NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 22, 2009

Mr. Jay Skabo, Vice President, Operations
Montana Dakota Utilities Company/
Great Plains Natural Gas Company
400 North Fourth Street
Bismarck, North Dakota 58501-4092

CPF 3-2009-1007M

Dear Mr. Skabo:

On June 18-22, 2007, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and Minnesota Office of Pipeline Safety pursuant to Chapter 601 of 49 United States Code inspected the Great Plains Natural Gas (GPNG) integrity management (IM) plan and procedures in Fergus Falls, Minnesota.

On the basis of the inspection, PHMSA has identified apparent inadequacies within GPNG's plans or procedures, as described below:

§192.911 What are the elements of an integrity management program?

An operator's initial integrity management program begins with a framework (see §192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (ibr, see §192.7) for more detailed information on the listed element.)

1. §192.911(a) An identification of all high consequence areas, in accordance with §192.905.

§192.903 . . . . . *High consequence area* means an area established by one of the methods described in paragraphs (1) or (2) as follows:
(1) An area defined as—
(i) A Class 3 location under §192.5; or
(ii) A Class 4 location under §192.5; or
(iii) Any area in a Class 1 or Class 2 location where the potential impact radius is greater than 660 feet (200 meters), and the area within a potential impact circle contains 20 or more buildings intended for human occupancy; or
(iv) Any area in a Class 1 or Class 2 location where the potential impact circle contains an identified site. . . . . .

***Identified site* means each of the following areas:**
(a) An outside area or open structure that is occupied by twenty (20) or more persons on at least 50 days in any twelve (12)-month period. . . . .
(b) A building that is occupied by twenty (20) or more persons on at least five (5) days a week for ten (10) weeks in any twelve (12)-month period. . . . . .
(c) A facility occupied by persons who are confined, are of impaired mobility, or would be difficult to evacuate.

§192.905(a) General. To determine which segments of an operator's transmission pipeline system are covered by this subpart, an operator must identify the high consequence areas. An operator must use method (1) or (2) from the definition in §192.903 to identify a high consequence area. An operator may apply one method to its entire pipeline system, or an operator may apply one method to individual portions of the pipeline system. An operator must describe in its integrity management program which method it is applying to each portion of the operator's pipeline system. The description must include the potential impact radius when utilized to establish a high consequence area. (See appendix E.I. for guidance on identifying high consequence areas.)

§192.905 (c) *Newly identified areas.* When an operator has information that the area around a pipeline segment not previously identified as a high consequence area could satisfy any of the definitions in §192.903, the operator must complete the evaluation using method (1) or (2). If the segment is determined to meet the definition as a high consequence area, it must be incorporated into the operator's baseline assessment plan as a high consequence area within one year from the date the area is identified.

- **Item 1A: §192.903**

GPNG's integrity management program (IMP) does not clearly describe how a high consequence area (HCA) is identified. The plan does not include specific details nor specify the required documentation. In addition, the plan does not sufficiently define

the process for utilization of all required information sources to determine each identified site.

GPNG's plan does not provide sufficient criteria for determining identified sites, including:

- Occupancy (the number of persons at a potential identified site)
- Structure use
- How the distance from the pipeline to the identified site is determined and verified in the field, and
- Documentation of its field verification activities.

- **Item 1B: §192.905(a)**

GPNG's plan indicates it will utilize Method 2 for identifying HCAs and GPNG personnel verbally described the process it uses; however, the plan does not include any detailed procedures outlining these activities or the required documentation.

- **Item 1C: §192.905(c)**

GPNG's plan does not include documented processes for how new information which may result in a pipeline segment impacting a high consequence area is identified and integrated within the IMP.

2. §192.911(b) A baseline assessment plan meeting the requirements of §192.919 and §192.921.

§192.919 What must be in the baseline assessment plan? An operator must include each of the following elements in its written baseline assessment plan:
(a) Identification of the potential threats to each covered pipeline segment and the information supporting the threat identification. (*See* §192.917.)

> **§192.917(e) *Actions to address particular threats.* If an operator identifies any of the following threats, the operator must take the following actions to address the threat. . . . .**
>
> **§192.917(e)(4) *ERW pipe.***
>
> **If a covered pipeline segment contains low frequency electric resistance welded pipe (ERW), lap welded pipe or other pipe that satisfies the conditions specified in ASME/ANSI B31.8S, Appendices A4.3 and A4.4, and any covered or non-covered segment in the pipeline system with such pipe has experienced seam failure, or operating pressure on the covered segment has increased over the maximum operating pressure experienced during the preceding five years, an operator must select an assessment technology or technologies with a proven application capable of assessing seam integrity and seam corrosion anomalies. The operator must prioritize the covered segment as a high risk segment for the baseline assessment or a subsequent reassessment.**

(b) The methods selected to assess the integrity of the line pipe, including an explanation of why the assessment method was selected to address the identified threats to each covered segment. The integrity assessment method an operator uses must be based on the threats identified to the covered segment. (*See* §192.917.)

More than one method may be required to address all the threats to the covered pipeline segment;

§192.921(f) ***Newly identified areas.*** **When an operator identifies a new high consequence area (*see* §192.905), an operator must complete the baseline assessment of the line pipe in the newly identified high consequence area within ten (10) years from the date the area is identified.**

> **§192.905(c)** ***Newly identified areas.*** **When an operator has information that the area around a pipeline segment not previously identified as a high consequence area could satisfy any of the definitions in §192.903, the operator must complete the evaluation using method (1) or (2). If the segment is determined to meet the definition as a high consequence area, it must be incorporated into the operator's baseline assessment plan as a high consequence area within one year from the date the area is identified.**

- **Item 2A: §192.905(c)**

GPNG's plan does not clearly indicate how and when newly identified HCAs are incorporated into the Baseline Assessment Plan.

- **Item 2B: §192.917(e)(4)**

GPNG's plan does not thoroughly address threats due to pipe manufacturing defects. GPNG's plan does not require that the seam type and the 5-year maximum operating pressure that each segment has experienced are determined. GPNG's plan does not include provisions for a continuous monitoring program to determine whether these threats remain stable.

- **Item 2C: §192.919(a)**

GPNG's plan does not specify a process to determine which threats may affect newly identified HCAs or new pipeline segments that affect HCAs.

- **Item 2D: §192.919(b)**

GPNG's plan does not include criteria to ensure the selection of assessment methods is appropriate for the identified threats.

3. §192.911(c) An identification of threats to each covered pipeline segment, which must include data integration and a risk assessment. An operator must use the threat identification and risk assessment to prioritize covered segments for assessment (§192.917) and to evaluate the merits of additional preventive and mitigative measures (§192.935) for each covered segment.

§192.917(a) ***Threat identification.*** **An operator must identify and evaluate all potential threats to each covered pipeline segment. Potential threats that an operator must consider include, but are not limited to, the threats listed in ASME/ANSI B31.8S (ibr, see §192.7), section 2……**

§192.917(b) ***Data gathering and integration.*** **To identify and evaluate the potential threats to a covered pipeline segment, an operator must gather and integrate existing data and information on the entire pipeline that could be relevant to the covered segment. In performing this data gathering and integration, an operator must follow the requirements in ASME/ANSI B31.8S, section 4. At a minimum, an operator must gather and evaluate the set of data specified in Appendix A to ASME/ANSI B31.8S, and consider both on the covered segment and similar non-covered segments, past incident history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, internal inspection records and all other conditions specific to each pipeline.**

§192.917(c) ***Risk assessment.*** **An operator must conduct a risk assessment that follows ASME/ANSI B31.8S, section 5, and considers the identified threats for each covered segment. An operator must use the risk assessment to prioritize the covered segments for the baseline and continual reassessments (§§192.919, 192.921, 192.937), and to determine what additional preventive and mitigative measures are needed (§192.935) for the covered segment.**

