

April 26, 1974

Mr. Robert Bruflat
Kentucky Public Service Commission
P.O. Box 496
Frankfort, KY 40601

Dear Mr. Bruflat:

In a telephone conversation with Mr. Furrow of this office on April 5, 1974, you asked whether gas leaks caused by natural disasters, such as tornadoes, must be reported under the requirements of 49 CFR Part 191.

Under 49 CFR Part 191, all gas leaks which are unintended by the operator and require immediate or scheduled repair must be reported as prescribed. There is no exception to the reporting requirements for leaks caused by natural disasters. In fact, Part B of the written leak report forms provides a square to check for leaks caused by earthquakes, landslides, and washouts, which may be characterized as natural disasters. Leaks caused by tornadoes or other disasters must be noted next to the square marked "other." We recognize, however, that individual reports of numerous leaks caused by a catastrophe would not be in keeping with the purpose of Part 191. In this situation, a single telephone call or a single written report summarizing with respect to all leaks the information required to be reported would be sufficient.

We trust this satisfactorily answers your question.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety