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Manager – System Integrity

February 21, 2014

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: CPF 1-2013-1036M – Columbia Gas Transmission, Notice of Amendment

Dear Mr. Coy:

This letter is provided on behalf of Columbia Gas Transmission L.L.C. (Columbia Gas) in response to the Notice of Amendment CPF 1-2013-1036M (NOA), dated December 23, 2013 and received on December 26, 2013. On January 9, 2014 Columbia Gas submitted an e-mail request for additional time to respond to the NOA. By way of a letter dated January 10, 2014 and received on January 14, 2014, PHMSA provided Columbia Gas until February 24, 2014 to respond. Columbia Gas appreciates this additional time to respond.

The NOA was issued following inspections conducted by the New York State Department of Public Service on July 23-31, 2012, of the Millennium Pipeline facilities in Owego, NY. In accordance with Section II (a) of the Response Options for Pipeline Operators in Compliance Proceedings provided with the NOA, Columbia Gas submits this letter to notify you that it has revised its plans and procedures to address the items in the NOA.

The language from the NOA is provided in bold, followed by the Columbia Gas response.

- 1. 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**

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system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

CGT's manual of written procedures was inadequate in that it did not have sufficient guidance for handling abnormal operations as required by 192.605(a).

Specifically, the manual did not include detailed procedures as required in 192.605(c)(1) with states:

(c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provided safety when operating design limits have been exceeded:

(1) Responding to, investigating, and correcting the cause of:

- i. Unintended closure of valves or shutdowns;
- ii. Increase or decrease in pressure or flow rate outside normal operating limits;
- iii. Loss of communication;
- iv. Operation of any safety device; and,
- v. Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.

CGT's Abnormal Operations Reporting Procedure 220.005.003 Version 6 Effective 02232011, Section 2.0 provides guidance in the following areas:

1. Identify the Abnormal Operation
2. Returning the Facilities to Service
3. Contact Record
4. Property Damage and Personal Liability
5. Review of Abnormal Operation Investigation
6. Effectiveness of the Procedures

However, none of the guidance provided in the areas noted above adequately address the requirements stated in 192.605(c)(1). Specifically, the procedure does not provide details on the following items;

1. Responding to, investigating, and correcting the cause of:
 - a. Unintended closure of valves or shutdowns;
 - b. Increase or decrease in pressure or flow rate outside normal operating limits;
 - c. Lose of communications;
 - d. Operation of any safety device; and

- e. Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.

2. Guidance detailing:

- a. The roles and responsibilities of the CGT personnel as it relates to AOC response and investigation
- b. Who should respond to an AOC.
- c. When is an AOC investigation required?
- d. What are the elements of the investigation?
- e. When is a root cause analysis required?
- f. What constitutes an adequate description to explain the Abnormal Operation?
- g. Who should conduct, review and approve an AOC investigation?
- h. How should the AOC investigation be documented?

Columbia Gas Response:

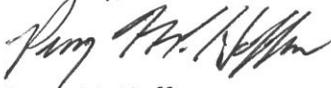
Columbia Gas has updated O&M Plan 220.05.02 Abnormal Operations and has developed six new procedures, as follows, to address the concerns raised in the NOA:

- 220.005.005 Abnormal Operation Reporting – Unintended Valve Closure or Shutdown
- 220.005.006 Abnormal Operation Reporting – Increase or Decrease in Pressure or Flow Rate Outside Normal Operating Limits
- 220.005.007 Abnormal Operation Reporting – Unintended Loss of Critical Communications
- 220.005.008 Abnormal Operation Reporting – Operation of a Safety Device
- 220.005.009 Abnormal Operation Reporting – Malfunction of a Component, Deviation from Normal Operation, or Personnel Error
- 220.005.010 Abnormal Operation Reporting – Third Party Damage or Near Miss to Pipeline Facility

We believe that the revised plan and procedures, together, address the concerns raised in the NOA. A copy of the revised Plan 220.05.02 Abnormal Operations is included in Attachment A. A copy of each of the procedures listed above is included in Attachments B through G.

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

Sincerely,



Perry M. Hoffman
Manager – System Integrity
Columbia Pipeline Group