



Southwest Region,
Office of Pipeline Safety

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U.S. Department
of Transportation

Research and
Special Programs
Administration

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 3, 1997

Mr. Theoplis Holeman
Vice President Operations
Trunkline Gas Company
5400 Westheimer Court
Houston, Texas 77056-5310

CPF No. 47102-C

Dear Mr. Holeman:

On October 23 - 25, 1996, a representative of the Southwest Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code conducted a pipeline safety inspection of Trunkline Gas Company's onshore facilities and records in Epps, Louisiana.

As a result of the inspection and in keeping with pipeline safety regulations we have noted some areas of concern as follows:

At the time of the inspection of your records at the Epps district office, it was noted that the 1995 mainline valve inspection reports were not available. Section 192.745 requires that each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.

In reviewing the internal corrosion records it was noted that Trunkline Gas uses coupons to monitor the internal condition of its pipe at the storage field site. When coupons are used as part of an operator's internal corrosion mitigation plan, the coupons or other means of monitoring internal corrosion must be checked two times each calendar year, but with interval not exceeding 7 ½ months.

Sometime after the inspection, Trunkline Gas safety staff assured us that the above mentioned concerns had been addressed. The 1995 missing valve inspection reports were substituted with actual field valve operations during 1995. The missed inspection intervals for the corrosion coupons were

due partly to a change in responsibility in the field. In the future, we expect that Trunkline Gas will strive to improve the monitoring of its corrosion coupons.

We acknowledge your response to the areas of concern that were brought to your attention during our inspection and trust that Trunkline Gas Company personnel will continue to improve on the safe operation and maintenance of the pipeline system.

Sincerely,

James C. Thomas
Regional Director