

April 2, 1974

Mr. Fred J. Collins
Manager, Right of Way Department
Colonial Pipeline Company
3390 Peachtree Road, N.E.
Lenox Towers
Atlanta, GA 30326

Dear Mr. Collins:

This refers to your letter of March 6, 1974, concerning Section 195.410, placement of line markers. Specifically you requested our review and advice concerning five water crossings, and possible consideration for waiver.

Section 195.410 requires each carrier to place and maintain line markers over each buried line in sufficient number so that its location is accurately known. Also, line markers placed on each side of a navigable waterway crossing must have the additional words, "Do Not Anchor or Dredge." If the water crossing is not a navigable waterway crossing, then a normal line marker placed on each side of the crossing will satisfy Section 195.410.

The Office of Pipeline Safety does not give preliminary opinions as to whether particular circumstances present sufficient grounds for a waiver. Therefore, we are returning your plats covering the Elizabeth and Raritan River, Rancocas and Raccoon Creeks, all in New Jersey, and the Nansemond River located in Virginia.

To determine if a waiver should be granted in accordance with 49 CFR, Part 5, the carrier should show why Section 195.410 is not appropriate, why the public interest would be served, and a discussion of the basis upon which the proposal would not be inconsistent with liquid pipeline safety.

The requirement to mark the location of pipelines is considered an essential part of our program to reduce the number of accidents on pipeline systems and thus improve public safety.

If we may be of any further assistance to you in this matter, please advise.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Enclosure