

March 8, 1971

Mr. E. W. Ekroot
Manager, Gas Division
Department of Water & Gas
City of Duluth
414 West First Street
Duluth, Minnesota 55802

Dear Mr. Ekroot:

This is in reply to your letter of February 25, 1971, concerning the application of 49 CFR, Section 191.5 to your department of water and gas which has less than 100,000 customers.

The exception to the reporting requirements for companies with 100,000 or less customers contained in Section 191.9 applies only to the written leak report requirements of that section. Therefore, you are required to make telephonic reports where they are indicated under Section 191.5.

We hope this answers your question, and if you have other do not hesitate to ask.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety