



Utility Safety and Design Incorporated
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October 23, 2019

Mr. Robert Burrough, Director
PHMSA Eastern Region
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

Re: Response to CPF 1-2019-1019W

Dear Mr. Burrough:

USDI, on behalf of PGPipeline, acknowledges receipt of your letter dated September 26, 2019. USDI and PGPipeline agree that a probable violation was committed and PGPipeline failed to perform semi-annual leak surveys as required by 192.935(d)(3). The following revisions have been made to correct the inadequacies identified.

1. 192.935 Preventive and Mitigative Measures – Section 6.3 was modified to include the frequency of surveying Class 3 and Class 4 locations to be conducted semi-annually.
2. The entirety of the pipeline was surveyed on September 10, 2019 and the Class 3 location was again surveyed on October 8, 2019. Moving forward the Class 3 location will be surveyed once in the spring and once in the fall.

The noted changes have been posted to USDI/PGPipeline "Sharefile" cloud-based storage system. These sections and documents will be sent via email and hard copies mailed to the PHMSA Eastern Region office.

We trust that these revisions meet with your approval. If after reviewing this you have any questions or concerns, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Taylor Browne". The signature is written in a cursive, flowing style.

Taylor Browne, USDI

Pc: Mr. Steve Newell, PGPipeline