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BY:

atlas pipeline
operating affiliates

October 30, 2007

Mr. R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Material Safety Administration
8701 Gessner, Suite 1110
Houston TX 77074

RE:CPF- No 4-2007-1013M

Mr. Seeley:

This letter is in response to the Notice of Amendment dated October 3, 2007. Three (3) items were addressed in the Notice of Amendment; we have included a response to each item and a copy of the Company's revised Operations and Maintenance plan. Ozark Gas Transmission respectfully submits the following:

§ 192.605 Procedural manual for operations, maintenance, and emergencies (d) *Safety-related condition reports.* The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.

Ozark Gas Transmission System's procedures did not clearly state that employee's are trained on an ongoing basis to recognize safety related conditions.

Ozark Gas Transmission employee's who perform operation and maintenance activities are qualified on an ongoing basis to recognize conditions that potentially may be safety related conditions through the company Operator Qualification Plan, performing routine operations and maintenance activities, on the job training and company safety meetings.

§ 192.616 Public awareness (g) the program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

Ozark Gas Transmission System's procedures did not clearly state that the public education program must be conducted in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

Ozark Gas Transmission, LLC has amended section 1400 – Damage Prevention Program through the company's Management of Change process to clearly state the company's public education program will be conducted in other languages commonly understood by a significant number and concentration of the non-English speaking population. The affected public along the company's right of ways of jurisdictional lines are receiving the public awareness information in English and Spanish, as outlined in the company's public awareness plan. (A copy of the distributed information is enclosed)

§ 192.463 External corrosion control: Cathodic protection
Ozark Transmission System's procedures did not clearly state the need to include the requirements and process for "IR Drop" in relation to adequate cathodic protection.

Ozark Gas Transmission, LLC has revised procedure 901 External Corrosion, Procedures (B) through the company's a Management of Change (MOC) process provisions to address IR Drop measurement considerations as it pertains to obtaining cathodic protection voltage measurements.

If any questions or additional information is needed, please call (918) 496-4903.

Respectfully,

Thomas B. Williams

Thomas B. (Tom) Williams
Sr. Vice-President – Technical Services
Atlas Pipeline, operating affiliates.

Enclosure:(s)

Corrosion Control Procedures - 900

External Corrosion - 901

General

The following procedure establishes guidelines for the design, installation, operation and maintenance of cathodic protection systems on DOT regulated pipeline systems.

Responsibility

The Director of Regulatory Compliance and Corrosion Control shall be responsible for:

A. Approving procedures for the design, construction, operation and maintenance of all corrosion control facilities on existing pipelines and on new pipelines;

B. The design, installation (either by contract or by company personnel), inspection during construction, initial performance evaluation.

Pipeline Operations personnel shall be responsible for:

A. Initiating and directing the various tests, inspections and measurements outlined in this section and shall ensure schedules are prepared and permanent records maintained of all tests, inspections and operating data.

B. Testing of all corrosion control facilities required on existing pipelines and on new pipelines.

Procedures

A. New Pipelines

1. All new buried or submerged pipelines and all new pipe replacements installed after July 31, 1971 shall have an approved external coating and a cathodic protection system designed to protect the pipeline in its entirety.

2. The cathodic protection system shall be installed and placed in operation as soon as possible after completion of construction, but shall not exceed one (1) year after completion of construction.

B. Existing Pipelines

1. All existing pipelines that are regulated under 192 Sub Part I shall have a cathodic protection system designed to protect the pipeline in its entirety. Each cathodic protection system must provide a level of protection that complies with the following criterion:

a. A negative (cathodic) voltage of at least -0.85 volt with reference to a saturated copper-copper sulfate half cell contacting the electrolyte as near to the structure as possible. Determination of this voltage must be made with the protective current applied.

b. IR drop considerations to identify significant voltage drops will be performed in accordance to established procedures outlined in NACE RP0169-2002 6.2.2. P/S potentials taken over blacktop, concrete, frozen ground, or other extremely high resistance surfaces are considered invalid due to the high IR drop that may be present and the possibility the reading indicated may be remote to the relative position of the half-cell. Half-cell contact must be made with the representative environment that surrounds the pipeline. In areas paved with asphalt or frozen, the high resistance cover should be removed. Where possible, a permanent access point should be installed. It may be necessary to water the point of contact with the half-cell in areas of dry or high resistivity soils to lower the contact resistance of the half-cell to an acceptable level.

c. A minimum negative (cathodic) polarization voltage shift of 100 millivolts. The polarization voltage shift must be determined by interrupting the protective current and measuring the polarization decay. When the current is initially interrupted an immediate voltage shift occurs. The voltage reading after the immediate shift must be used as the base reading from which to measure polarization decay.

