ENERGY TRANSFER
Transwestern Pipeline Company

Determining High Consequence Areas

Code Reference :	Procedure No.: J.01	
49 CFR: 192 Subpart O, 192.903, 192.905, and 192.947	Effective Date: *November 14, 2008*	Page 1 of 16

1.0 Procedure Description

This Standard Operating Procedure (SOP) describes the requirements for identifying locations meeting the requirements of a High Consequence Area (HCA) through routine operation and maintenance activities, such as surveillance activities and data analysis. The procedure also identifies a process for review of mitigative strategies to eliminate the potential existence of an HCA.

2.0 Scope

This SOP defines HCA and identified sites as well as the requirements used to determine an HCA and its boundaries as defined by federal regulations. Areas defined as an HCA are subject to increased inspection, more rigorous repair criteria, and an accelerated time period for when repairs are made.

3.0 Applicability

This SOP applies to all pipelines operated by the company that are identified as either an HCA or a non-HCA.

4.0 Frequency

Annually: Run IRAS application.
As required: Investigate structures and open areas in accordance *SOP B.13 Survey Requirements for Class Location and HCA Determination.*

5.0 Governance

The following table describes the responsibility, accountability, and authority of the operations described in Section 7.0 of this SOP.

Function	Responsibility	Accountability	Authority
Surveillance for Determination of HCA	Asset Management Team	Asset Management Team	Operations Manager
Update GIS Structure Table	GIS Analyst	GIS Analyst	Principal Engineer
IRAS Application	Technical Specialist Compliance	Technical Specialist Compliance	Principal Engineer
HCA Reviews	Pipeline Integrity Engineer	Pipeline Integrity Engineer	Principal Engineer
Field Verification	Asset Management Team	Asset Management Team	Pipeline Integrity Engineer
Mitigation Consideration	HCA Review Committee	HCA Review Committee	Director Technical Services
Reduction in MAOP	Gas Control and Marketing	Gas Control and Senior VP of Operations	Gas Control and VP of Marketing
Removal of Structures and/or Identified Sites	Right-of-Way Manager	Right-of-Way Manager	Right-of-Way Manager

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6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *A.01 Glossary and Acronyms*.

Terms	Definitions
Confined Person	A person who is held or physically restrained within a location, so that his free will movement is prevented.
Difficult to Evacuate Person	A person who under normal circumstances would have difficulty removing themselves from a location without assistance from another person, or if during an evacuation would be expected to move at a significantly slower speed than a reasonably able person would move.
Evidence of Use	An outdoor site which is reasonably marked as a congregation point or is determined to be significantly used through study, interview, or observation (a site used by 20 or more people for 50 days in a 12 month period is reasonably expected to show noticeable indications of this intensive use; if these indications are not present the "evidence of use" will be determined not to exist).
Facility	A commercial facility.
HCA Review Committee	The committee charged with: • Sr. Vice President of Operations • Director of Technical Services • Pipeline Integrity Engineer • Principal Engineer Codes and Compliance • Director of Gas Control
NOTE: At the present time the company has elected to apply only method (2) to establish HCAs on pipeline facilities.	
High Consequence Area (HCA)	An area established by one of the methods described in paragraphs (1) and (2) as follows: (1) An area defined as: • A Class 3 location • A Class 4 location or Any area in a Class 1 or Class 2 location where the potential impact radius is greater than 660 feet (200 meters), and the area within a potential impact circle contains 20 or more buildings intended for human occupancy; or • Any area in a Class 1 or Class 2 location where the potential impact radius contains an identified site. (2) The area within a potential impact circle containing: • 20 or more buildings intended for human occupancy, unless the exception in paragraph (4) applies; or an identified site.

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	Where a potential impact circle is calculated to establish a high consequence area, the length of the high consequence area extends axially along the length of the pipeline from the outermost edge of the first potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy to the outermost edge of the last contiguous potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy. This procedure assumes the use of the definition for HCA as detailed in method (2) as defined in *49 CFR: 192 Subpart O 192.903*. At the discretion of the Director of Technical Services, the definition as detailed in method (1) may be used, but it will be so noted in the HCA database. At the present time the company has elected to apply only method (2) to its pipeline facilities
Identified Site	• Means one of the following structures, buildings, or outside areas that is known to public officials with safety or emergency response or planning responsibilities or is visibly marked (e.g. a sign), is licensed or registered by a Federal, State or local Government Agency, or is on a list (including a list on an internet web site) or map maintained by or available from a Federal, State or local Government Agency and is available to the General Public. • An open structure or outside area that contains evidence of use by at least 20 or more persons on at least 50 days in any 12 month period (days need not be consecutive) (Examples include but are not limited to beaches, playgrounds, recreational facilities, camping grounds, outdoor theatres, stadiums, recreational areas near a body of water, areas outside a rural building such as a religious facility).A building that is occupied by 20 or more persons on at least five (5) days a week for ten (10) weeks in any 12 month period (days and weeks need not be consecutive) (Examples include but are not limited to religious facilities, office buildings, community centers, general stores, 4-H facilities, or roller skating rinks). • A facility that is occupied by persons who are confined, are of impaired mobility, or who would be difficult to evacuate. (Examples include but are not limited to hospitals, prisons, schools, day care facilities, retirement facilities, or assisted living facilities).
Impaired Mobility	Person(s) cannot move from one point to another without the assistance of other persons or the use of mechanical devices. Mechanical devices for purposes of this definition are wheel chairs, walkers, and crutches.

Licensed or Registered	The building or area is licensed or registered, not that some person who is licensed or registered uses the building. It also means that someone has filled out an application for permission to use a building or area for a particular purpose, that this application is approved and that the approval has been recorded in the County or City Clerk's office.
Licensed or Registered by a Federal, State, or Local Agency	For Federal, available in generally accessible databases, such as those on the internet; for state and local, reasonably available on state or county tax records or licensed to do business (if these records are not available on the Internet, either a certified or equivalent mailing to the applicable agency or a request included in the company's emergency response/liaison will be conducted).
List or Map	To be provided by public officials as part of communication through the company's public awareness and/or emergency response/liaison programs (Not to be generated by Company searches due to the language in HCA definition: "...list or map maintained by or available from a Federal, State, or local agency..."). Lists must identify a business by product and service category as well as Business name.
Potential Impact Circle (PIC)	The circular area within the PIR distance of the pipeline.
Potential Impact Radius (PIR)	The radius of a circle within which the potential failure of a pipeline could have significant impact on people or property. PIR is determined by the formula: $r = 0.69 \times (\text{square root of } (p \times d^2))$ Where is the radius of a circular area in feet surrounding a point on the pipeline, p is the MAOP, and d is the nominal diameter of the pipeline. Where a potential impact circle is calculated to establish a high consequence area, the length of the high consequence area extends axially along the length of the pipeline from the outermost edge of the first potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy to the outermost edge of the last contiguous potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy.
Public Official with Safety or Emergency Response or Planning Responsibilities	Those individuals and agencies which are currently defined as police, fire or Public Officials that might be contacted as part of a Pipeline Emergency, who are identified in the area's Emergency Plan per 192.615(a)(2), 192.615(a)(8), and 192.615(c). Inquiries are to be conducted through the company's public awareness and/or emergency response/liaison programs to determine identified sites known by the public officials. Refer to SOP J.02, HCA Identified Sites-Communication with Public Officials.

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Publicly Available Database	Those databases, which are known to the general public and are not generally limited to use by specific groups, industries, or agencies.
Site	A building, open structure or a "well defined" outside area.
Structure Intended for Human Occupancy (SIHO)	Any building normally occupied by persons in the course of business, recreation or residence. These could include houses, apartments, office and other commercial buildings, retail shops, schools, hospitals, etc. Buildings only occasionally or incidentally visited are not in this category. Examples of such buildings are garages, barns, storage sheds, and other agricultural outbuildings.
Surveillance Methods	Methods of providing surveillance data, such as: • Aerial Patrols • Foot Patrols • Vehicle Patrols • Pipeline Inspections • Aerial Photography and Global Positioning Surveys • Encroachment Investigations
Visibly Marked	The area or building itself is marked with a sign or other obvious marking visible from the road by a person with normal or corrected 20/20 vision. It should be legible by an operator of or an observer within a vehicle moving at the posted speeds of the location. If no posted speeds are present, the default speed will be 30 miles per hour. The sign or other obvious marking for a building does not necessarily have to be attached to the building, but should be close enough so that it is clear which building is indicated. The markings must state "day care," "hospital," "school," "prison," "retirement facility," "assisted living facility," or equivalent.

7.0 Determining High Consequence Areas

This section includes the following procedures:

- Surveillance for Determination of HCA per SOP B.13 Survey Requirements for Class Location and HCA Determination
- Update GIS Structure Table
- IRAS Application
- HCA Reviews
- Field Verification
- HCA Elimination Consideration
- Reduction in MOAP
- Removal or Purchase of Structures and/or Identified Sites

The table below describes the overall process table to determine HCAs. The sub-procedures that follow support tasks in this process.

Continued on next page

Step	Task	Done By
1	Gathers data and submits findings to the GIS Analyst per *SOP B.13 Survey Requirements for Class Location and HCA Determination.*	Asset Management Team
2	Incorporates gathered data into GIS database and initially reviews potential HCAs.	GIS Analyst
3	Performs next level of HCA review.	Pipeline Integrity Engineer
4	Performs final of HCA review.	Principal Engineer Codes and Compliance
5	Conducts field review to verify proposed status of an HCA.	Asset Management Team
6	Reviews and approves all rejected changes to HCA.	Director of Technical Services/Principal Engineer Codes and Compliance
7	Performs mitigation analysis, recommends actions, and determines mitigation measures.	Pipeline Integrity Engineer/ Principal Engineer Codes and Compliance

7.1 Surveillance for Determination of HCA

The Asset Management Team performs surveillance activities in accordance with *SOP B.13 Survey Requirements for Class Location and HCA Determination.*

7.2 Update GIS Structure Table

The GIS Analyst uses the following steps to make updates to the GIS Structure Table.

Step	Activity
1	**LOG** *Form B.13.A Encroachment Investigation* into the APDM system using the report format that has been generated on the form by Area personnel.
2	**REVIEW** and **UPDATE** GIS structure table for accuracy.
3	**ENTER** each outside area, open structure or buildings station and offset and **CONFIRM** that the identified structure or area is placed in the correct location and orientation.
4	**DETERMINE** the bounds of any outside area where people may congregate.
5	For structures except for single-family dwellings, **DIGITIZE** the "building footprint" and **ENTER** the origin of the structure cell at the closest point to the pipeline facility.
6	**QUERY** the APDM system and **CONFIRM** that all forms (Form B.13.A) submitted by the areas are entered into the database.

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7.3 IRAS Application

The Technical Compliance Specialist using the following steps to run IRAS or requests DRAS to run IRAS

Step	Activity
1	**RUN** the HCA analysis program IRAS semi-annually against the existing data in the database to identify potential new HCAs.

