

STATE OF ALABAMA  
ALABAMA PUBLIC SERVICE COMMISSION  
STATE OFFICE BUILDING  
P.O. BOX 991  
MONTGOMERY, ALABAMA 36102

December 7, 1981

Mr. Mel Judah  
Acting Associate Director for  
Pipeline Safety Regulations  
Materials Transportation Bureau  
Department of Transportation  
400 Seventh Street, SW  
Washington, D.C. 20590

Dear Mr. Judah:

This Commission has been asked by Alabama Gas Corporation to grant a waiver of the odorization requirements of 49 C.F.R. paragraph 192.625 (1975).

We have reviewed the information submitted to us by Alabama Gas Corporation and have subsequently granted the requested waiver.

We respectfully ask that you review the enclosed information and concur with our actions. If you should have any questions or desire additional information, please advise.

Sincerely,

(signed)  
Billy Joe Camp, President

(signed)  
Lynn Greer, Associate Commissioner

(signed)  
Jim Folsom, Jr., Associate Commissioner

BJC/LG/JFjr/jd

Enclosures

STATE OF ALABAMA  
ALABAMA PUBLIC SERVICE COMMISSION  
STATE OFFICE BUILDING  
P.O. BOX 991  
MONTGOMERY, ALABAMA 36102

January 8, 1982

Mr. Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau  
Department of Transportation  
400 Seventh Street, SW  
Washington, D.C. 20590

Dear Mr. Judah:

The Commissioners have asked that I respond to your letter of December 29, 1981, regarding the waiver of odorization requirements granted Alabama Gas Corporation for their customer--Hunt Oil Company.

I have contacted Alabama Gas Corporation and asked them to submit further information concerning this line; this additional information is enclosed. This office has also made an investigation of this line and found that even though it is in a Class 3 location there are no residences or businesses in the area. It is also noted that for several years Southern Natural Gas Company, which is an interstate pipeline company, has operated an unodorized gas line that is only 10 feet from this line. Alabama Gas Corporation has established procedures to have this line leak surveyed each three months.

Considering the previous information submitted and the above further clarification, I can see no reason why this unodorized line would create a hazard to the public.

I hope you will see fit to concur with this waiver which the Commission has granted Alabama Gas Corporation. If you desire further information, please feel free to contact this writer.

Sincerely,

Larry E. Waldrop  
Administrator  
Gas Pipeline Safety

LEW/jd  
Enclosures

*Enclosure to the incoming letter dated 12/07/81*

STATE OF ALABAMA  
ALABAMA PUBLIC SERVICE COMMISSION  
STATE OFFICE BUILDING  
P.O. BOX 991  
MONTGOMERY, ALABAMA 36102

Mr. W.H. Donovan, Jr.  
Manager - Technical Services  
Alabama Gas Corporation  
1918 First Avenue, North  
Birmingham, Alabama 35295

Dear Mr. Donovan:

The Commission has reviewed the information you submitted to the Gas Pipeline Safety Office on November 25, 1981, requesting a waiver of the odorization requirements of 49 C.F.R. paragraph 192.625 (1975).

In view of the fact that your customer's (Hunt Oil Company) product would be adversely affected by the use of odorant in the gas provided them, and that this unodorized line would create no hazard to the public, we hereby grant Alabama Gas Corporation a waiver of the odorization requirements for this particular line.

Dated at Montgomery, Alabama, this the 11th day of December, 1981.

ALABAMA PUBLIC SERVICE COMMISSION

(signed)  
Billy Joe Camp, President

(signed)  
Lynn Greer, Associate Commissioner

(signed)  
Jim Folsom, Jr., Associate Commissioner

BJC/LG/JFjr/jd

*Enclosure to the incoming letter dated 12/07/81*

ALABAMA GAS CORPORATION  
BIRMINGHAM, ALABAMA

November 25, 1981

Mr. Larry E. Waldrop, Administrator  
Gas Pipeline Safety

Alabama Public Service Commission  
Post Office Box 991  
Montgomery, Alabama 36102

Dear Mr. Waldrop:

I am enclosing a copy of a letter dated November 17, 1981, from Hunt Oil Company in Tuscaloosa requesting that Alabama Gas Corporation furnish them unodorized gas for their new hydrogen unit. Gas provided by Alabama Gas to Hunt Oil is used as a feed stock for the production of hydrogen and, if odorized, can poison their catalyst. In order for us to comply with Hunt Oil's request, we respectfully request a waiver of the odorization requirements of 49 C.F.R. paragraph 192.625 (1975).

I am also enclosing a drawing of our recently constructed 4" steel pipeline designed to supply gas to Hunt Oil. Operating at 370 PSIG, the pipeline is approximately 1,000 feet in length from Southern Natural's No. 1 meter station to our Hunt Oil meter station. It is possible for us to provide unodorized gas for this pipeline by connecting it to a point on our facilities upstream of the point at which we inject odorant at the Southern Natural Gas Company meter station No. 1 in Tuscaloosa. No other customers, other than Hunt Oil, will be served by this pipeline.

The pipeline referred to above is located primarily on Hunt Oil's property and parallels Southern Natural Gas Company's pipeline, which also transports unodorized gas. This is a Class III area, as defined in 49 C.F.R. 192 (1975). The pipeline crosses under Sanders Ferry Road, a public street, owned and maintained by the City of Tuscaloosa.

The pipeline can be operated safely without odorization and, in light of the potential for poisoning Hunt Oil's catalyst, we respectfully request a waiver of the odorization requirements of 49 C.F.R. 192.625 (1975).

