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April 17, 2019

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

**RE: CPF 1-2019-1009M**

Dear Mr. Burrough,

This letter is the formal response by Dominion Energy Transmission, Inc. (DETI) to Notice of Amendment (NOA) CPF 1-2019-1009M dated April 8, 2019, which identified one (1) concern in DETI's Standard Operating Procedures (SOPs) that requires clarification or further explanation. More specifically, PHMSA noted the following:

- “1.       **§192.613 Continuing surveillance.**  
          **(a)       Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.**

Dominion's procedures for continuing surveillance of its facilities were inadequate. Specifically, Dominion's Standard Operating Procedures *01/Continuing Surveillance of Pipeline Facilities, Section 065/Continuing Surveillance*, revised 8/2/2018 (SOP), failed to include continuing surveillance provisions for unusual operating and maintenance conditions such as soil erosion, replacement of a pipeline segment, or other circumstances. The SOP failed to include guidance on when and how to evaluate the depth of cover of facilities experiencing these conditions and to take appropriate actions when discovered.

Following the construction project inspection conducted in November of 2017, PHMSA requested and reviewed Dominion's SOP. Based on that review, Dominion's procedures were deemed inadequate for addressing the unusual operating and maintenance condition

of replacing a pipeline segment. Dominion should consider adding provisions in its SOP for addressing this condition, including steps such as:

- Performing an analysis to assess the potential safety impacts of inadequate depth of cover resulting from erosion, short pipeline segment replacements, or other circumstances.
- Implementing measures to address these potential safety impacts, when appropriate.”

**DETI Response:**

DETI is proposing to add the below requirements to SOP 065/01 Continuing Surveillance of Pipeline Facilities Paragraph III. A copy of the revised document is provided in Appendix A of this response.

**III. CONTINUING SURVEILLANCE**

- A. Continuing surveillance shall be conducted to identify any pipeline facilities experiencing abnormal or unusual operating and maintenance conditions. This may be accomplished by the following:
1. Periodic visual inspections of pipeline facilities which may be subjected to the following:
    - a. Changes in population density. (Refer to **Class Location SOP 040/03 Class Location Studies** for required studies due to changes in population density.)
    - b. Exposure or movement resulting from blasting, excavation, severe cold weather, or other disturbances. (In addition to visual inspections, leak surveys should also be considered after these conditions, especially on cast iron pipelines.)
    - c. Changes in topography which may have an effect on pipeline facilities.
    - d. Potential for or evidence of tampering, vandalism, or damage.
    - e. **Encroachment.**
    - f. Potential for gas migration into buildings from vaults and pits through air intakes.
    - g. Specific conditions discovered during pipeline patrols (e.g. changes in cathodic protection due to nearby installation of new

pipeline or changes in existing nearby pipeline cathodic protection requirements) and leak surveillance.

2. Periodic review and analysis of records, such as the following:
  - a. Pipeline patrols.
  - b. Leak surveys.
  - c. Valve inspections.
  - d. Vault inspections.
  - e. Pressure regulating, relieving and limiting equipment inspections.
  - f. Corrosion control inspections, tests and surveys.
  - g. Facility failure investigations.

3. A review of the depth of cover following a pipeline segment replacement.

B. If surveillance reveals that a pipeline segment requires maintenance or a change in operating pressure, but poses no immediate hazard, that segment shall be repaired or abandoned in accordance with this manual or the maximum allowable operating pressure shall be reduced in accordance with **Maximum Allowable Operating Pressure SOP 190/01 Steel and Plastic Pipelines**.

C. If it is determined that the existing cover on the replaced pipeline segment could lead to an unsafe condition, then DETI shall evaluate whether subsequent safety measures should be implemented. Such measures may include installation of line markers, installation of a concrete pad (or other protective barrier), adding cover over the pipeline, lowering the pipe, or revising agreements with the landowner.

The proposed changes have been incorporated into the annual SOP review and will be communicated and reviewed with personnel prior to implementation. If you have any questions, or should require additional information, please do not hesitate to contact Jeremy Ross at (681) 842-3586.

Respectfully,



Brian C. Sheppard  
Vice President, Eastern Pipeline Operations  
Dominion Energy Transmission, Inc.