



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Gessner, Suite 1110  
Houston, TX 77074

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

January 5, 2011

Mr. M. Dwayne Burton  
Vice President Gas Pipeline Operations and Engineering  
Natural Gas Pipeline Company of America  
500 Dallas Street, Suite 1000  
Houston, TX 77002

**CPF 4-2005-1011H**

Dear Mr. Burton:

On May 13, 2005, Natural Gas Pipeline of America (NGPL) experienced a failure of its Gulf Coast Mainline 36-inch #3 natural gas pipeline near Marshall, TX. As a result of the incident the Pipeline and Hazardous Materials Administration (PHMSA) issued a Corrective Action Order (CAO), 4-2005-1011H, dated May 26, 2005, requiring NGPL to take corrective actions with respect to its Gulf Coast Mainline natural gas pipeline system.

The cause of the failure was determined to be Near-Neutral Stress Corrosion Cracking (SCC) and NGPL presented a plan of corrective measures with annual updates designed to prevent additional in-service failures. Through field and record inspections over the past five years, PHMSA has determined that NGPL has substantially completed the requirements of the CAO.

Because of the ongoing nature of SCC issues, NGPL agreed to incorporate the processes of detecting, evaluating, and remediating SCC developed during the work performed under the CAO into your Operations and Maintenance procedures. Consequently, PHMSA believes that it is not necessary to continue to monitor this work under the authority of the CAO. This case is now closed.

Sincerely,

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous  
Materials Safety Administration