



March 3, 2016

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

Re: CPF 1-2016-1003

Mr. Byron Coy,

Tennessee Gas Pipeline Company, LLC (TGP) received your letter dated February 10, 2016 in which TGP was issued a Notice of Probable Violation (NOPV) with associated Proposed Civil Penalty and Proposed Compliance Order.

The NOPV was issued to TGP for not performing a baseline assessment of all covered segments by December 17, 2012 as required in §192.921(d). Specifically, the NOPV alleged TGP failed to perform an assessment on 4 ½ feet of underground pipe at a 10-inch interconnect facility located at 749 Meriden-Waterbury Turnpike, Southington, CT.

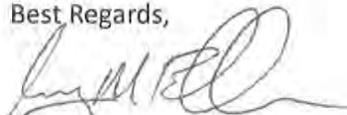
Across the Meriden Waterbury Turnpike, and 180 feet away from the interconnect facility, is a Church of Jesus Christ of Latter Day Saints at 750 Meriden-Waterbury Turnpike, Southington, CT. At the time that the Integrity Management Rule (Amendment 192.95) went into effect, TGP had conservatively identified the Church building as an *identified site*, as defined in §192.903. In August 2015 and again in February 2016, a TGP representative spoke with Church leadership, most recently a Church Bishop and Facility Manager, regarding the use of the Church building. From these conversations, TGP confirmed that the Church primarily operates, and has always operated, one day a week (Sunday) for a three hour block and is then used for small meetings, no more than ten people in attendance, on some week nights. TGP also confirmed the Church has never operated a daycare facility at this location. This type of use does not meet the definition of an identified site as defined in §192.903.

Since TGP has exclusively used Method 2 for HCA identification, the interconnect facility in question is not currently, nor has ever been, in a High Consequence Area (HCA) as defined in §192.903. As such, a violation of §192.921(d) has not occurred, as only pipelines in HCA's were required to have baseline assessments completed by December 17, 2012.

In light of the new information provided, TGP respectfully requests for the Notice of Probable Violation, Proposed City Penalty, and Proposed Compliance Order be rescinded. TGP's deadline to request a hearing in this matter is March 11, 2016 and therefore TGP would appreciate hearing back from you as soon as possible regarding your decision.

If you have any concerns or would like further information regarding this matter, please contact Reji George at 713-420-5433.

Best Regards,

A handwritten signature in black ink, appearing to read 'Gary Buchler', written in a cursive style.

Gary Buchler  
Chief Operating Officer  
Tennessee Gas Pipeline Company, LLC