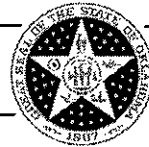


OKLAHOMA  
CORPORATION COMMISSION

P.O. BOX 52000  
OKLAHOMA CITY, OKLAHOMA 73152-2000

Marchi C. McCartney, Director  
Transportation Division  
(405) 521-2965 [www.occeweb.com](http://www.occeweb.com)



April 14, 2011

Ms. Cynthia L. Quarterman  
Administrator  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administrator  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Dear Ms. Quarterman:

By letter dated March 31, 2011, you invited comments from state pipeline safety programs concerning plans for replacement of the highest risk pipelines. We understand this information will be uploaded to a Web site associated with the upcoming Pipeline Safety Forum on April 18, 2011.

The Oklahoma Corporation Commission ("Commission") conducts the Pipeline Safety program in Oklahoma. The Commission has been a part of the federal Natural Gas Pipeline Safety program following the passage of the Natural Gas Pipeline Safety Act in 1968 and the adoption of the pipeline safety regulations 49 CFR Part 192. The Hazardous Liquid program followed shortly after the passage of the Hazardous Liquid Pipeline Safety Act in 1979 and the adoption of 49 CFR Part 195 in the mid 1980s.

We are fortunate the operators in Oklahoma recognized the potential hazards of cast iron pipe and by the late 1990s had retired or removed all cast iron pipe from their gas pipeline systems. As to protected and unprotected bare steel pipe, they are being removed under a voluntary pipe replacement program. Operators are evaluating and addressing the removal of the pipe based on leakage history and associated risk. There has been no event within the State arising to the level where the Commission has felt it was necessary to take formal action requiring the systematic removal of a specific type of pipe or pipe component.

Replacement is not the only means of maintaining safe infrastructure. While pipe condition has not been a major issue in Oklahoma, the Commission has brought action against operators who were not properly operating and maintaining their pipelines in

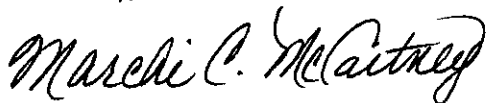
Letter to Cynthia Quarterman  
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compliance with safety standards. Those actions have ranged from civil penalties to the shutting in of gas systems.

We believe Oklahoma and the Oklahoma operators have been proactive in addressing issues related to pipe that is in unsatisfactory condition and in operating and maintenance activities that go beyond federal standards. The implementation of the new Distribution Integrity Management regulations should help refine and improve the process by which the need for such actions can be identified.

Oklahoma appreciates the opportunity to comment in this matter. If further information is desired, please contact Dennis Fothergill, Manager of the Pipeline Safety Department, at [d.fothergill@occemail.com](mailto:d.fothergill@occemail.com) or (405) 521-2258.

Sincerely,



Marchi C. McCartney, Director  
Transportation Division

c: Dana Murphy, Chair  
Brooks Mitchell, Director of Administration