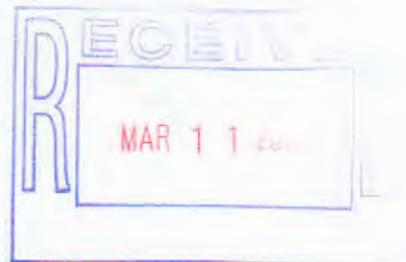




Northern Natural Gas Company
1111 South 103rd Street
Omaha, NE 68124-1000
(402) 398-7000



March 8, 2013

Mr. R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
Suite 1110
8701 South Gessner
Houston, TX 77074

RE: CPF 4-2013-1007W

Dear Mr. Seeley:

Northern Natural Gas (Northern) received a Warning Letter dated February 19, 2013, from the US Department of Transportation – Pipeline and Hazardous Materials Safety Administration (PHMSA) resulting from a PHMSA Southwest Region audit of Northern Natural Gas facilities in the Spearman, Texas area during the period of September 17, 2012 and February 7, 2013. Although Northern understands that a formal response is not required, Northern is submitting this letter for the record in response to the issues noted in the Warning Letter.

The following is an excerpt from the Warning Letter, in **bold**, with Northern's response in *italics*:

1. **§192.465 External Corrosion Control: Monitoring**

(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

At the time of the field and records inspection, the PHMSA inspector found a low pipe to soil cathodic protection reading at M.P. 23.7 on Line "C". Records indicated that the reading had been out of compliance for the years 2011 and 2012 monitoring cycles.

Northern Natural corrosion and compliance personnel stated that they performed a short close intervals survey and found the low area to be about 500 feet in length. They are in the process of ordering material to mitigate the situation and the installation is expected to be complete by June 2013.



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Northern has received the material for the small ground bed and rectifier to protect this short section of the Sunray to Beaver C-line (aka M770C) near mile post 23.7. The construction is expected to be completed in March of 2013. Once the project is completed, Northern will notify the Southwest Region PHMSA inspector the work was completed.

Additionally, it should be noted that the area was considered under cathodic protection using an alternate cathodic protection criteria as permitted in Appendix D of Part 192. Northern personnel obtained information to show that the 100 mV of polarization was met and the documentation is attached to this response. It should be noted that the printed report used to display cathodic protection readings during a standard inspection does not indicate which criteria was being use nor does it typically include the "Structure IRF" or "Native P/S" columns.

Northern trusts that this response adequately addresses the concerns of the Warning Letter. Please contact me if you have any questions or require additional information in regard to this letter.

Sincerely,

Thomas Correll
Director, Pipeline Safety and Integrity
thomas.correll@nngco.com
402-398-7715