



CPN PIPELINE COMPANY

VIA FEDEX AND EMAIL

60 RIVER ROAD
RIO VISTA, CA 94571

NYSE CPN

December 9, 2014

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

RE: Response to November 12, 2014 Notice of Notice of Probable Violation and Proposed Compliance Order CPF 5-2014-0006

Dear Mr. Hoidal:

CPN Pipeline Company has received the above-referenced Notice of Probable Violation and Proposed Compliance Order. Item #1 states that CPN did not document the person qualified in pipeline corrosion control methods on its corrosion control records when specific covered tasks were performed and the name of the qualified individual was not found on several annual cathodic protection survey reports and periodic rectifier reading records.

CPN is a small operator and there has only been one Corrosion Specialist responsible for all corrosion control activities on our Sacramento Valley pipeline system, with some limited assistance from an outside contractor. The Corrosion Specialist is the owner of the CP Survey Xcel files and the only individual that has access to the file. He is also certain that he completed the rectifier inspections in question. Unfortunately, in the process of converting manual hardcopy documentation to electronic files some years ago, the inclusion of a unique identifier on each record was overlooked. We have attached an Affidavit signed by our Corrosion Specialist attesting to the fact that he was the qualified inspector that completed the rectifier inspections and the annual Cathodic Protection inspections referenced in the Notice.

CPN modified the Xcel documentation and rectifier logs after the integrated inspection to require positive identification of the qualified individual completing each covered task. I have also attached examples of our revised Annual CP Survey clearly identifying the qualified individual.

As evidenced by our explanation and attached documentation, CPN Pipeline does not believe a violation of 49 CFR 192.453 occurred and hereby request that be reflected in the Final Order. We have also completed the necessary changes to our procedures and recordkeeping to satisfy the requirements of the Proposed Compliance Order.

If you believe any additional corrective actions are necessary in response to your Notice, or if you have additional questions please contact me at 707-374-1505.

Respectfully,



Scott Vickers
Compliance Manager

Cc: Chris Delaney
Lyle Fedje
Kurt Seel

Enclosures: Example Annual CP Surveys (4)
Mark Middleton Affidavit
Mark Middleton NACE Certification