If additional information is required for consideration of this request, please advise.

Sincerely,

W.H. Donovan, Jr.  
Manager - Technical Services

WHDjr/db  
Enclosures  
cc: Hunt Oil Company

*For blueprint referenced as enclosure, see paper copy available in Office of Pipeline Safety file.*

*Enclosure to the incoming letter dated 12/07/81*

**HUNT OIL COMPANY**

**Sanders Ferry Road**

P.O. Drawer 1850

TUSCALOOSA, ALABAMA 35403

November 17, 1981

Alabama Gas Corporation  
1918 First Avenue, North  
Birmingham, AL 35295

Letter No. HAG-097

Attention: Mr. Paul Wildes

Subject: Odorant for our Hydrogen  
Unit feed gas

Dear Mr. Wildes:

The mercaptans which you put into your natural gas to odorize it contains sulfur. The purpose of the gas which we are purchasing from you is for primary feed to our Hydrogen Unit. The catalyst in our Hydrogen Unit will be poisoned if as little as one half of one ppm  $H_2S$  reaches it.

Since this gas is going to be used as feed gas and since your odorant will poison our catalyst, we respectfully request that you do not odorize it.

Thank you.

Best Regards,

HUNT OIL COMPANY

(signed)  
Ron Palculict  
Process Engineer

RIP:ddk

*Enclosure to the incoming letter dated 01/08/82*

ALABAMA GAS CORPORATION  
BIRMINGHAM, ALABAMA

January 6, 1982

Mr. Larry E. Waldrop, Administrator  
Gas Pipeline Safety  
Alabama Public Service Commission  
Post Office Box 991  
Montgomery, Alabama 36102

Dear Mr. Waldrop:

In accordance with your telephone request this morning, I am furnishing additional information on the pipeline we recently installed to serve the Hunt Oil Company in Tuscaloosa and for which we requested the waiver of odorization requirements.

1. This 4 1/2" O.D. steel pipeline is located on private property owned by Hunt Oil Company with the exception of 40 feet in the dedicated roadway of Sanders Ferry Road, a City of Tuscaloosa public street.
2. This pipeline has a total length of 1,060 feet. For 800 feet of this length, it is located parallel to and 10 feet away from a Southern Natural Gas Company high pressure natural gas pipeline which is transporting unodorized natural gas. Both of these lines are marked with pipeline markers.
3. This recently installed pipeline was built and tested in accordance with DOT regulations. It is a welded pipeline and all welds were inspected by X-Ray.
4. There are no residences located within one hundred yards of this pipeline. The only buildings located near the pipeline are the Southern Natural Gas Company meter station building and the office building of Hunt Oil Company.
5. We have established procedures to have this pipeline surveyed with a flame ionization leak detector each three months.
6. This pipeline is under cathodic protection.

The drawing I sent you with my letter of November 25 (copy enclosed) furnishes additional information regarding construction of the pipeline, test pressures, MAOP, and other details. Please let me know if we can be of further service at this time.

Sincerely,

(signed)

W. H. Donovan, Jr.,  
Manager - Technical Services

WHDjr/db  
Enclosure

cc: Mr. W.S. Wilson  
Mr. J.A. Martin  
Mr. R.F. Etheredge  
Mr. P.R. Wildes

*For blueprint referenced as enclosure, see paper copy available in Office of Pipeline Safety file.*

December 29, 1981

Ms. Lynn Greer  
Mr. Billy Joe Camp  
Mr. Jim Folsom, Jr.  
Alabama Public Service Commission  
State Office Building  
P.O. Box 991  
Montgomery, Alabama 36102

Dear Madam & Gentlemen:

We are considering your submission of a waiver from 49 CFR 192.625 granted the Alabama Gas Corporation for transportation of unodorized gas to its customer, Hunt Oil Company.

While it appears that the Corporation has a good reason for seeking relief from the odorization requirement due to the effect of H<sub>2</sub>S on the customer's processing unit, before making a decision on your request for concurrence, we would like more information about the safety impact of transporting unodorized gas. Essentially, we would like an explanation of the reasoning behind Mr. Donovan's statement in his November 25 letter that "[t]he pipeline can be operated safely without odorization. . ." and the Commission's finding in its December 11 response to him that "this unodorized line would create no hazard to the public." Since the pipeline is in a Class 3 area, we are particularly concerned about the methods of leak detection if smelling escaped gas is not possible or, alternatively, why a gas leak in the Class 3 area would not be hazardous.

Sincerely,

Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

cc: DMT-30, 31(2)  
DCC-1, B. R. file  
Files  
LMFurrow/tr/x62392: 12/29/81  
Control #: OPSR-115

February 1, 1982

Mr. Larry E. Waldrop  
Administrator, Gas Pipeline Safety  
Alabama Public Service Commission  
State Office Building  
P. O. Box 991  
Montgomery, Alabama 36102

Dear Mr. Waldrop:

In view of the information submitted by your letter of January 8, 1982, regarding the safety of Alabama Gas Corporation's proposal to transport unodorized gas to the Hunt Oil Company, we have no objection to the Commission's granting a waiver from 49 CFR 192.625 for that purpose, provided leak surveys are made on the line as promised by Alabama Gas.

Sincerely,

*Signature stamp on file copy*

Melvin A. Judah  
Acting Associate Director for  
Pipeline Safety Regulation  
Materials Transportation Bureau

cc: DMT-30, 31(2)  
DCC-1, B. R. file  
File: Alabama State Waiver File  
LMFurrow/tr/x62392: 1/28/92  
Control #: OPSR-6