

US Department of Transportation  
Research and Special Programs Administration  
400 Seventh Street, S.W  
Washington, D.C. 20590

APR 17, 2000

G. Joel Tierney  
Utilities Engineer  
Utility Division  
Montana Public Service Commission  
P.O Box 202601  
Helena, MT 59620-2601

Dear Mr. Tierney:

We have considered your letter of March 6, 2000, notifying us the Commission granted the Montana-Dakota Utilities Co., two waivers from compliance with gas pipeline safety standards in 49 CFR Part 192. Each waiver permits the operator to use anodeless risers to bring plastic pipe above ground in the circumstances described below.

The first waiver concerns distribution lines that transport gas from mains through meter manifolds to more than one customer. The waiver reclassifies these lines from "mains" to "service lines" under the definitions in § 192.3. As service lines, anodeless risers can be used under § 192.375(a) to connect the lines to the manifolds.

The second waiver concerns plastic mains that transport gas from farm tap facilities to more than one customer. The limitation in § 192.321(a) against installing plastic mains above ground is waived so that anodeless risers can be used to connect the mains to the farm tap facilities.

We believe that each waiver is consistent with acceptable usage of anodeless risers and will not diminish the level of public safety. Therefore, we have no objection to the waivers.

Sincerely,  
Richard B. Felder  
Associate Administrator for Pipeline Safety