alabama, Inc. for the Clarke-Mobile Counties Gas District. The waiver would exempt a proposed 4-inch line, 1,456 feet long, from the odorization requirements of Section 192.625.

We have reviewed the material submitted and question why the proposed waiver is not intended to apply to the existing 4-inch line serving Courtaulds North America, Inc., as well as the proposed 4-inch line. If the existing 4-inch line is subject to the jurisdiction of 49 CFR Part 192, and operated by the Union Gas Company, then the company would be subject to penalty for failing to odorize the gas transported in that line as well as the proposed line.

In this regard, the letter dated February 28, 1975, from G.M. Coulter to Jack Prather indicates that a meter is located at the connection of the existing 4-inch line and the 12-inch main. If so, and Courtaulds North America, Inc. owns the existing 4-inch line and is the sole consumer of gas transported by that line, then the line would not be subject to the jurisdiction of Part 192.

We also have the following questions, each of which should be considered by the Commission before taking final action on the petition:

1. How would the public interest be served by the waiver?
2. What is the basis upon which the proposed waiver would not be inconsistent with gas pipeline safety?
3. If the waiver is granted, what alternative safety measures, if any, are needed for protection of the public?
4. What would be the impact on Courtaulds North America, Inc. if the waiver is not granted and its gas supply is odorized.

We appreciate this opportunity to comment on the proposed waiver. Should the Commission decide to grant the waiver, a record providing answers to the questions raised herein would facilitate our further review during the statutory 60-day notice period. As you know, the authority of a State agency under Section 3 of the Natural Gas Pipeline Safety Act of 1968 to grant waivers of compliance with the Federal gas pipeline safety standards is subject to the power of the Secretary of Transportation to stay the State's action granting a waiver by objecting in writing within 60 days

after receiving written notice of that action. Consequently, the comments herein, made in advance of final State action on the proposed waiver, are merely advisory and not in execution or derogation of the Secretary's authority regarding State waivers under Section 3 of the Act.

Sincerely,

*Original signed by
Joseph C. Caldwell*

Joseph C. Caldwell
Director
Office of Pipeline Safety

TES-34; LMFurrow; peg; 4/1/75

cc: TES-30, 32, 33, 34

File: Alabama
OPS #158