

July 22, 1996

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

Dear Mr. Fronterhouse:

We have considered your letter of May 23, 1996, notifying us that the Commission's Office of Pipeline Safety has granted Graham County Utilities, Inc., a waiver from 49 CFR 192.707(c). This regulation requires operators to place and maintain line markers along each section of a main and transmission line that is located aboveground in an area accessible to the public. The waiver allows Graham County Utilities, Inc., to avoid marking certain aboveground portions of mains serving multi-meter manifolds used to deliver gas to customers not in master meter systems.

The aboveground portions of mains are similar to service risers that do not come under the marking regulation. In view of this similarity and your conclusion that the absence of markers will not jeopardize public safety, we have no objection to the waiver.

Sincerely,

Richard B. Felder
Associate Administrator
for Pipeline Safety

B. Furrow:brw,(202)366-4395;7/8/96
CC: DPS-1,2,10,20, Region
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