Columbia Gas Transmission
A NiSource Company
1700 MacCorkle Ave., SE
Charleston, WV 25314
Phone: (304) 357-2000

April 23, 2008

Byron E. Coy, PE
Director, Eastern Region
United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Eastern Region – New Jersey District Office
820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

Re: CPF 1-2008-1003 Notice of Proposed Violation and Proposed Civil Penalty

Dear Mr. Coy:

Columbia Gas Transmission Corporation ("Columbia" or "the Company") respectfully submits this response to the Notice of Probable Violation and Proposed Civil Penalty ("NOPV") Letter dated March 14, 2008. The NOPV letter was received by Columbia on March 25, 2008.

The information submitted in this response includes a timeline of the applicable events from May 1, 2006 to August 21, 2006 as Exhibit 1. Statements from appropriate Columbia employees who were directly involved in the events leading up to the incident that occurred on August 21, 2006 are provided in Exhibits 4, 5 and 6.

Please note- the probable violations contained in the NOPV are shown in bold type and the Company's response to each charge follows immediately thereafter.

Section §192.605(b)(3) of the Pipeline Safety Regulations requires that the manual of written procedures required by §192.605(a) must include procedures for making construction records, maps, and operating history available to appropriate operating personnel.

Columbia Response:
The provisions for this requirement are provided by Columbia Plan 200.01.01 Pipeline Facility As-Built Records. The requirements for making construction records and maps available to appropriate operating personnel are provided in Section 3 of the Plan. A copy of the 2006 plan applicable at the time of the event is attached as Exhibit 2.

The operator failed to provide adequate construction records and/or maps showing the location of abandon tap on WB-Loop Line to appropriate personnel and/or excavating contractor.

Columbia Response:
Maps indicating the location of the abandoned tap were available to appropriate personnel, including the excavating contractor, ST Pipeline, at the construction site and at Columbia's operating location at Lost River Compressor Station. These maps are provided as Exhibit 3.

According to the statement from Jeffrey Allan Taylor (Exhibit 4), Chief Inspector for Columbia, a copy of the inventory map from the construction trailer was provided to the WV Public Service Commission during its investigation. The map provided to the WV Public Service Commission demonstrates that a map showing the location of the abandoned tap on WB-Loop Line was available to the appropriate personnel and/or excavating contractor.

The operator failed to follow the procedures established for safe excavating practices, as outlined in their Operations and Maintenance Plan, Section No. 110.01.13 (Trenching and Excavation

Requirements), during construction activities within the yard limits of the Lost River Compressor Station.

Columbia Response:
On April 10, 2006 the entire length of the pipeline was blown to atmosphere. ST Pipeline submitted one-calls to Miss Utility of West Virginia during this project. Copies of the one-call tickets submitted to Miss Utility of West Virginia by ST Pipeline are provided in Exhibit 8 for dates from April 12, 2006 until July 7, 2006.

According to statements and records provided by Columbia employees Perry G. Heltzel (Exhibit 5) and Randall Jenkins (Exhibit 6), Columbia located the pipelines in the vicinity of the excavation site at Lost River Compressor Station by exposure on May 1, 2006. At the time of this excavation, Columbia personnel instructed ST Pipeline to contact Columbia when ST Pipeline returned to install Line M-1 as part of the Hardy County Storage Project.

Section 3.4, subpart A, of the Operation and Maintenance Plan, states that "prior to starting work, investigation shall be made (to) determine if underground structures or installations will be encountered, if so, their location shall be determined"

Columbia Response:
As provided by the statements from Columbia employees Perry G. Heltzel and Randall Jenkins, Columbia complied with the requirements of the Operations and Maintenance Plan by locating the pipelines in the area of excavation using exposure on May 1, 2006, and by informing the excavation contractor, ST Pipeline about a buried valve that was in close proximity to the planned excavation area. A copy of Columbia's Location of Buried Facilities form dated May 1, 2006 is attached as Exhibit 8.

The buried valve was clearly marked with a pipeline marker when the lines were located on May 1, 2006, as demonstrated by the statement from Randall Jenkins. Columbia has also provided a photograph which shows the pipeline marker at the site of the buried valve prior to the excavation activities at Lost River Compressor Station. A copy of two photographs showing the marker is provided as Exhibit 7. The pipeline marker was installed prior to 1997 and removed by unknown persons between May 1, 2006 and August 21, 2006.

"As work proceeds the exact location shall be determined and proper support or protection provided."

Columbia Response:
On May 1, 2006, Columbia instructed ST Pipeline to contact the Company when construction continued at the Lost River Compressor Station construction site. ST Pipeline failed to communicate this request to the ST Pipeline crew that conducted the excavation activities on August 21, 2006, and ST Pipeline failed to initiate a new one-call notification for the excavation activities.

Columbia contacted Miss Utility of West Virginia to research one-call ticket records. One call notifications from ST Pipeline were found from April 12, 2006 until July 7, 2006 and are attached as Exhibit 9. The records research conducted by Miss Utility of West Virginia showed no one-call notifications by from ST Pipeline for the entire month of August 2006.

The operator failed to communicate with its contractor, ST Pipeline, the exact location of an underground abandoned pipeline tap on WB-Loop Line at Lost River Compressor Station.

Columbia Response:
On May 1, 2006, Columbia notified ST Pipeline employees (Jerry and Wayne, last names unknown) about the buried valve on WB-Loop Line and requested that they contact the Columbia office when ST Pipeline returned to install Line M-1 for the Hardy County Storage Project. Columbia's communication with the contractor, ST Pipeline, about the presence of a buried valve on May 1, 2006 demonstrates that Columbia as the operator did communicate with its contractor, ST Pipeline the exact location of the abandoned pipeline tap on WB-Loop line.

The failure to identify and communicate the location of the abandoned tap was a contributing factor which led to the incident.

Columbia Response:
As noted above, the abandoned tap was identified and located May 1, 2006.

Columbia communicated expectations with ST Pipeline through a pre-construction kick-off meeting and a number of tailgate safety meetings held with ST Pipeline employees. In these meetings, ST Pipeline was instructed by Columbia not to conduct any excavation activities without the presence of a Columbia Inspector.

Columbia also provided ST Pipeline with a Contractor Safety Manual (Exhibit 10) which clearly states that ST Pipeline is expected to comply with applicable laws and regulations under 49 CFR §192, and Columbia polices and procedures.

As a result, there was no failure on the part of Columbia to identify and communicate the location of the abandoned tap, and this was not a contributing factor which led to the incident.

In light of foregoing materials submitted in answer to the allegations contained in the NOPV, Columbia believes that it has fully responded to those allegations. At the least, Columbia submits that the information submitted is sufficient to fully mitigate the proposed penalty, and that the penalty should be withdrawn.

Columbia would welcome the opportunity to discuss these issues with representatives of PHMSA. Should those discussions fail to produce a satisfactory resolution, Columbia reserves its right to request a hearing pursuant to 49 C.F.R. §§ 190.209 and 190.211.

Please contact me if you have any questions or require any additional information.

Sincerely,

William J. Butterworth
Director, Engineering Services
Columbia Gas Transmission
1700 MacCorkle Ave. SE
Charleston, WV 25314
540-465-6425
bbutterworth@nisource.com

cc: D. Anderson, K. Christman, V. Gaglio, M. Newman, S. Yeh

Attachments

PLAN NUMBER: **200.01.01** VERSION NUMBER: **11**
PROCESS OWNERSHIP: **Engineering Services** RELATED POLICY

Pipeline Facility As-Built Records

1 SCOPE

This plan establishes the process in which pipeline facility as-built records are processed, distributed and retained. As-built records are essential for safe operation, regulatory compliance and documentation of Columbia Gas Transmission Corporation (Company) assets.

2 APPLICABILITY

The requirements within this plan are applicable to:

- All construction activities on all pipeline facilities (See Section 6, Definitions) owned and/or operated by the Company;
- All critical air and electrical systems associated with pipeline facilities;
- Cathodic protection systems associated with the pipeline facilities; and
- Both DOT jurisdictional and non-jurisdictional pipeline facilities.

Construction activities include but are not limited to:

- All new pipeline facility installations;
- Pipe replacements;
- Measurement and regulation equipment replacements;
- Pipeline repairs such as leak repairs, pipeline reinforcements (e.g. welded sleeves and composite repairs such as clockspring installations), grinding and weld metal deposition on DOT jurisdictional pipelines;
- Compressor station piping/equipment replacement;
- Storage well facility replacements;
- Cathodic protection systems including anode, ground bed and rectifier installations; and
- Pipeline facility recoating projects.

3 PLANS

3.1 General

As-built records are developed during the design, construction and commissioning phases of construction activities for new and/or modified pipeline facilities, and other systems associated with pipeline facilities such as cathodic protection systems and critical air and electrical systems. The process for as-built records depends on how a construction activity is funded, whether by a Capital or an Operations & Maintenance (O&M) budget. However, regardless of how the construction activity is funded, current as-built information per Section 3.4 shall be kept for the life of the facility. Appropriate

databases shall be updated, appropriate drawings will be revised and updated information (including drawings) shall be submitted back to the Operating location responsible for the pipeline facility.

