



Northern Natural Gas Company
1111 South 103rd Street
Omaha, NE 68124-1000
(402) 398-7000

December 6, 2024

Gregory Ochs – Director
PHMSA – Central Region
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: CPF 3-2024-068-WL

Dear Mr. Ochs,

In response to a Warning Letter dated November 6, 2024, Northern Natural Gas (Northern) submits the following. Each of the issues is listed below followed by Northern Natural Gas's (Northern's) response.

The PHMSA issues from the Warning Letter are quoted in italics with the Northern response following in plain text.

Item 1

§ 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

NNG failed to follow its written procedures for conducting operations and maintenance activities, per the requirements of § 192.605(a). Specifically, NNG failed to follow its Operations and Maintenance (O&M) Procedure 040.203, entitled "Impressed Current Source Inspection" (O&M 040.203), for inspection of cathodic protection rectifiers. O&M 040.203, section 5.2.4 mandated comparing bi-monthly remote monitoring unit (RMU) readings of voltage and amperage with manual multi-meter readings on an annual basis, to ensure RMU accuracy.

During the PHMSA field inspection, PHMSA discussed the documented annual readings with NNG and NNG's personnel confirmed that they were not recording the comparison of the manual reading to the RMU reading, contrary to its O&M Procedure 40.203 and the requirements of § 192.605(a).

Northern Response:

At the annual corrosion meeting held December 5, 2024, in Johnston, Iowa, technicians were trained where to enter information in the new company approved corrosion control database, American Innovations, PCS program.

Item 2

§192.605 Procedural manual for operations, maintenance, and emergencies.

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NNG failed to follow for each pipeline its manual of written procedures for conducting operations and maintenance activities, per the requirements of § 192.605(a). Specifically, NNG failed to follow its O&M 160.101, entitled "Valve Maintenance," section 5, which required testing of each valve and documentation of the valve open/close as-found and as-left settings. PHMSA reviewed the valve maintenance records for 2020 through 2023 calendar years and found that NNG failed to document the mode for which each valve was tested (e.g., manual or motor operated) and the as-found and as-left settings were frequently not documented. This was for all locations across NNG's system.

Northern Response:

The Maximo application was revised to record this information for valve maintenance tasks. Northern's procedure will be revised to eliminate powered-actuated and remote-controlled operation during annual maintenance. Partial valve operation cannot be performed using these modes of travel as this could cause service interruption if valves are fully operated.

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Long Description

160.101 - CHECK, OPERATE, LUBRICATE

Font Size Format None

1. CONTACT GAS CONTROL PRIOR TO STARTING WORK CALL TIME: _____ CONTROLLER NAME:

2. AS FOUND - OPEN / CLOSED (CIRCLE ONE)

3. CHECK VALVE AND OPERATOR (IF ANY) FOR LEAKS OR VISUAL SIGNS OF LOOSENESS.

4. VERIFY EVERY VALVE IS PROPERLY SECURED, LABELED AND, WHERE REQUIRED, A VALVE WRENCH IS PROPERLY STORED AND AVAILABLE.

5. AS LEFT - OPEN / CLOSED (CIRCLE ONE)

6. CONTACT GAS CONTROL WHEN DONE WITH WORK CALL TIME: _____ CONTROLLER NAME.

7. LOG PERCENT OF VALVE TRAVEL DURING ANNUAL MAINTENANCE. _____

8. RECORD THE ALTERNATIVE VALVE, IF FOUND INOPERATIVE AND TAG IT.

Reset Clear

OK Cancel

Figure 1 - Added line 7 to the job plan in Maximo

Item 3

§ 192.709 Transmission lines: Record Keeping.

