CPN PIPELINE COMPANY

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NYSE CPN

VIA FEDEX AND EMAIL

December 9, 2014

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

RE: Response to November 12, 2014 Notice of Notice of Amendment
CPF 5-2014-0002M

Dear Mr. Hoidal:

CPN Pipeline Company has received the above-referenced Notice of Amendment. Item #1 states that CPN Pipeline Company's IMP procedures lacked specific details of the method(s) used for evaluating in-line inspection tools used to perform its pipeline assessments.

CPN Pipeline does not dispute the finding and we have revised our Integrity Management Program to include Appendix 6A: Characterization and Evaluation of ILI Results. I have attached a copy of Appendix 6A for your review.

If you have any additional questions or comments regarding our Integrity Management Program, and specifically Appendix 6A, please contact me at 707-374-1505.

Respectfully,

Scott Vickers
Compliance Manager

Cc: Chris Delaney
Lyle Fedje
Kurt Seel

Enclosure: Integrity Management Program Appendix 6A

Integrity Management Program
Natural Gas Pipelines
Appendix 6A: Characterization and Evaluation of ILI Results

Ref: 49 CFR 192.921, 933 **Updated: September 2014**

IMP PROCEDURE
CHARACTERIZE AND EVALUATE IN-LINE TOOL RESULTS
(PER PHMSA FAQ-275)

1.1 *Scope*

The procedure provides CPN Pipeline (CPNPL) with guidelines for characterizing and evaluating in-line tool results. This chapter specifies the procedures and methods for confirming tool performance within the accuracy of in-line tool results.

1.2 *Background*

In-line inspection (ILI) is an integrity assessment method used to locate and preliminarily characterize anomalous indications in a pipeline. The effectiveness of the ILI tool used depends on the condition of the specific pipeline segment to be inspected and how well the inspection objectives are accomplished.

Operators must have in-line tool procedures that include a valid method to confirm tool performance within specifications and the accuracy of in-line tool results. CPNPL will determine the methods to confirm if the in-line tool including its sensors, other electronics, and evaluation models are properly evaluating the pipeline segment.

1.3 Tool Validation Report

Upon receipt of the ILI report from the Vendor, the Engineering Manager shall:

- Confirm the tool run was acceptable using vendor tool run qualification criteria.
- Obtain ILI tool data and reports.
- Review areas of pipeline where tool may have operated outside established limits.
- Review ILI vendor assumptions, calculations, and interaction spacing for FPR calculations. Validate that the safety factor and/or design factor is correct.
- Document results and conclusions in a Tool Validation Report.

1.4 *Tool Validation Prioritization Verification (Anomaly Selection)*

After the Engineering Manager accepts the ILI report, a minimum of three metal loss anomalies and/or features shall be selected to validate the ILI tool's accuracy. The IMP Engineer will review the ILI data and select the anomalies considering the following:

- The distribution of metal loss anomalies and range of depths. Where practical, anomalies varying in depth should be selected.
- Proximity to anomalies selected that meet immediate or one year criteria.
- Accessibility of location and proximity to features that can be identified.

Engineering judgment and consideration of the criteria above will be employed when selecting the three anomalies/features for verification.

1.5 *Tool Validation - Field Excavation Verification*

The following information will be collected in the field (as a minimum) to characterize and measure the anomalies selected for verification:

- Characterization of the anomaly
- Circumferential width, longitudinal length, and depth of anomaly
- Local wall thickness of the anomaly using UT or other techniques
- The distance from the nearest girth weld and/or seam weld if applicable
- The O'Clock Position of the anomaly

The field data collected will be documented on a "Pipeline Condition Assessment Report" or similar document.

1.6 *Tool Validation Verification - Analysis and Documentation*

After obtaining the field measurements collected in 1.5, the Engineering Manager shall compare the measurements collected to the data in the ILI report and determine if the data is consistent with the tool performance specification. If the deviations are outside the tool performance specification, the data will be reported to the ILI vendor with the request to re-analyze the data and provide modifications if applicable.

1.6 *Roles and Responsibilities*

The Engineering Manager is responsible for implementing this procedure.