



**U.S. Department  
Of Transportation  
Pipeline and  
Hazardous Materials  
Safety Administration**

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
**609.989.2171**

**EXPRESS OVERNIGHT MAIL**

April 19, 2012

Mr. Barry Cigich  
Vice President Operations and Engineering  
Inergy Midstream, LP  
Two Brush Creek Boulevard, Suite 200  
Kansas City, MO 64112

**CPF 1-2011-1008M**

Dear Mr. Cigich:

On September 15, 2008, an inspector from the New York State Department of Public Service (NYS DPS), acting as agents for the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Central New York Oil & Gas (CNYOG) pipeline facilities in Owego, NY. As a result of the inspection, CNYOG was issued an NOA on May 23, 2011. The NOA required CNYOG to amend certain procedures in its written operations and maintenance (O&M) manual.

On June 15, 2011, PHMSA received CNYOG's existing procedures in response to the referenced NOA, which CNYOG believed addressed the NOA. Based on our review, we determined the existing procedures are still inadequate; specifically, CNYOG did not adequately address atmospheric corrosion monitoring requirements in the existing O&M procedures, or in the CNYOG form to be completed when atmospheric corrosion is discovered.

As a result of our review, CNYOG was issued a Region response for information letter on December 28, 2011, notifying CNYOG that the existing procedures PHMSA received on June 15, 2011, are still inadequate.

On February 13, 2012, PHMSA received via e-mail CNYOG amended procedures in a response dated January 25, 2012.

On March 1, 2012, a member of my staff sent Mr. John Shaffer of CNYOG an e-mail that provided PHMSA public guidance information indicating that the amended CNYOG procedures appeared to still be inadequate; specifically, CNYOG did not adequately address atmospheric

corrosion monitoring requirements as required in §192.481(c): “If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479 (c).” The CNYOG amended procedures appeared not to comply with the actions required by §192.479 (c) by excluding adequate atmospheric corrosion protection at soil-to-air interfaces.

On March 26, 2012, PHMSA received CNYOG amended procedures in a response dated March 23, 2012.

My staff reviewed the amended procedures, and it appears that the inadequacies outlined in this Notice of Amendment have been corrected.

This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.

Sincerely,

Byron E. Coy, P.E.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Cc: Mr. Kevin Speicher, NYS DPS