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Michael Hoffman
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May 11, 2012

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
W. Trenton, NJ 08628

RE: Response to Notice of Amendment, CPF 1-2012-1010M

Dear Mr. Coy:

This letter is provided on behalf of Columbia Gas Transmission, LLC by NiSource Gas Transmission and Storage (NGT&S) in response to the Notice of Amendment CPF 1-2012-1010M, which was dated April 12, 2012, and received by NGT&S on April 13, 2012.

In accordance with Section II.a of the Response Options for Pipeline Operators in Compliance Proceedings provided with the NOA, NGT&S submits this response letter to notify you of NGT&S's plans to address the items identified in the NOA.

The language from the NOPV is provided in bold, followed by the NGT&S response to each item.

1. 192.605 Procedural manual for operations, maintenance and emergencies

Each operator shall include the following in its operating and maintenance plan: (b) Maintenance and normal operations. The manual required by paragraph (aA) 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.

Columbia's procedures for controlling corrosion were inadequate in that they failed to identify the qualifications for individuals who perform design, construction, operations or maintenance functions, required by §192.605(b)(2).

NGT&S Response:

NGT&S has updated O&M Plan 70.01.01, External Corrosion Control, to incorporate language clarifying how individuals are qualified through education/training including safety training, work skills and

corrosion science to enable such personnel to consistently perform required job functions in a safe, knowledgeable and competent manner. Provided below is an excerpt of the language incorporated:

“Design, installation, operation and maintenance of cathodic protection systems must be carried out by or under the direction of a qualified Engineer, Specialist, other qualified company personnel or a qualified contractor. NGT&S provides personnel performing corrosion control related duties continuing education and training through internal processes, work related experience and industry accepted programs. The education/training includes safety training, work skills and corrosion science to enable such personnel to consistently perform required job functions in a safe, knowledgeable and competent manner. Post installation cathodic protection testing is completed to verify the adequacy of the design.”

If you have any questions regarding the actions NGT&S took for addressing the items identified in the Notice of Amendment, please feel free to contact me.

Sincerely,



Perry M. Hoffman
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