§192.917(e) ***Actions to address particular threats.*** **If an operator identifies any of the following threats, the operator must take the following actions to address the threat. . . . . .**
(5) ***Corrosion.*** **If an operator identifies corrosion on a covered pipeline segment that could adversely affect the integrity of the line (conditions specified in §192.933), the operator must evaluate and remediate, as necessary, all pipeline segments (both covered and non-covered) with similar material coating and environmental characteristics. An operator must establish a schedule for evaluating and remediating, as necessary, the similar segments that is consistent with the operator's established operating and maintenance procedures under part 192 for testing and repair.**

- **Item 3A: §192.917(a)**

GPNG's plan lists all 21 threats and contains a basic framework for threat identification and risk assessment. However, the plan does not provide procedural details or indicate the documentation requirements. The plan does not clearly delineate how all nine threat groups are to be addressed, nor does it provide criteria for evaluating or eliminating threats. The risk analysis output does not clearly indicate whether a specific threat is stable or whether a threat has been eliminated. Also, the plan does not provide procedural details or documentation requirements for considering interactive threats consistent with ASME/ANSI B31.8S, section 2.2.

- **Item 3B: §192.917(b)**

GPNG's plan has reproduced the ASME data table elements, but does not contain a process for collecting, analyzing, and integrating data on the pipeline and documenting the results. GPNG indicates it has evaluated its data in trying to determine the threats and how to assess for them, but has not documented its processes or its results.

GPNG's plan does not provide details to address data quality and accuracy or to define how new information is to be captured and included for review.

GPNG's plan does not include a process to integrate its data, including procedures to capture and integrate information on foreign lines crossing its pipelines.

- **Item 3C: §192.917(c)**

GPNG's plan does not adequately establish the risk assessment process to determine the benefit derived from mitigating actions, such as:

- Establishing priorities for scheduling mitigating action,
- Assessing the benefits derived from mitigating action,
- Determining the most effective mitigation measures for identified threats
- Assessing more effective resource allocation, and
- Facilitating decisions to address risks.

GPNG's plan indicates that new information is being incorporated, but it does not include provisions to ensure that new information is incorporated in a timely and effective manner.

- **Item 3D: §192.917(e)(5)**

GPNG's plan does not include procedures for addressing corrosion on similar pipelines (coating materials and environmental characteristics) in both covered and non-covered segments if corrosion is found on a covered segment.

4. §192.911(e) Provisions meeting the requirements of §192.933 for remediating conditions found during an integrity assessment.

§192.933(a) What actions must be taken to address integrity issues? *General requirements*. An operator must take prompt action to address all anomalous conditions that the operator discovers through the integrity assessment. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure that the condition is unlikely to pose a threat to the integrity of the pipeline until the next reassessment of the covered segment. If an operator is unable to respond within the time limits for certain conditions specified in this section, the operator must temporarily reduce the operating pressure of the pipeline or take other action that ensures the safety of the covered segment. If the pressure is reduced, an operator must determine the temporary reduction in operating pressure using ASME/ANSI B31G (ibr, *see* §192.7) or AGA Pipeline Research Committee Project PR–3–805 ("RSTRENG"; ibr, *see* §192.7) . . . . .

§192.933(b) *Discovery of condition.* Discovery of a condition occurs when an operator has adequate information about a condition to determine that the condition presents a potential threat to the integrity of the pipeline. A condition that presents a potential threat includes, but is not limited to, those conditions that require remediation or monitoring listed under paragraphs (d)(1) through (d)(3) of

this section. An operator must promptly, but no later than 180 days after conducting an integrity assessment, obtain sufficient information about a condition to make that determination, unless the operator demonstrates that the 180-day period is impracticable.