The Company's goal is to facilitate timely as-built information turnaround to Operations. Inasmuch as there are numerous factors that impact as-built information timing (number of projects in a given year, types of projects, etc.), the timeframes in this plan are targets only.

3.2 Construction Activities – Capital Funded

All capital funded projects, regardless of whether they are lead by Operations or Engineering Services, should follow the procedures under this section. This includes all projects that are capital funded, where a Facility Maintenance Report may be used to help document the construction activities.

During the project-planning phase of a capital funded construction activity, the project leader (See Section 6, Definitions) will designate the As-Built Responsible Person. The As-Built Responsible Person is responsible for putting together the applicable records as per Sections 3.2.1, 3.2.2 and 3.2.3 for the construction activity, and for working with various groups to resolve issues with the as-built information.

3.2.1 As-Built Maps, Drawings/Sketches

Where pipeline facilities are added or in the case where replacements will significantly alter the operation of the facility, as-built information in the form of red-marked drawings, sketches or other appropriate documentation shall be distributed to the Operations team leader responsible for the pipeline facility and to Gas Control prior to the facility being placed in-service.

3.2.1.1 Single Line As-Built Maps, Drawings/Sketches

A. Within 60 calendar days after the new or replacement pipeline facilities are put into service:

1. Two copies of red-marked single line as-built maps, drawings and/or sketches should be prepared for the construction activity.

2. The as-built maps, drawings and/or sketches will be reviewed and signed off by the on-site project lead person, chief inspector and/or resident engineer for pipeline maps and mechanical drawings and for electrical drawings, the inspector or appropriate Engineering Services (ES) Automation & Electrical Group technician.

3. One set of red-marked single line as-built maps, drawings and/or sketches will be left with the Operations team leader responsible for the location.

B. One set of red-marked single line as-built maps, drawings and/or sketches will be transmitted to the Geographic Information and Mapping Services (GIMS) group in the Charleston Office within 90 days.

C. Within 180 calendar days of receipt of the single line as-built maps, drawings and/or sketches, the GIMS group or the ES-Design group as appropriate, should:

1. Review the submitted as-built maps, drawings and/or sketches for completeness.

2. Work with the As-Built Responsible Person and/or Project Support to resolve issues.

3. Generate revised maps and or drawings as appropriate that accurately reflect the as-built conditions.

4. Submit a copy of the revised maps and or drawings to the Operations team leader responsible for the facility location.

3.2.1.2 Double Line As-Built Drawings

Double line drawings are detailed drawings that depict the width as well as the arrangement of piping and other equipment. Double line drawings are often used where additional detail, not provided by single line drawings, is needed.

A. Within 90 calendar days after commissioning of the new or replacement pipeline facilities:

1. Two copies of red-marked double line as-built drawings should be prepared for the construction activity provided that double line drawings were used for construction.

2. The as-built drawings will be reviewed and signed off by the on-site project lead person, chief inspector and/or resident engineer for mechanical drawings and for electrical drawings the inspector or appropriate ES Automation & Electrical Group technician.

3. One set will be left with the Operations team leader responsible for the location.

4. The other set will be transmitted to the GIMS group in the Charleston office. Upon review for information critical to the Geographical Information System (GIS), the GIMS group will forward the red marked as-built double line drawings to the ES-Design group.

B. Within 360 calendar days of receipt of any double line as-built drawings, the ES-Design group should:

1. Review the submitted as-built drawings for completeness.

2. Work with the As-Built Responsible Person to resolve issues.

3. Generate revised drawings as appropriate that accurately reflect the as-built conditions.

4. Submit a copy of the revised drawings to the Operations team leader responsible for the facility location.

3.2.2 Pipeline Facility Test Plan and Test Report Package

The preparation of test plans and associated test report packages shall be in accordance with Plan 170.04.01, Piping Testing Requirements.

The As-Built Responsible Person for the construction activity should submit the completed test report package to the appropriate ES engineer for approval . For the purposes of this plan, appropriate ES engineers are the Pipeline, M&R, Compressor or Pipeline Safety engineers that have the functional expertise or are responsible for the facilities.

The test report packages should be sent by the As-Built Responsible Person for the construction activity as soon as possible after construction is completed using the following schedule:

- Compressor Station Activities –within 60 calendar days after the last test.
- Pipeline, Measurement and Regulation Activities – within 90 calendar days after the last test.

The appropriate ES engineer should:

- Review the test report package, resolve any issues and approve within 90 days of receipt.

- Upon approval send the approved test report package to the GIMS group in the Charleston office.

- Submit a copy of the approved test report package to the Operations' location responsible for the operation of the pipeline facility.

3.2.3 **Other As-Built Information**

All other as-built information in Section 3.4 that is applicable to a construction activity shall be verified and checked by the As-Built Responsible Person. This information, along with a copy of the unapproved test report package, shall be submitted to the GIMS group in the Charleston office with the as-built drawings/sketches per Section 3.2.1. The unapproved copy of the test report should be stamped or watermarked "Unapproved Copy, Do Not Process".

3.3 **Construction Activities – O&M Funded**

For construction activities funded by O&M budgets (generally maintenance and repair activities), the Operations team leader for the pipeline facility is responsible for compiling the appropriate as-built record information in Section 3.4. The appropriate ES staff (engineers, field engineering technicians, etc.) for the particular functional nature of the work (compression, pipeline, M&R) will provide support as outlined below.

3.3.1 **General**

Maintenance and repair related construction activities will be documented utilizing the Facility Maintenance Report (Form 1100 CE 4 CPS). The Operations Team Leader (or Construction Crew Leader as appropriate) or his designee will complete all applicable sections of this form and shall see to it that a detailed sketch/drawing is made that clearly shows the work that was performed. The completed form along with all applicable as-built construction records in Section 3.4 (including as-built sketches/drawings and test report package) should be submitted to the appropriate ES field engineering technician (See Section 6, Definitions) for review within 60 calendar days of completion of the construction activity.

The field engineering technician should review, accept and submit the Facility Maintenance Report and as-built construction records (with copy of the unapproved test report package) to the GIMS group within 60 calendar days of receipt. The original test report package will be sent to the appropriate ES engineer.

3.3.1.1 Within 120 days of receipt of the Facility Maintenance Report and as-built construction records, the GIMS group should:

1. Review the submitted as-built drawings and/or sketches for completeness.

2. Work with the field engineering technician to resolve issues.

3. Generate revised maps and or drawings as appropriate that accurately reflect the as-built conditions.

4. Submit a copy of any revised maps and or drawings to the Operations team leader responsible for the facility location.

3.3.2 **Pipeline Facility Test Plan and Report Package**
The preparation of test plans and associated test report packages shall be in accordance with Plan 170.04.01, Piping Testing Requirements.

The appropriate ES engineer should:

A. Review the test report package, resolve any issues and approve within 90 days of receipt.

B. Upon approval, send the test report package to the GIMS group in the Charleston office.

C. Submit a copy of the approved test report package to the Operations location responsible for operation of the pipeline facility.

3.4 **As-Built Record Requirements**
The following as-built records are required, where applicable, for a particular construction activity:

- Design Calculations
- Equipment Manual
- Material Documentation
- AC Mitigation Plan
- Abandonment Plan
- Drug Testing Compliance Statement
- One Call Compliance
- Construction Specifications
- Blasting Compliance
- Welder Qualification
- Welding Procedures (including any shop fabrication)
- Radiographic Qualification/Reports (including any shop fabrication)
- Depth of burial (including for facility replacements)

- Cathodic Protection System Installation Records
- Inspector Log/Reports
- Test Plan and Report Package
- As-built drawings/sketches
- Commissioning Documentation
- Operator Qualification Construction Tracking Records, if third party contractors are used
- Repair method used

4 RESPONSIBILITIES

4.1 Operations

A. Operations Staff

- Operations staff shall notify and involve the field engineering technician and ES engineer of all general maintenance and repair construction activities prior to commencement.

B. Operations Team Leader

- The Operations team leader, or his designee, shall be responsible for compiling the appropriate as-built information for construction activities funded by O&M budgets.

- The Operations team leader, or his designee, shall be responsible for submitting completed Facility Maintenance Forms and all other required as-built information to the appropriate field engineering technician.

- The Operations team leader will assure that all personnel performing tasks under the DOT Operator Qualification regulations will be qualified under the Company Operator Qualification Plan.

4.2 Support Staff

- The field engineering technician will review and accept the Facility Maintenance Report and the associated construction records and forward the as-built records to the GIMS group.

- The field engineering technicians will work with the GIMS group to assure that the as-built information submitted will accurately represent the as-built condition of the work managed by Operations.

- ES engineers, or their designee, shall review and sign each test report, submit the test report package to the GIMS group, and submit a copy of the approved test report package to the appropriate Operations location.

- The GIMS group shall verify the as-built package provided by this plan is complete, enter data in the GIS, and file the original records in a permanent filing system.

- GIMS and or ES-Design group will revise drawings/maps as appropriate to reflect as-built conditions and submit revised drawings/maps to the Operations Team Leader responsible for the operating location.

- The ES Project Leader will assign an As-Built Responsible Person for each construction project, and will ensure that the As-Built Reponsible Person has received appropriate training on the requirements of this plan. The ES Project Leader has overall responsibility to ensure that the collection, checking and transmission of as-built information is completed per this plan.

