

LETTER OF CONCERN

January 11, 1999

Mr. Tom McCauley
Vice President Operations
LOOP, Inc.
One Seine Court
P. O. Box 6638
New Orleans, Louisiana 70174-6638

Dear Mr. McCauley:

CPF No. 49701C

On December 15 and 16, 1998, a representative of the Southwest Region, Office of Pipeline Safety (OPS), visited your Clovelly Station. Records and written procedures were reviewed at this office. The review disclosed deficiencies in your damage prevention program that are cause for concern.

A review of your written procedural plan for operations, maintenance, and emergencies indicated that it does not include the written damage prevention procedures as required by §195.442(a). Refer to Amdt. 195-54, 60 FR 14651, March 20, 1995. Also, although most elements required by a damage prevention program are more than adequately in place, it was noted that you have neither identified, on a current basis, those persons who normally engage in excavation activities in the area in which the pipeline is located §195.442(b)(1), nor provided for actual notification of the damage prevention program's existence and purpose §195.442(b)(2). It should also be noted that this inspection did not include the LOCAP pipeline system which you additionally operate under LOOP's written Operation and Maintenance procedures, however this concern would nevertheless be applicable to that pipeline system as well.

Because of the good faith that you have exhibited up to this time, we expect that you will act to ensure that this oversight is corrected. Please refer to CPF No. 49701C in any correspondence or communication on this matter.

Sincerely,

R. M. Seeley, Director
Southwest Region