

October 17, 1972

Mr. Delbert L. Boyer  
Engineer  
Wyoming Public Service Commission  
Supreme Court Building  
Cheyenne, Wyoming 82801

Dear Mr. Boyer:

By your letter of June 20, 1972, you gave written notice to this office that the Wyoming Public Service Commission granted the Cheyenne Light, Fuel, and Power Company a waiver from Section 192.625 of Title 49 of the Code of Federal Regulations. The commission action was taken pursuant to Section 3(e) of the Natural Gas Pipeline Safety Act of 1968 (49 U.S.C. 1672 (e) providing that a State agency, under a Section 5(a) certification, may waive compliance within safety regulation, subject to objection by the Department of Transportation.

Section 192.625 requires that combustible gases in mains and service lines be odorized in accordance with certain standards there set forth. In order to evaluate the effect of a waiver from this section on public safety, this office asked a number of questions to which you responded on September 15, 1972. Based on the additional information given in your answers, it appears that the lines supply a single industrial consumer, and are located in a rural area, coated and cathodically protected, and are well maintained with a small number of leaks experienced. In addition, the leak survey schedule for these lines exceeds the Federal requirement.

The information available supports a determination that a waiver of compliance with Section 192.625 is not inconsistent with gas pipeline safety. Therefore, the Office of Pipeline Safety does not object to the granting of the waiver to the Cheyenne Light, Fuel and Power Company.

Sincerely,  
SINGED  
Joseph C. Caldwell  
Director  
Office of Pipeline Safety

The State of Wyoming  
Public Service Commission  
Supreme Court Building  
Cheyenne, Wyoming 82001

September 15, 1972

Mr. Joseph C. Caldwell Director  
Office of Pipeline Safety  
Washington, D.C. 20590

Re: Cheyenne Light, Fuel & Power Company's request for waiver of the odorization requirement on two service lines to Wycon Chemical Company.

Dear Mr. Caldwell:

Please find enclosed a Xerox copy of a letter of transmittal from Cheyenne Light, Fuel & Power Company which contained the data requested in your letter of July 20, 1972.

Should you need any additional information concerning the above request for waiver by Cheyenne Light, Fuel & Power Company, please do not hesitate to call on us.

Sincerely,  
Delbert L. Boyer  
Engineer

Cheyenne Light, Fuel and Power Company  
P.O. Box 1409  
Cheyenne, Wyoming 82001

September 14, 1972

Mr. Delbert L. Boyer, Commission Engineer  
Public Service Commission of Wyoming  
Cheyenne, Wyoming

Attention: Mr. Jon F. Jacquot  
Pipeline Safety Engineer

Re: Waiver on odorization of gas to Wycon Chemical

Dear Mr. Jacquot:

In accordance with your request to furnish additional information on the above referenced subject, we herewith submit a detailed tabulation of data.

Each question proposed by DOT is listed and answered for each segment of the various sizes of; pipe involved.

Thank you for your assistance in processing our request for waiver.

Yours very truly,  
L. W. Supanci.  
Superintendent

ADDITIONAL INFORMATION

For Cheyenne Light, Fuel & Power Co. request for waiver of odorization of natural gas to . Wycon Chemical Company

	6"	6"	8"	10"	16"
Length of Line, miles	8.2	2.5	3.2	1.1	7.2
Question #					
1. Number of occupied buildings? How Close?	None	None	3 400'	3 400'	1 500'
2. Age of line? Mechanical coupling joints? Gas or arc welded?	1926 None arc	1964 None arc	1967 None arc	1967 None arc	1947 None arc
3. Is line coated with effective protection coating?	yes	yes	yes	yes	yes
4. Is the line effectively cathodically protected? Method used to provide protection current	yes	yes	yes	yes	yes
-----Magnesium Anodes-----					
5. Normal cover Shallow Above ground Crossings 60' Total	30-36" None 2 channel	36" None None	36" None None	30-36" None None	30-36" None None
6. Operational experience  Leaks, Breaks, etc.	None  Since purchase 1964	None  None	3 small leaks 1967-1968	None	None  Since Purchase 1964
7. Replacement or rehabilitation record	Replaced for Highway Construction .079 mi. 1957 .974 mo. 1962 Rehabilitated .088 mi 1951 .588 mi. 1953 1.19 mi. 1959 2.687mi. 1962	None	None	None	None
8. Surveillance Schedule	-----visual check monthly-----				
9. Leak survey schedule Date of latest leak survey	-----annual-----				
	3-23-72	4-16-72	7-24-72	4-24-72	3-30-7

