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**Perry Michael Hoffman**  
Manager – System Integrity

February 11, 2014

Mr. Byron E. Coy, PE  
Director, Eastern Region  
United States Department of Transportation  
Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety  
Eastern Region – New Jersey District Office  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

**RE: CPF 1-2013-1037 – Columbia Gas Transmission, Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance**

Dear Mr. Coy:

This letter is provided on behalf of Columbia Gas Transmission L.L.C. (Columbia Gas) in response to the Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order CPF 1-2013-1037 (NOPV), dated December 23, 2013 and received on December 27, 2013. On January 9, 2014 Columbia Gas submitted an e-mail request for the PHMSA's case file and additional time to respond to the NOPV. By way of a letter dated January 10, 2014 and received on January 14, 2014, PHMSA provided Columbia Gas an additional 30 days from the date of receipt of the letter (until February 14, 2014) to respond. Columbia Gas appreciates this additional time to respond.

The NOPV was issued following inspections conducted by the New York State Department of Public Service on July 23-31, 2012, of the Millennium Pipeline facilities in Kirkwood NY. The NOPV alleges violations of the general provisions of the natural gas pipeline safety regulations and proposes a civil penalty of \$24,400 and a compliance order for item 1.

This communication addresses both the findings detailed within the NOPV and the requirements specified in the accompanying Compliance Order.

The language from the NOPV is provided in bold below, followed by our response.

1. **§ 192.603 General Provisions**

**CPF 1-2013-1037**

**(b) Each operator shall keep record necessary to administer the procedures established under § 192.605**

CGT failed to keep adequate records necessary to administer the procedures established under §192.605 (c) Abnormal operation. Specifically, the CGT Abnormal Operations Report (AOR) for Work Order Number (WO) B2293112 dated 6/13/2011 did not adequately document what caused the compressor station emergency shutdown (ESD).

CGT Procedure 220.005.003 Version 6, effective 02232011, Paragraph 2.1.1 states.. “Record a description to explain the Abnormal Operation (*Required*)”. The description recorded on WO B2293112 to explain the abnormal operation states “Station ESD between 10 AM 6/12/11 and 8 AM 6/13/11”. The description provided by CGT does not indicate what caused the emergency shutdown. Therefore CGT failed to keep records necessary to administer the procedures established under § 192.605.

NYSDPS commented on the inadequate AOR and requested and received a copy of the AOR during the July 2012 inspection.

#### Columbia Gas Response

Columbia Gas is compiling additional information concerning the June 2011 event in accordance with the proposed corrective action order. In addition, Columbia Gas is amending its abnormal operating procedures to provide further guidance regarding the actions taken surrounding abnormal operations.

### **2. § 192.603 General Provisions**

**(b) Each operator shall keep records necessary to administer the procedures established under §192.605**

CGT failed to produce records to show that a capacity review required by § 192.743(a) of each and every overpressure protection device had been done in 2011.

CGT representatives stated during the inspection of the Corning Compressor Station that the capacity review is part of an undocumented consideration, and is only documented upon input from the local engineer that there were known changes to the pipeline.

As of 12/17/2012 there had been no records provided by CGT to NYSDPS as requested for overpressure protection device capacity review documentation for 2011.

#### Columbia Gas Response

Columbia Gas is validating that all relief valve calculations are available during future relief valve inspections conducted on the pipeline system.

### **3. § 192.603 General Provisions**

**(b) Each Operator shall keep records necessary to administer the procedures established under § 192.605.**

CGT failed to keep adequate records necessary to administer the procedures established under §192.605. Specifically, CGT Plan No. 220.02.03 Sec. 3.2.1 and 3.3.1 Effective 12/31/2011 states... "Field population density surveys shall be conducted annually on all pipelines to identify any changes in class location and HCAs. Ongoing surveys will also be conducted throughout the year by Operations, who will identify and document new structures using GPS coordinates and other data with Plan 200.02.01".

CGT could not produce records to substantiate that they conducted a field population density study in 2011. Therefore, CPG failed to keep records necessary to administer the procedures established under §192.605.

Columbia Gas Response

Columbia has revised its Plan 220.02.03, Population Density Survey, Class Location Determination and Evaluation as well as Procedure 220.003.003 Population Density/HCA Structure Identification since the July 2012 inspection to enhance the effectiveness of population density information collection along the pipeline system. A copy of the revised plan and procedure are included in Attachment A.

Columbia believes that the actions being taken will fully address the issues raised in the NOPV and Proposed Compliance Order.

If you have any questions or would like additional information, please do not hesitate to contact me.

Sincerely,



Perry M. Hoffman  
Manager – System Integrity  
Columbia Pipeline Group