Existing pipelines installed before If installed before July 31, 1971, all effectively coated pipelines must be cathodically protected, coated pipelines must be provided in areas of active corrosion for: bare or ineffectively coated transmission lines, and bare or coated compressor station, regulator station and meter station piping.

C. Reference Half Cells

A negative cathodic voltage must be measured between the structure surface and a saturated copper-copper sulfate half cell contacting the electrolyte.

- A reference electrode check should be shall at a minimum, before starting the annual external survey. (Refer to Procedure 911)

D. Design of Cathodic Protection System

1. The type of cathodic protection used shall deliver sufficient current to the structure so that the selected criterion for protection is attained. It shall also be

designed to:

a. Minimize interference current on or from foreign structures;

b. Provide a design life commensurate with the life of the protected structure; and

c. Provide adequate allowance for changes in current requirements with time.

2. Design considerations shall include the type of structure to be protected, structure accessibility, power availability, electrical resistivity of the electrolyte, electrical continuity and electrical isolation of the structure.

3. The types of cathodic protection can be either impressed current systems or galvanic anodes.

   a. Galvanic anodes such as magnesium, zinc or aluminum should be used in cases where any one of the following exist:

      i. Current requirements are low,

      ii. The structure to be protected is well coated,

      iii. Localized protection is required; or

      iv. The electrolyte has relatively low resistivity.

   b. Galvanic anodes shall be installed according to company specifications.

4. Impressed current systems utilizing rectifiers and ground beds shall be used where high current is required in any soil resistivity to protect larger and more expansive structures. Rectifiers and ground beds shall be installed per approved company procedures.

5. Proper maintenance is essential for effective and continuous operation of cathodic protection systems. All maintenance activities performed on cathodic protection systems shall be referenced in detail and documented in the annual CP inspection survey.

6. All installation as-built information shall be submitted to the Corrosion Supervisor.

Records

Form 1122 - Corrosion Installation Report
Corrosion - Protective Coating (902)

References

DOT 49 CFR 192.453, 455, 457, & DOT 49 CFR 195.242 & 414
IMP Manual 6-003 – Risk Assessment
O&M Section 911.
Company Engineering Standards

Damage Prevention Program - 1400

Damage Prevention Program - 1400

General

The purpose of this section is to establish guidelines for minimizing the number of excavation related damage incidents sustained by company facilities, and is intended to satisfy the requirements of DOT regulations and state statutes for interstate, intrastate and jurisdictional gathering pipelines pertaining to excavation activities.

It is company policy to participate in this program not only because it satisfies governmental regulations, but also because it adds an extra degree of protection from damage to our facilities. This procedure outlines the minimum compliance required and provides various ways to achieve compliance. This section is also used in conjunction with the Company Public Awareness Plan.

The "One-Call" system is a computerized notification system for anyone planning an excavation. Any excavator can call Oklahoma, (1-800-522-6543), Texas, (1-800-DIG-TESS), Arkansas (1-800-482-8998), and Missouri (1-800-344-7483), and the One-Call system will notify its members. The One-Call system currently provides utility notification services for the company, as well as other members statewide. Its purpose is to receive excavation location information from excavators who plan to dig, drill or blast, and to disseminate this information to its members in an attempt to promote safety and reduce underground utility damage (refer to the Company Awareness Plan).

The Damage Prevention Program is applicable to all company facilities covered under CFR 49 192.

The Damage Prevention Program has five major requirements:

1. Annual notification to area contractors and excavators of the existence and purpose of the Damage Prevention Program and how the excavator may learn the location of underground facilities.
2. Notification to the public in the areas of the pipeline of the existence and purpose of the Damage Prevention Program and how the public may learn the location of underground facilities.

At a minimum, educational material content must include:

- Purpose of pipeline;
- Hazards of product(s) transported;
- General pipeline location and pipeline marker identification;
- Damage prevention information and One-Call requirements;
- Leak recognition, response, and reporting; and,
- Company contact information.

If a significant number and concentration of non-English speaking population is identified within the pipeline operating area, the educational materials should be developed in the language(s) commonly understood by that population.

Educational material may be delivered through informational brochures, newspaper advertisements, radio or television ads, or other means determined effective by the Technical Services Group.

3. Membership in a "qualified one-call system" within the State(s) and provide a means of receiving and recording notification of planned excavation activities.
4. Notify inquiring excavators if there are buried pipelines in the area and the type of markings that will be used to identify the location of the pipeline as far ahead of the excavation activity as practical; and
5. Furnish inspection on those pipelines which the operator has reason to believe could be damaged by excavation activities and in instances where blasting occurs, the inspection must include a leakage survey.

