



CenterPoint Energy Gas Transmission
P.O. Box 21734
Shreveport, Louisiana 71151
Phone 888-641-TEAM

March 12, 2013

R. M. Seeley, Director, SW Region
Pipeline and Hazardous Materials Administration
Office of Pipeline Safety
8701 South Gessner, Suite 1110
Houston, TX 77074

RE: CPF 4-2013-1003M

Dear Mr. Seeley,

This letter is written in response to Notice of Amendment (NOA) CPF 4-2013-1003M dated January 25, 2013 and received by CenterPoint Energy Gas Transmission (CEGT) January 28, 2013.

This response addresses inadequacies PHMSA identified within CEGT's procedures while inspecting construction work near Saratoga, AR between August 28th and October 25th, 2012.

CEGT has amended Construction Specifications No. 100, No. 102, No. 103 and No. 201B to reference the proper standards as listed in 49 CFR 192.7, as per your letter.

CEGT believes in a safety culture and is committed to the continuous improvement and effectiveness of our pipeline safety programs as exhibited by the steps taken to address the issues identified in this response.

If you have any questions concerning the actions we have taken, please feel free to call me.

Sincerely,

A handwritten signature in black ink that reads "Walter L. Ferguson".

Walter L. Ferguson
Div. Sr. VP Midstream Fld Ops
Engineering & Construction

CC: Royce Brown, Div. VP Pipeline Safety
Chris Bullock, Director of DOT Compliance
Johnny Cavitt, DOT Compliance Manager

Enclosed:

1. Summary of Changes, Manual of Construction Specifications, Book 2, February 25, 2013 (CEGT Management of Change)
2. 100B2 (Revised Construction Specification 100, Standard Welding Specifications)
3. 102B2 (Revised Construction Specification 102, Welder Qualification)
4. 103B2 (Revised Construction Specification 103, Repair of Weld Defects)
5. 201B2 (Revised Construction Specification 201B ASME Welding Procedure for Pipe 1" O.D. and Larger, Low-Hydrogen Electrodes, Groove & Fillet Welds)