



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: stanley_chapman_iii@tcenergy.com

May 4, 2023

Mr. Stanley Chapman III
Executive Vice President and President US & Mexico Natural Gas
Columbia Gas Transmission, LLC
700 Louisiana Street
Houston, Texas 77002

CPF 1-2023-032-NOA

Dear Mr. Chapman:

From November 2, 2021, through July 22, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Columbia Gas Transmission, LLC's (TCO) procedures for compliance with new rule titled Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments¹, in Houston, Texas.

As a result of the inspection, PHMSA has identified the apparent inadequacy found within TCO's plans or procedures. The item inspected and the inadequacy is described below:

- 1. 49 C.F.R. § 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ...**
 - (b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.**

TCO's written procedures for verifying material properties were inadequate. Specifically, TCO's

¹ 84 Fed. Reg. 52,180 (Oct. 1, 2019).

manual failed to include procedures presenting a process for verification of material properties and attributes when traceable, verifiable, and complete records are missing during MAOP reconfirmation efforts under § 192.607(c).²

During the inspection, PHMSA reviewed TCO's TEP-IN-MV-G Material Verification Procedure (US) (2020-Jul-24), TEP-IN-MAOP-G MAOP Verification Procedure (US) (2021-Sep-01), Maximum Allowable Operating Pressure Reconfirmation (US) (2020-Aug-07) and TEN-IN-MAOP-G MAOP Confirmation Standard (US) 2020-Aug-27 (Columbia Procedures). In instances where insufficient material properties records were noted, TCO procedures did not present a specific process for attaining and/or establishing said records. Furthermore, details on how affected gas transmission pipeline segments would be flagged and/or scheduled for consideration opportunistically were lacking.

Therefore, TCO's written procedures were inadequate. TCO must amend its written procedures to comply with the requirements of § 192.605(b)(1) as it pertains to § 192.607(c).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Compliance Proceedings.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the

² §192.607 Verification of Pipeline Material Properties and Attributes: Onshore steel transmission pipelines.

...

(c) Verification of material properties and attributes. If an operator does not have traceable, verifiable, and complete records required by paragraph (b) of this section, the operator must develop and implement procedures for conducting nondestructive or destructive tests, examinations, and assessments in order to verify the material properties of aboveground line pipe and components, and of buried line pipe and components when excavations occur at the following opportunities: Anomaly direct examinations, in situ evaluations, repairs, remediations, maintenance, and excavations that are associated with replacements or relocations of pipeline segments that are removed from service. The procedures must also provide for the following:

inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Columbia Gas Transmission, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2023-032-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings