Tennessee Gas Pipeline
an El Paso company

October 23, 2007

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Mr. Larry White
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, S.E.
East Building, 2nd Floor
Washington, D.C. 20590

Re: CPF No. 2-2007-1011

Mr. White:

Tennessee Gas Pipeline (TGP) would like to thank you and PHMSA for the opportunity to present its position regarding the referenced NOPV.

As we discussed in the hearing, TGP feels that the appropriate steps have been taken to minimize corrosion at this location as noted below:

- Attempts to clear the shorted casing were unsuccessful, however the inspection reports indicated that the pipe and coating were in very good condition near the end of the casing. TGP believes that the protective coating is an important method of minimizing corrosion of the carrier pipe.
- Cathodic surveys have documented that protection criteria have continuously been satisfied on the pipeline at this crossing. As noted in the attachment the data from 1985 to present documents the readings are all exceed -1000 mVs. Where effective cathodic protection is maintained, recent research shows that cathodic protection current is provided to the carrier pipe inside the casing minimizing corrosion.
- Close interval surveys have been conducted on three occasions. Readings from these surveys indicated that protection levels at the end of the casing exceed -1000 mVs, well above the required minimum of -850 mVs indicating effective cathodic protection.
- As the data at this location was accumulated, leak surveys were conducted and no gas was detected. Once the cathodic protection levels were established to be well in excess of requirements the CP readings were utilized to minimize corrosion in the casings. The attached PRCI report verifies maintaining cathodic protection levels minimizes corrosion in the casing.
- The pipe was hydrostatically tested, with no failures.
- TGP respectfully disagrees with PHMSA's assertion and basis for the NOPV that "no measures have been taken to minimize corrosion of the pipeline inside the casing."
- PHMSA, RSPA at the time, has reviewed the requirements of §192.467 and 192.483 on several occasions since 1992. Some of these reviews included specific suggestions to add the four items contained in the OPS Enforcement Guidelines. The

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PHMSA response has been that the regulations are adequate as written in performance language with no inclusion of these guidelines. TGP believes that PHMSA issuing an NOPV based on the guidelines is de facto rulemaking without the due process of CFR 49 Part 190.

Additionally, TGP respectfully pointed out that PHMSA had demonstrated in its own internal study that there is no correlation between a shorted casing and corrosion on the carrier pipe. A report resulting from this study was assigned Project No. 87-6, Interoffice Report, dated 5/10/88 within PHMSA.

Attached for your reference and for the record is a copy of the presentation "Tennessee Gas Pipeline Company (TGP) / PHMSA NOPV CPF-2-2007-1011 Hearing / October 4th, 2007." In addition, the PRCI report referenced on Slide 16 of the presentation, PRCI Report GRI -05/0200, "External Corrosion Probability Assessment for Carrier Pipes Inside Casings," is attached for the record.

TGP apologizes for not clearly bringing out all of the actions that we noted in this summary and in our presentation at the time of the inspection. Had all of the facts been clear at the time of the inspection the enforcement action would not have been necessary. As noted in the hearing, we believe that the appropriate steps have been taken to minimize corrosion and that the NOPV should be withdrawn.

Sincerely,

Patrick F. Carey, P.E.
Director, D.O.T. Compliance Services

Attachments

cc: Linda Daugherty, PHMSA, Southern Region