



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

MAY 1 2009

Ms. Lucy Baxley
President
Alabama Public Service Commission
P. O. Box 304260
Montgomery, Alabama 36130-4260

Dear Ms. Baxley:

Pursuant to 49 U.S.C. 60118(d), the Pipeline and Hazardous Materials Safety Administration (PHMSA) has reviewed your letter of March 3, 2009, notifying us that the Alabama Public Service Commission, is granting a waiver of 49 CFR 192.625 to Alabama Gas Corporation (AGC) allowing a new 12" steel line located entirely on the grounds of a facility owned by the Hunt Oil Company to be operated without odorization. This regulation was adopted by Alabama pursuant to Article 3, Chapter 4 of Title 37, Code of Alabama.

The Commission's grant of the waiver is conditioned on AGC's compliance with six specific requirements listed in your letter. Based on these conditions, PHMSA does not object to the waiver of § 192.625 for the specified line.

If you wish to discuss this special permit or any other pipeline safety matter, my staff would be pleased to assist you. Please call John Gale, Director of Regulations at 202-366-0434 for regulatory matters or Alan Mayberry, Director of Engineering and Emergency Support at 202-366-5124 for technical matters.

Sincerely,

William Hunt
for

Jeffrey D. Wiese
Associate Administrator for Pipeline Safety

MAR 06 2009



STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
P.O. BOX 304260
MONTGOMERY, ALABAMA 36130-4260



GAS PIPELINE SAFETY

LUCY BAXLEY, PRESIDENT
JAN COOK, ASSOCIATE COMMISSIONER
SUSAN D. PARKER, PH.D, ASSOCIATE COMMISSIONER

WALTER L. THOMAS, JR.
SECRETARY

Mr. Jeffrey D. Wiese
Associate Administrator for Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Second Floor, East Building
Washington, DC 20590

Dear Mr. Wiese:

This Commission has been asked by Alabama Gas Corporation, 605 Richard Arrington, Jr. Boulevard North, Birmingham, Alabama 35203-2707, Phone: (205) 326-8177, to grant a waiver of the odorization requirements of 49 Code of Federal Regulations (CFR) paragraph 192.625 (2003).

We have reviewed the information submitted to us by Alabama Gas Corporation and have subsequently granted the requested waiver. This waiver was granted on the following provisions submitted by Alabama Gas Corporation:

1. The line will be installed, welded and tested according to CFR Part 192 requirements.
2. The line will be located on private property owned by Hunt Oil Company. (Sanders Ferry Road, formerly a Tuscaloosa public street, has been vacated and no longer has public access.)
3. The class location is 3. The only structures within 220 yards of the pipeline are industrial warehouse type facilities and Hunt Oil's office building which is within 100 yards. There are no residences located within 220 yards of the line. No customers other than Hunt Oil will be served off this line.
4. The line will be marked with pipeline markers and will fall under Alabama Gas Corporation's damage prevention program.
5. After installation, the line will be surveyed with flame ionization equipment every three months.
6. The line will be under cathodic protection.


This is a new 12" steel line which will replace an existing 4" steel line that has been in service since 1982. The existing line has been under a waiver for non-odorization

since its installation. All of the previous information regarding this waiver can be found on *WinDOT* under paragraph 192.625, dated February 1, 1982.

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.

Dated at Montgomery, Alabama, this 3rd day of March, 2009.

Sincerely,



Lucy Baxley, President



Jan Cook, Associate Commissioner



Susan D. Parker, PHD, Associate Commissioner

WRJsr.jsm

cc: Mr. Mike Swinson

File

ms. Linda Daugherty

Mr. Don Martin