- The As-Built Responsible Person is responsible for collecting, checking and transmitting As-Built information on Capital funded construction activities as per this plan. The As-Built Responsible Person will assist with resolution of as-built information issues.

5 RECORDS

5.1 Company Forms/Database

The following Company forms should be used:

- Facility Maintenance Report (Form 1100-CE 4 CPS)
- Pipeline Reinforcement Installation Report (Form 2633-P17)

The pipeline facility attribute information collected by this Plan will be stored in the GIS database.

5.2 Records Retention

All original as-built records (with the exception of ES-Design group drawings) shall be maintained by the GIMS group for the life of the facility. Copies of as-built maps and drawings and approved test report packages shall also be kept at the Operations location responsible for the pipeline facility.

6 DEFINITIONS

As-Built Responsible Person: Person selected by the project leader or construction crew leader that is responsible for collecting, checking, and transmitting as-built information on Capital funded construction activities (including maps, drawings and/or sketches), as well as for assisting in the resolution of as-built information issues.

Critical Air and Electrical Systems: Air or electrical systems that are essential in assuring the proper operation of primary overpressure protection, emergency shutdown or gas detection systems associated with DOT jurisdictional pipeline facilities.

Engineering Services Technician: A group of employees in various Engineering Services fields, and may include ES field engineering technicians (pipeline), equipment analysis technicians (compressor), measurement/regulation technicians, or corrosion specialists.

Pipeline Facility: All parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenances attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.

Project Leader: The Company person responsible for a construction activity. This person may be an ES project leader, Operations team leader, construction crew leader, or other designated person.

7 REFERENCES

7.1 Related Plan Documents

Plan No:	Title:
170.04.01	Piping Testing Requirements

7.2 Related Procedures

Procedure No:	Title:
OEP-117	Clockspring Installation Procedures

7.3 Other Related References

Not Applicable.

8 REGULATORY CITATIONS AND EXCEPTIONS

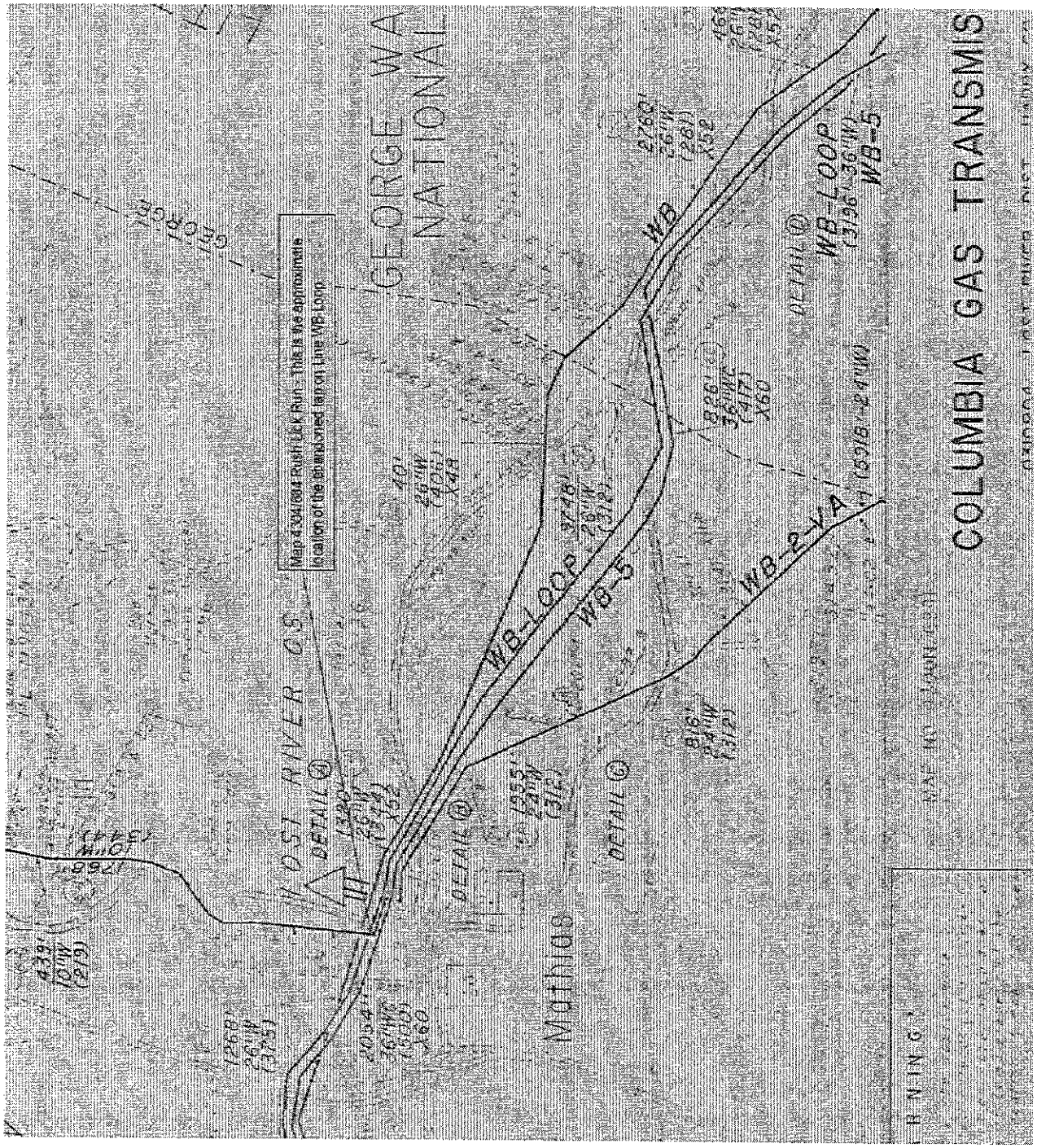
8.1 Federal Requirements

Citation	Title
49 CFR 192.605	Procedural Manual for Operations, Maintenance and Emergencies
49 CFR 192.709	Transmission Lines: Record Keeping

8.2 State Requirements

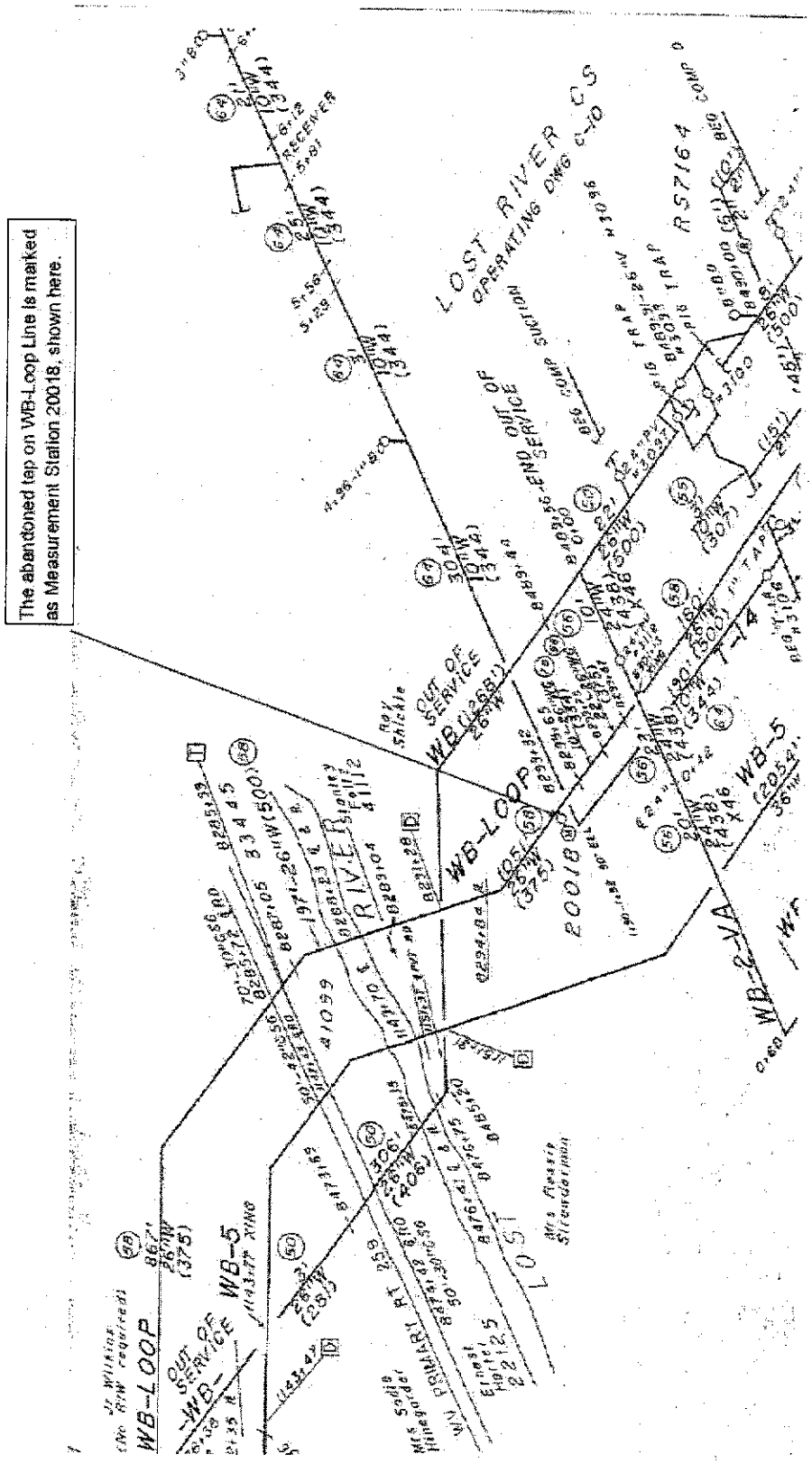
Not Applicable.

Exhibit 3 CPF 1 2008-2003 Map 1



Map 4304/684 Revised 4/5/99 and in effect August 2006

Exhibit 3 CPF 1 2008-2003 Map 2



Map 4304/684 Detail Sheet revised 4/5/99 and in effect August 2006

Statement of Jeffrey Alan Taylor
Job Title: Chief Inspector
Columbia Gas Transmission Corporation

My name is Jeffrey Alan Taylor and I am employed by Columbia Gas Transmission Corporation as Chief Inspector. My responsibilities in that position include assisting the Project Leaders with the planning of all aspects of capital and market development projects, providing skilled supervision of the process activities necessary to construct and place into service quality facilities within the Company's financial and scheduled guidelines.

ESSENTIAL FUNCTIONS:

- Field Lead and coordinate to finalization of the scope, estimated cost and schedule,
- Provide skilled supervision of multiple inspection teams and coordination of company, third party, and contractor efforts.
- Ensure project is completed within the Company's financial and scheduled guidelines by effectively planning, monitoring, and managing contract and company labor,
- Coordinate with Project Leader to finalize project scope of work,
- Work with developers, landowners and governmental agencies to reroute pipelines to meet their needs within Pipeline Policies,
- Coordinate with Land surveyors, environmental clearance activities, stream crossings, wetland permits, pipe disposal, road and railroad permits,
- Direct and supervise the daily activities of company and third party personnel assigned to the project,
- Assist Project Team with the work order completion report activities.
- Act as the as-built responsible to insure drawings are completed timely and correctly,
- Verify and approve invoices in accordance with company policy,
- Coordinate schedule for facility outages with Gas Control,
- Act as the Company's site representative for all contacts with the community, governmental agencies, property owners, contractor and vendors,
- Oversee on-site inspection and tours by regulatory agencies and customers,

- Provide oversight and direction to third party inspectors at other locations, and
- Provide construction estimates for projects.

According to my recollection ST Pipeline exposed Line WB-Loop and WB-5 at the Lost River Compressor Station on or about May 1, 2006. I remember the day the lines were exposed in my mind but not just by the date. Rich Hedricks (ST Pipeline, Supt.) and Sam Jarvis (ST Pipeline, R.O.W. Forman) had a backhoe available and wanted to spot the lines. Operation personnel were notified in advance and were on-site for the exposure of both lines. At this time, the only thing ST Pipeline was doing was to physically locate to visually see the lines and get the depth. The lines were not entirely exposed and I wasn't able to stay there for the entire time they were exposing them. Operations personnel were there and I had a couple inspectors working at Lost River Compressor Station on Fabrication (Bobby Parrish, Jimmy Shamblin – Gulf Interstate Field Services). My Assistant Chief Inspector was also on site (Barry Tanhoff – Gulf Interstate Field Services).

Two to three weeks after the exposure Rich Hedricks moved on to another Project with ST and Sam continued on with his duties as R.O.W and Ditch Forman. John Hardy came on board with ST Pipeline and took over a role as kind of the Assistant Superintendent to Terry Bear Gandee.

The exposed pipeline was safety fenced and not bothered anymore until the morning of 8-21-06. This is when John Hardy and his crew from ST Pipeline decided to continue the ditch for installation of the M-1 Line under WB-Loop and WB-5. My assistant Chief was made aware of it as they were in the process of digging the ditch towards the existing lines. He called me and I went to the Station at approximately 9:20 a.m. When I got there, I checked to make sure that the hoe teeth were covered and the side cutters were off the hoe. I told them to wait until I got a inspector down there before they dug any closer to the loaded lines. I contacted Barry Tanhoff to get him to help me locate a third party inspector and then I was on my way back to the office to get Randy or Pete from operations to be on location while there was digging near the loaded lines. I left the office and was returning when I got the word that ST Pipeline had hit the line. There were no injuries, fires, or evacuations. Gas Control was notified and monitoring for gas in surrounding areas began. The monitoring Center was notified along with Mountaineer Gas. Preparation to shut down the segment of pipeline from Moorefield Gate

Valve Setting to Lost River Compressor Station began immediately with operations.

During the WV PSC investigation, I was told by Bill Valentine that he would be filing a report on this incident, but other than getting an inventory and construction map from us at the Lost River Construction trailer, he never asked for any statements or reports from me or any of my inspectors.

Jeffrey Alan Taylor

Jeffrey A. Taylor
Signature

4-14-06
Date

Statement of Perry G. Heltzel

Pipeliner
Columbia Gas Transmission Corporation

My name is Perry G. Heltzel and I am employed by Columbia Gas Transmission Corporation as a Pipeliner. My responsibilities in that position include the following:

- Locate underground pipeline facilities
- Mark pipeline facilities,
- Pipe protection in ditch, and
- Various other associated tasks.

On May 1, 2006, I was at the Lost River Compressor Station to oversee the exposing of lines WB5, WB36 and WB Loop by ST Pipeline. All three lines were exposed without incident. The depths were taken by myself and two ST Pipeline employees named Jerry and Wayne. I heard my co-worker Randy Jenkins tell the ST Pipeline employees that there was a tap under a line marker on the WB Loop about 20' east of the point where the pipe was exposed.

On August 21, 2006, I was at Moorefield Gate Set when I was notified that the tap was hit. I was not notified that there was to be digging at Lost River Compressor Station on that day.

Perry G. Heltzel
Signature

4-17-08
Date

Statement of Randall Jenkins
Pipeliner
Columbia Gas Transmission Corporation

My name is Randall Jenkins and I am employed by Columbia Gas Transmission Corporation as a Pipeliner. My responsibilities in that position include:

- Locate underground pipeline facilities,
- Mark pipeline facilities,
- Pipe protection in ditch, and
- Various other pipeline operation and maintenance tasks.

May 1, 2006

I was going about my daily work duties. I stopped by Lost River Compressor Station where my co-worker Perry Heltzel was overseeing the exposing of three pipelines with ST Pipeline. When I arrived I told the ST Pipeline equipment operator that there was a valve on the pipeline under a pipe marker where his backhoe was parked. He thanked me.

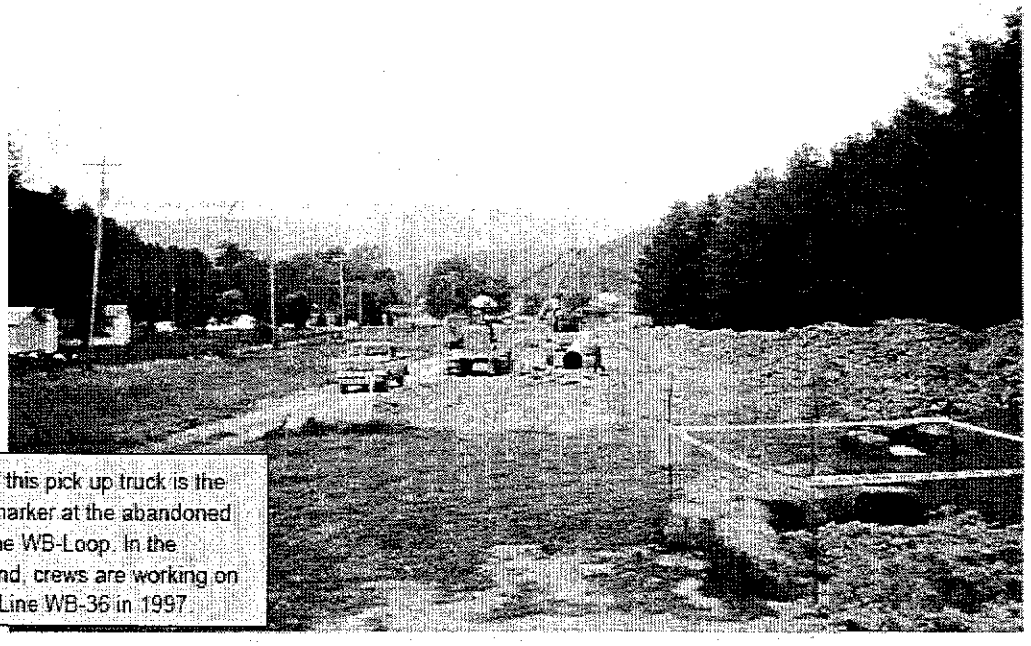
August 21, 2006

I was called by company radio to go to Lost River compressor station. When I arrived there was an ST Pipeline backhoe at a hole where gas was blowing. It was at the site where the pipelines were exposed in May. I got close enough to see that the 2" valve was hit. I informed my Team Leader that gas was blowing from around the 2" valve on line WB Loop.

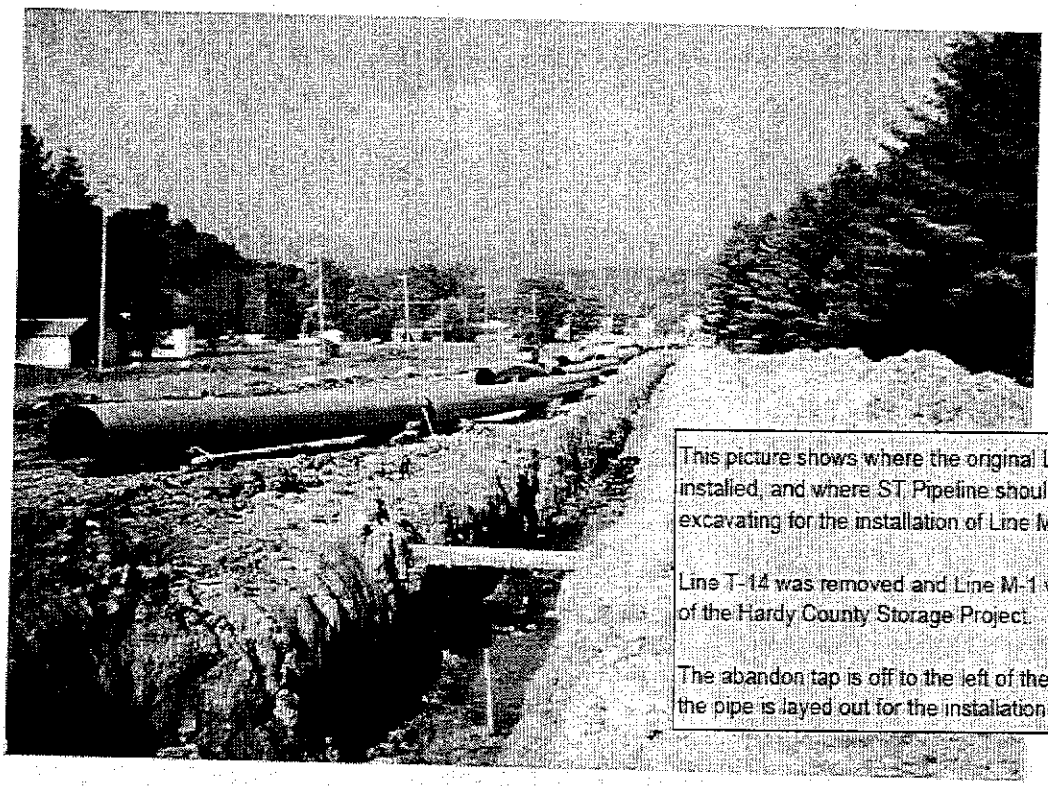
Randall Jenkins
Signature

4/17/08
Date

Exhibit 7 Response to CPF 1 2008-2003



In front of this pick up truck is the pipeline marker at the abandoned tap on Line WB-Loop. In the background, crews are working on installing Line WB-36 in 1997.



This picture shows where the original Line T-14 was installed, and where ST Pipeline should have been excavating for the installation of Line M-1.

Line T-14 was removed and Line M-1 was installed as pa of the Hardy County Storage Project.

The abandon tap is off to the left of the ditch, near where the pipe is layed out for the installation of Line T-14.

Exhibit 8 Response to CPF 1 2008-2003

FORM 1050 R17 (Rev. 6-2004)

COLUMBIA GAS TRANSMISSION/GRANITE STATE GAS TRANSMISSION
LOCATION OF BURIED FACILITIES

One Call locate number: 1000381 | Line Number: WB 5 WB Loop WB 36

Line Size: 36" 26" 20" | Line Pressure: 800 | Approx. Station: 63 994 ft | UTM Map No. 4309 N 684 E 17

Line located for: Name: ST Pipeline | Address: 5 Youngstown Dr. Cleveland, WV 25065 | Phone: 304-548-7013

Type of Business (check one)
☐ City ☐ County/State ☐ Utility ☑ Contractor ☐ Individual ☐ Other

Type of Buried Facility (check one)
☑ Transmission ☐ Gathering ☐ Storage ☐ Other

Pipe Line Description (check one)
☑ Steel ☐ Plastic ☐ Other

R/W Name from Map: Columbia Gas Trans Corp | Current Owner: Columbia Gas

Reason for Locating Buried Facilities – Proposed Type of Construction (circle one)
Water Gas Electric Sewer Comm. Cable Bldg. Demolition Road/Street Other (Explain below)

Brief Description of Proposed Construction – Describe Heavy Equipment to be on P/L ROW or Easement – Include Sketch Below or on Separate Sheet

Putting New Gas Pipe line in For Hardy Storage

Road Crossing Yes ☐ No ☑ | If yes, have plans been submitted for review Yes ☐ No ☐
Blasting Yes ☐ No ☑ | If yes, have plans been submitted for review Yes ☐ No ☐

Describe Existing Line Marker Location

Line Located by: ☑ Exposure ☑ Pipeline Locator ☑ Bar ☐ Other (Explain below)
Approx. Length of Exposed Pipe 2' each line
Approx. Depth of Line WB 5 - 36" deep WB Loop 36" deep WB 36 80" deep

Description of Temporary Marking ☐ Flags ☐ Paint ☐ Other
Distance between temporary markers:

Drawing Available	Copies given to Contractors	Line Marked by: (Name)	Date
Yes ☐ No ☑	Yes ☐ No ☑	Peter G. Heltzel	5-1-06

Explanations: (Name All persons Witnessing Line Location) Note All Additional Instructions Given Excavator

I Hereby Acknowledge That: (1) The Approximate Pipeline Location Has Been Satisfactory Marked and (2) I Have Received a Copy of the Company Guidelines for Construction Activities on Rights-of-Way and in Vicinities of Gas Pipelines and agree to comply.

Contractor or Landowner Signatures:	Date	Gas Company Representative Signature	Date
		Peter G. Heltzel	5-1-06

If the contractor is installing facilities above the Company's existing facilities the following section must be completed. Company personnel will be responsible for making sure that the contractor has authority to sign this agreement.

In consideration of the permission given by the Company to construct upon its ROW, Contractor and _____ agree to indemnify and hold harmless the Company and its parent, subsidiary and affiliate corporations, and the agents and employees of all of them, and each of them, from and against any and all losses (including, but not limited to, consequential damages) and liability for claims, demands, suits, or causes of action in law or in equity from damages and injury of every kind and nature, whether to persons or property, arising out of or in any manner related to (i) the performance of the construction activities hereunder and/or (ii) subsequent damage by the Company or its agents to the facilities as described in this Location of Buried Facilities form.

Gas Company Representative (Print):	Date	Gas Company Representative (Signature)	Date
Contractor Representative or Landowner(print):	Date	Contractor Representative or Landowner (Signature)	Date

*Note: Each Drawing Must be Marked or Stamped with Disclaimer Concerning Accuracy.

MINIMUM GUIDELINES FOR CONSTRUCTION ACTIVITIES IN THE VICINITY OF BURIED FACILITIES

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0333 CDC = XPR

```
@@@@ @@@@  @@@   @ @@@@@ @@@@ @@@@@
@  @@  @@  @  @@  @   @
@@@@ @@@@ @  @  @ @@@@ @   @
@   @@ @  @  @@  @   @
@   @ @ @ @@  @@  @   @
@   @  @ @@@  @@@ @@@@@ @@@@  @
```

AT =AT&T CLARKSBURG PE =AL PWR/PE -UTIL MI =MCI HG =HAMPSHIRE GAS
CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS SVE=SHENDH VLY ELE
GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CAB=CAPON BRIDGE GSV=GREEN SPRING VA
ROM=ROMNEY CITY OF

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1000333 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 12-APR-06 Time: 1630
DBLookup: COUNTY/TOWN Prepared By: COLLEEN O LAUGHLIN

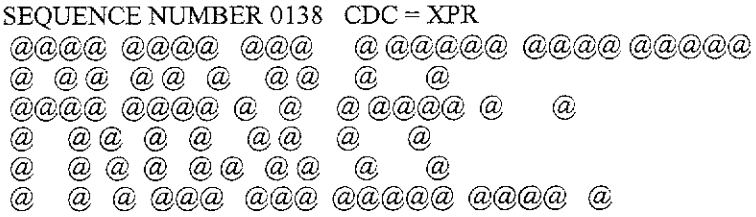
Remarks: Distance From Intersection: .50 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE
COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS
OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH
HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA
GAS TRANSMISSION P/L FOR THAT ENTIRE DISTANCE

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-897-6990
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013
Caller: RICK GANDEE Prepared: 10-APR-06@1620

Grids:

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0138 CDC = XPR



AT =AT&T CLARKSBURG PE =AL PWR/PE -UTIL MI =MCI HG =HAMPSHIRE GAS CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS SVE=SHENDH VLY ELE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CAB=CAPON BRIDGE GSV=GREEN SPRING VA ROM=ROMNEY CITY OF

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1640137 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 15-JUN-06 Time: 1030
DBLookup: COUNTY/TOWN Prepared By: NOELLE MANDA

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20 IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANS.P/L FOR ENTIRE DISTANCE//RC 1430022 UPDATE ONLY

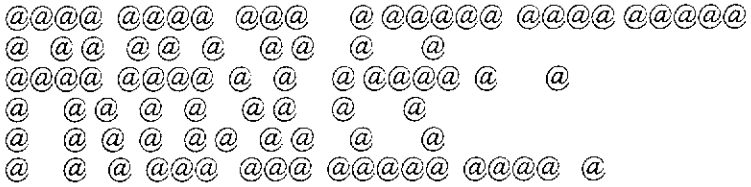
Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: ANGIE GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-897-6901
Alt Contact: Alt Phone: 304-548-7013
Caller: ANGIE GANDEE Prepared: 13-JUN-06@1026

Grids:

NIV Delivery By: N/A

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0331 CDC = XPR



PE =AL PWR/PE -UTIL CGH=CLMBA GAS-STRSB HTC=HARDY TELECOM CEY=MOUNT GAS/KEYSR
MFD=MOOREFIELD TOWN SVE=SHENDH VLY ELE CTR=CT&R CABLE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA TOW=WARDENVILE TOWN HCP=HARDY CTY PSD

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1000331 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 12-APR-06 Time: 1615
DBLookup: COUNTY/TOWN Prepared By: COLLEEN O LAUGHLIN

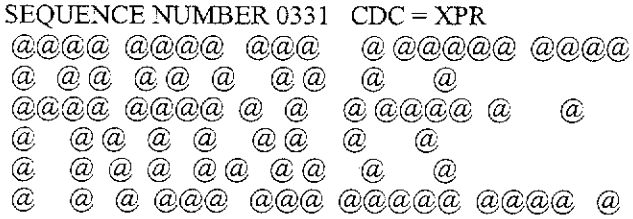
Remarks: Distance From Intersection: .50 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-897-6990
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013
Caller: RICK GANDEE Prepared: 10-APR-06@1613

Grids:

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0331 CDC = XPR



PE =AL PWR/PE -UTIL CGH=CLMBA GAS-STRSB HTC=HARDY TELECOM CEY=MOUNT GAS/KEYSR
MFD=MOOREFIELD TOWN SVE=SHENDH VLY ELE CTR=CT&R CABLE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA TOW=WARDENVILE TOWN HCP=HARDY CTY PSD

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1000331 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 12-APR-06 Time: 1615
DBLookup: COUNTY/TOWN Prepared By: COLLEEN O LAUGHLIN

Remarks: Distance From Intersection: .50 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-897-6990
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013
Caller: RICK GANDEE Prepared: 10-APR-06@1613

Grids:

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0094 CDC = XPR

@@@@ @@@@ @@@ @@@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @@ @@ @ @
@ @ @@@ @@@ @@@@@ @@@@ @

AT =AT&T CLARKSBURG PE =AL PWR/PE -UTIL MI =MCI HG =HAMPSHIRE GAS
CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS SVE=SHENDH VLY ELE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CAB=CAPON BRIDGE GSV=GREEN SPRING VA ROM=ROMNEY CITY OF

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1220094 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 04-MAY-06 Time: 1015
DBLookup: COUNTY/TOWN Prepared By: JANE WADSWORTH

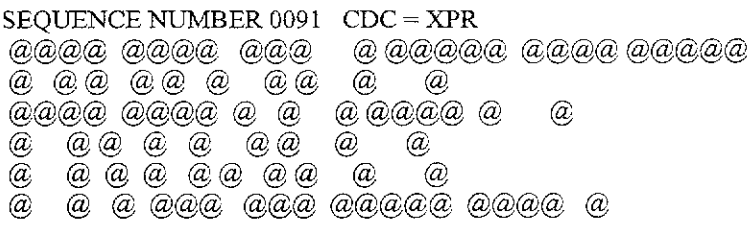
Remarks: Distance From Intersection: .5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20 IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANS.P/L FOR ENTIRE DISTANCE//RC 1000333 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013
Caller: RICK GANDEE Prepared: 02-MAY-06@1007

Grids:

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0091 CDC = XPR



PE +AL PWR/PE -UTIL CGH+CLMBA GAS-STRSB HTC+HARDY TELECOM CEY=MOUNT GAS/KEYSR
MFD=MOOREFIELD TOWN SVE=SHENDH VLY ELE CTR=CT&R CABLE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA TOW=WARDENVILE TOWN HCP=HARDY CTY PSD

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1220091 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 04-MAY-06 Time: 1015
DBLookup: COUNTY/TOWN Prepared By: JANE WADSWORTH

Remarks: Distance From Intersection: .5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1000331 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013
Caller: RICK GANDEE Prepared: 02-MAY-06@1005

Exhibit 9 Response to CPF 1 2008-2003

Grids:

SEQUENCE NUMBER 0091 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

PE -AL PWR/PE -UTIL CGH+CLMBA GAS-STRSB HTC+HARDY TELECOM CEY=MOUNT GAS/KEYSR
MFD=MOOREFIELD TOWN SVE=SHENDH VLY ELE CTR=CT&R CABLE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA TOW=WARDENVILE TOWN HCP=HARDY CTY PSD

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1220091 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 04-MAY-06 Time: 1015
DBLookup: COUNTY/TOWN Prepared By: JANE WADSWORTH

Remarks: Distance From Intersection: .5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1000331 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013

Exhibit 9 Response to CPF 1 2008-2003

Caller: RICK GANDEE Prepared: 02-MAY-06@1005

Grids:

SEQUENCE NUMBER 0237 CDC = XPR

@@@@ @@@ @ @ @@@@@ @@@@@ @ @ @@@@@
@ @@ @@ @ @ @ @@ @@
@@@@ @ @@ @ @ @ @@@ @@@@
@@ @ @@ @ @ @ @@@@
@ @ @ @@ @ @ @ @ @@@
@ @ @@@ @@@ @ @@@@@@ @ @@@@@

CGH=CLMBA GAS-STRSB HTC=HARDY TELECOM PE =AL PWR/PE -UTIL SVE=SHENDH VLY ELE

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1290237 -->ROUTINE Lead Time: 48

County: HARDY Town: LOST RIVER
Street: 0 WINSTON RD
Near Inter: HELMICK RD
Excavation Length: UNKNOWN Excavation Direction: U
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: On Sidewk:
Other: SEE REMARKS
On Prop Location: UNKNOWN
Dig Site Marked in White ?: NO

Start Date: 11-MAY-06 Time: 1400
DBLookup: PINPOINT GRIDS 2 Prepared By: LINDA DOERR

Remarks: Distance From Intersection: Direction:
MARK 300FT ALL DIRECTIONS OF ABOVE INTER
REQ TO PLEASE CONTACT MR RICK GANDEE BEFORE LOCATING
SHENANDOAH VALLEY ELECTRIC,& HARDY TELECOMMUNICATIONS ONLY
NEED TO RESPOND

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-897-6990
Alt Contact Phone: Fax: 304-897-6901
Alt Contact: Alt Phone: 304-548-7013
Caller: RICK GANDEE Prepared: 09-MAY-06@1343

Grids:
38582-078514 38582-078516

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0017 CDC = XPR
@@@@ @@@ @ @ @@@@@ @@@@@ @ @ @@@@@
@ @@ @@ @ @ @ @@ @@
@@@@ @ @@ @ @ @ @@@@@@@@
@@ @ @@ @ @ @ @@@@
@ @ @ @@ @ @ @ @ @@@
@ @ @@@ @@@ @ @@@@@@ @ @@@@@@

PE =AL PWR/PE -UTIL CGH=CLMBA GAS-STRSB HTC=HARDY TELECOM SVE=SHENDH VLY ELE

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1430017 -->ROUTINE Lead Time: 48

County: HARDY Town: MATHIAS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 25-MAY-06 Time: 0815
DBLookup: COUNTY/TOWN Prepared By: MICHAEL BURKE

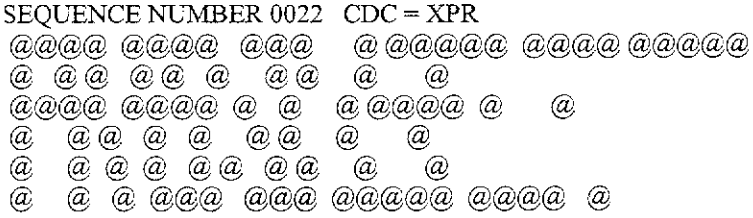
Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1220091 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-897-6901
Alt Contact: Alt Phone: 304-897-6990 OFFICE
Caller: RICK GANDEE Prepared: 23-MAY-06@0811

Grids:

Exhibit 9 Response to CPF 1 2008-2003

SEQUENCE NUMBER 0022 CDC = XPR



AT =AT&T CLARKSBURG PE =AL PWR/PE -UTIL MI =MCI HG =HAMPSHIRE GAS
CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS SVE=SHENDH VLY ELE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CAB=CAPON BRIDGE GSV=GREEN SPRING VA ROM=ROMNEY CITY OF

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1430022 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 25-MAY-06 Time: 0830
DBLookup: COUNTY/TOWN Prepared By: MICHAEL BURKE

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE
COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS
OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH
HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA
GAS TRANS.P/L FOR ENTIRE DISTANCE//RC 1220094 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: RICK GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-897-6901
Alt Contact: Alt Phone: 304-548-7013

Exhibit 9 Response to CPF 1 2008-2003

Caller: RICK GANDEE Prepared: 23-MAY-06@0816

Grids:

