



Northern Natural Gas Company
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November 5, 2020

Mary L. McDaniel P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

cc: Gregory Ochs, Operations Supervisor, Central Region, PHMSA

Re: Northern Natural Gas' Response to CPF-4-2020-1008

Dear Ms. McDaniel:

In response to the Notice of Probable Violation and Proposed Compliance Order dated October 30, 2020, Northern Natural Gas Company submits the following clarifications.

Item 1: § 191.5 Immediate notice of certain events.

Line 4 of the PHMSA Incident Report – Gas Transmission and Gathering Pipeline Systems (form PHMSA F 7100.2) – requests the local time and date of the incident. Northern Natural Gas did not consider that specific time to be that of the confirmed discovery, but rather the first indication of a potential issue. Line 7 records the date and time of the National Response Center report, which was within one hour of confirmation of the presence of a leak that had the potential to reach the reportable limit threshold. If Line 4 is intended to be the “confirmed discovery time,” Northern Natural Gas will note that accordingly for future reporting.

During the initial investigation, Northern Natural Gas calculated it would take more than a month before the leak reached the reportable limit. The gas loss caused no drop in inlet pressure at the Lehigh, Iowa, town border station located within one mile of the leak site. Later, Northern Natural Gas also determined the reportable limit probably would be reached before the flood waters receded or the gas was re-routed. The National Response Center report was filed within an hour of that determination.

Northern Natural Gas will correct the 30-day report with a supplemental report and is developing a definition for “confirmed discovery.”

Item 2: 192.935(c) What additional preventative and mitigative measures must an operator take?

Northern Natural Gas reviewed the company's position paper and study results for installing automatic shut-off valves and/or remote control valves in high consequence areas during three separate agency audits that occurred in 2019 and 2020. These position papers and analyses performed were consistent with Northern Natural Gas' approach for many years and have been subject to numerous audits without issue. The paper was revised several times (see the following table) based on ongoing improvement efforts and feedback given by inspectors during the three 2019 and 2020 audits, and eventually was broken into two papers that were published December 4, 2019, and February 25, 2020.

Rev. #	Revision Date	Comment
1	May 9, 2006	Preventive and Mitigative Measures Position on RCVs and SWVs
2	September 11, 2018	Updated response time study results
3	September 28, 2019	Updated to clarify position on installation of ASVs and RCVs
4	December 4, 2019	Separated from position paper
5	February 25, 2020	Added 49 CFR 192.935(c)

The response times of Northern Natural Gas personnel, which is a requirement of 192.935(c), is revised annually as part of the company's annual risk analysis. This analysis with a review of response times has been completed as part of the program for many years.

The revision dated September 28, 2019, was sent to the PHMSA-Southwest Region audit team October 31, 2019.

As the PHMSA-Southwest Region audit was being finalized in early 2020, PHMSA-Central Region initiated an audit of Northern Natural Gas during which the automatic and remote shut-off valve issue again was discussed. These discussions resulted in additional revisions to Northern Natural Gas' guidance document. The document was revised into two separate documents for additional clarity, and specifically, to include the requirements of 192.935(c). The revisions dated December 4, 2019, and February 25, 2020, were sent May 6, 2020, to the PHMSA-Central Region audit team as they were conducting the active audit. Northern Natural Gas did not send the May 2020 revisions to the PHMSA-SW region auditors.

In conclusion, based on this additional information and because Northern Natural Gas already addressed the issue with the automatic and remote shut-off valve guidance documents, Northern Natural Gas requests the Notice of Probable Violation (CPF 4-2020-1008) be withdrawn.

Sincerely,



Thomas Correll
Vice President, Pipeline Safety and Risk