

** Operator misnamed their attachments in this letter. "Attachment B" should read as "Attachment A" and "Attachment C" should read as "Attachment B". BD/05232013



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May 22, 2013

Mr. Byron E. Coy, PE
Director, Eastern Region
United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety
Eastern Region – New Jersey District Office
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Response to Notice of Probable Violation and Proposed Civil Penalty CPF 1-2013-1003

Dear Mr. Coy:

This letter is provided on behalf of Columbia Gas Transmission L.L.C. (Columbia Gas) in response to the Notice of Probable Violation and Proposed Civil Penalty (NOPV) in CPF 1-2013-1003, dated April 5, 2013, and received by Columbia Gas on April 11, 2013. Columbia Gas then sought PHMSA's violation report and additional time to respond to the NOPV. PHMSA provided Columbia Gas until May 23, 2013 to respond. Columbia Gas appreciates this additional time to respond.

The NOPV was issued following inspections conducted by the West Virginia Public Service Commission between October 19, 2010 and June 3, 2011. The NOPV alleged violations of transmission line patrols, prevention of accidental ignition and procedural manual for operations, maintenance, and emergencies and proposed a civil penalty of \$29,000. As shown in this correspondence, Columbia Gas has taken actions to aggressively address the issues noted in the NOPV. As a result, and in accordance with Section I(a)(1) of the Response Options for Pipeline Operators in Compliance Proceedings, Columbia Gas submits this response letter to address the issue raised and does not contest any violation alleged in the Notice of Probable Violation.

Details for addressing the individual items noted in the NOPV are outlined below. The language from the NOPV is provided in bold, followed by a brief description of actions taken by Columbia Gas to resolve the respective item.

1. § 192.705 Transmission lines: Patrolling

(b) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but

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intervals between patrols may not be longer than prescribed in the following table:

Class location of line	Maximum interval between patrols	
	At highway and railroad crossings	At all other places
1, 2	7 ½ months; but at least twice each calendar year.	15 months; but at least once each calendar year.
3	4 ½ months; but at least four times each calendar year.	7 ½ months; but at least twice each calendar year.
4	4 ½ months; but at least four times each calendar year.	4 ½ months; but at least four times each calendar year.

CGT failed to patrol its line, designated HB, in Class 1 and 2 locations, at highway and railroad crossings, within the 7 ½ months interval, as prescribed in § 192.705(b).

Columbia Gas Response:

Columbia Gas has reviewed the records associated with the patrols on Pipeline HB in our Work Management System (Maximo), and has taken steps to ensure the appropriate patrols are documented in the Work Management System going forward. In addition, a review of all patrol frequencies across the pipeline system has been initiated to ensure the appropriate patrols are consistent with the designated Class location.

2. § 192.751 Prevention of accidental ignition.

Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

- (a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.

CGT failed to take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion

Columbia Gas Response:

As a follow-up to the inspection, Columbia Gas installed plugs on the two switches on the bottom of the switch box enclosure at the Kenova Compressor Station (see Attachment B for pictures).

3. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

CGT failed to follow its O&M procedure 200.01.02 section 3.4 which required identification tags on emergency valves.


Columbia Gas Response:

As a follow-up to the inspection, Columbia Gas installed tags on the emergency valve setting on Pipeline "P" at the Wilson gas delivery point (see Attachment C for pictures). In addition, Columbia Gas has a comprehensive initiative underway to ensure all identification tags on critical valves throughout the pipeline system are installed.

Columbia Gas believes that the actions taken and the documentation that we have provided fully address the issues raised in the NOPV.

If you have any questions or would like additional information, please do not hesitate to contact me.

Sincerely,



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