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EASTERN SHORE
NATURAL GAS

January 18, 2018

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

Re: **CPF 1-2017-1023M** (Notice of Amendment)
Uncontested Response of Eastern Shore Natural Gas Company

Dear Mr. Burrough:

On December 21, 2017, as a result of inspections of field construction activity on the natural gas transmission system of Eastern Shore Natural Gas Company (Eastern Shore) between December 7 – 9, 2015, you issued a Notice of Amendment (NOA) to Eastern Shore in regard to its welding procedures, as required by the Pipeline Safety Regulations, Title 49, Code of Federal Regulations, Part 192.225.

The NOA alleges the following procedural inadequacy:

1. Eastern Shore's Construction Standards Manual – SMAW Procedure No. 10, dated 03/16/2013 (Procedure) did not record adequate details regarding time between weld passes, as required by API Standard 1104 – Welding of Pipelines and Related Facilities, 20th Edition (API 1104).

   The Procedure stated in part under Section 10, Time Lapse Between Passes, "The time lapse between subsequent passes is unlimited."

   The NOA also notes that API 1104 states in Section A.5.3.2.10 "The maximum time between the completion of the root bead and start of the second bead, as well as the maximum time between completion of the second bead and the start of the other beads, shall be designated."

   The NOA also states that API issued a technical clarification on January 15, 2016 clarifying the intent of Section 5.3.2.10, stating "Yes, the intent of API 1104, Section 5.3.2.10 is to identify the maximum time between the 1st pass and the 2nd pass and the maximum time between the 2nd pass and the 3rd pass."

   Therefore, PHMSA alleges that Eastern Shores Procedure did not satisfy in part the requirement for a designated maximum time between the completion of the second bead and the start of the other beads, per API1104 Section 5.3.2.10.

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Eastern Shore proposes the attached updates to our SMAW Procedure No. 10 to address the concern 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

Eric M. Pearson
Senior Manager, Operations Compliance & Engineering

SMAW Procedure No. 10 (Proposed – Revised Standard)

Section 10. TIME LAPSE BETWEEN PASSES: The time lapse between completion of the root bead and start of the hot pass shall be the time required for interpass cleaning, but shall not exceed ten (10) minutes. The time lapse between completion of the hot pass and start of the subsequent filler passes shall not exceed seventy-two (72) hours.

SMAW Procedure No. 10 (Current Standard)

Section 10. TIME LAPSE BETWEEN PASSES: The time lapse between root bead and hot pass shall be the time required for interpass cleaning but shall not exceed ten minutes. The time lapse between subsequent passes is unlimited.