

May 16, 2013

Mr. R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner, Suite 1110  
Houston, TX 77074

Dear Mr. Seeley,

The following information is provided in response to a Notice of Amendment associated with the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspection report number CPF 4-2013-1008M. The report concerned a comprehensive inspection of Golden Triangle Storage, Inc (GTS) procedures for operations, maintenance, public awareness and damage prevention.

The PHMSA identified deficiencies found within GTS's plans and procedures as well as GTS's responses to these identified deficiencies are as follows:

1. GTS O&M sections 204 "Construction Near Company Facilities" and O&M section 232 "Damage Prevention and Public Education" did not include the identity of persons who normally engage in excavation activities in the area in which the pipeline is located.

**In response, while these procedures were not properly identified in Sections 204 and 232 in GTS's O&M Plan, GTS addresses these activities through its parent company, AGL Resources' Pipeline Public Awareness Program (PPAP). Persons who normally engage in excavation activities in the areas in which GTS's pipelines are located are identified and notified as specified in the Pipeline Public Awareness Plan. This list is requested by the Company annually from the appropriate one call center and stored on the Company's Pipeline Public Awareness SharePoint site.**

2. GTS O&M sections 204 "Construction Near Company Facilities" and O&M section 232 "Damage Prevention and Public Education" did not have

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provisions to provide for notification of the public in the vicinity of the pipeline and actual notification of the persons engaged in excavation activities how to learn the location of underground pipelines before excavation activities are begun.

**In response, while these procedures were not properly identified in Sections 204 and 232 in GTS's O&M Plan, GTS addresses these activities through its parent company, AGL Resources' PPAP. The Pipeline Public Awareness Plan contains provisions to provide for notification to the public and persons engaged in excavation activities in the vicinity of GTS's pipelines on how to learn the location of underground pipelines before excavation activities are begun. GTS's procedures will be updated to reference the PPAP.**

3. GTS O&M section 204 "Construction Near Company Facilities" and O&M section 232 "Damage Prevention and Public Education" did not have a management commitment, did not define program roles and responsibilities, nor did it identify the administrator of their public awareness program as required by §192.616.

**In response, while these procedures were not properly identified in Sections 204 and 232 in GTS's O&M Plan, GTS addresses these activities through its parent company, AGL Resources' PPAP. The Pipeline Public Awareness Plan contains a statement of management commitment, defines program roles and responsibilities and identifies the administrator of the PPAP. GTS's procedures will be updated to reference the PPAP.**

4. GTS O&M section 232 Damage Prevention and Public Education did not follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, specifically their procedures did not have provisions to require a public awareness program effectiveness review and continually improving their public awareness program.

**In response, while these procedures were not properly identified in Section 232 in GTS's O&M Plan, GTS addresses these activities**

**through its parent company, AGL Resources' PPAP. The Pipeline Public Awareness Plan contains provisions to require a public awareness program effectiveness review and continual improvement of the program. GTS's procedures will be updated to reference the PPAP.**

5. GTS O&M section 232 Damage Prevention and Public Education (Section 232) did not have provisions to educate appropriate government organizations and persons engaged in excavation related activities as required stakeholders; did not have provisions to educate stakeholders on the hazards and physical indications associated with an unintended release.

**In response, while these procedures were not properly identified in Section 232 in GTS's O&M Plan, GTS addresses these activities through its parent company, AGL Resources' PPAP. The Pipeline Public Awareness Plan contains provisions to educate appropriate government organizations and persons engaged in excavation related activities as required stakeholders and to educate stakeholders on the hazards and physical indications associated with an unintended release. GTS's procedures will be updated to reference the PPAP.**

6. GTS O&M section 232 Damage Prevention and Public Education did not have provisions to determine if the Public Awareness Program should be conducted in languages other than English.

**In response, while these procedures were not effectively identified in Section 232 in GTS's O&M Plan, GTS addresses these activities through its parent company, AGL Resources' PPAP. The Pipeline Public Awareness Plan contains provisions to determine if the PPAP should be conducted in languages other than English. GTS's procedures will be updated to reference the PPAP.**

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The document sections in question showing proposed revisions to GTS's procedures which incorporate the PPAP as well as a copy of the AGL Resources PPAP are included for your review.

If you have any questions or need additional information, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "RRL", is positioned above the printed name.

Richard R. Lonn  
Director  
Compliance Assurance