

July 10, 2007

Linda Daugherty  
Director, Southern Region  
Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety  
233 Peachtree Street, Suite 600  
Atlanta, Georgia 30303

Re: CPF No. 2-2007-1011

Ms. Daugherty:

We are in receipt of your Notice of Probable Violation (NOPV) and Proposed Civil Penalty, dated June 6, 2007, received on June 9, 2007, in which the Pipeline and Hazardous Materials Safety Administration (PHMSA) asserts that Tennessee Gas Pipeline Company (TGP) committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations.

TGP appreciates the attention PHMSA pays to pipeline safety. As you are aware, TGP also takes safety and pipeline integrity seriously. Consequently, we have examined your notice closely regarding the operations and maintenance review at our offices in Columbus, MS and Heidelberg, MS and respectfully disagree with PHMSA's findings associated with item #1 listed below and explained in our response. TGP requests a hearing be conducted in this matter.

**1. §192.467 External corrosion control: Electrical isolation.**

**(c) Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system.**

**However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.**

**PHMSA's Assertion:**

In the Heidelberg Operating Area there is a shorted casing on the 500-1 Pipeline in Valve Section 534, MP 9.340 at Hwy 49. An interoffice memorandum dated 7/15/91 indicates that an unsuccessful attempt was made to clear this short in 1974. No attempts have been made to clear the shorted casing since 1974 and no measures have been taken to

minimize corrosion of the pipeline inside the casing.

**TGP's Response:**

TGP disagrees with the finding that no measures have been taken to minimize corrosion. TGP has taken measures to minimize corrosion by conducting detailed close interval on/off cathodic surveys in this area and has handled this issue in accordance with our O&M and Corrosion Control procedures. These procedures are the same procedures which have been audited by PHMSA under a corporate inspection, with no determination of deficiencies. TGP believes that the measures used by TGP are as effective as alternatives used by other operators to monitor shorted casings.

Subsequent to receipt of your letter, TGP has conducted a leak survey on the casing at Highway 49 and found no indications of a leak. In addition, this segment is scheduled for an In Line Inspection (ILI) in 2010.

While we do not believe public safety at this site has been compromised at any time by TGP, TGP agrees to modify its procedures to add monitoring the shorted casing with leak surveys until the ILI has been conducted. As noted above, TGP requests a hearing to demonstrate that our procedures in place prior to and at the time of the inspection and previously reviewed by PHMSA on several occasions, including the system review of the O&M manual, are in compliance with §192.467.

TGP fully understands the issues associated with casings in pipeline systems. In fact, we are currently teaming up with one of our industry partners, CORRPRO, to submit a proposal to solicitation DTPH56-07-BAA-000002. An objective of this proposal will be to address some of the ECDA issues encountered in casings. These issues that are the same whether the casing is shorted or clear, and the proposal should provide better definition on measures adequate to minimize corrosion in a casing.

TGP respectfully requests PHMSA to reconsider the issuance of a NOPV and the fine with respect to this issue. TGP believes that its actions described above represent compliance with §192.467, and requests that the NOPV be reduced to a warning with no fine, thus eliminating any need for a hearing.

**2. §192.605 Procedural manual for operations, maintenance, and emergencies.**

**(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

**(3) Making construction records, maps, and operating history available to appropriate operating personnel.**

**PHMSA's Assertion:**

During the records review at the Columbus, MS office, the PHMSA inspector was given a schematic drawing of the Columbus Operating Area. The drawing was determined to be out of date when the PHMSA inspector could not locate some meter stations on the drawing. The operations personnel were not aware the drawing was out of date until it was brought to their attention by the PHMSA inspector. The operations personnel were able to download the current drawing off the company mapping database. The current drawing was dated 8/27/2003, the drawing first provided to the PHMSA Inspector was dated 2/15/2000. It is critical that operations personnel have up to date pipeline drawings available to them at all times.

**TGP's Response:**

TGP concurs that it is imperative that operations personnel have updated pipeline drawings available to them at all times. PHMSA's finding has been distributed to all of TGP's operations Directors, and this information will be shared with all of our Area personnel to emphasize the need to regularly review the operational drawings to have current information available at each location. TGP will review its revision processes to determine if appropriate notifications are being provided to Area personnel, and will revise these processes as required.

Tennessee Gas Pipeline appreciates your attention to pipeline safety matters, and is prepared to work with both you and your staff to satisfactorily and efficiently resolve the issue discussed above. If you have any questions concerning this matter, please call me at 713-420-4164.

Respectfully submitted,



Patrick F. Carey, P.E.  
Director, D.O.T. Compliance Services

cc: File

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