NOTE:

1. This software application automatically calculates the Potential Impact Circle (PIC) based on the characteristics of the pipeline being reviewed. The program electronically imposes this circle over the pipeline and identifies areas that meet the requirements of an HCA as identified in *Section 6.0 Terms & Definitions* of this SOP.
2. Any existing or proposed HCA areas identified by this application are assigned a unique HCA ID by IRAS.

2	**GENERATED by GIS Analyst** - HCA alignment sheet for each proposed HCA managed segment change

7.4 HCA Reviews

The Pipeline Integrity Group (Pipeline Integrity Engineer, Principal Engineer Codes and Compliance and Corrosion Specialist) perform HCA reviews based on the following procedure.

Step	Activity
1	**PERFORM** a drawing review to confirm that the quantity, type, and location of structures analyzed by the program are accurate and result in an HCA based on such information.
2	**APPROVE** the stationing boundaries established by the HCA Analysis Program and **VERIFY** that it meets HCA criteria
3	**INITIATE** verification of the HCAs using IRAS.

NOTE:

1. The decisions and actions taken by Area, and Houston personnel for a specific HCA under review shall be entered into ICAM.
2. Use the ICAM application to capture correspondence regarding decisions and actions performed during the HCA review process.
3. If the field requires additional information, the field submits a request to the area with specific information requirements.
4. Rejected HCAs are noted in the database with the reason for disqualification.

4	**ANALYZE** each HCA for possible mitigation and **SUBMIT** mitigation candidates with mitigation recommendations to the HCA Committee for further review.
5	**SUBMIT** accepted HCAs to the Codes Engineer and mitigation candidates to the HCA Committee.
6	**VERIFY** that proposed HCA meets the HCA criteria, and **SUBMIT** accepted HCAs to the HCA Database (ICAM).

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Step	Activity
7	**SUBMIT** all rejected HCAs to Principal Engineer Codes and Compliance for review.

NOTE: HCAs are only rejected for reasons of incorrect data, pipeline abandoned, out of service, or sold.

Step	Activity
8	**PLACE** confirmed HCAs in the Assessment Scheduler Program or equivalent for assessment within one year of identification as a new HCA.
9	**NOTIFY** Director of Technical Services of the existence of the new HCAs.

7.5 Field Verification

The Pipeline Integrity Engineer, or Principal Engineer Codes and Compliance may initiate field verification requests. Field verification may be required in the event data elements are missing or operational requirements change.

The Asset Management Team uses the following steps to make field verification.

Step	Activity
1	**REVIEW** the HCA area changes and **VERIFY** man-hour counts, the location of facilities, structures or outside areas where people congregate, as requested by the originator of the field verification request.
2	If information for the proposed new HCA is correct and no modification is required, **MARK** Data Correct in IRAS and ICAM.

NOTE: The Area conducts a field survey of the proposed new HCA if a question on boundaries or validity is raised. Operations personnel familiar with the area assist with this survey. Each building, open structure or outside area in the HCA is evaluated for occupancy. Buildings near the PIC boundary are measured for distance from the pipeline. Buildings at each end of the HCA boundary are measured to determine survey station. Refer to *SOP B.13 Survey Requirements for Class Location and HCA Determination.*

3	**DOCUMENT** the information on Form B.13.A and **MARK** as supplemental to the original form.
4	**SUBMIT** to the GIS Analyst for entry for newly acquired information.
5	**RETURN** the modified HCA to the HCA re-run queue(IRAS).
6	**RESTART** HCA review process.

7.6 HCA Elimination Consideration

The Pipeline Integrity Engineer prepares strategies for the elimination of HCA's based on the reported information according to the following procedure.

Step	Activity
1	**CONFIRM** HCA candidates for potential mitigation.
2	**PERFORM** a cost benefit analysis.
3	**REPORT** results of cost benefit analysis for the proposed mitigation tactic to HCA Committee.

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NOTE: The mitigation options available to the HCA Review Committee consist of the following:

- Remove structures
- Reduce MAOP of affected pipeline segment

4	**FOLLOW** the procedure in *Section 7.7 Reduction in MAOP* if the MAOP is proposed to be reduced.
5	**FOLLOW** the procedure in *Section 7.8 Removal of Structures and/or Identified Sites* if a structure is proposed for removal.

7.7 Reduction in MAOP

The table below describes the process for reducing the MAOP of a pipeline facility.

Step	Task	Done By
1	Gains concurrence from Gas Control and Marketing for MAOP reduction.	Director of Technical Services
2	Confirms MAOP reduction and notifies the Area Management, Principal Engineer Codes and Compliance and GIS Analyst at the same time once the MAOP reduction proposal has been confirmed.	Gas Control
3	Verifies appropriate MAOP protection is in place and properly set and notifies Area Management and Gas Control	Asset Management Team
4	Modifies PLD drawings to reflect the MAOP reduction and notify the Principal Engineer Codes and Compliance that the drawings have been updated.	GIS Analyst
5	Confirms modification to the GIS database to reflect the MAOP reduction.	Principal Engineer Codes and Compliance

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7.8 Removal of Structures and/or Identified Sites

The table below describes the process for the removal or purchase of a structure or structures to eliminate a location as an HCA.

