

PI-71-0100

January 7, 1971

Mr. E. L. Lohmann
Vice President
Pennsylvania & Southern Gas Co.
103 S. Elmer Avenue
Sayre, PA. 18840

Dear Mr. Lohmann:

The interpretation you have made of 49 CFR, Section 191.11 is correct. Lines operating at or over 20% SMYS must be reported on Form F 7100.1-1.

You are also correct in that you must report each of your four systems separately as covered in 49 CFR, Section 191.7.

As requested, 30 copies of each form and four copies of each of the instructions are enclosed.

Thank you for your interest in the pipeline safety program.

Sincerely,
SIGNED
Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Pennsylvania & Southern Gas Company
103 So. Elmer Avenue
P.O. Box 188
Sayre, Pennsylvania 18840

December 22, 1970

Mr. Joseph C. Caldwell, Deputy Director
Office of Pipeline Safety
Department of Transportation
Washington, D. C. 20590

Re: Part 191 - Reports of Leaks

Dear Mr. Caldwell:

We received today the following items from your office:

1 copy - Instructions for Completing DOT Form F 7100.1-1

1 copy - Instructions for Completing DOT Form F 7100.2-1

1 copy - Form F 7100.2-1

There was no copy of form F 7100.1-1 included. We assume that this form was missed in the mailing.

Our Company is basically in gas distribution. We have, however, some lines operating over 20% of SMYS. Our interpretation of Part 191.11 is that we must report on both forms. We also operate in four different states, namely New York, Pennsylvania, Maryland and North Carolina. We assume that we must report each system separately either to the respective state or to your office. Please advise.

A supply of 30 of each of these forms and 4 copies of each of the instruction sheets would be greatly appreciated.

Thank you.

Very truly yours,
Pennsylvania & Southern Gas Company
E.L. Lohmann, Vice President