§192.933(c) ***Schedule for evaluation and remediation*****. An operator must complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation. Unless a special requirement for remediating certain conditions applies, as provided in paragraph (d) of this section, an operator must follow the schedule in ASME/ANSI B31.8S (incorporated by reference, see §192.7), section 7, Figure 4. If an operator cannot meet the schedule for any condition, the operator must explain the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety.**

§192.933(d) ***Special requirements for scheduling remediation.*** **(1)** ***Immediate repair conditions.*** **An operator's evaluation and remediation schedule must follow ASME/ANSI B31.8S, section 7 in providing for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure in accordance with paragraph (a) of this section or shut down the pipeline until the operator completes the repair of these conditions. An operator must treat the following conditions as immediate repair conditions: . . . . .**

(3) ***Monitored conditions.*** **An operator does not have to schedule the following conditions for remediation, but must record and monitor the conditions during subsequent risk assessments and integrity assessments for any change that may require remediation: . . . . . .**

- **Item 4A: §192.933(a)**

GPNG's plan does not include procedures for determining the appropriate pressure reduction using ASME B31G or "RSTRENG", or for reducing pressure to a level not exceeding 80% of the level at the time the condition was discovered. GPNG's plan does not address time limits for pressure reductions and the justification if it exceeds one year.

- **Item 4B: §192.933(b)**

GPNG's plan covering remediation does not include details, or reference other O&M procedures, that address how GPNG reacts to anomalies discovered during normal operations as well as during IMP assessments.

In addition, GPNG's plan does not include a requirement to document the actual date of discovery of all anomalous conditions resulting from integrity assessments.

- **Item 4C: §192.933(c)**

GPNG's plan does not include provisions under ASME B31.8S, Section 7, Figure 4, for scheduling and remediating any other threat conditions that do not meet the classification criteria of 192.333(d).

GPNG's plan does not include a requirement to develop a technical justification should GPNG determine that a remediation timeframe cannot be met, or to notify OPS and the State pipeline safety authority should GPNG be unable to meet a remediation schedule, if it cannot provide a temporary reduction in operating pressure.

- **Item 4D: §192.933(d)**

GPNG's plan does not include provisions to classify and categorize anomalies meeting the criteria for Immediate Repair Conditions (Conditions requiring immediate remediation actions), One-Year Conditions (Conditions requiring remediation within one year of discovery), and Monitored Conditions (Conditions which must be monitored until the next assessment).

- **Item 4E: §192.933(d)(1)**

GPNG's plan does not include a requirement that operating pressure be temporarily reduced, or the pipeline be shut down, upon discovery of all immediate repair conditions.

- **Item 4F: §192.933(d)(3)**

GPNG's plan does not include provisions to record and monitor anomalies that are classified as "monitored conditions" during subsequent risk or integrity assessments for any change in their status that would require remediation.

5. §192.911(f) A process for continual evaluation and assessment meeting the requirements of §192.937.

§192.937(b) *Evaluation.* An operator must conduct a periodic evaluation as frequently as needed to assure the integrity of each covered segment. The periodic evaluation must be based on a data integration and risk assessment of the entire pipeline as specified in §192.917. For plastic transmission pipelines, the periodic evaluation is based on the threat analysis specified in §192.917(d). For all other transmission pipelines, the evaluation must consider the past and present integrity assessment results, data integration and risk assessment information (§192.917), and decisions about remediation (§192.933) and additional preventive and mitigative actions (§192.935). An operator must use the results from this evaluation to identify the threats specific to each covered segment and the risk represented by these threats.

§192.937 (c) *Assessment methods.* In conducting the integrity reassessment, an operator must assess the integrity of the line pipe in the covered segment by any of the following methods as appropriate for the threats to which the covered segment is susceptible (*see* §192.917), or by confirmatory direct assessment under the conditions specified in §192.931. . . . . .

- **Item 5A: §192.937(b)**

GPNG's plan does not include procedures for the continual evaluation of each covered segment as required to include a review of threats, a review of the adequacy and

effectiveness of existing preventive and mitigative measures and any proposed new measures, and an evaluation of assessment methods and schedules during its annual review of data and records, and for documenting the results of these annual reviews.

- **Item 5B: §192.937(c)**

GPNG's plan indicates it will conduct low stress re-assessments, however, GPNG's MAOPs exceed 30% of SMYS (specified minimum yield strength), which by definition are not low stress.

6. §192.911(h) Provisions meeting the requirements of §192.935 for adding preventive and mitigative measures to protect the high consequence area.

§192.935(a) General requirements. An operator must take additional measures beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area. An operator must base the additional measures on the threats the operator has identified to each pipeline segment. (See §192.917) An operator must conduct, in accordance with one of the risk assessment approaches in ASME/ANSI B31.8S (ibr, see §192.7), section 5, a risk analysis of its pipeline to identify additional measures to protect the high consequence area and enhance public safety. Such additional measures include, but are not limited to, installing Automatic Shut-off Valves or Remote Control Valves, ……..

§192.935(b)(1) ***Third party damage.*** **An operator must enhance its damage prevention program, as required under §192.614 of this part, with respect to a covered segment to prevent and minimize the consequences of a release due to third party damage. Enhanced measures to an existing damage prevention program include, at a minimum—**

§192.935(b)(2) ***Outside force damage.*** **If an operator determines that outside force (*e.g.*, earth movement, floods, unstable suspension bridge) is a threat to the integrity of a covered segment, the operator must take measures to minimize the consequences to the covered segment from outside force damage. These measures include, but are not limited to, increasing the frequency of aerial, foot or other methods of patrols, adding external protection, reducing external stress, and relocating the line.**

§192.935(c) ***Automatic shut-off valves (ASV) or Remote control valves (RCV).*** **If an operator determines, based on a risk analysis, that an ASV or RCV would be an efficient means of adding protection to a high consequence area in the event of a gas release, an operator must install the ASV or RCV. In making that determination, an operator must, at least, consider the following factors—swiftness of leak detection and pipe shutdown capabilities, the type of gas being transported, operating pressure, the rate of potential release, pipeline profile, the potential for ignition, and location of nearest response personnel.**

- **Item 6A: §192.935(a)**

GPNG's plan does not contain a risk-based systematic, documented decision-making process to determine which preventive and mitigative measures (PMMs) are to be implemented and which:

  - Involves input from relevant parts of the organization such as operations, maintenance, engineering, and corrosion control;
  - Considers both the likelihood and consequences of pipeline failures;
  - Documents the adequacy and effectiveness of existing and proposed additional measures.

- **Item 6B: §192.935(b)(1)**

GPNG's plan does not contain sufficient detail, or reference another procedure that provides the details, for a follow up investigation concerning unreported excavations to include indirect surveys using methods defined in NACE RP-0502-2002 or for establishing a database of excavation damages and root causes to assist in developing PMMs.

- **Item 6C: §192.935(b)(2)**

GPNG's plan does not include all the threats to its transmission lines, such as threats due to corrosion and outside forces (e.g., earth movement, floods).

- **Item 6D: §192.935(c)**

GPNG's plan does not require that a risk-based analysis be conducted to determine whether an automatic shut-off valve or remote control valve should be added.

7. §192.911(i) A performance plan as outlined in ASME/ANSI B31.8S, section 9 that includes performance measures meeting the requirements of §192.945.

Item 7A: §192.945(a) *General.* An operator must include in its integrity management program methods to measure, on a semi-annual basis, whether the program is effective in assessing and evaluating the integrity of each covered pipeline segment and in protecting the high consequence areas. These measures must include the four overall performance measures specified in ASME/ANSI B31.8S (incorporated by reference, *see* §192.7), section 9.4, and the specific measures for each identified threat specified in ASME/ANSI B31.8S, Appendix A.

GPNG's plan does not include provisions to ensure it tracks threat specific performance measures.

8. §192.911(j) Record keeping provisions meeting the requirements of §192.947.

Item 8A: § 192.947 What records must an operator keep?
An operator must maintain, for the useful life of the pipeline, records that demonstrate compliance with the requirements of this subpart. At minimum, an operator must maintain the following records for review during an inspection. . . . .

GPNG's plan does not include details that address record keeping requirements, including the type of records it will maintain, the location, retention period, and person responsible.

9. §192.911(k) A management of change process as outlined in ASME/ANSI B31.8S, section 11.

Item 9A: ASME/ANSI B31.8S Section 11(a) Formal management of change procedures shall be developed in order to identify and consider the impact of changes to pipeline systems and their integrity. These procedures should be flexible enough to accommodate both major and minor changes, and must be understood by the personnel that use them. Management of change shall address technical, physical, procedural and organizational changes to the system whether permanent or temporary. The process should incorporate planning for each of these situations and consider the unique circumstances of each.

A management of change process includes the following:
(1) Reason for change
(2) Authority for approving changes
(3) Analysis of implications
(4) Acquisition of required work permits
(5) Documentation
(6) Communication of change to affected parties
(7) Time limitations
(8) Qualification of staff

ASME/ANSI B31.8S Section 11(b) The operator shall recognize that system changes can require changes in the integrity management program and, conversely, results from the program can cause system changes. The following are examples that are gas-pipeline specific, but are by no means all inclusive. . . . . .

GPNG's plan restates the code requirements for management of change. No process is clearly defined to identify and evaluate the potential impacts of change and determine their significance and how that change will be managed. GPNG's plan does not provide details of the process to address technical, physical, procedural, and organizational changes as well as the reason for the change, authority for approving changes, analysis of implications, acquisition of required work permits, documentation, communication of the change to affected parties, time limitations, and qualification of staff.

GPNG's plan does not address how integrity management system changes are properly reflected in the pipeline system and how pipeline system changes are properly reflected in the integrity management program.

10. §192.911(l) A quality assurance process as outlined in ASME/ANSI B31.8S, section 12.

§192.7 What documents are incorporated by reference partly or wholly in this part?
(a) Any documents or portions thereof incorporated by reference in this part are included in this part as though set out in full. When only a portion of a document is referenced, the remainder is not incorporated in this part.

§192.915 What knowledge and training must personnel have to carry out an integrity management program?
(a) *Supervisory personnel.* The integrity management program must provide that each supervisor whose responsibilities relate to the integrity management program possesses and maintains a thorough knowledge of the integrity management program and of the elements for which the supervisor is responsible. The program must provide that any person who qualifies as a supervisor for the integrity management program has appropriate training or experience in the area for which the person is responsible.
(b) *Persons who carry out assessments and evaluate assessment results.* The integrity management program must provide criteria for the qualification of any person—
(1) Who conducts an integrity assessment allowed under this subpart; or
(2) Who reviews and analyzes the results from an integrity assessment and evaluation; or
(3) Who makes decisions on actions to be taken based on these assessments.

- **Item 10A: §192.7**

GPNG's plan does not address how the non-mandatory "should" statements containing referenced standards are complied with.

- **Item 10B: §192.915(a)**

GPNG's plan does not include appropriate training or experience requirements necessary for supervisory personnel to carry out their assigned IMP functions.

- **Item 10C: §192.915(b)**

GPNG's plan does not include provisions to determine the qualifications of personnel that carry out assessments and who evaluate assessment results within the IMP.

11. Item 11A: §192.911(m) A communication plan that includes the elements of ASME/ANSI B31.8S, section 10, and that includes procedures for addressing safety concerns raised by—
(1) OPS; and
(2) A State or local pipeline safety authority when a covered segment is located in a State where OPS has an interstate agent agreement.

GPNG provided a copy of the presentation that was given to its personnel. The presentation slides were targeted towards senior management, and the individual slides were supplemented verbally with additional subject matter information. GPNG's plan does not include provisions for ongoing communications with its personnel regarding the status of implementing IMP activities.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). 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 inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 3-2009-1007M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*