TRINITY

July 12, 2013

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

RE: Notice of Amendment CPF 4-2013-5014M dated June 13, 2013.

Dear Mr. Seely:

Please accept this letter in response to the Notice of Amendment delivered to Trinity Pipeline GP LLC, as a result of an inspection by a representative of the Pipeline and Hazardous Materials Safety Administration in September 2012.

NOTICE OF AMENDMENT ITEMS

1. No action necessary.

2. No action necessary.

3. Management of Change form is attached implementing welding procedures to include "New Construction" in section 2.7 of Trinity's Operations and Maintenance Manual ("Exhibit A, Page 3").

4. No action necessary.

5. 195.567 Which pipelines must have test leads and what must I do to install and maintain the leads?

Trinity's Operations and Maintenance manual states:

"1.14.4.5 TEST STATIONS

LOCATION: The pipeline system shall be equipped with sufficient cathodic protection test stations or other contact points to determine the adequacy of the cathodic protection system.

In general, test stations should be installed at foreign metallic structure crossings, railroad crossings, and major road or street crossings. Consideration should be given to installing test stations at other paved road crossings and at suitable intervals frequent enough to obtain electrical measurements indicating the adequacy of the cathodic protections.

INSTALLATION: Test station installations are to be constructed in accordance with company specifications."

1.14.5.2 PIPE-TO-SOIL POTENTIALS

Test Lead Installation Method to be used:

(1) Locate the leads at intervals frequent enough to obtain electrical measurements indicating the adequacy of cathodic protection.
(2) Provide enough looping or slack so backfilling will not unduly stress or break the lead and the lead will otherwise remain mechanically secure and electrically conductive.
(3) Prevent lead attachments from causing stress concentrations on pipe.
(4) For leads installed in conduits, suitably insulate the lead from the conduit.
(5) At the connection to the pipeline, coat each bared test lead wire and bared metallic area with an electrical insulating material compatible with the pipe coating and the insulation on the wire.

Regarding this issue, Trinity has a total of 424 test leads on 185 miles of pipeline; of which 74.29% are not at any kind of road crossings.

A) 55 test stations at highway crossings
B) 54 test stations at lease roads
C) 369 test stations at non-road locations

We do not recall any comment regarding interval spacing being related solely to road crossings and in any case, this is not accurate. We believe we have more than an adequate number of test leads to comply with the code and do not feel an amendment is necessary.

6. 195.577 What must I do to alleviate interference currents?

Trinity has purchased rectifier interrupters and will implement on/off testing and take AC readings yearly with our annual cathodic protection surveys. The Management of Change form is attached showing how we will revise our O&M Manual ("Exhibit B").

7. 195.583 What must I do to monitor atmospheric corrosion control?

Trinity updated its Operations and Maintenance manual regarding atmospheric corrosion on September 20th, 2012 and submitted a Management of Change form to Mr. Mike Myers on September 21st, 2012. (Please see page 6 of attached Management of Change form "Exhibit C").

The highlighted text below was added to section 1.14.5.7 regarding Atmospheric Corrosion:

1.14.5.7 ATMOSPHERIC CORROSION

Above ground piping shall be evaluated at intervals not exceeding thirty-six (36) months for evidence of atmospheric corrosion. The following inspection procedures shall be followed:

- *Visually inspect piping for evidence of corrosion and check condition of coating and/or bare metal with special attention paid to the following: Pipe at soil-to-air interfaces, under dis-bonded coating and at pipe supports (pipe resting on pipe supports and through-wall piping in buildings) in accordance with 195.583(b)*

Please advise if any of these responses are not sufficient or more detail is needed. As always, Trinity will make every effort to comply with 195 regulations and the Pipeline and Hazardous Materials Safety Administration, to ensure the safe operation of its pipelines.

Best Regards,

Barry F. Petty
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