

March 24, 1971

Mr. Paul M. Heim  
Assistant Vice President  
Heath Consultants Incorporated  
Zero Laurel Avenue  
Wellesley Hills, Massachusetts 02181

Dear Mr. Heim:

In reply to your letter of December 23, 1970, 20-day written reports are required only as specified in Section 191.9. As stated in Paragraph 191.9(a)(2), when a repair is made on an emergency basis and requires other emergency action to protect the public, such as evacuation of a building, blocking off an area, or rerouting traffic, a 20-day written report is required.

Unless such additional measures are taken to protect the public, a 20-day report is not required. These 20-day reports are required only from operators having more than 100,000 customers in their system.

You are correct in the assumption that operators having either more or less than 100,000 customers must report leaks in their annual report.

The "C" classification that you speak of is purely an industry classification that may or may not require reporting to the Office of Pipeline Safety.

I trust this information answers your questions and apologize for the delay in answering your letter.

Sincerely,

Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety