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February 19, 2008

Mr. Byron E. Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Eastern Region - PHP-100
Office of Pipeline Safety
409 3rd Street S.W., Suite 300
Washington, DC 20024

Sent via Certified Mail

**RE: Notice of Amendment dated January 11, 2008
Interstate Storage and Pipeline Corporation
CPF 1-2008-5001M**

Dear Mr. Coy,

This letter has been prepared in response to the Notice of Amendment dated January 11, 2008 that was submitted to Mr. Charles Denault regarding the Integrity Management Program inspections performed by your office in October 2007. This Notice of Amendment was received by Mr. Denault on January 22, 2008.

In this referenced letter it is stated that, on the basis of the inspection, PHMSA has identified an apparent inadequacy within ISPC's plans or procedures. Following are the details of the PHMSA findings in the January 11, 2008 letter, and ISPC's response to these findings.

1. Program Evaluation: Process Approach

195.452(f)(7) Methods to Measure the Program's Effectiveness

PHMSA findings – *One area that Interstate has not addressed is a more global view of their IM Plan. The IM plan needs to document that Interstate will use methods to measure whether the program is effective, and to identify trends and/or insights.*

Some of these methods include the use of periodic self-assessments, internal/external audits, management reviews, or other self-critical evaluations to assess program effectiveness.

These findings would include a review and follow-up of program evaluation results and recommendations by appropriate company managers. Specified actions would then be implemented or scheduled for implementation.

ISPC response – At this time, ISPC does not anticipate the need for a hearing. ISPC will amend their Integrity Management Plan to further enhance the methods to measure the program's effectiveness, using *API Standard 1160* as a guide. ISPC anticipates the amendments to be completed and submitted to PHMSA within the allotted one hundred twenty (120) days of receipt of this notice, which will be May 22, 2008.

SECOR

Mr. Byron E. Coy, PE
CPF 1-2008-5001M

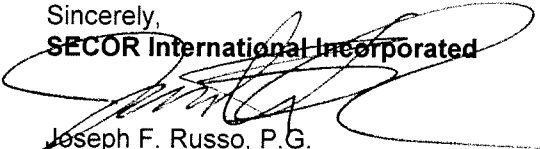
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I hope you find this response to be satisfactory. ISPC appreciates your input regarding their operation and your contribution to their commitment of operating a safe pipeline facility in the State of New Jersey.

If you have any questions regarding this letter, please feel free to contact me at (609) 844-7510.

Sincerely,

SECOR International Incorporated


Joseph F. Russo, P.G.
Principal Geologist

CC: Charles Denault, ISPC
Christopher Paige, DSPC
Alex Dyson, ISPC
George Steady, DSPC
Project File