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March 27, 2020

Gregg Ochs  
U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

Dear Mr. Ochs,

I am responding to the warning letters we received on November 25, 2019 in regards to your inspection of our Sturgeon Bay Pipelines, September 4-6, 2018. We have addressed the following items and made the corrections you requested.

1. 192.619 Maximum Allowable Operating Pressure. We added the statement of designing the pressure of the weakest element in the segment. For us that is the second stage regulator. We have changed our MAOP to be 10 psi downstream of the first cut regulator.
2. 192.805 Qualification Program. Per your request we added valve inspection and pipefitting as required tasks. We included training exercises for each task.
3. 192.199 Requirements for Design of Pressure Relief and Limiting Devices. At Birch Grove Condos, we have not corrected the underground cover at this time. We plan to modify the underground cover by cutting openings in the sides of the cover, so we can run the discharge through the side and up to correct the situation. The weather is now favorable and should be completed by May 10, 2020. Pictures will be sent to you upon completion.
4. 192.479 Atmospheric Corrosion. The meter situation that you listed has been inspected, cleaned and painted to prevent corrosion. Pictures and inspection records are attached.

The items listed for 2015 and 2016 have been addressed, personnel have been qualified and procedures are being followed. We will get you our updated OMM by Tuesday, March 31, 2020.

If you need anything further, please let me know.

Sincerely,

A handwritten signature in black ink that reads "David Anderson".

David Anderson  
District Manager  
Lakes Gas Co.

Attachments: 39