

October 7, 1974

Mr. Clarence J. Yablonski
Director of Safety
Sun Pipe Line Company
General Washington Building
216 Goddard Boulevard
King of Prussia, PA 19406

Dear Mr. Yablonski:

This responds to your letter of June 21, 1974, concerning the practice of marking pipelines installed in a common trench. You state that four pipelines (both liquid and gas pipelines) are in the trench which varies in width from 6 to 10 feet. Currently, markers are installed at each edge of the trench so that a pipeline is no more than 5 feet away from a marker. You ask whether this practice complies with 49 CFR 195.410.

Section 195.410(a) requires carriers to place and maintain line markers "over each" buried liquid line at certain locations. From the information you have provided, it is unclear whether a marker is "over each" liquid line. The only pipelines which would be marked as required are the ones at each side of the trench, but you do not state whether these lines carry liquid or gas. Any liquid line which lies in between the pipelines at each side of the trench does not have a marker over it, and consequently, is not marked in accordance with section 195.410(a).

Moreover, neither the existing nor the proposed line marking signs display the word "petroleum" or name the commodity transported, as required by §195.410(a)(2).

With respect to the gas pipeline in the trench, placement of the markers as you have described is in accordance with 49 CFR 192.707, presuming the gas pipelines are transmission lines. You should note, however, that this rule is the subject of a notice of proposed rule making published in the Federal Register on May 25, 1972, a copy of which is enclosed. As a result of this proceeding, we expect to revise section 192.707 in the near future. If a final rule is adopted as proposed, a line marker would be required over each gas main or transmission line, similarly as required for liquid lines. Also, the words "Warning Gas Pipeline" would be required on each line marking sign. This

latter proposed requirement should be of concern to you because neither your current signs nor the signs you intend to purchase bear the word "gas."

We appreciate your concern for pipeline safety.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety