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May 1, 2007

Mr. Byron Coy
Regional Director Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

Re: CPF 1-2007-1004 Notice of Probable Violation and Civil Penalty
2005 WVPSC Inspections

Dear Mr. Coy:

Columbia Gas Transmission Corporation (Columbia) has received the referenced PHMSA Notice of Probable Violation (NOPV) and Civil Penalty dated April 5, 2007 for West Virginia Public Service Commission inspections conducted in 2005.

Under the Procedures for Responding to a Notice of Probable Violation, Section I(a) (2) allows for submission of written explanations, information, and other materials in response to the allegations and/or seek elimination or mitigation of the proposed civil penalty. Columbia respectfully submits the following materials for Item 9 of the NOPV.

Item 9 of the NOPV states:

§192.739 Pressure Limiting and Regulating Stations: Inspection and Testing

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -

- (1) In good mechanical condition;
- (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;

Columbia failed to provide any records to document the annual inspections and testing for the devices (monitor-regulator followed by a control unit) located at regulator station RS-6821 on Line 18044 in Rowlesburg, Preston County.

No records were found for any inspection at that regulator station between 2002 and 2005.

Columbia Response:

The records for inspection and testing of RS-6821 for years 2002 through 2005 are attached for review. Columbia requests that Item 9 be removed from the NOPV along with the associated civil penalty.

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Please contact William Butterworth, Manager Engineering Services at (540)465-6425 or David Anderson, Principal Engineer at (724)223-2766 if you need further information.

Respectfully yours,



Reed D. Robinson

Attachments

cc: D. Anderson
W. Butterworth
D. Kirkland
M. Wendorff

**2002-2005 Maximo Records for control and monitor regulator at RS-6821,
Line PL-18044 in Rowlesburg, Preston County, WV.**

EQNUM: 756487 REGULATOR, SELF OPERATED - CONTROL - IA MONITOR

REGULATOR, SELF OPERATED - INSPECTION

11213768	6/2/05	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X)	369.00	
			ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X)	369.00	
			ENTER THE AS FOUND SET PRESSURE IN PSIG (XXXX.X)	50.00	
			DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N).		y

			ENTER THE AS LEFT INLET PRESSURE IN PSIG (XXXX.X)	369.00	
			ENTER THE AS LEFT OPERATING PRESSURE IN PSIG (XXXX.X)	369.00	
			ENTER THE AS LEFT SET PRESSURE IN PSIG (XXXX.X)	50.00	

1567889	7/21/04	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X)	368.00	
			ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X)	368.00	
			ENTER THE "AS FOUND" SET PRESSURE IN PSIG (XXXX.X)	50.00	
			DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N).		yes

			ENTER THE "AS LEFT" INLET PRESSURE IN PSIG (XXXX.X)	368.00	
			ENTER THE "AS LEFT" OPERATING PRESSURE IN PSIG (XXXX.X)	368.00	
			ENTER THE "AS LEFT" SET PRESSURE IN PSIG (XXXX.X)	50.00	

1088908	9/18/03	KWALLS			
606263	6/20/02	RKITZMILLER			

EQNUM: 756488 REGULATOR, SELF OPERATED - CONTROL - IA CONTROL

REGULATOR, SELF OPERATED - INSPECTION

11213729	6/2/05	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X)	369.00	
			ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X)	43.00	
			ENTER THE AS FOUND SET PRESSURE IN PSIG (XXXX.X)	44.00	
			DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N).		y

			ENTER THE AS LEFT INLET PRESSURE IN PSIG (XXXX.X)	369.00	
			ENTER THE AS LEFT OPERATING PRESSURE IN PSIG (XXXX.X)	44.00	
			ENTER THE AS LEFT SET PRESSURE IN PSIG (XXXX.X)	45.00	

1567890	7/21/04	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X)	368.00	
			ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X)	44.00	
			ENTER THE "AS FOUND" SET PRESSURE IN PSIG (XXXX.X)	43.00	
			DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N).		yes

			ENTER THE "AS LEFT" INLET PRESSURE IN PSIG (XXXX.X)	368.00	
			ENTER THE "AS LEFT" OPERATING PRESSURE IN PSIG (XXXX.X)	44.00	
			ENTER THE "AS LEFT" SET PRESSURE IN PSIG (XXXX.X)	45.00	

1088909	9/18/03	KWALLS			
606264	6/20/02	RKITZMILLER			

Note: Please see attached 2002-2003 field inspection records.

**COLUMBIA GAS SYSTEM
REGULATOR STATION INSPECTION REPORT**

STATION NAME <i>Kowlesburg</i>		STATION NUMBER <i>606821</i>		DATE <i>6/20/02</i>	TIME <i>10:00</i>
STATION LOCATION <i>L 13044 Above Kowlesburg</i>		CLASSIFICATION <i>TRANS</i>		LEAKAGE BEFORE VENTING <input type="radio"/> %	
SCHEDULED INSPECTION <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO [EXPLAIN IN REMARKS]		REGULATION AS FOUND <input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> ABNORMAL [EXPLAIN IN REMARKS]			
Regulator Number →	<i>1A</i>	<i>2A</i>			
Function	<i>Monitor Control</i>				
Size and Model	<i>2" RW 461 57 2" RW 461 57</i>				
Inlet Pressure (psig)	<i>352</i>	<i>352</i>	<i>352</i>	<i>352</i>	
Outlet Pressure (psig, oz., in. w.c.)	<i>352</i>	<i>352</i>	<i>49.5</i>	<i>45.0</i>	
Monitor Set Point (psig, oz., in. w.c.)	<i>50</i>	<i>50</i>	<i>-</i>	<i>-</i>	
Instr. Supply Pressure (psig)	<i>N/A</i>	<i>-</i>	<i>N/A</i>	<i>-</i>	
Instr. Output Pressure (psig)	<i>N/A</i>	<i>-</i>	<i>N/A</i>	<i>-</i>	
Inner Valve Position	<i>100%</i>	<i>100%</i>	<i>10%</i>	<i>10%</i>	
ITEMS INSPECTED: "OK" OR EXPLAIN IN REMARKS					
Instruments or Pilots	<i>N/A</i>	<i>N/A</i>			
Gages	<i>N/A</i>	<i>N/A</i>			
Auxiliary Regulators	<i>N/A</i>	<i>N/A</i>			
Filters and/or Dryers	<i>N/A</i>	<i>N/A</i>			
Diaphragms	<i>OK</i>	<i>OK</i>			
Valves and Seats	<i>OK</i>	<i>OK</i>			
Stem and/or Stem Seal	<i>OK</i>	<i>OK</i>			
Vents and Vent Lines	<i>OK</i>	<i>OK</i>			
Control & Supply Lines	<i>OK</i>	<i>OK</i>			
Operational Check as Left	<i>OK</i>	<i>OK</i>			
OTHER ITEMS INSPECTED: WRITE "YES" "NO" OR EXPLAIN					
Shut Off Valves:	<i>YES</i>	Lubricated <i>YES</i>	Sealed <i>NO</i>	Locked <i>YES</i>	
Bypass Valves:	<i>YES</i>	Lubricated <i>YES</i>	Sealed <i>NO</i>	Locked <i>YES</i>	
SCRUBBERS: <i>N/A</i>	HEATERS: <i>N/A</i>		SAFETY DEVICES: <i>N/A</i>		
Type	Type <i>WATER BATH</i>		Size and Type		
Inspected	Operating <i>NO</i>		Shut Off Valve Opened & Secured		
Cleaned	Inspected <i>YES</i>		Set Press. _____ in. w.c. or _____ psig.		
Controls Ckd.	Cleaned <i>NO</i>		Relieved at _____ in. w.c. or _____ psig.		
	Burner Ckd. <i>YES</i>		Operation Satisfactory		
Fencing <i>OK</i>	Building <i>N/A</i>	Lot <i>OK</i>	Atmospheric Corrosion <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
REMARKS:					
INSPECTED BY: <i>[Signature]</i>			REVIEWED BY:		

DUPLICATE

COLUMBIA GAS SYSTEM
REGULATOR STATION INSPECTION REPORT

STATION NAME KILLISBURG		STATION NUMBER 6821		DATE 7-15-03	TIME 11:15
STATION LOCATION 2104 H. KILLISBURG		CLASSIFICATION TAPPLS		LEAKAGE BEFORE VENTING 0 %	
SCHEDULED INSPECTION <input type="checkbox"/> YES <input type="checkbox"/> NO [EXPLAIN IN REMARKS]		REGULATION AS FOUND <input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> ABNORMAL [EXPLAIN IN REMARKS]			
Regulator Number →		1A	2A		
Function		110N/10K/10MT			
Size and Model		3" RR 461 3" RR 461/573			
Inlet Pressure (psig)		356	356		
Outlet Pressure (psig, or, in. w.c.)		356	49.5		
Monitor Set Point (psig, or, in. w.c.)		50	N/A		
Instr. Supply Pressure (psig)		N/A	N/A		
Instr. Output Pressure (psig)		N/A	N/A		
Inner Valve Position		100% OPEN	50% OPEN		
ITEMS INSPECTED: "OK" OR EXPLAIN IN REMARKS					
Instruments or Pilots	N/A	N/A			
Gages	N/A	N/A			
Auxiliary Regulators	N/A	N/A			
Filters and/or Dryers	N/A	N/A			
Diaphragms	SHUT OFF VALVE	SHUT OFF VALVE	OK		
Valves and Seats	N/E	N/E			
Stem and/or Stem Seal	N/E	N/E			
Vents and Vent Lines	OK	OK			
Control & Supply Lines	OK	OK			
Operational Check as Left	OK	OK			
OTHER ITEMS INSPECTED: WRITE "YES" "NO" OR EXPLAIN					
Shut Off Valves:	Lubricated	Sealed	Locked		
Bypass Valves:	Lubricated	Sealed	Locked		
SCRUBBERS:	HEATERS:	SAFETY DEVICES:			
Type N/A	Type N/A	Size and Type N/A			
Inspected	Operating	Shut Off Valve Opened & Secured			
Cleaned	Inspected	Set Press. _____ in. w.c. or _____ psig.			
Controls Ckd.	Cleaned	Relieved at _____ in. w.c. or _____ psig.			
	Burner Ckd.	Operation Satisfactory			
Fencing	Building	Lot	Atmospheric Corrosion <input type="checkbox"/> YES <input type="checkbox"/> NO		
REMARKS:					
ANNUAL I.P.S.A.					
CHECK SET POINTS. CHECK FOR LOCK UP.					
INSPECTED BY: AWG/CC			REVIEWED BY:		

DUPLICATE