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CERTIFIED MAIL

June 28, 2012

Mr. Byron Coy, Jr.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Mountain View Office Park
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Notice of Probable Violation CPF 1-2012-1015

Dear Mr. Coy:

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Notice of Probable Violation dated May 29, 2012, in which five (5) separate items were identified during the 2009 inspection of the Bridgeport Storage Field. The following are DTI's response to each.

"1. **§ 192.163 Compressor stations: Design and construction.**
(e) *Electrical facilities.* Electrical equipment and wiring installed in compressor stations must conform to the National Electrical Code, ANSI/NFPA 70, so far as that code is applicable.

Dominion Transmission, Inc. (DTI) was unable to provide documentation that electrical equipment and wiring in the Bridgeport Compressor Station complied with applicable provisions of the National Electrical Code Articles 250.5(b), 250.42 (a) (d) & (f), & 250.81(b).

At the time of WV PSC inspection, no grounding conductor was observed for the micro-turbine generators. The operator failed to comply with the referenced NEC Articles as these articles address the application of grounding conductors and systems installed for the micro-turbine generators housings."

DTI Response:

The National Electric Code (NEC) Articles referenced in Item #1 are not present in the version (NEC 2008) of the document incorporated by reference in 49 CFR Part 192. However, DTI has performed an evaluation of the two (2) Microturbine generators installed at Bridgeport

Compressor Station. The evaluation revealed that these devices are indeed equipped with grounding conductors (identified with green tape, in conformance with Article 250.119(A)(2)(c) of the NEC), as evidenced in Figure 1 below. For this reason, DTI respectfully requests the withdrawal of Item #1, and the associated proposed civil penalty.

Figure 1.

"2. **§ 192.163 Compressor stations: Design and construction.**
(e) *Electrical facilities.* Electrical equipment and wiring installed in compressor stations must conform to the National Electrical Code, ANSI/NFPA 70, so far as that code is applicable.

DTI was unable to provide documentation that electrical equipment and wiring in the Bridgeport Compressor Station complied with applicable provisions of the National Electrical Code NEC Article 501.5(b). The operator failed to install a conduit seal within 18 inches of the explosion-proof housing for the breaker/starter switch for the jacket water circulation pump, as required by NEC Article 501.5(b). The operator's personnel said that the conduit was installed no sooner than the year 2000."

DTI Response:

The NEC Article noted in Item #2 (NEC Article 501.5(b)) is not present in the version (NEC 2008) of the document incorporated by reference in 49 CFR Part 192. DTI will evaluate the NEC requirements in regard to this device, and take the appropriate actions (if warranted). As Item #2 is not supported by the referenced Article, DTI respectfully requests its withdrawal, along with the associated proposed civil penalty.

"3. **§ 192.163 Compressor stations: Design and construction.**
(e) *Electrical facilities.* Electrical equipment and wiring installed in compressor stations must conform to the National Electrical Code, ANSI/NFPA 70, so far as that code is applicable.

DTI was unable to provide documentation that electrical equipment and wiring in the Bridgeport Compressor Station complied with applicable provisions of the National Electrical Code NEC Article 230.95 (c). The operator was unable to produce any records of a post-construction performance test in compliance with the NEC Article 230.95 (c) that requires a performance test when the ground fault protection system is first installed on site, and requires a written record of the test to be created.

DTI Response:

DTI is unable to locate the records associated with the performance tests noted in Item #3. The tests will be conducted in accordance with the Proposed Compliance Order, once finalized.

"4. **§ 192.163 Compressor stations: Design and construction.**
(e) *Electrical facilities.* Electrical equipment and wiring installed in compressor stations must conform to the National Electrical Code, ANSI/NFPA 70, so far as that code is applicable.

Pursuant to NEC Article 230.57 (b), "Individually covered or insulated equipment grounding conductors shall have a continuous outer finish that is either green or green with one or more yellow stripes.

