

Mr. Scott Collier
Director, Engineering Services
Columbia Gulf Transmission Company
P. O. Box 683
Houston, TX 77001-0683

Dear Mr. Collier:

We have reviewed your letter of April 9, 1991, regarding three segments of gas pipelines in Rowan County, Kentucky that pass within 100 yards of an Outdoor Field Study Area used by the Rowan County School System. You asked if these pipeline segments are in a Class 3 location as defined by 49 CFR 192.5(d)(2).

Section 192.5(d)(2) defines a Class location as follows:

An area where the pipeline lies within 100 yards of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period (The days and weeks need not be consecutive).

From the information you provided in your letter and in a conversation with Jack Willock of this office, it appears that the Outdoor Field Study Area is not occupied at least 5 days a week for any period of the year. Therefore, the pipeline segments are not in a Class 3 location under §192.5(d)(2).

Sincerely,

Cesar DeLeon
Director of Pipeline Safety
Regulatory Programs