

Mr. B. H. Lord, Director
Division of Transportation
American Petroleum Institute
1801 K Street, N. W.
Washington, D. C. 20006

Dear Mr. Lord:

This is in reply to the petition for reconsideration filed by the American Petroleum Institute on October 26, 1970. That part of the petition which requested the inclusion of API Standard 6A in Section 192.145(a) of the Minimum Federal Safety Standards, was favorably acted upon by the spot amendment, issued on November 10, 1970. However, no action has been taken on the request for modification of Section 192.615(d), which requires that each operator shall establish an educational program to enable customers and the general public to recognize and report a gas emergency to the appropriate officials.

No change in Section 192.615(d) is contemplated at this time. In our view, the objections of the American Petroleum Institute are not sufficient, since the language of this Section is sufficiently general to allow for the operational differences between gathering lines, transmission companies and distributors. The nature of the "educational program to enable customers and the general public to recognize and report a gas emergency to the appropriate officials" is not specified, and may, of course, vary according to the circumstances of the individual operator. What is intended is that ledge of how to recognize a possible gas emergency and what authority to notify promptly.

It was certainly not intended, as suggested in the petition, that "a gatherer with a few miles of jurisdictional gathering lines would be required to spend the same amount of money and effort as would a large transmission company or distribution company with thousands of miles jurisdictional lines."

Although the customers of gathering lines are, as argued in the petition, usually transmission companies, that is not always the case, the moreover, even on gathering lines emergencies may occur which effect the public as well as customers. For that reason, the request that operators of natural gas gathering lines be exempted from the requirements of Section 192.615(d) is denied.

We agree, however, with your suggestion that the efforts of each operator shall be related to the size of his operations, and that the required educational programs may be organized and carried out by the operators jointly through trade associations representing the various segments of the

natural gas pipeline industry, cooperating with each other to avoid "duplication of effort" and conflicting instructions.

We hope this answers all your requests for clarification, and if we can be of further assistance, please let us know.

Sincerely,
/Signed/

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety