California Gas Gathering, Inc.

2981 Gold Canal Drive
Rancho Cordova, CA 95670
(916) 859-4700 ph (916) 859-4747 fax

July 8, 2008

Chris Hoidal
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

RE: Response to Notice of Amendment dated June 24, 2008, received by California Gas Gathering, Inc. on July 1, 2008
CPF 5-2008-0018M

Dear Mr. Hoidal:

California Gas Gathering, Inc. (CGG) received the Notice of Amendment dated June 24, 2008 from the Pipeline and Hazardous Materials Safety Administration (PHMSA) on July 1, 2008. We are herein responding to the inadequacies found by the inspector during our pipeline inspection that took place March 25-27, 2008 and April 22, 2008. We have addressed the inadequacies as follows:

1. 192.605(b)(8) – We have addressed this inadequacy by adding the following language to the Normal Operations & Procedures section of our Pipeline Specific Operations Manual. I have attached this section to this letter.

   Periodic Review of Work Performed by Operators - It is the primary responsibility of the Gas Control Manager and Vice President of Operations to periodically review the work performed by operators. The intent of this review is to determine the effectiveness of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found [49 CFR 192.605(b)(8)].

2. 192.603(b) – This has been addressed in our Operations and Maintenance Manual. The attached procedure titled Record Keeping, and table titled Table #2.01A have been incorporated and are in use in our Operations and Maintenance Manual.

I believe that this should satisfactorily address the inadequacies found by PHMSA during the inspection. If you have any questions or comments, please don't hesitate to contact me at the number listed above or via email at bhabersack@gasbiz.com or you may contact our Compliance Supervisor, Danielle Keelan, also at the number listed above or via email at dkeelan@gasbiz.com.

Regards,

Brian G. Habersack
Vice President, Operations

Enclosure

2. Chapter Two – Normal Operations & Procedures

2.1. ***Normal Operating Parameters*** – Newcomb Station, the northernmost point on Merrill Pipeline System (MPS), receives gas supply primarily via the Blewett Pipeline System (BPS) and secondarily from the third-party owned Red Heat Pipeline. The BPS receives its upstream gas supply at Stone Station and Coderniz Station – and those stations from their respective upstream gas gathering systems and gas fields. For the purposes of identifying normal pressures, flows, and their respective alarm parameters, Stone Station and Coderniz Station will be included with data for the Red Heat Pipeline. The MPS's gas supply is delivered into the PG&E system at Panoche Station, and as such, most of the normal operating parameters are derived from and dependent on the dynamic operating conditions on the PG&E system. The MPS is operated in this way to take advantage of the inventory (line pack and draft) present in the 33+ miles of 10-inch pipeline, to efficiently manage the gathering and delivery of gas on the MPS.

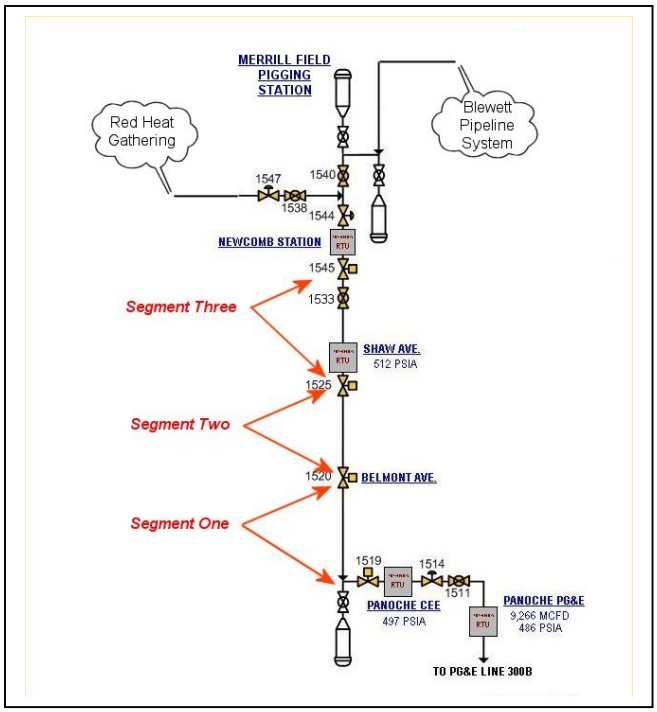
2.1.1. ***Pressures, Flows, & Alarm Setpoints*** – The following table depicts the parameters and alarm setpoints used in the operation of the MPS. All flow rates are expressed in Mcfd (thousands of cubic feet per day), and pressures in psia (pounds per square inch absolute):

Location	Data Point	Normal Range	LoLo Alarm	Low Alarm	High Alarm	HiHi Alarm
Stone Station	Flow Rate	8-9,500	0	1,000	10,500	12,000
	Pressure	475-880	440	450	920	930
Coderniz Sta	Flow Rate	300-700	0	250	900	950
	Pressure	475-870	440	450	905	915
Red Heat P/L	Flow Rate	300-500	0	200	750	1,000
	Pressure	475-870	440	450	880	895
Newcomb	Flow Rate	9-10,000	0	1,500	11,000	13,000
	Pressure	475-870	440	450	935	945
Shaw Ave	Pressure	475-900	440	450	935	945
Panoche Sta	Flow Rate	9-10,000	0	1,500	18,000	20,000
	Pressure	475-870	440	450	850	870

2.1.2. ***Valve Positions*** – All valves depicted in the MPS emergency valve schematic that are shown with yellow highlight (the Emergency Shutdown Valves, or ESV) are in the open position under normal operating conditions. These valves are used to divide the MPS into three distinct segments in the event of a full or partial shutdown to accommodate pipeline maintenance, or under an emergency condition requiring the shutdown of the pipeline. (see the MPS schematic for details).

2.1.2.1. MPS Emergency Valves & Line Segmentation:

- Segment One: Panoche Station to Belmont Avenue – Valves #1519 and #1520 must be closed.
- Segment Two: Belmont Avenue to Shaw Avenue – Valves #1520 and #1525 must be closed.
- Segment Three: Shaw Avenue to Newcomb Station – Valves #1525 and #1545 must be closed.



2.1.3. ***Pressure Limiting/Relief Settings*** **–** The following table depicts the settings of regulators and relief valves on the MPS, including the upstream sources from the BPS and Red Heat Pipeline:

Location	Device	Equipment ID	Setting
Stone Station	Regulator	1576	915 psia
	Relief Valve	1588	1,200 psig
Coderniz Station	Regulator	1564	900 psia
	Relief Valve	1560	1,200 psig
Red Heat P/L	Regulator	1547	875 psia
	Relief Valve	1542	1,200 psig
Newcomb Station	Regulator	1544	930 psia
	Relief Valve	1548	1,200 psig
Panoche Station	Regulator	1514	845 psia
	Relief Valve	1509	1,200 psig

2.2. ***Pipeline Startup Procedures*** – The general areas of this procedure are intended to address the startup of a new pipeline or segment, and the restart of a pipeline that has been shut down for routine maintenance or repairs. These procedures may also be followed for the restart of a pipeline that has been shut down due to an AOC or emergency condition, however in that case; the EOM Safety Team should also consult the Emergency Manual for specific instructions on the restart of a pipeline that had been shut down in response to an AOC or emergency.

2.2.1. ***Manuals, Updates, & Manufacturers Instructions*** – Prior to the startup of any new pipeline or segment, the EOM Safety Team will review and update the respective PSOM together. Should the new pipeline or segment include equipment that is not covered by an Equipment Manual already located in Gas Control and the Field Personnel's vehicles, the Safety Team will update the Equipment Manual with the new manual. Members of the Safety Team should not assume that equipment that is similar to that already in use on the MPS, or an updated version to equipment already in use utilizes the same startup procedure or sequence. Should said Manual be revised to include updated or additional manuals, the Safety Team will advise the Gas Control Manager and Field Superintendent(s) of the change and the need to include discussions for such addition in the pre-startup briefing and instructions.

2.2.2. ***Gas Control & Field Coordination*** – Prior to the startup of any new pipeline or segment, or the restart of a pipeline that has been shut down for routine maintenance or repairs, the Gas Control Manager and Field Superintendent(s) will meet in person, electronically, or telephonically to determine the scope and extent of the pre-startup briefing, and to develop a written plan (including the MPS schematic and any Station schematics material to the startup) to disseminate during the pre-startup briefing. Areas of their consideration should include: Consulting this PSOM and the EOM O&M Manual for guidelines that would impact the startup; pigging and/or purging requirements; work assignments; startup sequence; communication between Gas Control and the Field operations; normal and abnormal conditions that might be expected during startup; alternate procedures in the event of an emergency during startup; and the notification of producers, end-users, utilities, or agencies affected by the startup. As a result of the aforesaid meeting, the Gas Control Manager and Field Superintendent(s) will conduct pre-startup briefings with their respective work groups, or collectively with all EOM operations personnel that would be involved in the startup. After the pre-startup briefing is held, the Gas Control Manager and Field Superintendent(s) will direct their respective workgroups to proceed with the startup sequence.

2.2.3. ***Startup Sequence*** – Generally, the sequence of startup on the MPS will begin with the sources of gas that enter the system at Newcomb Station – and conclude with the Panoche Station gas deliveries into the PG&E system. The valves and regulators at each respective point along the MPS will be used to control the flows and pressures related to pigging, purging, or gas-up of the pipeline – and operated thereafter until the MPS is returned to normal operations. Assuming a complete shutdown has occurred prior to the startup of the MPS, this sequence will be followed for startup:

1. Stakeholder Notification – Gas Control will notify any gas producers, end-users, or utilities that will be affected by the startup sequence of the MPS.
2. Gas Source Confirmation – Using a multi-mode portable gas analyzer, confirm that 100% gas is present immediately upstream of valve #1540 (BPS) and valve #1538 (Red Heat P/L) – at a pressure sufficient to overcome the pressures prevailing in the MPS prior to startup.
3. Valve Lock-Out Tag-Out (LOTO) Reversal – Reverse the LOTO procedure for any valves affected by the shutdown of the MPS, and confirm their operability.
4. Newcomb Station – Open valve #1540 to pressurize the station piping (with higher Btu gas from the BPS). Confirm that #1544 (Mooney regulator) is closed but remotely operable from Gas Control. Open valve #1545 (Newcomb Station outlet) in preparation for the startup of Segment Three (Newcomb Station to Shaw Avenue) of the MPS.
5. MPS Segment Three – Gas Control will remotely step-open regulator #1544 until Pipeline & Field staff confirms that gas flows have been initiated. Gas Control will issue a flowrate setpoint to #1544 commensurate with the anticipated startup speed, and monitor pressures immediately downstream of #1544 along with Shaw Avenue MLV pressures to confirm that Segment Three is starting safely according to plan.
6. MPS Segment Two – After communicating with Gas Control, Pipeline & Field staff will gradually open the by-pass valves around Shaw Avenue MLV #1525, and monitor by-pass operations using pressure gauges until pressures are equalized upstream and downstream of MLV #1525. Once pressure equilibrium is attained, Pipeline & Field staff will notify Gas Control who will remotely open MLV #1525. Pipeline & Field staff will then close all by-pass valves at Shaw Avenue MLV in preparation for the startup of MPS Segment One. Throughout the startup of MPS Segment Two (and afterward, Segment One), Gas Control will monitor and adjust gas flows at Newcomb Station as needed to maintain a smooth, safe startup sequence.
7. MPS Segment One - After communicating with Gas Control, Pipeline & Field staff will gradually open the by-pass valves around Belmont Avenue MLV #1520, and monitor by-pass operations using pressure gauges until pressures are equalized upstream and downstream of MLV #1520. Gas Control will monitor the Panoche Station inlet pressure during this part of the process. Once pressure equilibrium across MLV #1520 is attained, Pipeline & Field staff will notify Gas Control and then locally open MLV #1520. Pipeline & Field staff will

then close all by-pass valves at Belmont Avenue MLV in preparation for the startup of Panoche Station.

8. Panoche Station – With Pipeline & Field staff present at Panoche, Gas Control will remotely open valve #1519 to pressurize the station piping. Confirm that #1514 (Mooney regulator) is closed but remotely operable from Gas Control. Open valve #1511 (Panoche Station outlet) in preparation for the startup of Panoche Station gas deliveries into the PG&E system. Gas Control will advise PG&E of the resumption of MPS flows into the PG&E system, after which Gas Control will remotely step-open Mooney regulator #1514 until Pipeline & Field staff confirms that gas flows have been initiated. Gas Control will issue a setpoint to #1514 and monitor flows into the PG&E system.
9. Red Heat Pipeline Startup – As soon as Gas Control and Pipeline & Field staff has confirmed that the preceding sequence was successfully executed, gas supply from the Red Heat P/L will be slowly restarted. Pipeline & Field staff will open valve #1538 at Newcomb Station, and then initiate the flow of gas from the Red Heat P/L.
10. Resumption of Normal MPS Operations – Gas Control will remotely adjust the flow of gas at Newcomb and Panoche Stations until normal MPS operations are achieved. As the MPS is returning to normal operations, Gas Control will communicate with any gas producers, end-users, or utilities that were affected by the startup sequence of the MPS.

2.2.4. ***Relief Devices – New Lines or Segments*** – As part of the activity associated with Article 2.2.1. herein, the Safety Team will confirm that adequate relief devices were engineered, installed, and tested prior to the startup of any new lines or segments. New relief devices will also be added to the list of those inspected annually.

2.2.5. ***Purging & Gas-Up Procedures*** – Prior to the startup of any new pipeline or segment, or the restart of a pipeline that has been shut down for routine maintenance or repairs, the Gas Control Manager and Field Superintendent(s) will meet in person, electronically, or telephonically to determine the purging requirements for the pipeline. A specific purging plan for the affected pipeline or segment will be drafted according to the general guidelines set forth in Article 6 hereto, "Purging of Pipelines". Pipeline maintenance or repairs may necessitate an inert gas purge to create a safe condition under which such work can be conducted. In the case of an inert gas purge, the referenced guidelines can be used to calculate the volumetric requirements for inert nitrogen and air. Once drafted, the Gas Control Manager and Field Superintendent(s) will meet with their respective work teams to distribute and discuss the purging

procedure – and assign tasks to all those participating in the procedure. The representative Pipeline & Field staff responsible for implementing the purge procedure will utilize a multi-mode portable gas analyzer to assess the effectiveness of the purge and to test the area where pipeline maintenance or repairs are to be performed to ensure the safety of persons in the work area.

2.2.6. ***Follow-Up Leak Surveys*** – After the start-up of any new pipeline or segment, or the restart of a pipeline that has been shut down for routine maintenance or repairs, the Field Superintendent(s) may determine that the immediate area near the repairs or connection requires surveying by a Flame Ionization Detector (FID) to confirm that no further repair work is required. In such case, the Field Superintendent(s) will direct or perform an FID survey and document the results. Should the FID test detect the presence of a gas leak, the Field Superintendent(s) will direct secondary repairs. If no leaks are detected, the pipeline will be restored to normal service, including annual FID testing.

2.3. ***Pipeline Shutdown Procedures*** – Two possible scenarios exist that involve the shutdown of a pipeline or segment. The first, an Emergency Shutdown, may involve AOC's, notification from emergency services organizations, Field Superintendent(s), or others that would fall within the scope of the Emergency Manual and involve the ESV's as described in 2.1.2.1. herein. The second scenario involves the shutdown of a pipeline or segment for purposes related to normal maintenance or the addition of new pipelines or segments to the system. Shutdown of the MPS for normal maintenance is the subject of this Article 2.3.

2.3.1. ***Gas Control & Field Coordination*** – Once it has been determined that the MPS requires a shutdown for normal maintenance, the Gas Control Manager and Field Superintendent(s) will meet in person, electronically, or telephonically to determine the scope and extent of the shutdown. They will prepare a written plan, including a MPS schematic and any Station schematics needed to effectively delineate the scope and extent of the shutdown. Some considerations in the written plan should include: Consulting this PSOM and the EOM O&M Manual for guidelines that would impact the shutdown; work assignments; shutdown sequence; communication between Gas Control and the Field operations; normal and abnormal conditions that might be expected during shutdown; alternate procedures in the event of an emergency during shutdown; and the notification of producers, end-users, utilities, or agencies affected by the shutdown. As a result of the aforesaid meeting, the Gas Control Manager and Field Superintendent(s) will conduct pre-shutdown briefings with their respective work groups, or collectively with all EOM operations personnel that would be involved in the shutdown. After the pre-shutdown briefing

is held, the Gas Control Manager and Field Superintendent(s) will direct their respective workgroups to proceed with the shutdown sequence.

2.3.2. ***Shutdown Sequence*** - Generally, the sequence of shutdown on the MPS will begin with the sources of gas that enter the system at Newcomb Station – and conclude with the Panoche Station gas deliveries into the PG&E system. The valves and regulators at each respective point along the MPS will be used to control the flows and pressures during the shutdown. Assuming a complete shutdown of the MPS is to occur, this sequence will be followed for startup:

1. Stakeholder Notification - Gas Control will notify any gas producers, end-users, or utilities that will be affected by the shutdown sequence of the MPS.
2. Gas Source Isolation – Gas Control and Pipeline & Field staff will isolate the MPS from all gas sources upstream by closing valve #1540 (BPS) and valve #1538 (Red Heat P/L) located at Newcomb Station.
3. MPS Segment Three Isolation – Gas Control will remotely close the Shaw Avenue MLV #1525, and confirm the closure with on-site Pipeline & Field staff – as well as confirming that all MLV bypass valves are closed.
4. MPS Segment Two Isolation – Gas Control will direct on-site Pipeline & Field staff to close Belmont Avenue MLV #1520, and confirm that #1520 and all MLV bypass valves are closed.
5. MPS Segment One Isolation – Gas Control will remotely close valve #1519 at Panoche Station and confirm the closure with on-site Pipeline & Field staff.
6. MPS Shutdown Confirmation – Gas Control will monitor all telemetered data from the MPS until they stabilize – after which Gas Control will confirm the successful shutdown of the MPS with Pipeline & Field staff, and notify any stakeholders identified in number 1 herein.

2.3.3. ***Work Site Safety*** – In addition to following standard safety guidelines for EOM personnel during the shutdown, Pipeline & Field staff will Lock-Out & Tag-Out (LOTO) any valves that may need to be closed to further isolate a segment of pipeline for maintenance.

2.4. ***Annual Review of Procedures*** - It is a requirement of the DOT regulations to review and update this Pipeline Specific Operations Manual (PSOM) at intervals not exceeding 15 months, but at least once each calendar year [49 CFR 195.605(a)]. The Gas Control Manager shall be responsible for completing this annual review. The record of revisions table is used as a means of documenting this review.

2.5. ***Periodic Review of Work Performed by Operators*** - It is the primary responsibility of the Gas Control Manager and Vice President of Operations to periodically review the work performed by operators. The intent of this review is to determine the effectiveness of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found [49 CFR 192.605(b)(8)].

RECORD KEEPING

1. REFERENCE

49 CFR, Section 192.491(c) and 192.709.

2. PURPOSE

The purpose of this procedure is to establish procedures for maintaining records.

3. RESPONSIBILITY FOR IMPLEMENTATION

The (72)**Compliance Supervisor** is responsible for proper documentation and filing of all records.

4. GENERAL

4.1 49 CFR 192.709 requires records to be kept on each leak discovered, repair made, line break, leakage survey, line patrol, and inspection.

4.2 Specific documentation requirements will be defined in each related procedure and not within this procedure.

5. PROCEDURE

5.1 Maintain records for each leak discovered, repair made, line break, leakage survey, line patrol, and inspection on all gas pipelines. Such records shall be kept on pipe, fittings, vessels, and related items for all pipeline facilities.

5.2 Permanent operating and maintenance records for DOT inspection purposes shall be available in the District Office or other designated area.

5.3 Complete all necessary forms and reports and maintain in permanent record file as required by specific procedures.

5.4 Retain all studies, reports, checks of monitoring devices, and other data for the life of the facility, or as long as the pipeline remains in service, at the District Office.

6. RELATED PROCEDURES

6.1 All procedures in this Manual.

7. RECORDS

7.1 No records are required for this procedure.

Gas Pipeline
O&M Table #2.01A
Record Keeping

Reference: 49 CFR 191 & 192	Date Revised: Oct 2007

Record Keeping

General

The purpose of this procedure is to provide guidance when meeting the requirements of record keeping for DOT pipelines. Maps, drawings and records shall be readily available to any person requiring these documents to perform their pipeline duties.

Index Description:

Each relevant subpart in 49 CFR 191, 192, and 199 is divided into colored sections as shown in detail in the index on the following pages. A summary table is shown below:

	Reg.	
▪ Miscellaneous Reports and Documents	191 & 199	BLUE
▪ Corrosion	192.451-491	ORANGE
▪ Test Requirements & Uprating	192.551-557	GREEN
▪ Operations	192.601-629	RED
▪ Maintenance	192.701-755	YELLOW

Process:

The appropriate person, as defined in the pipeline O&M manual, will generate the record for work performed. All records for reports, corrosion, operations, maintenance, construction, repairs, and operator qualification will be routed through the Pipeline Supervisor or DOT Pipeline Advisor for review and signature. These records will then be placed into the DOT filing system as directed by the Pipeline Supervisor or DOT Pipeline Supervisor. Only files directed by the Pipeline Manager will be allowed to be shipped to long term storage or destroyed.

Record Retention:

Each record will be retained for the time noted on the file index. Generally, routine operations, maintenance, and operator qualification records will be kept for a minimum of five years. Construction, repair, and corrosion records will be kept for the life of the pipeline. File folders with a red dot indicate the file shall be kept for the life of the pipeline.

Records Location:

Generally, routine operations and maintenance records will be kept in a pipeline system binder by calendar year. .

Records that require retention for life of the pipeline will be kept in the appropriate file location as noted in the DOT File Index. New construction, repairs, and other large projects shall be combined into a project binder or file for placement into the DOT filing system.

Gas Pipeline
O&M Table #2.01A
Record Keeping

Reference: 49 CFR 191 & 192 **Date Revised: Oct 2007**

Misc. Reports & Documents: 49 CFR 191 & 199

Description	Reg.	Freq.	Record Retention	Record Location
1. Safety Related Condition	191.23	NA	Life of Pipeline	
2. Incident Report (telephone)	191.5	NA	Life of Pipeline	
3. Incident Report (written)	191.15	NA	Life of Pipeline	
4. Annual Report	191.17	Annual	Life of Pipeline	
5. Anti-drug Plan	199.7	NA	5 Years	
6. Random Drug Testing of Employees	199.11	Annual	5 Years	
7. Verification of Drug Testing for Contractors	199.21	Qtrly*	5 Years	
8. Drug Testing Records	199.23	NA	5 Years	
9. DOT Agency Audits & Correspondence	NA	1x/3yr	5 Years	
10. DOT Misc. Correspondence	NA	NA	5 Years	
11. New Regulation Tracking	NA	NA	5 Years	
12. NPMS Mapping submission	Dec 2002 Pipeline Safety Act	Annual	5 Years	
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14.				
15.				
16.				
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20.				

* Recommended frequency

Gas Pipeline
O&M Table #2.01A
Record Keeping

Reference: 49 CFR 191 & 192 **Date Revised: Oct 2007**

Corrosion Control: Subpart I 192.451 - 491

Description	Reg. 192	Freq.	Record Retention	Record Location
1. Examination of buried pipe for external corrosion when exposed.	459	NA	Life of Pipeline	
2. Cathodic Protection System Design, etc.	463	NA	Life of Pipeline	
3. CP System Test	465(a)	Annual	Life of Pipeline	
4. CP Rectifier Inspection	465(b)	6x/year	Life of Pipeline	
5. Interface bond electrical check	465(c)	6x/year	Life of Pipeline	
6. Re-evaluate unprotected pipe	465(e)	3 years	Life of Pipeline	
7. Test electrical isolation	467(d)	Annual*	Life of Pipeline	
8. Test station, test lead maintenance	471	Annual*	Life of Pipeline	
9. Test for interference currents	473	Annual*	Life of Pipeline	
10. Inspection for Internal Corrosion when pipe removed from pipeline.	475(b)	NA	Life of Pipeline	
11. Internal Corrosion Monitoring (coupons, etc)	477	2x/year	Life of Pipeline	
12. Pipeline components exposed to atm	479	NA	Life of Pipeline	
13. ATM Corrosion Monitoring Re-evaluation	481	3 years	Life of Pipeline	
14. Corrosion Remedial Measures	483-85	NA	Life of Pipeline	
15. CP Maps, Dwgs	491	NA	Life of Pipeline	
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20.				

* Recommended frequency

Gas Pipeline
O&M Table #2.01A
Record Keeping

Reference: 49 CFR 191 & 192 **Date Revised: Oct 2007**

Test Requirements & Uprating: Subpart J & K, 192.501-557

Description	Reg. 192	Freq.	Record Retention	Record Location
1. Strength Test, >30% SYMS	505, 517	NA	Life of Pipeline	
2. Strength Test, <30% SYMS	505, 517	NA	Life of Pipeline	
3. Uprating investigation and survey	553(b)	NA	Life of Pipeline	
4. Uprating written plan	553(c)	NA	Life of Pipeline	
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Gas Pipeline
O&M Table #2.01A
Record Keeping

Reference: 49 CFR 191 & 192 **Date Revised: Oct 2007**

Operations: Subpart L 192.601-629

Description	Reg. 192	Freq.	Record Retention	Record Location
1. Customer Notification	16	NA	Life of Pipeline	
2. Update O&M Manual	605(a)	Annual	Until Updated	
3. Training on O&M Manual	605	Annual*	5 Yrs	
4. System maps, construction records, Operating history	605(b)(3)	NA	5 Yrs	
5. Abnormal Operations	605(c)	Annual*	5 Yrs	
6. Change In Class Location Required Study	609	NA	5 Yrs	
7. Change In Class Location MAOP	611	NA	5 Yrs	
8. Continuing Surveillance	613	Annual*	5 Yrs	
9. Damage Prevention – One Call System	614(b)	NA	5 Yrs	
10. Damage Prevention – Excavators	614(c)(1)	Annual	5 Yrs	
11. Damage Prevention – Public Education	614(c)(2)	1x/2yr	5 Yrs	
12. Em. Plan: Review Employee Activities	616(b)(3)	Annual*	5 Yrs	
13. Liaison Program with Public Officials	615(c)	Annual*	5 Yrs	
14. Update Emergency Plan	615	Annual	5 Yrs	
15. Train on Emergency Plan	615(b)(2)	Annual	5 Yrs	
16. Public Education	616	1x/3yr*	5 Yrs	
17. Investigation of Failures	617	NA	Life of Pipeline	
18. MAOP	619	NA	Life of Pipeline	
19. Odorization	625	Monthly	5 Yrs	
20. Tapping Under Pressure	627	NA	5 Yrs	

* Recommended frequency

Gas Pipeline
O&M Table #2.01A
Record Keeping

Reference: 49 CFR 191 & 192 **Date Revised: Oct 2007**

Maintenance: Subpart M, 192.701-755

Description	Regulation	Freq.	Record Retention	Record Location
1. Patrolling	192.705	4x/yr**	5 Yrs.	
2. Leak Surveys	192.706	Annual**	5 Yrs.	
3. Line Markers: ROW, RR, Comp. Stations	192.707	Annual*	5 Yrs	
4. Pipeline Repair Records	192.709(a)	NA	Life of Pipeline	
5. Component Repair Records	192.709(b)	NA	Life of Pipeline	
6. Repairs	192.711-717	NA	Life of Pipeline	
7. Test of Repairs: Replacement Pipe & Welds	192.719	NA	Life of Pipeline	
8. Abandonment	192.727	NA	5 Yrs	
9. Comp. Station: Test Relief Device (& 169)	192.731(a)	Annual	5 Yrs	
10. Comp. Station: Test Remote Shutdown	192.731(c)	Annual		
11. Comp. Station: Store Combustible Material	192.735	Annual*	5 Yrs	
12. Comp. Station: Gas Detection Performance Test & Fire Protection Inspection	192.736(c), 192.171	Annual*	5 Yrs	
13. Pres. Reg. Station: Inspect & Test Relief Devices and Equipment	192.739	Annual	5 Yrs	
14. Pres. Reg. Station Telemetering: Insp. of Equip. after Abnormal Conditions	192.741	NA	5 Yrs	
15. Pres. Reg. Station: Test Relief Devices	192.743	Annual	5 Yrs	
16. Valves (& 192.179)	192.745	Annual	5 Yrs	
17. Vaults (& 183, 185, 187, 189)	192.749	Annual	5 Yrs	
18. Prevention of Accidental Ignition	192.751	NA	5 Yrs	
19. Welding Procedures & Welder Re-quals	192.227-9	Annual	Life of Pipeline	
20. NDT Procedures, Plans, Records	192.243	NA	Life of Pipeline	

* Recommended frequency

** Frequency is determined by class location and other relevant factors. Frequency shown is most stringent.