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OF WYOMING

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April 13, 2011

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

Re: Pipeline Safety Forum - April 18, 2011

Dear Ms. Quarterman:

The Wyoming Public Service Commission (WPSC) would like to express its concern regarding the recent tragedies involving natural gas explosions and hazardous liquids spills. The WPSC believes the integrity of the pipelines in Wyoming deserves serious attention, and our Pipeline Safety Program continuously monitors the pipelines jurisdictional to the Commission. Our staff is resolved to identify problem pipelines and to work with the operators or utilities to have these lines upgraded or replaced. Our pipeline safety staff also knows they have agency support as to safety issues. The staff is on its second cycle of Gas Transmission Integrity Inspections. The first round of inspections indicated no serious issues in High Consequence areas. The WPSC appreciates the offer of invitational travel for state program managers to attend the Pipeline Safety Forum. Unfortunately, neither our Commissioners nor Staff will be able to attend the Forum due to previously scheduled Commission and inspection activity.

The Commission would like to point out that no cast iron pipe is in gas service in Wyoming. The last cast iron pipe was removed from service in the 1990's as part of a stipulated agreement in a rate case. However, Wyoming does have approximately 40 miles of bare steel, un-cathodically protected distribution pipe still in service. This pipe is in rural Class 1 locations with very low population densities. The operator is currently in the midst of a replacement program, and all these lines should be completely changed out within ten (10) years. This operator is also replacing some pre-1970's transmission line and anticipates eleven (11) miles will be replaced in 2011. This operator has also

hydro tested all of its High Consequence Areas with no failures. Another operator is in the middle of a four (4) year replacement plan to replace its remaining bare steel lines in the Kemmerer, Wyoming, area. In the 2004 time frame, a third operator replaced the bare-steel distribution lines in the town of Meeteetse, Wyoming. It is currently replacing a surface lay steel line in the Hart Mountain area of Wyoming. Other operators are in the process of replacing PVC and older steel distribution pipe with PE pipe; many of these projects are in conjunction with the cities and towns they operate in doing water and sewer upgrades.

In 2010, the Wyoming Legislature passed new One-Call laws. These changes in the Wyoming statutes improved the enforcement ability for individuals and companies damaged by third-party actions. The WPSC assisted this process by hosting two Stakeholder Workshops in 2008 and 2009 which started the necessary dialogue between the various stakeholder groups in the excavation and underground facility owner groups. The new law removes the local government exemptions from having to participate in the One-Call program. The Commission is still evaluating the effectiveness of the new law but expects it to have a positive impact in reducing third-party damages to gas transmission and distribution facilities in Wyoming.

Even though the Commission will not be participating in the Pipeline Safety Forum in person, it will be reviewing what comes out of the Forum and applying what will work in Wyoming to our practices. The Commissioners and staff are active participants in the National Association of Regulatory Utility Commissioners and the National Association of Pipeline Safety Representatives, and will be reviewing all of the material these organizations will be producing from the Forum. Pipeline Safety is a very high priority to the Wyoming Public Service Commission and we look at every proposal and opportunity to improve safety with an open but critical eye.

Again, thank you for your personal invitation to the Pipeline Safety Forum.

Sincerely

A handwritten signature in black ink that reads "Alan B. Minier". The signature is written in a cursive style with a horizontal line at the end.

Alan B. Minier
Chairman

ABM:cak

cc: Colin McKee
Office of the Governor