



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 26, 2007

Mr. Royce Ramsay
Vice President, Operations
Northern Natural Gas Co., Inc.
1111 S. 103rd Street
Omaha, NE 68124

CPF 3-2007-1008C

Dear Mr. Ramsay:

On August 15-17, 2006, a representative of the Michigan Public Service Commission acting as an Interstate Agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your facilities and records in Negaunee, Michigan.

As a result of the inspection, the following item was identified as a concern:

There was a discrepancy between the as-built drawings and the welding records. The Welding Inspector's Report for Pipeline Construction dated Feb 4, 2006 showed that some welds were listed as "cut out"; however, as-built drawings showed that some of them remained in the pipeline. The examples noted were welds RB-4 and RB-6. During the review of the welding and construction records for the M-35 replacement project, we were unable to ascertain whether the welds were actually repaired and non-destructively tested or if there was an error in the record-keeping.

We hope you will consider this area of concern as an opportunity to improve your existing pipeline safety program. If we can answer any questions or be of any help, please call us at 816-329-3800.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2007-1008C**. Be advised that all material you submit in response to this letter 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).

Sincerely,

A handwritten signature in cursive script that reads "Ivan A. Huntoon". The signature is written in dark ink and is positioned above the printed name and title.

Ivan A. Huntoon

Director, Central Region

Pipeline and Hazardous Materials Safety Administration