



INERGY
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Kansas City, MO 64112

RECEIVED SEP 09 2013

09/06/13

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

RE: CPF 1-2013-1013M

Dear Mr. Coy:

This correspondence is a response to the notice identified by the above-referenced tracking number to address the issues identified resulting from the March 26 – 30, 2012, inspection of Inergy's Central New York Oil and Gas Company (CNYOG) pipeline facilities, procedures, and records. CNYOG is submitting amended procedures. The identified inadequacies are indicated in italics, below, and the explanation of the revision in the procedure is in the paragraph following that.

1. *49 CFR 192.605(b)(9); CNYOG Procedure # 510, Excavations Near Company Pipeline, was deemed inadequate in that it did not include: 1) precautions that must be taken in excavated trenches to protect personnel from hazards of unsafe accumulation of gas; and 2) guidance on when emergency rescue equipment, including breathing apparatus, a rescue harness, and line, are needed.*

The revised CNYOG Procedure #510, revision 3, dated 09/06/13, is attached. This procedure has been revised to state that personnel will continuously monitor for hazardous atmospheres and must not enter, or are required to exit, excavated trenches with hazardous atmospheres. No emergency rescue equipment is needed.

2. *49 CFR 192.225; CNYOG Procedure #605, Qualification for Welding and Welders, was deemed inadequate in that it allowed the use of an outdated welding standard, API 1107.*

The revised CNYOG Procedure #605, revision 2, dated 09/06/13, is attached. This procedure has been revised to exclude any use of API 1107, replacing that reference with API 1104, 20th edition.

Please let me know if these revisions to CNYOG's procedures are suitable to correct the identified inadequacies.

Sincerely,



Bernadette Frieh
Compliance Director

Cc: Barry Cigich
John Shaffer