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February 23, 2016

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

RE: CPF 4-2016-1001

Dear Mr. Seeley:

This letter is provided on behalf of Columbia Gulf Transmission, LLC (Columbia Gulf) in response to the Notice of Proposed Violation (NOPV) and Proposed Civil Penalty CPF 4-2016-1001 letter dated January 19, 2016, and received by Columbia Gulf on February 1, 2016.

The NOPV and Proposed Civil Penalty were issued following the review conducted by the Pipeline and Hazardous Materials Safety Administration (PHMSA) Southwest Region of the Columbia Gulf Mainline 300 pipeline incident near Delhi, Louisiana. One item was noted in the NOPV and a Civil Penalty of \$33,100 was proposed. Within this correspondence, Columbia Gulf provides clarifications that we believe demonstrate that no violations took place. Columbia Gulf respectfully requests that PHMSA withdraw the allegation of violation and associated proposed civil penalty.

The language from the NOPV is provided in bold below, followed by Columbia Gulf's response.

1. §191.15 Transmission systems, gathering systems, and liquefied natural gas facilities. Incident report.

(c) Supplemental report. Where additional related information is obtained after a report is submitted under paragraph (a) or (b) of this section, the operator must make a supplemental report as soon as practicable with a clear reference by date to the original report.

Columbia Gulf Transmission, LLC (Columbia) failed to file a supplemental report for the ML300 natural gas pipeline incident that occurred on April 25, 2014, as soon as practicable after additional information was obtained.

Columbia experienced a reportable incident on their ML300 natural gas pipeline located near Delhi, Louisiana. As a result, Columbia filed a PHMSA Form F7100.2 for the incident, listing "unknown/still under investigation" cause on the form on May 22, 2014.

On April 7, 2015, Columbia received a metallurgical analysis report that provided the necessary information to determine a probable cause of failure and did not file a supplemental final report until receiving a request from the Southwest Region.

On September 30, 2015, Columbia filed a supplemental report with a cause of "miscellaneous"; however, the metallurgical report indicates the failure was caused by fatigue.

Repeated requests for an accurate supplemental final report based on the metallurgical analysis information resulted in a submittal of an additional supplemental final report with a cause consistent with the metallurgical report findings on November 29, 2015.

Response

The proposed NOPV involves whether Columbia Gulf filed a supplemental report for the Mainline 300 pipeline incident as soon as practicable after additional information was obtained. As further explained below, Columbia Gulf did file a timely supplemental report once the metallurgical analysis report was finalized, and based on requests from your office, a revised supplemental final report was filed.

The NOPV alleges that Columbia Gulf did not make a supplemental report as soon as practicable as required in §191.15 (c). However, Part 191 does not define "as soon as practicable", unlike Part 195, Transportation of Hazardous Liquids by Pipeline, §195.54 (b) which clearly states a supplemental report shall be filed within 30 days.

As stated in the NOPV, Columbia Gulf did file a supplemental report on September 30, 2015, once the metallurgical analysis report was finalized on April 7, 2015. This supplemental report had Section G8 completed with the incident cause identified as miscellaneous, and Columbia Gulf also provided additional description clearly stating the cause was fatigue consistent with the metallurgical analysis report. At the request of your office, Columbia Gulf was instructed to identify the cause as fatigue in Section G5 of the incident report. In response to your office's request, Columbia Gulf did file a revised supplement report on November 29, 2015, completing Section G5 as requested instead of Section G8, which was originally completed.

In summary, Columbia Gulf believes a supplemental final report was filed as soon as practicable in accordance with §191.15 with the cause of the incident consistent with the metallurgical report findings. The additional time from the September 30, 2015 supplemental final report filing to the additional supplemental final report being submitted was to address requests from your office to ensure the cause of the incident was identified in the correct section of the supplemental report.

Based on the information provided within this correspondence, Columbia Gulf respectfully requests the withdrawal of the alleged violation and associated proposed civil penalty.

Should you have any questions, require any additional information, or would like to meet to discuss any of the information above, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Perry M. Hoffman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Perry M. Hoffman
Manager – System Integrity
Columbia Pipeline Group