

**Research and  
Special Programs  
Administration**

July 27, 1995

Mr. Terry Fronterhouse  
Chief, Pipeline Safety  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Dear Mr. Fronterhouse:

This is in response to your letter of May 23, 1995, in which you seek the Research and Special Programs Administration's (RSPA) Office of Pipeline Safety approval of a waiver for Southwest Gas Corporation (SWG), for a planned gas system main installation in a residential area located in Tucson, Arizona. Your letter advises that the Arizona Corporation Commission has granted SWG a waiver to the requirement of 49 CFR §192.327(b) for two sections (approximately 230 feet each) of the main. You describe that SWG is planning to insert plastic pipe through two sections of existing 2-inch steel (installed in 1954) buried less than 24 inches of minimum cover requirement. You further describe that these sections of main are located on a steep hill in easements that will experience minimal foot traffic, no vehicular traffic, and that both sections are located under shrubs and hard/rocky soil. Also, during a telephone conversation on July 20, 1995, with Mr. Mike Israni of my staff, you said that a warning marker showing the location of the pipeline already exists at the planned site. Your review of SWG's plans and a field inspection of the planned installation site has convinced your office that there is no compromise for safety in the granting of this waiver. Based on the reasons presented in your grant of waiver, and the information provided to us, RSPA does not object to the grant of a waiver from 49 CFR §192.327(b) as specified under the waiver request.

Sincerely,

Cesar DeLeon  
Deputy Associate Administrator  
for Pipeline Safety