SEQUENCE NUMBER 0083 CDC = XPR

@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

CEY=MOUNT GAS/KEYSR CGH=CLMBA GAS-STRSB CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA
CTR=CT&R CABLE GAN=CITIZENS-UTIL HCP=HARDY CTY PSD HTC=HARDY TELECOM
MFD=MOOREFIELD TOWN PE =AL PWR/PE -UTIL SVE=SHENDH VLY ELE
TOW=WARDENVILE TOWN

------> Miss Utility of West Virginia Notice <-----

NOTICE: 2060083 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 27-JUL-06 Time: 0945
DBLookup: COUNTY/TOWN Prepared By: JANE WADSWORTH

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1860333 UPDATE AND REMARK

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: ANGIE GANDEE Contact Phone: 304-548-7013

Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-897-6990 OFFICE
Caller: ANGIE GANDEE Prepared: 25-JUL-06@0927

Grids:

NIV Delivery By: N/A
SEQUENCE NUMBER 0083 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

CEY=MOUNT GAS/KEYSR CGH=CLMBA GAS-STRSB CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA
CTR=CT&R CABLE GAN=CITIZENS-UTIL HCP=HARDY CTY PSD HTC=HARDY TELECOM
MFD=MOOREFIELD TOWN PE =AL PWR/PE -UTIL SVE=SHENDH VLY ELE
TOW=WARDENVILE TOWN

------> Miss Utility of West Virginia Notice <-----

NOTICE: 2060083 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 27-JUL-06 Time: 0945
DBLookup: COUNTY/TOWN Prepared By: JANE WADSWORTH

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1860333 UPDATE AND REMARK

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: ANGIE GANDEE Contact Phone: 304-548-7013

Exhibit 9 Response to CPF 1 2008-2003

Alt Contact: Alt Phone: 304-548-7013
Caller: ANGIE GANDEE Prepared: 25-JUL-06@0930

Grids:

NIV Delivery By: N/A

SEQUENCE NUMBER 0138 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

AT =AT&T CLARKSBURG PE =AL PWR/PE -UTIL MI =MCI HG =HAMPSHIRE GAS
CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS SVE=SHENDH VLY ELE GAN=CITIZENS-UTIL
CSM=ATLANTIC -MOORE CAB=CAPON BRIDGE GSV=GREEN SPRING VA ROM=ROMNEY CITY OF

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1640137 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 15-JUN-06 Time: 1030
DBLookup: COUNTY/TOWN Prepared By: NOELLE MANDA

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20 IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANS.P/L FOR ENTIRE DISTANCE//RC 1430022 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: ANGIE GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-897-6901

Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-897-6990 OFFICE
Caller: ANGIE GANDEE Prepared: 25-JUL-06@0927

Grids:

NIV Delivery By: N/A
SEQUENCE NUMBER 0085 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

AT =AT&T CLARKSBURG CAB=CAPON BRIDGE CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS
CSM=ATLANTIC -MOORE GAN=CITIZENS-UTIL GSV=GREEN SPRING VA HG =HAMPSHIRE GAS
MI =MCI PE =AL PWR/PE -UTIL ROM=ROMNEY CITY OF SVE=SHENDH VLY ELE

------> Miss Utility of West Virginia Notice <-----

NOTICE: 2060085 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: NO

Start Date: 27-JUL-06 Time: 0945
DBLookup: COUNTY/TOWN Prepared By: JANE WADSWORTH

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE
COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS
OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH
HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA
GAS TRANS.P/L FOR ENTIRE DISTANCE//RC 1860334 UPDATE AND REMARK

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: ANGIE GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-548-7232

Exhibit 9 Response to CPF 1 2008-2003

Alt Contact: Alt Phone: 304-548-7013
Caller: ANGIE GANDEE Prepared: 13-JUN-06@1026

Grids:

NIV Delivery By: N/A

SEQUENCE NUMBER 0334 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

AT =AT&T CLARKSBURG CAB=CAPON BRIDGE CGH=CLMBA GAS-STRSB CHP=CENTRAL HAMP PS
CSM=ATLANTIC -MOORE GAN=CITIZENS-UTIL GSV=GREEN SPRING VA HG =HAMPSHIRE GAS
MI =MCI PE =AL PWR/PE -UTIL ROM=ROMNEY CITY OF SVE=SHENDH VLY ELE

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1860334 -->PROJECT Lead Time: 48

County: HAMPSHIRE Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 07-JUL-06 Time: 1815
DBLookup: COUNTY/TOWN Prepared By: MICHAEL BURKE

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20 IN HARDY COUNTY THEN EXTENDS 23MI DUE NORTH FOLLOWING THE COLUMBIA GAS TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY,CROSS OVER HORN CAMP RUN, GOING PARALLEL WITH CR 10/5 TO THE TIE WITH HAMPSHIRE COUNTY GAS. MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANS.P/L FOR ENTIRE DISTANCE//RC 1640137 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045
Contact: ANGIE GANDEE Contact Phone: 304-548-7013

Exhibit 9 Response to CPF 1 2008-2003

Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-548-7013
Caller: ANGIE GANDEE Prepared: 05-JUL-06@1807

Grids:

NIV Delivery By: N/A

SEQUENCE NUMBER 0333 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

CEY=MOUNT GAS/KEYSR CGH=CLMBA GAS-STRSB CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA
CTR=CT&R CABLE GAN=CITIZENS-UTIL HCP=HARDY CTY PSD HTC=HARDY TELECOM
MFD=MOOREFIELD TOWN PE =AL PWR/PE -UTIL SVE=SHENDH VLY ELE
TOW=WARDENVILE TOWN

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1860333 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 07-JUL-06 Time: 1815
DBLookup: COUNTY/TOWN Prepared By: MICHAEL BURKE

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1220091 UPDATE ONLY**R/C #1640133 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045

Exhibit 9 Response to CPF 1 2008-2003

Contact: ANGIE GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-897-6990 OFFICE
Caller: ANGIE GANDEE Prepared: 05-JUL-06@1805

Grids:

NIV Delivery By: N/A
SEQUENCE NUMBER 0333 CDC = XPR
@@@@ @@@@ @@@ @ @@@@@ @@@@ @@@@@
@ @@ @@ @ @@ @ @
@@@@ @@@@ @ @ @ @@@@@ @ @
@ @@ @ @ @@ @ @
@ @ @ @ @@ @@ @ @
@ @ @ @@@ @@@ @@@@@ @@@@ @

CEY=MOUNT GAS/KEYSR CGH=CLMBA GAS-STRSB CSM=ATLANTIC -MOORE CSN=COL GAS-SENECA
CTR=CT&R CABLE GAN=CITIZENS-UTIL HCP=HARDY CTY PSD HTC=HARDY TELECOM
MFD=MOOREFIELD TOWN PE =AL PWR/PE -UTIL SVE=SHENDH VLY ELE
TOW=WARDENVILE TOWN

------> Miss Utility of West Virginia Notice <-----

NOTICE: 1860333 -->PROJECT Lead Time: 48

County: HARDY Town: SEE REMARKS
Street: 0 COUNTY ROUTE 20
Near Inter: STATE HWY 259
Excavation Length: 23 MI Excavation Direction: N
Excavation Depth : 7FT Blasting: NO
Work for: COLUMBIA GAS TRANSMISSION
Type of Work: CONSTRUCT UG PIPELINE
In St: X On Sidewk: X
Other:
On Prop Location: FRONT, REAR, SIDE
Dig Site Marked in White ?: YES

Start Date: 07-JUL-06 Time: 1815
DBLookup: COUNTY/TOWN Prepared By: MICHAEL BURKE

Remarks: Distance From Intersection: 0.5 MI Direction: E
PROJECT BEGINS APPX 1/2 MI E OF INTER ON THE N/S OF COUNTY RTE 20
THEN EXTENDS 23 MI DUE NORTH FOLLOWING THE COLUMBIA GAS
TRANSMISSION PIPELINE INTO HAMPSHIRE COUNTY
MARK 100FT ON BOTH SIDES OF THE COLUMBIA GAS TRANSMISSION P/L
FOR THAT DISTANCE.
R/C #1220091 UPDATE ONLY**R/C #1640133 UPDATE ONLY

Contractor: S T PIPELINE CO
Phone: 304-548-7013
Address: 5 YOUNGSTOWN DR; CLENDENIN WV 25045

Exhibit 9 Response to CPF 1 2008-2003

Contact: ANGIE GANDEE Contact Phone: 304-548-7013
Alt Contact Phone: Fax: 304-548-7232
Alt Contact: Alt Phone: 304-897-6990 OFFICE
Caller: ANGIE GANDEE Prepared: 05-JUL-06@1805

Grids:

NIV Delivery By: N/A

Exhibit 10 Response to CPF 1 2008-2003

Columbia Gulf Transmission
A NiSource Company

Columbia Gas Transmission
A NiSource Company

Contractor Safety Manual

Columbia Transmission Companies

Effective Date: January 1, 2006

Table of Contents

1. Purpose

Contractors are expected to comply with all applicable environmental, health and safety regulations of agencies having jurisdiction at the location where the services are being performed including, but not limited to the following:

- Laws and regulations regarding the environment, including but not limited to, the Federal Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act, Toxic Substance Contract Act, and the Safe Drinking Water Act;
- Applicable OSHA regulations in 29 CFR parts 1910 and 1926; and
- DOT regulations in 49 CFR, Parts 171-179, 191, 192, 195, and 199.

