

Mr. Gerald Pohlman  
Great Plains Gas  
National Propane Corporation  
P. O. Box 2067  
Cedar Rapids, Iowa 52406

Dear Mr. Pohlman:

This is in reply to your letter of March 12, 1971, stating that it is your understanding that the Minimum Federal Safety Standards require that DOT Form F-7100-1 be filed by "anyone servicing more than then individual living quarters, such as trailer courts."

The operator of the trailer court is an "operator...transport (ing) petroleum has in a system that serves ten or more customers," under Section 192.11 of these regulations, and as such is subject to all the requirements of the regulations, including those for reporting.

You also ask whether the regulations apply to a motel of ten or more separate units, where each unit has its own service line feeding from a common main which, in turn, is supplied from a single storage tank, either with one meter serving all units, or alternatively. with a separate meter at each unit.

From the safety viewpoint, there is no difference between the trailer court operator and the motel operator, and the regulations apply in both instances.

If we can be further assistance, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety