



2800 Post Oak Blvd. L-11  
Houston, Texas 77056

May 2, 2014

**CPF 1-2014-1003M**

Mr. Byron Coy  
Director – Eastern Region  
Pipeline and Hazardous Materials Safety Division  
Office of Pipeline Safety  
820 Bear Tavern Road, Suite 103  
West Trenton, New Jersey 08628

**Re: Transcontinental Gas Pipeline Company, LLC (Transco)  
Amended Procedures for Handling Pipeline Liquids and Leaking Valves  
Station 505, Neshanic Station, NJ**

Dear Mr. Coy,

In response to the request for amended procedures specified in the referenced Notice of Amendment, CPF 1-2014-1003M, please find enclosed, copies of the following revised procedures:

1. Procedure 10.22.02 – Gas Handling Plans
2. Procedure 90.52.01 – Hot Cutting the Pipeline

Procedure 10.22.02 was revised to strengthen the review of gas handling plans and the responsibility of the District Manager in that process. It also addresses, in greater detail, actions to be taken to identify and mitigate leaking valves that may impact safety in a given job scenario.

Procedure 90.52.01 was also revised to broaden the review and control of the District Manager. It further addresses steps to be taken to identify and control residual liquids in a pipeline, as well as, measures to be employed that provide greater detail in handling gas while cutting into a pipeline.

I have also enclosed a copy of the corporate email to employees notifying them of the revision of these two procedures. Revised Operations and Maintenance Manual policies and procedures are typically reviewed in a group setting at Company compressor stations and as required on an individual basis to ensure employees are aware of changes made.

We appreciate PHMSA's guidance in addressing ways to improve the effectiveness of our procedures. Should you have any questions, please let me know.

Sincerely,

Marie G. Sotak  
Manager – Pipeline Safety Gas and Liquids – East

Attachments

cc: Josiah R. Neave, V.P., Safety and Regulatory Compliance  
Stephen D. Potts, Director, Pipeline and Process Safety  
Stephen Gliebe – PHMSA Eastern Region