

Mr. Tony J. Finneman  
Montana-Dakota Utilities Co.  
400 North Fourth Street  
Bismarck, ND 58501

Dear Mr. Finneman:

I am responding to your letter of September 16, 1991, and December 13, 1991, regarding the line marking requirement for gas pipelines in §192.707 (d) (1). You asked if Class 3 locations and Class 4 locations may be considered "heavily developed urban areas" under §192.707 (d) (1).

In Part 192 the terms "Class 3 location," "Class 4 location," and "heavily developed urban areas" are categorizations of population density. Although "Class 3 location" and "Class 4 location" are defined in §192.5, Part 192 does not define "heavily developed urban areas."

All Class 4 locations - places where building four or more stories in height are prevalent - are included in the term "heavily developed urban areas." Buildings of four or more stories normally are prevalent only in such areas.

The definition of "Class 3 location" does not necessarily indicate that the location is in a heavily developed urban area. Yet the definition could encompass such areas, depending on the circumstances. We consider the surroundings of a Class 3 location to decide if all or part of it is a heavily developed urban area for purposes of §192.707 (d) (1).

I am sorry we were not able to answer your September letter sooner. Please call me if you would like to discuss this topic further.

Sincerely,

Cesar De Leon  
Director, Office Pipeline  
Safety Regulatory Programs