Responsibility

A. Qualified Operations Personnel shall be responsible for:

1. Ensuring the Damage Prevention Program is implemented within his assigned area.
2. Inspecting any facilities that he has reason to believe could be damaged by excavation activities.
3. Ensuring that each local office maintains a line locate log for recording all requests for line locates.
4. Responding to each notice received from any source that provides information of possible activities that might affect pipelines or pipeline facilities within his area.
5. Providing notification to excavating, directional drilling and other trenchless technology operators when excavation activities impact area facilities.

B. The Engineering Department shall be responsible for reviewing the State One-Call System's excavator mailing list each year to verify completeness and for assisting the Area manager or his designee

as needed with damage prevention program activities.

C. The Technical Services Department shall be responsible for development and administration of the Damage Prevention Program and related materials as well as Damage Prevention efforts for affected public located along pipeline right-of-ways. The effectiveness of the Damage Prevention Program will be assessed by the number of line hits, near misses and interaction with excavators

Procedures

A. Notification to Excavators

One-Call maintains a current, computerized list of all contractors, excavators, land-use officials, engineers, etc. that utilize their system, as well as other contractors contacted through their own damage prevention program. One-Call conducts a contractor mail out annually for its members.

The Compliance Supervisor is responsible for obtaining the One-Call system's annual excavator mailing list for the counties in their area of responsibility and reviewing it for completeness. This may be done by reviewing local telephone books and the Company Pipeline Approved Contractor list to ensure all excavation contractors, plumbers, etc. are on the One-Call system's mailing list. If an excavator is identified that was not included in the One-Call's mailing, the Compliance Supervisor must ensure this excavator is contacted and provided with Damage Prevention information. The Compliance Supervisor should also send the excavator's contact information to the One-Call system and request that they be added to their excavator database.

B. Receiving and Recording Notices of Planned Excavation Activities.

1. Calls from the "One Call" system are electronically received at the area office.
2. Upon receipt of the electronic transmittal notification, the area office shall log all data into the area Locate Log.
3. Each call logged in the area Locate Log shall be numbered and that number given to the person calling for the line locate request. In the case of "one call" notifications, the number assigned by the call shall be the transmittal number assigned by the one-call system.
4. If facilities are not impacted, this should be noted on the log and initialed by the person making the entry.
5. When a call is received that may impact our facilities or is in close proximity to warrant marking, log the request information on the log, assign locator, and monitor the progress of the work until its completion.

C. Responding to Each Notice of Planned Excavation Activities

1. If a call received by Gas Control is notification of a potential dig-up of company facilities or is a notification of immediate intent to excavate, then Gas Control shall immediately contact the appropriate Area Manager, On-Call Personnel or the area's Administrative Assistant.
2. If a company pipeline is located near the planned excavation

activity the Area Manager or Administrative Assistant shall provide the requester the following information:

a. Location and proximity of the facility,

b. When the pipeline will be marked,

c. Type of temporary marking to be provided, and

d. How to identify the marking.

3. Any construction near or within company right-of-way shall be investigated to determine the extent of the project and whether Company facilities will be impacted or affected. This includes but is not limited to:

   a. Foreign pipelines,

   b. Petroleum, water, or other well-drilling activities,

   c. Electric cables or telephone lines,

   d. Drilling holes for poles, posts or anchors, and

   e. Any other activity requiring excavation, such as building foundations, terracing, etc.

4. When company facilities are impacted by a construction project or an encroachment on company right-of-way is likely, every company line within and near the construction site shall be located and sufficiently marked to indicate its position.

5. If the locate request is for blasting operations, additional information shall be required from the third party prior to blasting operations and forwarded to Technical Services for review:

   a. Configuration of the explosive charges (point, line, or grid),

   b. Number of charges,

   c. Spacing between charges,

   d. Type of charge and weight,

   e. Distance between pipeline and nearest charge for the pipeline,

   f. Angle between pipeline and explosive line or grid,

   g. If grid, number of rows and number of charges per row, and

   h. Pipe description of each pipeline.

   Engineering will determine if blasting operations could affect the pipeline facilities and work with field operations to ensure the integrity of the pipeline during blasting operations. If warranted, the Engineering Department may require that a leak survey be performed immediately following blasting operations. If required, personnel shall conduct the leak survey and document on O&M Form 3101 "Pipeline Patrol & Leak Survey Report"

D. Pipeline Location and Marking

1. When possible,

   a. Provide temporary marking of buried pipelines in the area

of excavation activity before the activity begins;

b. Locate and mark pipelines in areas where excavation activities are observed, anticipated, or will occur as indicated by notifications;

c. Mark pipelines within 48 hours of receipt of notification, unless the notifying party agrees to extend this time, and before any excavation activities begin;

d. Mark bend areas and other changes of direction so that the location of the pipe is clearly delineated; and

e. Set markers on straight pipeline sections at distances required by conditions on the site and job, but preferably not to exceed 100 feet.