Step	Task	Done By
1	Initiates structure or identified site removal by contacting Right-Of-Way Manager.	Director of Technical Services
2	Notifies Area and Division that structure or identified site was purchased. Notifies Director of Pipeline Integrity if the structure or identified site could not be purchased.	Right-of -Way Manager
3	Submits structure or identified site removal information through *Form B.13.A* and redlined system drawings to the GIS Analyst for entry into the database.	Asset Management Team
4	Returns the HCA to accepted status and to the point in the process where mitigation was recommended using IRAS, if the purchase is unsuccessful.	Principal Engineer Codes and Compliance

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8.0 Documentation Requirements	Form B.13.A Encroachment Investigation Report IRAS Complete ICAM reporting requirements
9.0 References	B.13 Surveillance Requirements for Class Location and HCA Determination J.02 HCA Identified Sites-Communication with Public Officials

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Appendix A: KSA and OQ Task Table

There are no Operator Qualification (OQ) tasks required for this procedure.

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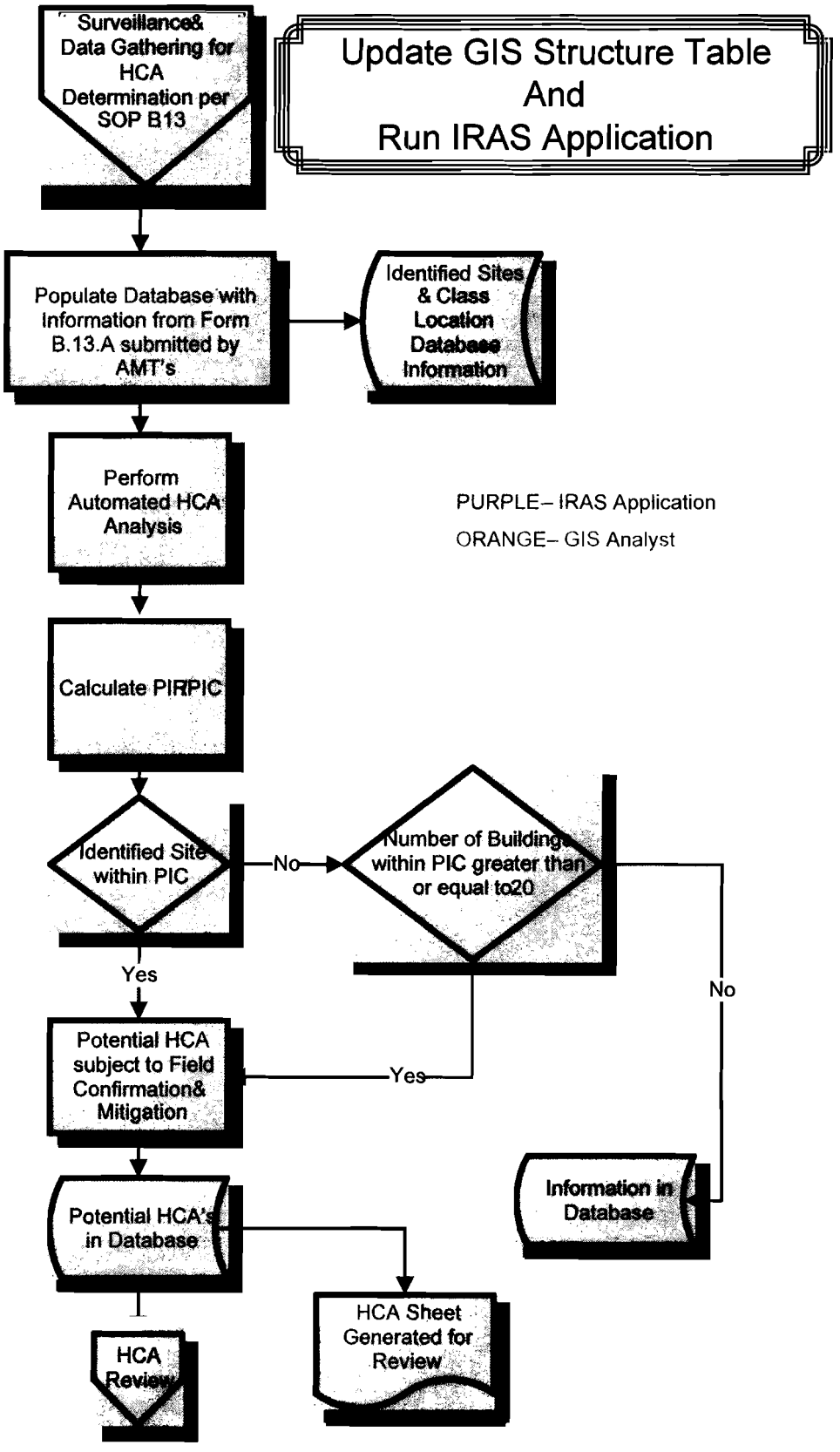
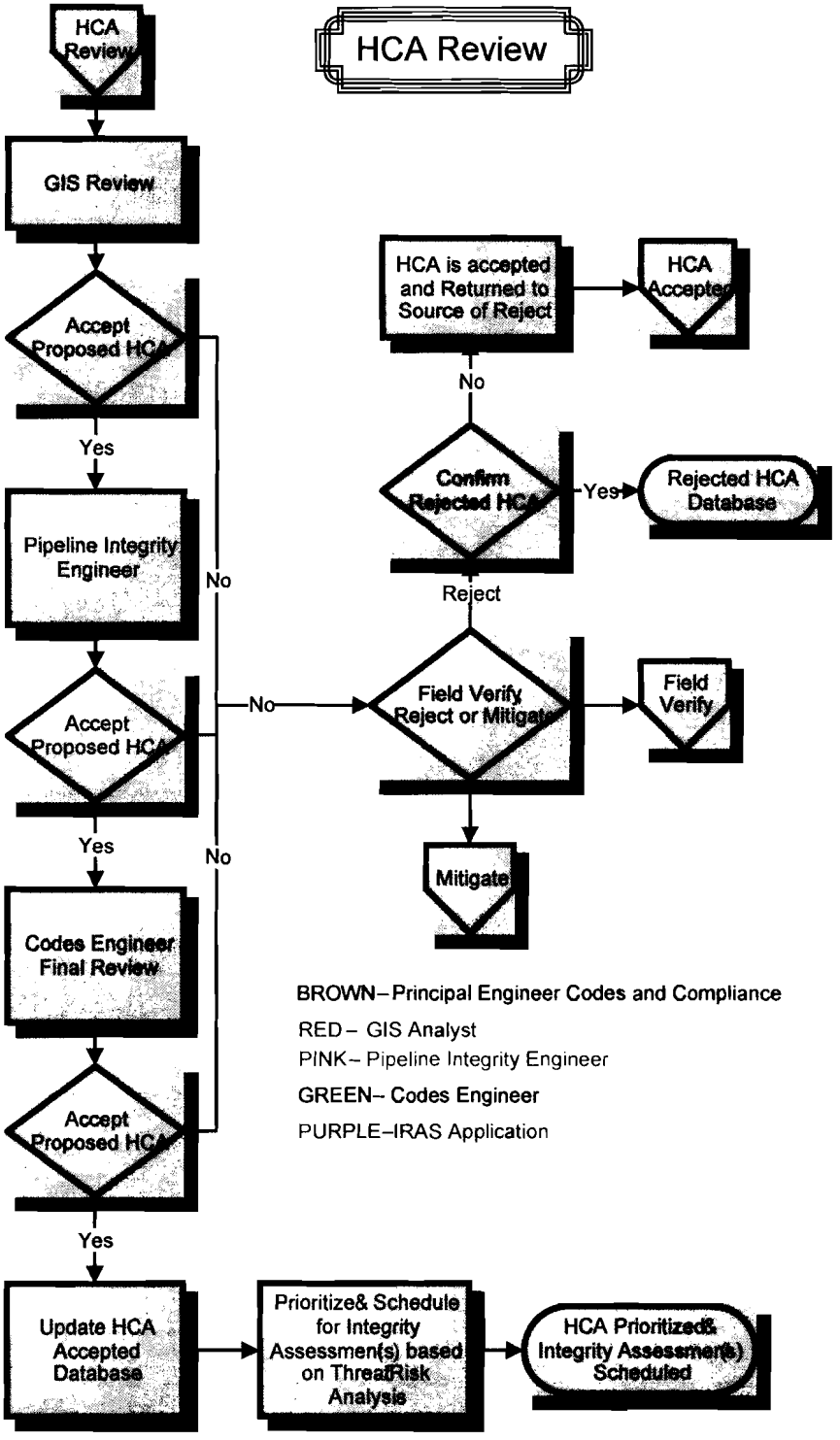
Appendix B: Update GIS Structure Table and Run IRAS

