

CNYOG

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AD

CENTRAL NEW YORK OIL AND GAS COMPANY, LLC  
THE STAGECOACH NATURAL GAS STORAGE FACILITY

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June 15, 2011

Mr. Byron Coy  
USDOT  
820 Bear Tavern Road  
Suite 103  
West Trenton, NJ 08628

Mr. Coy,

Attached you will find a copy of our procedure which addresses the requirements of your 192.481 for atmospheric corrosion control monitoring as addressed in your Notice of Amendment (CPF 1-2011-1008M) dated May 23, 2011. I do not understand why our procedure does not fulfill the requirement of your 192.481! We have had this procedure in effect since the latest revision date of 2-25-2004. Please advise us of the inadequacies in our procedures.

Thanks!

Sincerely,



Barry Cigich  
Vice President  
Storage Operations

BC/eb

Operation & Maintenance Procedures	
CNYOG	CENTRAL NEW YORK OIL AND GAS COMPANY
	THE STAGECOACH NATURAL GAS STORAGE FACILITY
Procedure No. 401 – Revision 1 Revision 0	February 25, 2004 December 1, 2001
<b>ATMOSPHERIC CORROSION CONTROL</b>	<b>Page 1 of 2</b>

**REFERENCE:** 49 CFR, PARTS 192.479, 192.481, 192.491  
16 NYCRR, PARTS 255.479, 255.481, 255.491

**SCOPE:**

This Procedure addresses the Company's program for monitoring and controlling corrosion on pipelines exposed to the atmosphere.

**RESPONSIBILITIES:**

Employees performing inspections and tests specified in the manual are also responsible for investigating aboveground piping for evidence of external corrosion.

The Facility Manager is responsible for the technical administration and implementation of the atmospheric corrosion control program.

**SPECIFICS:**

Schedule

A reevaluation of each onshore pipeline shall be made at intervals not to exceed 3 years.

Monitoring

The presence of atmospheric corrosion can best be detected by visual inspection. Attention should be given to specific locations, such as clamps, rest plates, sleeved openings, wet areas, and air-to-soil interface areas where corrosion of the pipe is more likely to be severe.

Employees performing inspections of vessels, valves, overpressure safety devices, rights-of-way, cathodic protection facilities, and fire fighting equipment shall observe aboveground pipe and piping components for evidence of corrosion. A Pipeline Corrosion/Damage Inspection Report (Form 401-1 shall be completed when corrosion is discovered and following regular inspections.

The inspector shall send a copy of the applicable inspection report to the Facility Manager who shall review the report and determine if maintenance of the coating is required or remedial action is necessary.

Coating

Each aboveground pipe or piping component shall be coated to mitigate atmospheric corrosion.

The Facility Manager shall determine the coating systems to be used for uncoated and previously coated surfaces. Surface preparation, prime coat, and top coat shall be in accordance with the manufacturer's recommendations for the selected coating.

Remedial Action

Refer to Procedure No. 404 for remedial actions required when atmospheric corrosion has reduced pipe wall thickness below specified limits or created the potential for leaks.

**RECORDS:**

Form 401-1 shall be retained in the DOT/PSC file.

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Chief Operating Officer

**PIPELINE CORROSION/DAMAGE INSPECTION REPORT**  
(Reference Procedure No. 401)

Overbend       Riser       Hot Tap       Pipeline Relocation   
Damage by Outside Forces       New Pipeline       New Plant       Meter Station

**1. System Information**

- a. Mainline System Name \_\_\_\_\_
- b. Lateral Name \_\_\_\_\_
- c. Location Name, M/S No. \_\_\_\_\_
- d. Location Class (1, 2, 3, 4) \_\_\_\_\_
- e. Map Reference \_\_\_\_\_

**2. Pipe Summary**

- a. Outside Dia. \_\_\_\_\_ in.
- b. Wall Thickness \_\_\_\_\_ in.
- c. API Grade \_\_\_\_\_
- e. Length (ft.) \_\_\_\_\_ From Station \_\_\_\_\_ To Station \_\_\_\_\_
- f. MAOP of Pipeline \_\_\_\_\_

**3. Corrosion/Damage Data**

- a. Corrosion Exists?    Yes     No
- b. Type of Corrosion    External     Internal
- c. Type & Condition of Coating \_\_\_\_\_
- d. Pipe to Soil Reading \_\_\_\_\_ Location \_\_\_\_\_
- e. Visual Pits? (Yes, No) \_\_\_\_\_ Maximum Pit/Damage Depth (inch) \_\_\_\_\_
- f. Maximum Pit/Damage Length \_\_\_\_\_ Maximum Pit/Damage Width (inch) \_\_\_\_\_
- g. Max. Allowable Pit/Damage Depth (inch) (For MAOP & Location Class) \_\_\_\_\_

**4. Inspection Comments/Recommendations**

**5. Remedial Action Completed**

Inspector: \_\_\_\_\_ Date: \_\_\_\_\_