

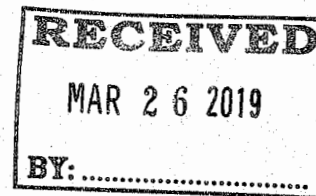


March 21, 2019

The Dow Chemical Company
2301 N. Brazosport Blvd.
Freeport, Texas 77541
USA

CERTIFIED MAIL #7016 0750 0000 0656 4702

Ms. Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
9701 S. Gessner, Suite 630
Houston, Texas 77074



**Re: NOA Response for Package CPF 4-2019-1003M
UCAR Pipeline Incorporated
Operator ID No. 19892**

Dear Ms. McDaniel:

This letter is in response to the Notice of Amendment issued to UCAR Pipeline Incorporated, a wholly owned subsidiary of The Dow Chemical Company (Dow), dated February 22, 2019 for Inspection Package CPF 4-2019-1003M (the NOA). In the NOA, you stated that PHMSA has identified an inadequacy in the Cathodic Protection program. Dow's response to the referenced findings is provided below.

Alleged Inadequacy:

OME M-15 does not require the measurement or calculation of the IR drop error, instead it only seeks to minimize it via measurement in close proximity to the pipe. In practice, UCAR employees measure the potential through several feet of earth which can induce significant IR drop error. UCAR must amend this procedure to require proper consideration of the IR drop error.

Dow's Response:

Dow is confident that the methods and processes in place for determining adequate cathodic protection of our pipelines and pipeline facilities meets or exceeds applicable standards and regulations, and ensures an appropriate level of protection of our assets. Dow evaluates data from Close Interval Surveys (CIS) to ensure adequate current is being distributed throughout the piping system and to determine if potentials are experiencing I/R drop in the CP measurements. For additional protection our CP system is remotely monitored to ensure current is present on the respective pipelines at all times. If the current is not adequate on the system, the CP technician is notified automatically and responds to repair and reinstate current.

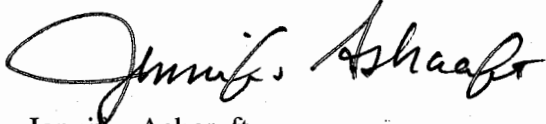
Though Dow's position is that the CP program is providing adequate protection for pipelines and pipeline facilities, OME M-15 Corrosion Control procedure was updated to clarify that I/R drop error is considered in determining the CP measurement. Dow further updated the procedure to include a description of negative polarized potential, and how it can indicate I/R drop error for consideration. A copy of the revised procedure is enclosed for your review and consideration.

Ms. Mary McDaniel
Director Southwest Region
PHMSA

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Dow appreciates PHMSA's input and guidance, and believes that the changes made to the OME M-15 Corrosion Control procedure meet your expectation. Please do not hesitate to contact me if you have any questions or comments, or if you require any additional information.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Ashcraft". The signature is written in a cursive style with a large initial "J".

Jennifer Ashcraft
Regulatory Compliance Specialist
The Dow Chemical Company
Phone: (979) 238-0361
E-mail: joashcraft@dow.com

Enclosure

cc: Stephanie Weidman, PHMSA Program Manager, Railroad Commission of Texas