

March 26, 1975

Mr. T. K. Spalding, Director  
Gas Pipeline Safety Division  
State of West Virginia  
Public Service Commission  
Charleston, West Virginia 25305

Dear Mr. Spalding:

This responds to your letter of March 11, 1975, asking whether Mr. Ralph Kirtley of the Shawkey Gas Company is required to file an Annual Report under 49 CFR Part 191 for the Shawkey system.

Based on the information furnished, it appears that Mr. Kirtley is operating a distribution system, not a "gathering" system in a rural area which is exempt from the reporting requirements. As a consequence, he is required to file an Annual Report in compliance with 49 CFR 191.11(a).

A copy of the requisite Form DOT F 7100.1-1 is enclosed for use in filing the report.

This Office recognizes the difficulty in this situation, and is reviewing the problems of small operators in filing reports required under Part 191.

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

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety