U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

February 9, 2018

Mr. Kenneth Grubb
Chief Operating Officer
Tennessee Gas Pipeline Company
1001 Louisiana Street, Suite 1000
Houston, TX 77002

CPF 1-2018-1004M

Dear Mr. Grubb:

From August 1-3, 2017 and August 29-31, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Tennessee Gas Pipeline Company's CT Expansion Project – MA Loop in Agawam, MA.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Tennessee Gas Pipeline Company's plans or procedures, as described below:

1. **§192.303 Compliance with specifications or standards.**

   Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Tennessee Gas Pipeline Company's (TGP) written construction standards for each transmission line constructed in accordance with Part 192 were inadequate. Specifically, TGP's construction standards for pipe coating did not adequately address minimizing damage to pipe coating during installation via boring, per the requirements of §192.461(e).

Section 192.461(e) states:

"If coated pipe is installed by boring, driving, or other similar method, precautions must be taken to minimize damage to the coating during installation."

During the inspection, the PHMSA inspector requested procedures addressing coating conditions of a pipeline when it is pulled out of the bore during horizontal directional drilling (HDD). TGP provided Construction Standards Section C1080, Below-grade or Submerged Pipe Coatings, revised 2017-04-01 (construction standards). However, the construction standards did not address how TGP will assess the coating condition of piping that is exposed during a pull-back in the HDD process, and how TGP will remediate if the coating is damaged.

Therefore, TGP's construction standards did not adequately address minimizing damage to pipe coating during installation via boring, per the requirement of §192.461(e).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 60 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 60 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Tennessee Gas Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, New Jersey 08628. Please refer to **CPF 1-2018-1004M** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*