



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

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

## WARNING LETTER

### OVERNIGHT EXPRESS MAIL

April 5, 2013

Shawn L. Patterson  
President Operations & Project Delivery  
Columbia Gas Transmission Corporation  
1700 MacCorkle Avenue, SE  
Charleston, WV 25314

**CPF 1-2013-1004W**

Dear Mr. Patterson:

From September 21-24, 2010, representatives of West Virginia Public Service Commission (WV PSC), acting as agents for the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, inspected Columbia Gas Transmission Corporation's (CGT) compressor station facilities in Clendenin, Glenville and Smithfield, West Virginia. In addition, representatives from WV PSC reviewed records related to CGT's pipeline called T System (1570 pipelines), in Charleston, West Virginia.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

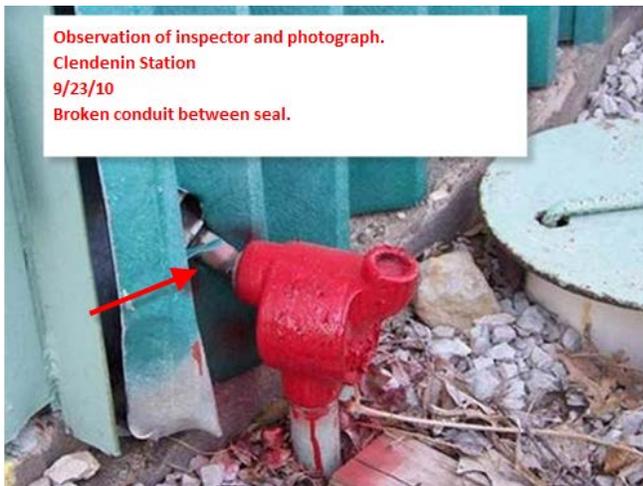
1. **§ 192.751 Prevention of accidental ignition.**

**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 in any structure or area where the presence of gas constitutes a hazard of fire or explosion.

During the field inspection at CGT's Clendenin Compressor Station, a representative from WV PSC observed and took photographs of a broken conduit between the explosive proof outlet and the seal allowing the wires to be open to the atmosphere (see below). The seal in question was outside the compressor building. Therefore, it is possible for gas to enter the broken conduit which is a potential source of ignition. The conduit is located in a class 1 division 2 area.



2. § 192.703 General.

(a) . . .

(b) **Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service.**

CGT failed to take appropriate remedial and protective measures to address an unsafe segment of exposed plastic pipeline.

CGT pipeline, designated 3665, is a 10-inch plastic pipeline. During the field inspection in Smithfield, a representative from WV PSC observed and took photographs of the segment of pipeline 3665 that was exposed (see below). This exposed segment of pipeline was located near a secondary highway.

CGT indicated to the representative from WV PSC that this line was scheduled for replacement in 2012.



Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in CGT being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2013-1004W** and, for each document you submit, please provide a copy in electronic format whenever possible, and please whenever possible provide a signed PDF (Portable Document Format). Smaller files may be emailed to [Byron.Coy@dot.gov](mailto:Byron.Coy@dot.gov). Larger files should be sent on a CD (Compact Disc) accompanied by the original paper copy to the Eastern Region Office. 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).

Sincerely,

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Cc: Mr. David Hippchen, WV PSC