

October 8, 2015

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

**RE: Eastern Shore Natural Gas Company (Eastern Shore)
Response to PHMSA NOTICE OF AMENDMENT (dated September 9, 2015)
CPF 1-2015-1022M**

Dear Mr. Coy:

The following is Eastern Shore's response to the PHMSA Notice of Amendment letter resulting from the inspection of Eastern Shore's Control Room Management procedures in Dover, DE for the period of November 17 through November 21, 2014.

1. Eastern Shore has revised the "SCADA HMI Screen Updating & Layout Management" procedure to include elements 4.1 – 4.5 of API RP 1165 Section 4. The updated procedure was sent to Mr. Robert Burrough via email communication on Friday April 3, 2015. However, further clarification as to how each element is referenced has been added to the procedure and has been included within this response (with new sections highlighted).
2. Eastern Shore has revised the "Gas Control Point-to-Point SCADA Verification" procedure to ensure that equipment that has been replaced with the same type of equipment is functioning properly. The updated procedure was sent to Mr. Robert Burrough via email communication on Friday April 3, 2015 and now specifies that the procedure covers any situation where the "control/signal wiring had to be re-landed in the RTU." This change ensures that any equipment that must be re-landed at the RTU due to a failure will be verified with the Point-to-Point process.
3. Eastern Shore has revised the "Point-to-Point Verification" form to include the capture of "Field Value" data and "SCADA Value" data. This will allow for the documentation of actual field data and SCADA displayed information as part of the verification process. This revised form was sent to Mr. Robert Burrough via email communication on Friday April 3, 2015.
4. Eastern Shore has revised the "Operator Fatigue Minimization" procedure to clarify our current operating practices with regard to maximum normal limits on controller hours of service. The "Hours of Service" section now addresses each element to the level of detail specified in the Notice of Amendment. We believe that our current hours of service limitations provide a safe, effective and compliant method for operating our pipeline. Even so, we are continuing to evaluate our control room staffing needs as related to hours of service limitations and other operational needs associated with natural gas transportation service demands on our pipeline system. The revised procedure has been included with this letter. This attachment also includes the "Control Room Management Deviations Form" to clarify the information being captured in the event of a deviation involving the hours of service limitations, or any other element of the Eastern Shore Control Room Management Plan.



5. Eastern Shore has revised the "Operator Fatigue Minimization" SOP to include a Work Load Awareness section. This section specifies that, in addition to Alarms, the number of Shift Notes recorded by the Gas Controllers and number and duration of Phone Calls made or received will be tracked on a monthly basis. This information will be trended and used to track the work load of the Gas Controllers. This updated procedure was sent to Mr. Robert Burrough via email communication on Friday April 3, 2015.

Should you have any questions or comments concerning Eastern Shore's response, please contact J. Solomon McCloskey, P.E., Senior Manager, Gas Pipeline Operations at 302.734.6710, extension 7658 or myself at 302.734.6742.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey R. Tietbohl".

Jeffrey R. Tietbohl
Vice President

Cc: Stephen C. Thompson
J. Solomon McCloskey