



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

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

NOTICE OF AMENDMENT

EXPRESS OVERNIGHT DELIVERY

May 23, 2011

Mr. Barry Cigich
Vice President Operations and Engineering
Inergy Midstream
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 (NYSDPS), 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.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within CNYOG's plans or procedures, as described below:

- 1. § 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.**
 - (2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.**

CNYOG did not have a procedure to address the requirements of §192.481 for atmospheric corrosion control monitoring.

CNYOG should modify their procedures as needed to address the inadequacy noted.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **30** days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that CNYOG maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron Coy, PE, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ, 08628 . In correspondence concerning this matter, please refer to **CPF 1-2011-1008M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

Cc: NYSDPS - Mr. Gavin Nicoletta

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*