

Mr. David Matthews



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

Southern Region, Pipeline Safety

Atlanta Federal Center  
Suite 16 T 15  
100 Alabama St., SW  
Atlanta, GA 30303-3104

**LETTER OF CONCERN**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

January 27, 1997

Mr. L. David Matthews  
Executive Vice President of Operations  
Southern Natural Gas Company  
P. O. Box 2563  
Birmingham, AL 35202-2563

CPF 27102-C

Dear Mr. Matthews:

On September 16-20 and September 23-26, 1996, a representative of the Southern Region, Office of Pipeline Safety, inspected your pipeline facilities and reviewed records at Pickens, MS, Louisville, MS, Gwinville, MS, and Franklinton, LA (just pipelines in MS). As a result, there were some areas of concern.

Please consider the following:

1. Pipeline Safety Regulations require pipelines to be electrically isolated from metallic casings,

and that inspection and electrical tests must be made to assure that electrical isolation is adequate. All

casings must be monitored for electrical isolation in order to comply with the regulations. A review of

your 1996 records indicated that two casings on the 22" North Main & Loop Lines - Onward District

were not monitored for isolation at Pickens Transmission. The reports showed no casing existed

when in fact the casings were still there.

2. §192.469 and §192.471 require that each pipeline must have sufficient test stations and that

each test lead wire be connected to the pipeline,

respectively, to determine and ensure adequate

cathodic protection. At Franklinton and Gwinville

Transmission, several CP reports showed

broken and/or no test leads for two to three consecutive

years. No follow-up action report was

available to inform if there was an intent to replace

or delete test stations.

3. Right of way and leak survey inspections were

not performed for 1994 at Louisville

Transmission - Muldon Storage Field.

4. The interval between 1994 and 1995 regulator

and relief valve inspections for Dexter - TXO

Morris at Franklinton Transmission exceeded 15 months.

Inspections were performed 4/94 and 10/95. At

Gwinville Transmission, two heaters with very old gas

regulators and relief valves had not been

inspected/tested because no information was

available for capacity calculations. At the time of

inspection, a follow-up action report had been

implemented to order new regulators and relief valves to

install on the two heaters. This follow-up action

has been completed since the inspection. We

appreciate your response to this safety issue.

We hope you will consider these areas of concern and

take action to further improve your present level of

safety. If we can answer any questions or be of any help,

please call (404) 562-3530.

Sincerely,

Frederick A. Joyner

Director, Southern Region

Office of Pipeline Safety

cc: Compliance Registry, OPS Headquarters

File: Southern Natural Gas Company

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