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Perry Michael Hoffman
Manager – System Integrity

May 26, 2015

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: Response to Notice of Probable Violation and Compliance Order CPF 1-2015-1006

Dear Mr. Coy:

This letter is provided on behalf of Millennium Pipeline Company, L.L.C. (“Millennium”) and Columbia Gas Transmission LLC (Columbia Gas) in response to Notice of Probable Violation, CPF 1-2015-1006 (“NOPV”), dated April 7, 2015. On April 21, 2015, Columbia Gas submitted an e-mail request for the PHMSA case file and additional time to respond to the NOPV. By way of a letter dated April 27, 2015, received on April 28, 2015, PHMSA provided Columbia Gas an additional 30 days from the receipt of the letter (until May 28, 2015) 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 between December 12, 2012 and October 14, 2013, of the Millennium Pipeline Minisink Compressor Station in Minisink, NY. The NOPV alleges violations of the general provisions of the natural gas pipeline safety regulations and proposes a compliance order.

This communication addresses the provisions of the Compliance Order. The language from the proposed compliance order is provided in bold below, followed by our response.

- 1. In regard to Item Number 1 of the Notice, pertaining to CGT’s failure to test a new segment of pipeline in accordance with § 192.619 to substantiate the maximum allowable operating pressure prior to putting the line into operation on June 1, 2013, CGT must reevaluate the installed Minisink Compressor Station and related piping to determine: (1) what further piping will need to be tested in accordance with § 192.503, and, (2) perform needed testing in accordance with § 192.503.**

Columbia Gas Response

It should be noted that the compressor station piping was pressure tested in accordance with §192.619 before installation and all welds were non-destructively tested in accordance with

§192.243. However, Columbia Gas is reviewing the pressure testing completed during construction and is formulating a plan to retest the pipe in the station, where needed, to meet the requirements of this order.

2. **CGT will have 60 days within receipt of the Final Order to provide a tally or detailed drawing that identify what piping in #1 of the PCO (above) will be tested, and CGT will have 210 days within receipt of the Final Order to complete testing of #1 of the PCO (above).**

Columbia Gas Response

Columbia Gas plans to provide plans to PHMSA detailing the piping that will be tested to meet condition (1) above within 60 days of receipt of the final compliance order and will perform the testing within 210 days of receipt of the final order.

3. **It is requested (not mandated) that CGT maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Byron Coy, PE, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. It is requested that the cost be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analysis, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.**

Columbia Gas Response

Columbia Gas plans to track the costs associated with compliance with the final compliance order, as outlined above, and to provide those costs to PHMSA.

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