



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

12300 W Dakota Ave , Suite 110  
Lakewood, CO 80228

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**NOTICE OF AMENDMENT**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 5, 2007

Mr. Thomas Morgan  
Vice President, Operations  
Colorado Interstate Gas Co.  
2 North Nevada Avenue  
Suite 1000  
Colorado Springs, CO 80903

**CPF No. 5-2007-1003M**

Dear Mr. Morgan:

In October 2005, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Colorado Interstate Gas Co.'s procedures for cathodic protection in Pueblo, Colorado.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Colorado Interstate Gas Co.'s plans or procedures, as described below:

**§192.605 Procedural manual for operations, maintenance, and emergencies**

**(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.**

**(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

**(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**

**§192.491 Corrosion control records.**

**(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.**

**§192.467 External corrosion control: Electrical isolation.**

**(d) Inspection and electrical tests must be made to assure that electrical isolation is adequate.**

Colorado Interstate Gas (CIG) procedures for corrosion control do not require electrical isolation tests at insulators, flanges, or connections. The procedures do not require personnel to retain a record of electrical isolation tests as required by §192.491(c); nor do they provide criteria for when mitigation is required and what mitigation actions are required.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 5-2007-1003M** and, for each document you submit, please provide a copy in electronic format whenever possible

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Hoidal', written in a cursive style.

Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

cc: PHP-60 Compliance Registry  
PHP-500 (C. Allen-#114308)