February 24, 1971

Mr. D. J. Hendrickson Chief, Utility Safety Section Indiana Public Service Commission 901 State Office Building Indianapolis, Indiana 46204

Dear Mr. Hendrickson:

This is in reply to your letter of February 11, 1971, concerning the interpretation of 49 CFR, Section 191.5(2) requiring telephonic notice of a leak that required the taking of any segment of transmission pipe out of service.

You described a situation where a short length of pipe is intentionally by-passed, so that it may be replaced.

Under ordinary circumstances such as occurrence would not result in a "leak" which we have interpreted as meaning an unintended escape of gas. Therefore, when a segment is intentionally removed from service there is no leak which requires reporting.

We hope this answers your question. If you have further questions, do not hesitate to ask.

Joseph C. Caldwell Director, Acting Office of Pipeline Safety