(a)

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

NNG failed to retain records indicating the leakage survey methods used to survey Class 3 locations, per § 192.709(c). As required by § 192.706(a) of Subpart M, each operator should conduct leakage surveys in Class 3 locations using leak detector equipment. NNG did conduct the leakage surveys; however NNG's records did not indicate the type or model of leak detection equipment used during the leakage surveys at its Beatrice, Palmyra, and South Omaha pipeline segments for calendar years 2020, 2021, 2022, and 2023.¹

While NNG did not record the type of equipment used in its leakage survey records, PHMSA observed the leak detector equipment being used in the field and determined that NNG was utilizing the appropriate equipment.

Northern Response:

The list of equipment along with the list of calibrations are kept in safety procedure 110.310. Operating Procedure 80.407 will be updated to reference 110.310 and its requirements.

Item 4

§ 192.745 Valve maintenance: Transmission lines.

(a)

(b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.

NNG failed to take prompt remedial action to correct a valve found inoperable, per the requirements of §192.745(b). Specifically, PHMSA reviewed NNG's valve inspection records. From this review, PHMSA found that NNG determined the 6" Schuyler Branchline Block Valve AYA08 at milepost 33.52 in the Beatrice Unit to be inoperable after multiple attempts in March 2022. NNG also failed to designate an alternative valve. NNG's tracking system (EATS) showed that project number 94181 was created to address repair of the valve, however, NNG did not perform the repair and no alternate valve was identified. NNG only visually inspected the valve in May 2022 and May 2023.

PHMSA notified NNG during the inspection of the failure to designate an alternate valve. Upon being notified, NNG designated alternate valves on December 14, 2023 and updated the comments on its EATS 94181.

Northern Response:

Maximo was revised to record this information during valve maintenance tasks; the revised maintenance task description with additional detail is shown below.

Long Description

160.101 - CHECK, OPERATE, LUBRICATE

Font: Size: Format: None

1. CONTACT GAS CONTROL PRIOR TO STARTING WORK CALL TIME: _____ CONTROLLER NAME:

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4. VERIFY EVERY VALVE IS PROPERLY SECURED, LABELED AND, WHERE REQUIRED, A VALVE WRENCH IS PROPERLY STORED AND AVAILABLE.

5. AS LEFT - OPEN / CLOSED (CIRCLE ONE)

6. CONTACT GAS CONTROL WHEN DONE WITH WORK CALL TIME: _____ CONTROLLER NAME.

7. LOG PERCENT OF VALVE TRAVEL DURING ANNUAL MAINTENANCE. _____

8. RECORD THE ALTERNATIVE VALVE, IF FOUND INOPERATIVE AND TAG IT.

Reset Clear

OK Cancel

Figure 2 - Added line 8 to the job plan in Maximo

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The screenshot shows a Maximo job plan form titled "Long Description". The main heading is "160.101 - CHECK, OPERATE, LUBRICATE". Below this is a rich text editor with a toolbar. The form contains the following numbered steps:

1. CONTACT GAS CONTROL PRIOR TO STARTING WORK CALL TIME: _____ CONTROLLER NAME:
2. AS FOUND - OPEN / CLOSED (CIRCLE ONE)
3. CHECK VALVE AND OPERATOR (IF ANY) FOR LEAKS OR VISUAL SIGNS OF LOOSENESS.
4. VERIFY EVERY VALVE IS PROPERLY SECURED, LABELED AND, WHERE REQUIRED, A VALVE WRENCH IS PROPERLY STORED AND AVAILABLE.
5. AS LEFT - OPEN / CLOSED (CIRCLE ONE)
6. CONTACT GAS CONTROL WHEN DONE WITH WORK CALL TIME: _____ CONTROLLER NAME.
7. LOG PERCENT OF VALVE TRAVEL DURING ANNUAL MAINTENANCE. _____
8. RECORD THE ALTERNATIVE VALVE, IF FOUND INOPERATIVE AND TAG IT.

At the bottom right of the form are four buttons: "Reset", "Clear", "OK", and "Cancel".

Figure 2 - Added line 8 to the job plan in Maximo

Should you have any questions, please feel free to contact me directly at (402) 398-7715.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Correll', with a stylized, cursive script.

Tom Correll

Vice President

Pipeline Safety and Risk