



Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330
402 398-7200

April 29, 2016



R. M. Seeley
Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, Texas 77074

RE: CPF 4-2016-1002W

Dear Mr. Seeley,

Northern Natural Gas Company ("Northern") received a warning letter dated March 23, 2016, in which your agency referenced two issues identified during the records inspection of Northern in 2015; the first being (§ 192.479) Atmospheric Corrosion Control: General and the second being (§ 192.615) Emergency Plans.

As stated in the letter, the first issue regarding inadequate soil-to-air interface coating on the Burdett block valve 1 risers on the M610B line in Kansas has been remediated and, as the letter noted, the documentation submitted was acceptable. In addition, a physical barrier was installed to prevent reoccurrence.

As for the second issue, the cause of the unintentional release of gas was a leaking relief valve. The local field team responded to the situation as an abnormal operating valve. Once the gas loss was calculated, Northern submitted incident report 20140051-16755 to PHMSA's online reporting system because the amount exceeded the 3 MMcf reporting threshold. Because the relief valve operated as designed, the situation was not escalated to a full emergency response, which would have necessitated a more extensive documentation process and operating procedure review. In response to the concern raised in the warning letter, Northern has updated its Event Investigation Report form (10.106a) to prompt a review of employee activities and responses, whether the operating procedures were effectively followed, and if appropriate corrective actions were taken for all abnormal operating conditions in addition to accidents, failures, leaks, etc.

Should you require further information, please don't hesitate to call.

Tom Correll
Sr. Director, Pipeline Safety and Risk
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