1.01 Failure to observe the guidelines contained in this document, company policies and procedures and any Federal, State, or location standards may result in dismissal from the site.

1.02 The contractor is fully responsible for ensuring that their employees are aware of, and properly trained in accordance with all applicable OSHA, EPA and DOT requirements.

1.03 The contractor will fully comply with all Columbia Transmission ("Columbia") policies and procedures.

1.04 Certain jobs require the prior notification to Columbia. Contractor notification to outside regulatory agencies may also be required. These include, but are not limited to the following:

a. Use of explosives (Engineering Services/Land Department)

b. Tunneling and boring (Engineering Services/Land Department)

c. Addition of or renovation to any fire protection system (local operations)

d. Asbestos removal (Local EH&S)

e. Aboveground and Underground storage tank removal (Local EH&S)

f. Lead Abatement (Local EH&S)

1.05 Unless expressed contractual arrangements have been made prior to the start of work, Columbia requires contractors and their subcontractors to maintain acceptable Anti-drug and Alcohol Misuse Programs. Acceptable means that the programs are conducted in accordance with the requirements of 49 CFR Parts 40 and 199. Such programs shall be reviewed and approved before the contractor or subcontractor is allowed to perform "Safety Sensitive" work.

Contractor drug and alcohol testing requirements apply to all contractors performing the following types of work:

- Contractors who perform or may in the future perform construction, maintenance or emergency response activities on new or existing pipeline facilities; and
- Contractors who perform work in a gas processing plant (Compressor Station).
- Positions that Columbia classifies as Safety Sensitive under 49 CFR Parts 40 and 199 and that therefore must be included in an approved Anti-drug Plan and an Alcohol Misuse Plan.

2. Pre-Job Planning

One of the most important elements of eliminating incidents is a clear understanding, by both Columbia's and the contractor's employees, of the scope and type of work to be performed by the contractor.

It is essential that a pre-job meeting take place between the designated Columbia employee(s) and key contactor representatives.

2.01 In addition to the contents of this document, the following items will be reviewed in the meeting:

a. Specific limits of the area in which the work is to be performed. Contractors will be confined to this designated area.
b. Scheduled working days and times.
c. Columbia's procedures for access and exit to the job site, contractor parking and appropriate material storage areas.
d. Procedures and access for equipment and material delivery.
e. Any specific Company hazardous materials or processes in or near the work area (i.e., the hazard communication standard).
f. Any hazardous materials or processes brought on site by the contractor.
g. Any special safety precautions or equipment called for by the type or work to be performed.
h. Columbia emergency procedures/plans, evacuation procedures, alarms, etc.
i. Columbia's Environmental, Health and Safety programs
j. The Monitoring Center (800) 835-7191 is to be called in the event of a spill, injury, fatality, vehicle accident or other similar concern.
k. Site-specific security measures/contractor employee identification.

3. Site Preparation

The work area should be physically designated by signs, caution tape, barricades, construction fencing or other appropriate means when applicable. Excavations 6 feet (1.8m) or more in depth shall be protected from falling by guardrail systems, fences, or barricades when the excavations are not readily seen because of plant growth or other visual barriers.

3.01 The type and degree of designation shall be a function of the type of work to be performed, need for access to the site and the degree of any hazards that may be presented.

3.02 As a minimum, the area must be designated with caution signs stating *"CAUTION – CONSTRUCTION AREA – AUTHORIZED PERSONNEL ONLY"*.

3.03 The site must be properly illuminated for the type of work to be performed.

3.04 Barriers for dust, noise or any other recognized hazards must be provided by the contractor, where necessary.

4 General Safety Rules and Conduct

The following rules must be adhered to by all contractor employees while on a Columbia site. Any breach of these rules can result in dismissal from the site.

4.01 Columbia requires all Contractor personnel to be fully trained and knowledgeable of their assigned duties. This includes all applicable requirements for environmental, health and safety regulations associated with the full scope of the Contractor's work.

4.02 Safety devices, such as relief valves, shutdowns, alarms, fire suppression systems and vibration devices, etc., shall not be removed, bypassed or disconnected.

4.03 The transportation, sale, possession or use of alcoholic beverages, intoxicants, illegal drugs or other illegal substances is strictly prohibited.

4.04 All Columbia safety rules and regulations must be followed.

4.05 The possession or sale of firearms is prohibited.

4.06 Emergency escape paths and exit ways must not be obstructed in any way.

4.07 It shall be the Contractor's responsibility to practice good housekeeping. This will include the disposal of trash, keeping materials and supplies orderly and stored safely, and keeping equipment and material from obstructing roads and walkways.

5 Industrial Safety and Security

Contractor shall perform the Work in a safe and careful manner. Contractor shall furnish and require its employees to use such safety devices and methods as are necessary to protect its employees, its subcontractor's employees, the employees of other contractors, Columbia's employees and the public from bodily injury and property damage.

5.01 Contractor shall comply with all project, safety and security rules issued by Columbia.

5.02 Contractor shall have a written safety program and shall distribute copies to each of its employees and to Columbia.

5.03 Contractor shall be responsible for employee compliance with project, safety, health and security rules. Contractor shall conduct frequent inspections to ensure that its employees comply with such rules. Columbia may accompany Contractor on its inspections.

5.04 Contractor shall furnish, erect and maintain warning notices, signs, signals, lights, protective guards, enclosures, platforms and other devices as necessary to adequately protect the work and the employees of Contractor, its subcontractors, other contractors, Columbia and the public.

5.05 When Work is required on or near apparatus such as electrical circuits, piping systems or installed equipment, Contractor shall investigate and obtain all pertinent information regarding the apparatus involved. Contractor shall specifically warn its employees of the hazards of working near energized apparatus and of the necessity to use extreme caution. Contractor shall adequately restrain its equipment to ensure that it maintains safe clearance distances from such apparatus. Contractor shall not disrupt the operation of energized apparatus unless Contractor secures prior written approval from Columbia.

5.06 Contractor shall coordinate with Columbia any work that involves locking out electrical and mechanical systems and other equipment.

5.07 As part of its fire prevention and fire protection program, Contractor shall:

a. Control and remove weeds, brush and debris in and around Contractor's storage and field office areas,

b. Provide and maintain portable fire extinguishers of a proper type throughout Contractor's office trailers, storage buildings, construction shops, change rooms,

construction equipment and at all locations requiring welding and cutting operations.

c. Prohibit smoking, cutting operations, or welding operations in storage buildings, near flammable gas storage equipment or flammable gas handling equipment, near volatile combustible fluids, or in other posted areas;

d. Inform Columbia of any other requirements to provide adequate fire protection for its work areas and equipment.

Contractor's buildings for storing critical or combustible materials shall be of a non-combustible type of construction. However, if so authorized by Columbia in writing in advance, Contractor may use other types of construction in certain cases.

5.08 Contractor shall not refuel any internal combustion engine in a storage building. Internal combustion engines shall not be operated in storage buildings.

5.09 Contractor shall keep Columbia informed, in writing, regarding (a) the types, quantities and uses of all hazardous materials that Contractor will have on the Site, (b) the types, quantities and uses of all hazardous wastes that Contractor will generate on the Site, and (c) Contractor's safety program for storing, handling and disposing of such materials in a safe and secure manner. Contractor shall provide Columbia with Material Safety Data Sheets for all hazardous chemicals, as defined in 29 CFR 1910.1200, including solvents, thinners, detergents, coatings, preservatives, cleaners, oils, gases, welding rods and similar materials.

5.10 The use of explosives will not be allowed without written approval by Columbia. Contractor agrees to submit daily blasting reports to Columbia as directed.

5.11 Contractor shall immediately inform Columbia of all federal, state and local safety inspections, citations and penalties.

5.12 Contractor shall promptly inform Columbia of all injuries (that occur on the job site) to its employees that require medical treatment beyond first aid or result in lost time.

5.13 Contractor shall investigate all incidents resulting in personal injuries or property damage to determine the root causes and shall take appropriate action to eliminate such causes.

5.14 Contractor is responsible for post-accident drug and alcohol testing in accordance with the Company's procedures. Testing must be performed within 32 hours after an accident.

5.15 Contractor shall establish and distribute an emergency notification list for reporting fires, accidents and other emergencies.

5.16 Contractor shall comply with all federal, state and local environmental regulations and Columbia's environmental permits. Contractor shall not dump waste oils, solvents, fuels, hazardous waste or any other hazardous material. Contractor shall properly dispose of all waste and by-product materials.

5.17 If Contractor becomes aware of any damage to, or any malfunction of, any environmental monitoring or control equipment, the Contractor shall immediately contact Columbia regardless of whether the problem is caused by Contractor, its employees, or any other individuals.

5.18 Contractor shall establish an emergency evacuation program and coordinate such program with Columbia.

5.19 All personnel and all vehicles entering or leaving the Site may be subject to inspection at any time by Columbia-provided security guards on the Site.

5.20 Asbestos or lead containing materials shall not be removed unless authorized in advance by Columbia in writing.