The following flow diagram illustrates the processes used for updating the GIS structure table and running the IRAS application.

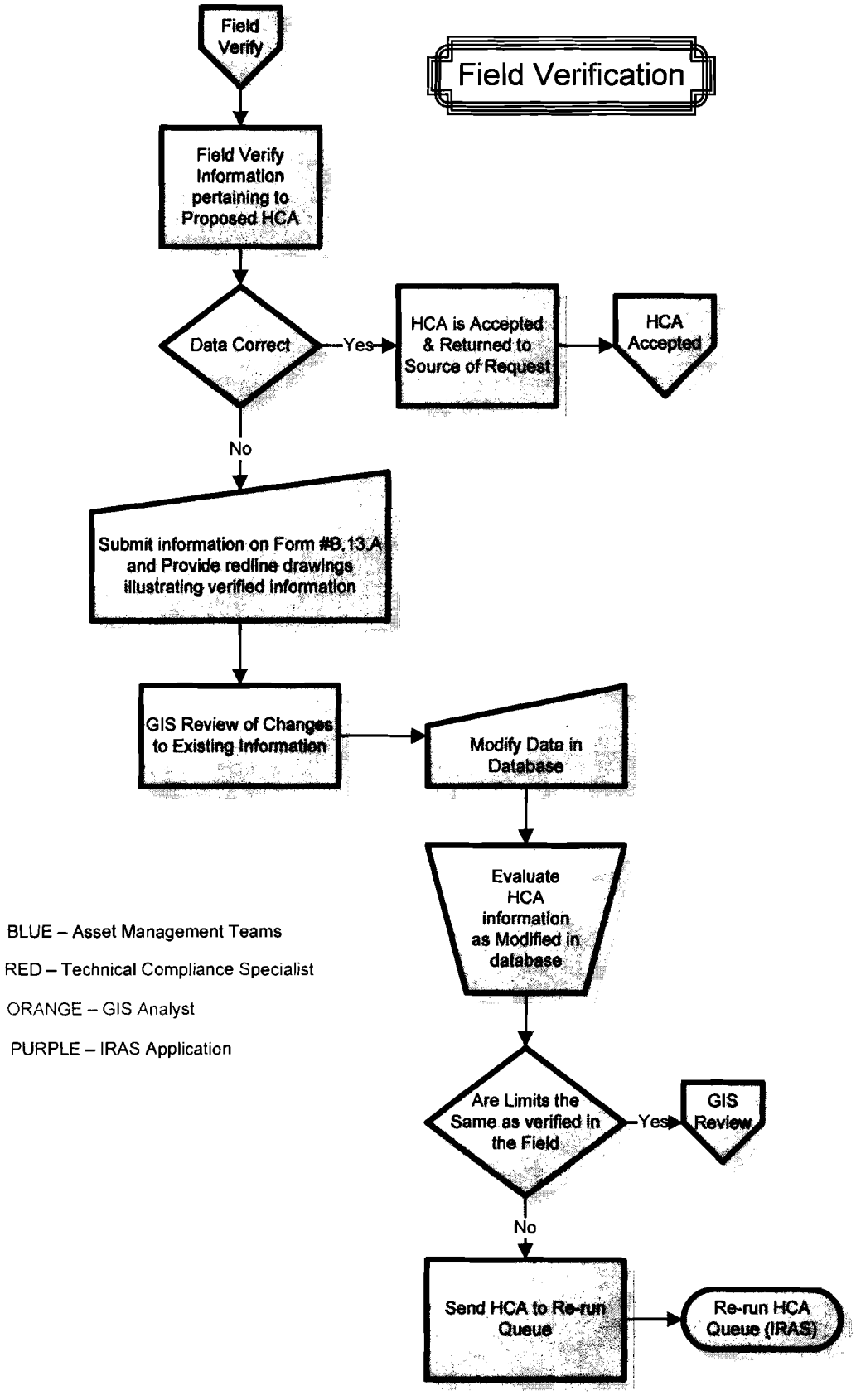


Appendix C:
HCA Review Process

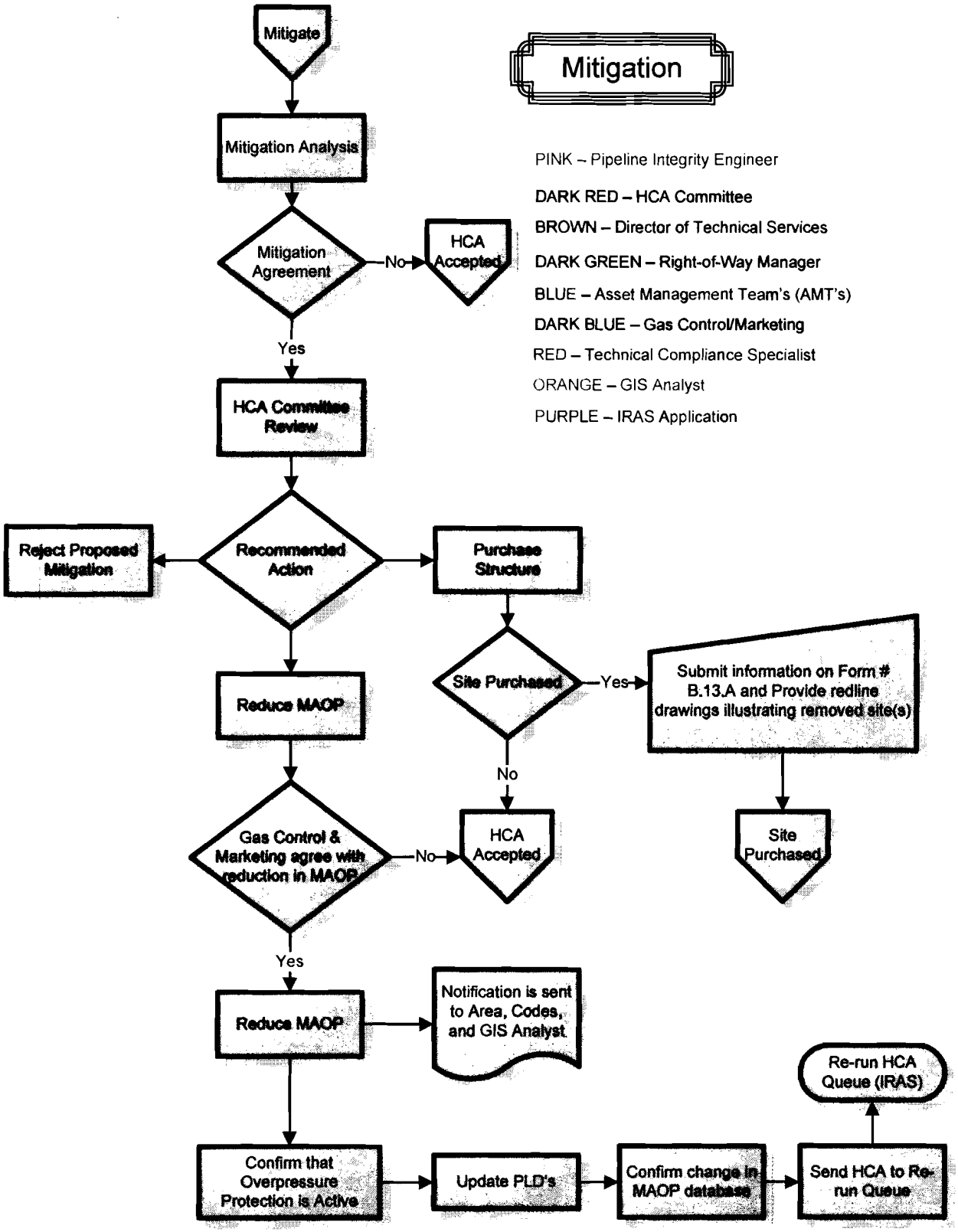
The following flow diagram illustrates the HCA review process.



Appendix D: Field Verification The following flow diagram illustrates the field verification process.



Appendix E: Mitigation The following flow diagram illustrates the mitigation process.