July 20, 1972

Mr. Delbert L. Boyer  
Wyoming Public Service Commission  
Supreme Court Building  
Cheyenne, Wyoming 82001

Dear Mr. Boyer:

This is a further response to your letter of June 20, 1972, concerning Cheyenne Light, Fuel and Power Company's request for waiver of the odorization requirements on two service lines to Wycon Chemical Company.

In order to evaluate the affect of this waiver on public safety, we request the following additional information:

1. Are there any occupied buildings within the class location zone as covered in 49 CFR Section 192.5 Class location, and if so, how many and how close?
2. What is the age of the line? Were the joints made by mechanical couplings, gas welding or arc welding?
3. Is the line coated with an effective protective cating?
4. Is the line effectively cathodically protected? What method is used to provide cathodic protection current?
5. What is the normal amount of cover? If there are portions of the line that are exceptionally shallow or above ground, what is the extent of such sections?
6. What has been the operational experience on the line leaks, breaks, etc.?
7. What has been the record of replacement or rehabilitation work?
8. What is the surveillane schedule on the lines?
9. What is the leak survey schedule on the lines? When was the latest leak survey conducted?

This information will greatly assist us in making an evaluation of this particular situation.

The effective date of this waiver shall be deferred until 30 days after receipt of this requested information.

Sincerely,  
Original signed by:  
Joseph C. Caldwell  
Director  
Office of Pipeline Safety

United States Government  
Department of Transportation  
Office of the Secretary

DATE: July 7, 1972

SUBJECT: Project No. 38-2-Waiver of Section 192.625 Odorization of gas, for Cheyenne Light, Fuel and Power Co.

FROM: Paul Cory

TO: Chief, Technical Division

Since Wyoming did not require that transmission lines be odor [zed in the past I don't believe that this waiver was necessary, but with the effective date of the extension of time about to run out I suppose they are just playing it safe.

I can see no reason for our objecting to this waiver. It is in an area that from the description they give sounds even more remote than the waiver that Indiana granted in a similar case and we did not object.

Our proposed NPRM on odorization would take care of this problem.

July 3, 1972

Mr. Delbert L. Boyer  
Wyoming Public  
Service Commission  
Supreme Court Building  
Cheyenne, Wyoming 92001

Dear Mr. Boyer:

This will acknowledge receipt of your letter dated June 20, 1972, regarding granting of a waiver of Section 192.625 to Cheyenne Light, Fuel and Power Company.

We will review the information submitted on this matter and let you know of the results of this review within 45 days.

Sincerely,  
SIGNED  
Joseph C. Caldwell  
Director  
Office of Pipeline Safety

The State of Wyoming  
Public Service Commission  
SUPREME COURT BUILDING  
CHEYENNE. WYOMING 82001

June 20, 1972

Mr. Joseph C. Caldwell  
Director  
Office of Pipeline Safety  
Washington, D.C. 20590

Dear Mr. Caldwell:

Please find enclosed a copy of Cheyenne Light, Fuel & Power Company's request for waiver of odorization to serve Wycon Chemical Company natural gas without odorization as required under §192.625, Title 49, of the Transportation of Natural and Other Gas by Pipeline; Minimum Federal Safety Standards and supporting information.

I have also enclosed a letter from the Commission to Cheyenne Light, Fuel & Power Company showing that the Wyoming Public Service Commission has jurisdiction of this intrastate operation and that they did grant their request for waiver.

Sincerely,  
DELBERT L. BOYER  
Engineer