

4/24/98

Mr. David W. Kunsch  
Solicitor  
Legal Department  
Union Gas Limited  
P.O. Box 2001  
Chatham, Ontario, Canada N7M 5M1

Dear Mr. Kunsch:

This responds to your request for approval to install Clock Spring<sup>®</sup> wrap on an interstate gas transmission line. The pipeline is located in Minnesota and is operated by Centra Pipelines Minnesota Inc.

As you know, we granted 28 operators of interstate gas transmission lines a waiver from compliance with the standards in 49 CFR 192.713(a) and 192.485 to permit the installation of Clock Spring<sup>®</sup> wrap (60 FR 10630; February 27, 1995). Subsequently, other interstate operators have been added to the list of operators allowed to use the wrap under the waiver (60 FR 47800; September 14, 1995). We will add Centra Pipelines Minnesota Inc. to the list as well.

Please keep in mind that the waiver requires installation of the wrap to be in accordance with the following:

- (1) Clock Spring<sup>®</sup> wrap must be installed using procedures recommended by the manufacturer;
- (2) Clock Spring<sup>®</sup> wrap must be installed consistent with the program, GRI WRAP;
- (3) Clock Spring<sup>®</sup> wrap must be installed consistent with a Gas Research Institute plan, including, at 2-year intervals, excavating and evaluating a statistical sample of sites, recording the results, and sending the results to RSPA;
- (4) To allow inspection by RSPA and state agencies serving as interstate enforcement agents, scheduled non-emergency installations of Clock Spring<sup>®</sup> wrap must be reported (by phone, fax, or mail) a reasonable time before installation to the RSPA pipeline regional office and state agent with authority over the repair; and

- (5) Persons installing Clock Spring<sup>®</sup> wrap must have been trained and certified in installation procedures either by the Clock Spring Company or by persons the Clock Spring Company has trained and certified.

Sincerely,

Richard B. Felder  
Associate Administrator for Pipeline Safety  
L.M.Furrow:jmd:64046:4-23-98  
cc: DPS-1,2,10,20,Regions,TSI,StateMailing