



August 14, 2012

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Material Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228-2585

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VIA COURIER

Re: CPF 5-2012-1004W PHMSA GTN Audit Warning Letter

Dear Mr. Hoidal:

On February 27, 2012 TransCanada Corporation received the above referenced Warning Letter that was a result of the PHMSA's audit of GTN facilities in Redmond OR. TransCanada submits this response to contest the allegation that ventilation systems are not adequate at Stations 11 and 14 on the GTN System.

In accordance with §192.173, and the guidance material developed by the GPTC, GTN's compressor buildings at Stations 11 and 14 are equipped with a ventilation system that ensures dangerous levels of gas never accumulate.

Vents are located in the roof of these compressor buildings to allow natural gas to escape, and ventilation fans are distributed around the buildings at a low level that blow air into the building to maintain a positive pressure at all times when a compressor unit is running.

The compressor buildings are equipped with gas detectors near the ceiling which monitor at all times for gas that might begin to accumulate. The control systems are set to alarm when the system detects gas that exceeds 10% of the Lower Explosive Limit (LEL) and that detection level activates all available vent fans. A detection level of 25% LEL initiates a full shutdown of all compressor units, isolation of the compressor station from the pipeline, and venting of all gas within the compressor station.

The vent pipes observed during the inspection carry gas and other vapors outside the buildings and above the level of the vent fan intakes, ensuring that gas cannot accumulate and endanger employees. We believe these systems fully comply with the provisions of §192.173 of the Pipeline Safety Regulations

Pursuant to Part 192.173, "Each compressor station building must be ventilated to ensure that employees are not endangered by the accumulation of gas in rooms, sumps, attics, pits, or other enclosed places." The code does not require that vent pipes that extend through the walls of the compressor building to extend above the roof line. Accordingly, we are requesting that this Warning Letter be withdrawn or an informal conference be convened at which time we can discuss the basis of the Warning Letter.

Please contact me at (832)320-5462 or (402)680-3636 if you wish to discuss this further.

Sincerely,

A handwritten signature in black ink that reads "Ken Crowl". The signature is written in a cursive, slightly slanted style.

Ken Crowl
Manager, US Pipeline Compliance
TransCanada Pipelines
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Houston, TX 77002-2761