



RECEIVED OCT 17 2013

**Dominion**<sup>™</sup>

Jeffrey L. Barger  
Vice President  
Pipeline Operations

**Dominion Transmission, Inc.**  
445 West Main Street, Clarksburg, WV 26301-2450  
Mailing Address: P.O. Box 2450  
Clarksburg, WV 26302-2450

**CERTIFIED MAIL**

October 4, 2013

Mr. Byron Coy, Jr.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
Mountain View Office Park  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

**RE: CPF 1-2013-1014W (Warning Letter)**

Dear Mr. Coy,

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Warning Letter dated August 16, 2013, which identified two (2) probable violations as a result of the inspection performed by a PHMSA representative at Boom and Harrison Compressor Stations in 2012. Following are DTI's responses to each:

1. **192.605 Procedural manual for operations, maintenance, and emergencies.**  
**Each operator shall include the following in its operating and maintenance plan:**  
**(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 one 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.**

Dominion failed to keep appropriate parts of the procedural manual for operation, maintenance, and emergencies at locations where operations and maintenance activities are conducted.

Specifically, automatic shutdown and manual shutdown procedures were not kept at Harrison Station.

**DTI Response:**

At the time of the inspection, automatic shutdown and manual shutdown procedures were available and located in the Task and Step Manual located in the office building at Harrison compressor station. DTI

personnel immediately posted the appropriate shutdown procedures at each compressor unit while the PHMSA representative was still on site.

2. **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 one 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.

Dominion failed to follow its emergency plan revised 3/1/2006. That emergency plan required written directions (for field location), developed either by field personnel or supervision, be available at field offices or support offices.

Specifically, written directions were not available at Boom Station.

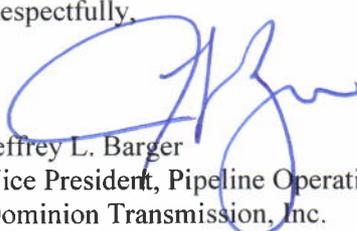
**DTI Response:**

With the advent of GPS and state of the art electronics, DTI has found it more convenient to rely upon electronic mapping and data retrieval services which are readily available via DTI's internal servers, databases, and proprietary software which is where facility GPS coordinates, drawings, maps, and diagrams are stored. Addresses to field/support offices are also provided on all company computers through a shared internal DTI website. Access to a computer and the internal company network is provided at every field office/support office.

Please advise if PHMSA has any objections to this philosophy. Otherwise, DTI will revise its Combined Emergency Plan accordingly.

If you have any questions, or should require additional information, please do not hesitate to contact Kirk Wissmar at (304) 627-3369.

Respectfully,

  
Jeffrey L. Barger  
Vice President, Pipeline Operations  
Dominion Transmission, Inc.