

# NiSource Gas Transmission & Storage®

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**Michael Hoffman**  
Manager – System Integrity

December 12, 2011

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 South Gessner, Suite 1110  
Houston, TX 77074

**RE: CPF 4-2011-1014**

Dear Mr. Seeley,

This letter is provided on behalf of Columbia Gulf Transmission Company by NiSource Gas Transmission and Storage (NGT&S) in response to a Notice of Probable Violation and Proposed Compliance Order CPF 4-2011-1014 dated November 7, 2011 and received by NGT&S November 16, 2011.

Prior to the issuance of the NOPV and Proposed Compliance Order, NGT&S had taken actions to address the identified items in the Proposed Compliance Order. Based upon the fulfillment of the Proposed Compliance Order, as further demonstrated within this correspondence, NGT&S respectfully requests closure of Proposed Compliance Order 4-2011-1014.

Details addressing the individual items noted in the Compliance Order are outlined below. The language from the Compliance Order is provided in bold, followed by a brief description of the NGT&S actions completed relative to each item.

**In regard to Item Number 2 of the Notice pertaining to the failure of CGT to document and keep on file records necessary to demonstrate that Gas Control and Monitoring Center personnel were trained and are knowledgeable in the Emergency Procedures and verified that the training was efficient, CGT must train each Gas Controller and Monitoring Center individual in the Emergency Procedures. The training must be documented and verified for effectiveness.**

All NGT&S Gas Controllers and Monitoring Center Analyst's completed computer based Incident Management training in September and October of 2011. Records of the Incident Management training obtained from the NGT&S Learning Management System (LMS) are included in Attachment A. The records show the time and date that each individual completed the training. Attachment B provides screen shots of the contents of the training provided. A quiz was included as part of the course to confirm understanding of the material and training effectiveness. Each employee needed to score a 70% or higher on the quiz before the course was recorded as complete in LMS. In addition, NGT&S will continue to test the effectiveness of the training through review of actions taken by employees as well as lessons learned as the result of mock drills or actual emergencies, as they may occur. Changes to the training will occur, as necessary, to address any deficiencies found.

**CGT must perform and document this training within 45 days following the receipt of the Final Order.**

The training, as outlined above, was completed in September and October of 2011, prior to issuance of the Proposed Compliance Order.

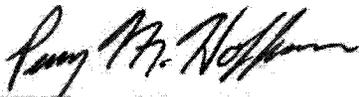
**It is requested (not mandated) that Columbia Gulf Transmission Company maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.**

The emergency training given was developed and implemented independently from the requirements of the Proposed Compliance Order. However, the development cost for the training was \$10,500. There were no costs associated with replacements, additions or other changes associated with pipeline infrastructure as the result of the fulfillment of the Proposed Compliance Order.

As detailed in this correspondence, NGT&S has taken aggressive action, prior to issuance of the Proposed Compliance Order that addressed the concerns of the order. In addition to addressing the issues raised in the Proposed Order, under the new NGT&S Control Room Management Plan, NGT&S has implemented a robust comprehensive training and tracking program for all of its Gas Controllers and Monitoring Center personnel. This training is now being documented and tracked via the NGT&S Learning Management System. We believe that the measures taken have satisfied the Proposed Compliance Order and respectfully request closure of the Order.

If you have any questions or require any further information, please feel free to contact me.

Sincerely,



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