



07/08/2020

**Via Overnight Delivery:**

Robert Burrough, Director  
PHMSA Eastern Region  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

**Via Email:**

robert.burrough@dot.gov

**Re: Notice of Amendment  
CPF 1-2020-1022M**

Mr. Burrough:

We have received and reviewed the Notice of Amendment dated June 12, 2020 regarding findings at the time of inspection during inspections taking place from April 30, 2019 to May 2, 2019, August 7, 2019 to August 8, 2019, and December 3, 2019 to December 5, 2019. Our responses are provided below:

1. General Conditions and Specifications for Pipeline Construction, undated failed to include training and experience requirements for individuals who perform visual inspection of welding, as prescribed in 192.241(a).

Please find enclosed RH energytrans, LLC's revised and re-issued procedure 241-1 addressing training and experience requirements for individuals who perform visual inspection of welding.

2. General Conditions and Specifications for Pipeline Construction, undated failed to include the requirements for the limitation on welders and welding operators prescribed in 192.229(b).

Please find enclosed RH energytrans, LLC's revised and re-issued procedure 229-1 addressing the limitation on welders and welding operators.

3. General Conditions and Specifications for Pipeline Construction, undated failed to specify requirements for pressure test records as prescribed in 192.517(a).

Please find enclosed RH energytrans, LLC's revised and re-issued procedure 517-1 addressing requirements for pressure test records.

4. Construction standards for coating inspection failed to adequately address the requirements of 192.307 regarding pipe that was installed via horizontal directional drilling (HDD).

Please find enclosed RH Energytrans, LLC's revised and re-issued procedure 307-1 for general material inspection requirements and RH Energytrans, LLC's revised and re-issued procedure 461-2 addressing different types of coatings and inspection of coatings in fluid piping installed via HDD.

5. Construction standards for coating inspection filed to adequately address the requirements of 192.461(e) regarding piping that was installed via HDD.

Please find enclosed RH Energytrans, LLC's revised and re-issued procedure 461-2 addressing different types of coatings and inspection of coatings including piping installed via HDD.

If you require any further information, please do not hesitate to reach out to me.

Regards,

Richard Rhoades, LLC



By \_\_\_\_\_

Richard Rhoades

**Enclosures:**

Revised procedures-  
241-  
229-  
517-  
307-1  
461-2