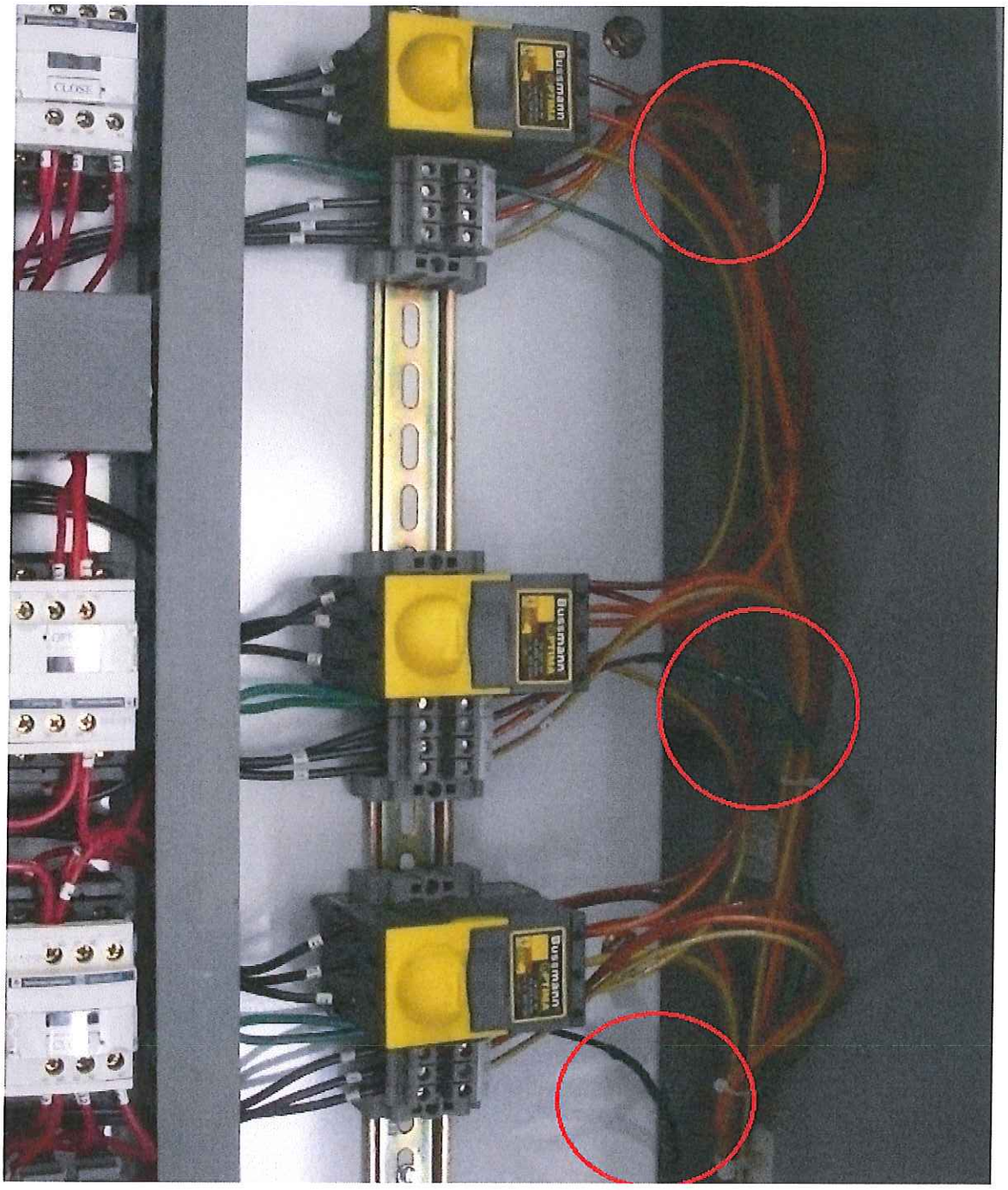
DTI failed to have grounding conductors with a continuous outer finish that is either green or green with one or more yellow stripes. The grounding wires for the motor control center for the suction, discharge, & bypass of compressor engine number 1 in the Bridgeport Compressor Station had a red continuous outer finish."

DTI Response:

The NEC Article referenced in Item #4 is not present in the version (NEC 2008) of the document incorporated by reference in 49 CFR Part 192. However, DTI has performed an evaluation of the grounding conductors associated with the "motor control center for the suction, discharge, and

bypass of compressor engine number 1." That evaluation revealed that the wires in question are marked with green tape (see Figure 2 below, grounding conductors circled in red), which adequately identifies them as grounding conductors. For this reason, DTI respectfully requests the withdrawal of Item #4, and the associated proposed civil penalty.

Figure 2.



"5. **§ 192.603 General provisions.**
(b) Each operator shall keep records necessary to administer the procedures established under §192.605.

DTI failed to keep records necessary to administer the procedures established under §192.605.

DTI had replaced all segments of pipeline TL-260 except for two segments. DTI representatives stated that the maximum allowable operating pressure (MAOP) for those two segments were determined pursuant to §192.619(c). DTI did not provide the MAOP records for those two segments of pipeline TL-260.

DTI failed to produce copies of the MAOP documentation or otherwise make it available for review during the inspection, and DTI did not provide the documentation in a subsequent request for specific information."

DTI Response:

The MAOP of pipeline TL-260 is established at 460 psig. Item #5 correctly states that the MAOP of two (2) short segments of this pipeline was established under §192.619(c). It incorrectly asserts however that the documentation of the highest operating pressure was not made available during the 2009 inspection. A copy of the record reviewed by the WVPSC is provided for your reference in Appendix A of this Response. The record clearly shows that a pressure of 460 psig was recorded on pipeline TL-260 on November 4, 1969. For this reason, DTI respectfully requests the withdrawal of Item #5, and the associated civil penalty.

If you have any questions, or should require additional information, please do not hesitate to contact Shawn Miller at (304) 627-3404.

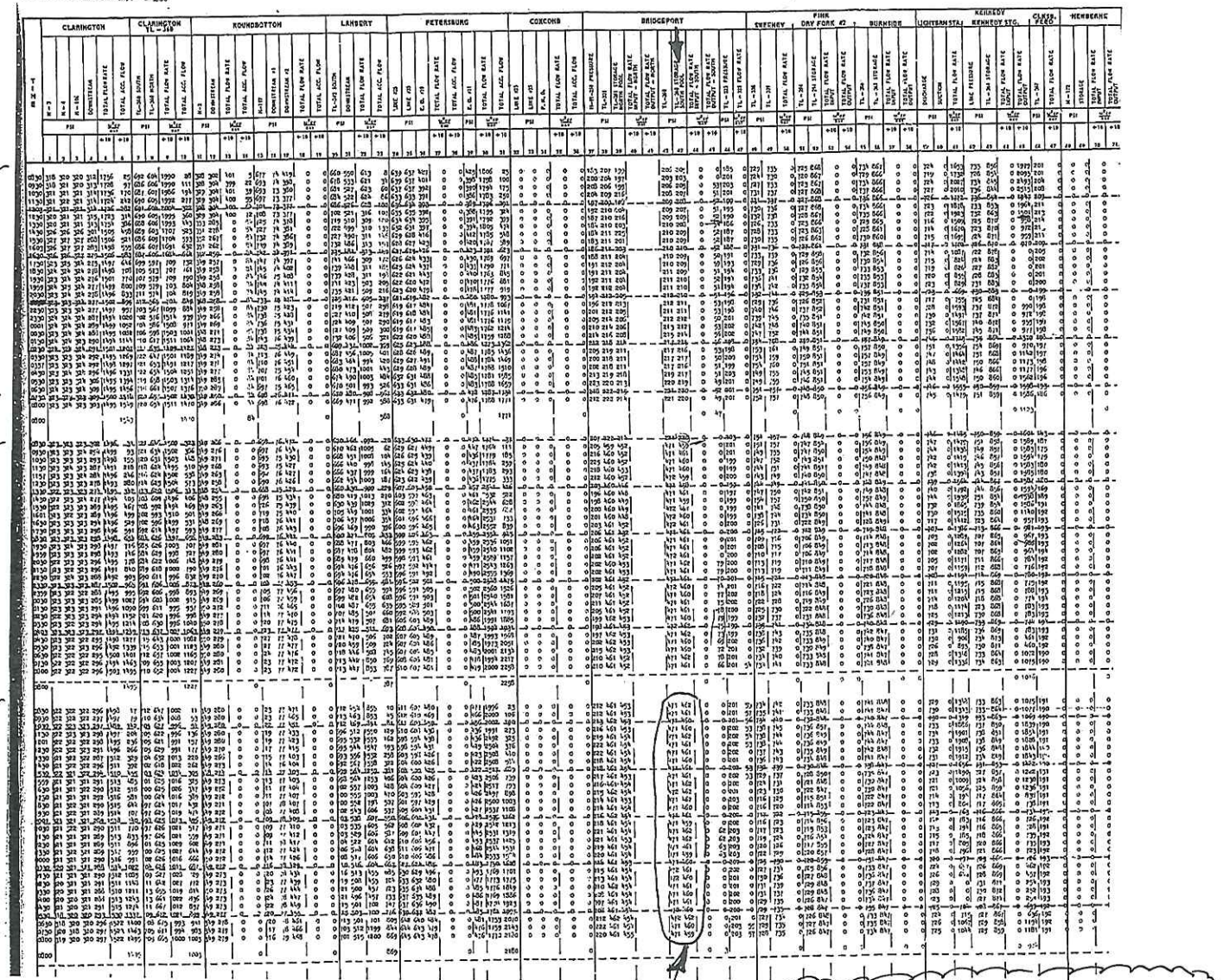
Respectfully,

Jeffrey L. Barger
Vice President, Pipeline Operations
Dominion Transmission, Inc.

Appendix A

DATE MONDAY NOV 3 1969
TUESDAY NOV 4 1969
RUN NO.
LOG SHEET NO. 1 WEDNESDAY NOV 5 1969

CONSOLIDATED GAS SUPPLY CORPORATION



BRIDGEPORT STORAGE H.O.P. SUPPORT
RECORDED NOV. 5TH 1969 USED 460#