



May 14, 2007

Ms. Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street
Suite 600
Atlanta, GA
RE: Notice of Amendment CPF-2-2007-1006M)

Dear Ms. Daugherty,

This letter is in response to the Notice of Amendment dated April 17, 2007. There were 3 items addressed in the letter, Ozark has compiled the following in response to the issues raised in your letter. Ozark Gas Transmission respectfully submits the following:

1. **§ 192.911 What are the elements of an integrity management program? An operator's initial integrity management program begins with a framework (see §192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (incorporated by reference, see §192.7) for more detailed information on the listed element.)**
 - a. **The Ozark Gas Transmission (OGT) IMP documentation must have sufficient detail about IMP processes (e.g. data gathering, questionable data) to understand how a task is performed. The details should include the following:**
 - Who owns/ is responsible for the task;
 - What are the goals/objectives of the task;
 - What data/information/resources is required to complete the task;
 - How is the task to be completed;
 - When or how often is the task to be completed;
 - Are key elements to the task completion documented;
 - Where is task documentation stored;
 - Are task outputs/results communicated to key personnel;
 - Is there a method for process improvement (reviews/feedback loops)

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Prior to the close of the inspection, OGT updated the Responsibilities matrix in Section 3 of the IMP Program manual and added titles and section numbers in Appendix B to address the first bullet of this issue. The remaining items on this issue remained open at the close of the inspection.

Ozark Gas Transmission has reviewed and revised the aforementioned procedures to include the information requested. The MOC (Management of Change) was adopted May 2007.

2. **§ 192.911 What are the elements of an integrity management program?**
 - (c) **An identification of threats to each covered pipeline segment, which must include data integration and a risk assessment. An operator must use the threat identification and risk assessment to prioritize covered segments for assessment (§192.917) and to evaluate the merits of additional preventive and mitigative measures (§192.935) for each covered segment.**
 - a. **The IMP Section 6.1.3.2 identifies “typical data sources” and Section 6.1.3.3 discusses integrating data. OGT gathered data for the entire pipeline, not just HCA’s. The inspection team noted that additional detail was needed on the processes and procedures (e.g. IMP 6-003 Section 2.1.6) for identifying threats and data integration.**

OGT has reviewed the Notice of Amendment dated April 17, 2007 and the “Integrity Management Inspection Summary Report, provided by Mr. Dave Waters dated 08/06 and the aforementioned section of the company IMP plan. The IMP plan has been and revised through the company Management of Change process to meet the expectations expressed above. The Management of Change was adopted in May, 2007

3. **§ 192.933 (d) (1) Immediate repair conditions. An operator's evaluation and remediation schedule must follow ASME/ANSI B31.8S, section 7 in providing for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure in accordance with paragraph (a) of this section or shut down the pipeline until the operator completes the repair of these conditions.**
 - a. **OGT needs to provide more detail on how the process for discovery of immediate conditions is implemented, starting with the first receipt of preliminary assessment information to discovery following final report information from the pigging vendor. Prior to the close of the inspection, OGT clarified the requirement for pressure reduction and remediation within 5**

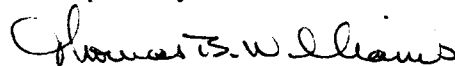
days by modifying Section 6.3.3.1 of the IMP to state "The operator shall examine these indications within a period not to exceed 5 days following determination of the condition. After examination and evaluation any defect found to require repair or removal shall be promptly remediated by repair or removal unless the operating pressure is lowered to mitigate the need to repair or remove the defect."

- b. OGT needs to address how multiple immediate conditions discovered during an assessment covering multiple covered segments are individually prioritized and scheduled for remediation. Prior to the close of the inspection, OGT modified Section 2.4.2 of IMP 6-017 to state, "Prioritize the evaluation and remediation of individual anomalies within the HCA segments from highest to lowest risk utilizing the Gas Pipeline Assessment, IMP 6-003 procedure."
- c. OGT did not have provisions in their IMP or implementing procedures to schedule and remediate anomalies arising from threat conditions that do not meet classification criteria of § 192.933 (c). Prior to the close of the inspection, OGT modified Table 1, Scheduling Requirements by Type of Condition, in IMP 6-018 to address this issue by adding the following; "*Any indication, anomaly, or other condition that is not listed in the above categorized items that reduces the integrity of the line such that it warrants remediation*"

OGT has revised the aforementioned section of the code through the company's Management of Change process; the changes were adopted May 2007. A copy of this procedure and the proceeding procedures are herein being provided to the Southern Region Office, PHMSA and the Southwest Region Office PHMSA

If any questions arise or any additional information is needed, please call (918) 496-4903.

Respectfully,



Thomas B. (Tom) Williams
Senior Vice-President – Engineering & Operations
Atlas Pipeline, operating affiliates

Cc. Mr. Rod Seeley - Director, Southwest Region, PHMSA

Enclosure: Response to Notice of Amendment – CPF-2-2007-1006M