2. When temporarily marking for damage prevention purposes, yellow flags shall be used as markers. The following information shall be included on these flags:

   a. Company Name,

   b. Danger High Pressure Gas Pipeline, and

   c. Company Emergency Telephone Number.

   The use of paint is an acceptable method of temporarily marking a pipeline located under concrete, asphalt, or similar surface, provided yellow flags are placed on each side of the painted surface. Where a temporary paint marking greater than 20 feet in length is used to identify a pipeline, i.e. parking lot, highway crossing, etc., the Company name and product within the pipeline shall be identified in paint as PIPELINE HP alongside the pipeline marking.

3. If practical, locate and mark pipelines when a requester's representative is present. The minimum length of pipeline to be marked shall be as required by conditions of the site or job.

E. Inspection and Monitoring of Excavation Activities

1. The inspection must be performed as frequently as necessary during and after excavation in order to verify the integrity of the facility, especially when blasting operations are involved.

2. A company representative shall be assigned to be present when excavation activities require exposing or crossing a Company pipeline. If there are parallel encroachments or other circumstances where this provision will require the representative to be present for long periods of time, and there is to be no crossing of the company pipeline, operations personnel may make other provisions to prevent damage to the pipeline.

3. When possible, a company representative shall determine a pipeline's approximate depth if the pipeline is going to be exposed or crossed by use of probing bar and request the intended excavation depth from the outside party.

Documentation

Locate Logs and locate requests shall be retained at the area office for a minimum of 5 years.

Documentation of annual One-Call mail-outs, One-Call excavator listing, and annual excavator reviews shall be retained at each area office for a minimum of 5 years.

Documentation of Public Damage Prevention ads shall be maintained in the Corporate Engineering Department for a minimum of 5 years.

Completed O&M Form 3101 "Pipeline Patrol & Leak Survey Report" for leakage surveys following blasting operations shall be kept for a minimum of 5 years.

Reference

Company Public Awareness Plan
Oklahoma One-call
Dig-Tess (Texas)
Missouri One-Call
Kansas One-Call

Records

O&M Form 1301 Pipeline Patrol & Leak Survey Report

Emergency Procedures - 1600

Reporting Safety Related Conditions - 1600

General

Safety-related conditions involving company pipeline facilities must be reported as soon after discovery as can be done safely to the Area Manager or designee will consult with the Engineering Department as soon as possible to determine if the condition is reportable under the provisions of CFR 49 Part 191.23. The Engineering Department is responsible for making all regulatory telephonic notifications. Associated reports must be filed (received by the secretary of the PHMSA in Washington, DC) in writing within 5 working days (not including Saturday, Sunday or Federal holidays) after a representative of the company first determines that the condition exists, but not later than 10 working days after the company discovers the condition. To report safety related conditions to PHMSA, send a fax to (202) 366-7128. The address for providing documentation is 1200 New Jersey Ave SE, 2ND Floor, Washington D.C. 20590.

The following are safety-related conditions that are reportable under CFR 49 Part 191.23.

A. In the case of a pipeline that operates at a hoop stress of 20 percent or more of its specified minimum yield strength, general corrosion that has reduced the wall thickness to less than that required for the maximum allowable operating pressure, and localized corrosion pitting to a degree where leakage might result.

B. Unintended movement or abnormal loading by environmental causes, such as an earthquake, landslide, or flood, that impairs the serviceability of a pipeline or the structural integrity or reliability of an LNG facility that contains, controls, or processes gas or LNG.

C. Any material defect or physical damage that impairs the serviceability of a pipeline that operates at a hoop stress of 20 percent or more of its specified minimum yield strength.

D. Any malfunction or operating error that causes the pressure of a pipeline to rise above its maximum allowable operating pressure plus the build-up allowed for operation of pressure limiting or control devices.

E. A leak in a pipeline that constitutes an emergency.

F. Any safety-related condition that could lead to an imminent hazard and cause (either directly or indirectly by remedial

action of the operator), for purposes other than abandonment, a 20 percent or more reduction in operating pressure or shutdown of a pipeline.

G. Any safety related condition that is reported on an evaluated internal inspection tool report that indicates defects that have reduced the wall thickness to less than that required for the maximum allowable operating pressure.

Using the aforementioned criteria, qualified (safety meetings, operator qualification testing, work related experience and on the job training) personnel who perform operations and maintenance activities should be able to recognize conditions that potentially may be safety-related. Along with the immediate notification of Area Manager or designee, a Safety-Related Condition Report must be filled out by the person that noted such a condition (Form 3108). This form should then be copied and sent to the Director of Compliance and Corrosion to meet reporting requirements as provided under CFR 49 Part 191.23 and will be filed by the Supervisor of Compliance.

Records

Form 3108 Safety Related Condition Report

CFR 49 191.23 – Reporting Safety Related Conditions