ENERGY TRANSFER
Transwestern Pipeline Company

Encroachment, Foreign Line Crossing and Class Location HCA Reports

B.13.A

AVAILABLE ELECTRONICALLY

Report No. ☐ One-call No. ☐ Other

RECIPIENT OF REQUEST/REPORT:

Received by (Co. Person) | Other Company Personnel Notified | Date Received | Time Received

COMPANY PIPELINE OR FACILITY INVOLVED:

Line Number | Name of Pipeline | Survey Station/Mile Post

Describe Involvement:

FOREIGN PARTY IDENTIFICATION: ☐ ATTACHED ONE-CALL TICKET ☐ ATTACHED LIST OF "INDENTIFIED SITES"

Business/Contractor/Landowner/Local Official | Contact's Name and Title

Business Telephone No. | Contact Telephone No.

Address | City | State | County and ZIP

INFORMATION PROVIDED TO FOREIGN PARTY:

By: ☐ Phone ☐ Fax ☐ Letter ☐ Site Visit ☐ List ☐ Email ☐ Other

Construction Guidelines Provided: ☐ Yes ☐ No

PROPOSED SCOPE OF WORK: ☐ SEE ATTACHED ONE-CALL TICKET

Description of Information Requested or Work to be Performed:

Starting Date | Starting Time | Explosives Used? ☐ Yes ☐ No | One-Call Notified ☐ Yes ☐ No

Location of Proposed Work:

City | State | County

Township | Range | Section | Block | Other

SITE INVESTIGATION: Were Flags or Markers Existing? ☐ Yes ☐ No Installed? ☐ Yes ☐ No Were Lines Located? ☐ Yes ☐ No

If Yes, attach related details. If No, Why?

Any Damage To The Lines? ☐ Yes ☐ No If yes, Describe:

Date Investigation Conducted | Time Investigation Conducted

Name of Person(s) Investigating. | Print Name | (Signature)

Foreign Crossing Report Prepared ☐ Yes ☐ No Comments:

Class Location Report Prepared ☐ Yes ☐ No Comments:

☐ Project in Progress ☐ Project Completed

Prepared By (Signature)

DISTRIBUTION:
Original – Team Compliance File
Copy's – Integrity Engineer, GIS Dept., Project Completion

Revised 6/25/08

RETENTION:
Original – 5 Years
Copy – 5 Years

Class Location Report

REPORT SOURCE: ☐ SURVEILLANCE ☐ LOCAL OFFICIAL ☐ LIST/MAP ☐ ATTACHED SKETCH

☐ INITIAL REPORT ☐ SUPPLEMENTAL REPORT DATE OF INITIAL REPORT:

LINE NO. ENGINEERING STATION

LINE NO.	ENGINEERING STATION	OFFSET DIRECTION (L/R)	OFFSET DISTANCE	LATITUDE	LONGITUDE

TYPE OF STRUCTURE, OPEN AREA OR FACILITY INVOLVED (See SOP J.01 for Definitions)

☐ Single Family Dwelling ☐ Facility With Impaired Mobility, Confined or Hard to Evacuate People

☐ Multiple Occupancy Dwelling ☐ Open Air Structure (Stadium or other Structure that is open to the air or with temporary walls)

☐ Populated Outside Area Detail:

Date Occupied

SPECIFIC INFORMATION ON THE ABOVE STRUCTURE, OPEN AREA OR FACILITY CHECKED ABOVE

Facility/Site Type: (Prison, School, Park etc.) Facility Name: (Ex.- Joe's Crab Shack)

Number of Occupants (max per day)	Days per week	Weeks per year	Hours per day	Days per year

