

PI-72-0103

2/14/72

Mr. A. A. Burkard
Regional Skelgas Sales & Safety Engineer
Skelly Oil Company
6000 Douglas Avenue Building
Des Moines, Iowa 50322

Dear Mr. Burkard:

This will acknowledge receipt of your letter of January 31, 1972, and my telephone conversation with your Mr. Kelly on February 4, 1972.

As I advised Mr. Kelly over the telephone, amendment 192.11 of Title 49 of the Code of Federal Regulations issued on January 21, 1972, relieves the operators of petroleum gas systems serving less than 100 customers from the requirement of submitting an annual report for 1971.

If you have any further questions regarding this matter, please contact us.

Sincerely,
Cesar DeLeon
Operation & Compliance Officer
Office of Pipeline safety

Skelly Oil Company
Marketing Department Central Region
6000 Douglas Avenue Building
Des Moines, Iowa 50322

January 31, 1972

Office of the Secretary of Transportation
Washington, D. C.

Attention: Cesar DeLeon
Operation and Compliance
Officer Office of Pipeline Safety

Dear Sir:

Your letter of January 12, 1972, to Mr. Mel Field at 4502 Leavenworth, Omaha, Nebraska, has been referred to me.

I have been wondering how you intend for us to use your forms concerning distribution lines when you are dealing in miles and miles of gas lines. Our problem is that we do have a few trailer courts piped up to one or more 1,000 gallon propane tanks and the most pipe we would have in the ground at any one location probably would be 3,000 feet. All your forms ask for how many miles. Our systems are all covered pipe and are protected with anodes, and the only pressure we run in the systems is 10 psi.

If you need all this information, why can't you provide us with a form that fits our needs? A fraction of one mile is not going to provide you with much information unless your only interest is to compile statistics.

May I hear from you soon so that we can meet your February deadline?

Yours truly,
A. A. Burkard
Regional Skelgas Sales &
Safety Engineer