



June 6, 2017

Mr. Robert Burrough, Acting Director
Pipeline and Hazardous Materials Safety Administration - Eastern Region
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: **CPF 1-2017-1009M** (Notice of Amendment)
Uncontested Response of Eastern Shore Natural Gas Company

Dear Mr. Burrough:

On May 11, 2017, as a result of inspections of field construction activity on Eastern Shore's natural gas transmission system during the weeks of May 16, 2016 and September 26, 2016, you issued a Notice of Amendment (NOA) to Eastern Shore Natural Gas Company (Eastern Shore) in regard to Eastern Shore's construction procedures, as required by the Pipeline Safety Regulations, Title 49, Code of Federal Regulations, Part 192.303.

The NOA alleged the following procedural inadequacy:

1. ESNG's Construction Standards Manual, Revision 3, dated 3/16/13 (Manual) did not provide sufficient guidance for securing ground clamps during welding to maintain electrical conductivity.

As noted in the NOA, during the inspection in May 2016, the PHMSA inspector reviewed ESNG's Manual and, at Section 9.3.11, Ground Clamps, the Manual states:

"A. External pressure-type clamps shall be utilized when performing all welding. Ground clamps may be fitted with copper or brass contact tips to prevent arc burns on the pipe surfaces.

B. A welder is automatically disqualified if he tacks the ground lead to a pipe or appurtenance."

The NOA also notes that American Petroleum Institute (API) Standard 1104 "Welding of Pipeline and Related Facilities" 20th Edition, incorporated by reference in §192.7(b)(9), states in Section A.5.3 that "Arc burns may occur on the internal or external surface of the pipe as a result of inadvertent arc strikes or improper grounding." Eastern Shore's Manual, according to the NOA, lacked guidance on how ground clamps will be secured to the pipeline in order to maintain electrical conductivity.

Eastern Shore proposes the attached updates to our procedures to address the concerns outlined in the NOA.



Please review the attached proposal and provide any comments so that we may address those accordingly and incorporate the updates into our Construction Standards Manual. The NOA indicates that enforcement action will be closed once the amended procedures adequately address the concerns raised.

Eastern Shore appreciates this opportunity to work with PHMSA to improve our procedures to address your concerns and to close this matter.

Sincerely,
Eastern Shore Natural Gas Company

A handwritten signature in black ink, appearing to read "E. Pearson".

Eric M. Pearson
Senior Manager, Operations Compliance & Engineering

9.3.11 Ground Clamps (Proposed – Revised Standard)

- A. Ground clamps shall be securely fastened, but not welded, to the work and shall fit in such manner to prevent arc burns. Ground connections are to be attached in the “V” bevel or finished weld. This contact shall be large enough to prevent local overheating or arcing between the contact and work. Contractor shall be responsible for any arc burns and shall repair or replace as a cylinder, as directed by Company, any portion of the pipe containing an arc burn.
- B. Welders working on fabrication, repairs, or tie-ins shall use insulated electrode holders. Arc strikes or dragging of electrodes on the surface of the work will not be permitted. Striking of arcs shall be confined within the welding groove. Any arc strikes occurring outside the weld bevel area shall be repaired or cut out and replaced as a cylinder as directed by the Company.
- C. A welder is automatically disqualified if he tacks the ground lead to a pipe or appurtenance.

9.3.11 Ground Clamps (Current Standard)

- A. External pressure-type clamps shall be utilized when performing all welding. Ground clamps may be fitted with copper or brass contact tips to prevent arc burns on the pipe surfaces.
- B. A welder is automatically disqualified if he tacks the ground lead to a pipe or appurtenance.