Address (street) City, State ZIP

Alignment Sheet No.: Subdivision Plat Attached (if available) ☐ Yes ☐ No

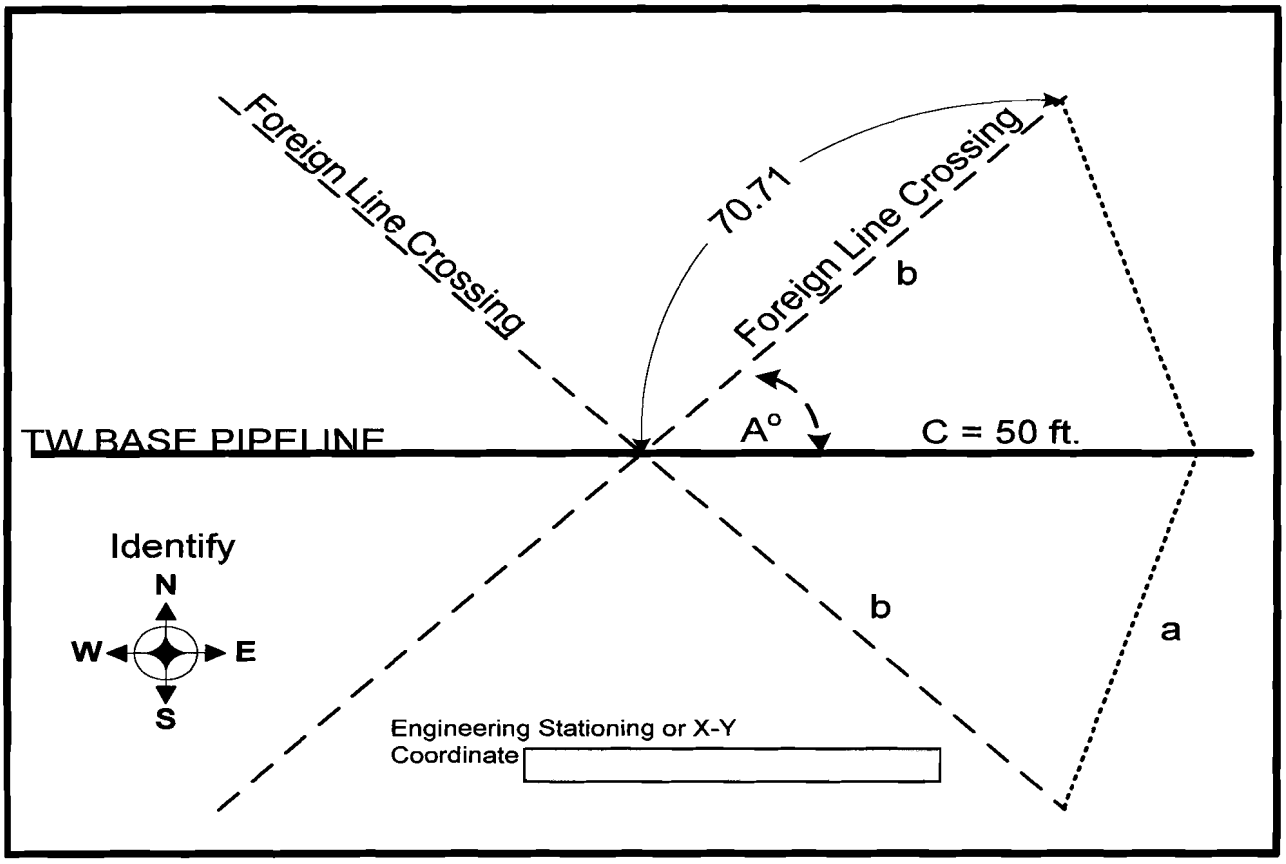
DGPS/GPS METHOD

1.Structure **Upstream**	*Latitude =	°N	*Longitude =	°W
a.Pipeline **Center Line**	*Latitude =	°N	*Longitude =	°W
2.Structure **Center of Structure**	*Latitude =	°N	*Longitude =	°W
b.Pipeline **Center Line**	*Latitude =	°N	*Longitude =	°W
3.Structure **Downstream Corner**	*Latitude =	°N	*Longitude =	°W
c.Pipeline **Center Line**	*Latitude =	°N	*Longitude =	°W
***Example of DGPS format:**	**Latitude =**	**+ 27.93821 °N**	***Longitude =**	**+ 89.50000 °W**

Note: Any structure whose width is 50ft. or less in length requires only the center point of the structure determined 90° from the centerline of the pipeline. All structures greater than 50ft. will require the upstream, center, and downstream points determined 90° from the centerline of the pipeline.

OFFSET MEASUREMENT (*Report offset distance & direction to closest pipeline – Measured at 90 degrees to the pipeline*)

A. Upstream Corner of the structure	ft.		
B. Station Plus of the Pipeline Centerline	ft.	E. Downstream Corner of the Structure	ft.
C. Center of the Structure	ft.	F. Station Plus of the Pipeline Centerline	ft.
D. Station Plus of the Pipeline Centerline	ft.		



EXAMPLE

Equation	Step 1 {Calculate Equation}	Step 2 {Result}	Step 3 {Calculate the Angle of Crossing}
$A = \frac{b^2 + c^2 - a^2}{2bc}$	$A = \frac{(70.71)^2 + (50)^2 - (50)^2}{2(70.71)(50)}$	A = 0.707	Cosine^{-1} A = 45°
a = 50 ft. b = 70.71 ft c = 50 ft	$A = \frac{4{,}999.90}{7{,}071}$		

Foreign Facility

Size Type/Transports Material

COMMENTS:

AVAILABLE ELECTRONICALLY

CONTACTS: ☐ EMERGENCY OFFICIAL QUESTIONAIRE with LIST of currently known "IDENTIFIED SITES" attached

Business/Contractor/Landowner/Local Official — Contact's Name and Title

Business Telephone No. — Contact Telephone No.

Address — City — State — County — ZIP

TYPE OF STRUCTURE, OPEN AREA OR FACILITY INVOLVED (See SOP J.01 for Definitions)

☐ Single Family Dwelling
☐ Multiple Occupancy Dwelling
☐ Populated Outside Area Detail:
Date Occupied
☐ Facility With Impaired Mobility, Confined or Hard to Evacuate People
☐ Open Air Structure (Stadium or other Structure that is open to the air or with temporary walls)

SPECIFIC INFORMATION ON THE ABOVE STRUCTURE, OPEN AREA OR FACILITY CHECKED ABOVE

Facility/Site Type:
(Prison, School, Park etc.)

Facility Name:
(Ex.- Joe's Crab Shack)

Number of Occupants — Days per week — Weeks per year — Hours per day — Days per year

Address (street) — City, — State — ZIP

Alignment Sheet No.: — Subdivision Plat Attached (if available) ☐ Yes ☐ No

IDENTIFIED SITES

Facilities with persons who are mobility-impaired, confined or difficult to evacuate.

☐ Hospital ☐ Retirement Facility ☐ Prison ☐ Assisted Living Facility ☐ Day Care Facility
☐ Other:

Where people gather for recreational and other purposes
{Facilities or outside area where Twenty (20) or more people gather fifty (50) times per year (Not consecutive), within a twelve-(12)-month period.}

☐ RV Park ☐ Restaurant ☐ Stadium ☐ Convenience Store ☐ Park ☐ Airport ☐ Lake
☐ River ☐ Factory ☐ Marina ☐ Community Center ☐ Church ☐ Business ☐ Building
☐ Other:

COMMENTS: