

April 2, 1991

The Honorable E. Thomas Coleman
U. S. House of Representatives
2468 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Coleman:

Your recent inquiry transmitted a letter from your constituent, Lana Fowler, to our Office of Congressional Affairs. Ms. Fowler, President of the Hidden Lake Homes Association, explained therein that Williams Pipe Line Company (Williams) had installed white plastic marker poles in her neighborhood to identify the location of petroleum pipelines. The Association proposes to replace the marker poles with markers flush with the ground.

The markers identify the location of four pipelines in a single corridor that traverse the neighborhood. They carry gasoline, jet fuel, and home heating oil. The federal regulation (49 CFR 195.410) referred to by Ms. Fowler requires operators such as Williams to mark the presence of pipelines carrying these products by using signs or other objects. The particular type or size of marker is not specified in the regulation, but is left to the operator's discretion provided the objectives of the rule - to warn others of the presence of underground pipelines and to provide an emergency telephone number - are carried out. The importance of pipeline markers was recognized by Congress in 1988 in the Pipeline Safety Reauthorization Act when the destruction or removal of pipeline markers was made subject to criminal penalties.

Although the flush markers recommended by Ms. Fowler may technically be permissible under the pipeline safety regulations, we do not encourage their use because they can become obscured by snow, debris, or vegetation. I believe the most effective alternative would be an above ground marker that conveys the required information, but in an aesthetically pleasing manner. Hopefully, this can be worked out in discussions between Ms. Fowler's homeowner's association and Williams.

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

Sincerely,

Travis P. Dungan