

CITY OF SUSANVILLE

PUBLIC WORKS DEPARTMENT

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Hardcopy... Electronically ✓
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May 30, 2012

Christopher Hoidal
Director Western Region
Pipeline and Hazardous Materials Administration
12300 W Dakota Avenue, Suite 100
Lakewood, CO 80228

Re: CPF 5-2012-0012W

Dear Mr. Hoidal,

In your letter dated May 14, 2012 you indicate a probable violation with regard to the Pipeline Safety Regulations, Title 49, Code of Federal Register Part 191.13, Reporting separately both gas distribution and gas transportation.

Pipeline Safety Regulation, Part 192.3 Definitions; Transmission line:

Transmission line means a pipeline, other than a gathering line, that:

(1) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not down-stream from a distribution center;

The City receives its natural gas from the Tuscarora Transmission Company Interstate Gas Transmission Pipeline at the Tuscarora custody transfer metering station. Since the Tuscarora pipeline is a transmission pipeline and not a gathering line or storage facility the City did not believe that this part applied to its 6 inch pipeline.

(2) Operates at a hoop stress of 20 percent or more of SMYS; or

The City's 6" steel pipeline operates at approximately 340 psig which is well below 20% of SMYS for the pipeline, therefore again the City did not believe that this part applied to its 6 inch pipeline.

(3) Transports gas within a storage field.

The pipeline in discussion is not within a gathering field.

The City of Susanville has operated its 6 inch steel pipeline as a distribution line since beginning operation September 13, 2001. Since the initial start-up, the City has experienced multiple Pipeline Safety Inspections without any prior indication to the affect that this 6 inch pipeline is anything other than a distribution line. The City will undoubtedly incur additional costs associated with operating a transmission line rather than a distribution line. I will have to take our action plan including any incremental costs to the City Council for their

Christopher Hoidal

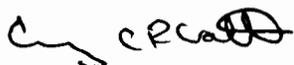
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approval and budget variance. Respectfully I request your explanation as to why this pipeline is now considered a transmission line and no longer considered a distribution line.

Please feel free to contact me at my office (530) 257-1050 or my email cplatt@cityofsusanville.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig C. Platt". The signature is cursive and somewhat stylized.

Craig C. Platt
Public Works Director
City of Susanville

cc: Jeff Stahoviak
General Engineer (Senior Inspector)
U.S. Department of Transportation
Office of Pipeline Safety - Western Region
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228