

THE STATE OF NEW HAMPSHIRE

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April 14, 2011

Cynthia L Quarterman
Administrator
US Dept of Transportation
Pipeline and Hazardous Material Safety Administration
1200 New Jersey Avenue S.E.
Washington, DC 20590

RE: April 18, 2011 Pipeline Safety Forum

Dear Ms. Quarterman:

I am writing in response to your March 31, 2011 invitation to the Pipeline Safety Forum scheduled for April 18, 2011. New Hampshire has long recognized that ensuring safe and reliable service is a fundamental cornerstone of responsible regulation. Aged infrastructure including worn, leak prone bare steel and cast iron pipelines has been a top priority for New Hampshire since 1990 when the Commission ordered an accelerated bare steel replacement program. Since that time we have included safety related directives in many proceedings concerning gas utilities. *See* Commission Orders Nos. 22,386 (1996), 23,333 (1999), 23,470 (2000), 24,777(2007) and 24,906(2008).

In 1994, New Hampshire's inventory of cast iron and bare steel mains represented 353 miles or approximately 27% of the distribution pipelines in New Hampshire. Through enhanced recovery mechanisms authorized by the Commission, that inventory has been reduced by 165 miles (47% reduction) to less than 187 miles with one operator projected to remove all bare steel by 2017 and another operator projected to remove all cast iron and bare steel within the next 25 years. Presently, these pipelines represent less than 7.5% of the distribution mains in New Hampshire. The Staff of the New Hampshire Safety Division has been extensively involved with developing customized approaches applicable to New Hampshire gas distribution systems in determining which pipelines are subject to the highest pipeline safety risks. This requires, among other things, reviewing operators' data integrity and algorithms used for weighting worn pipelines and, determining priorities, requiring physical samples, and reporting on selected candidates for verification purposes.

Within the last six years, New Hampshire's program expanded to include jurisdictional liquid petroleum operators. As a result, we have inspected each of the approximately 45 operators and 850 jurisdictional facilities, and monitored compliance for pipeline safety regulations.

In addition, New Hampshire maintains stricter guidelines than Federal regulations by:

1. Limiting operators' response times for leak and odor complaints to typically within 30 minutes and by exception to 60 minutes;
2. Requiring more frequent leak surveys than federal regulations;
3. Requiring leak classification and repair protocols;
4. Limiting operating pressures on cast iron pipelines to less than 0.5 psig.

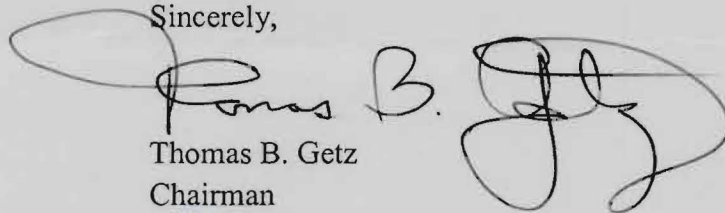
New Hampshire's Underground Damage Prevention Program has been in place since 1983 with enforcement authority and rule making residing directly with the Commission. We believe that strong enforcement coupled with educational and public outreach mechanisms has prevented much third party damage from occurring and minimized potential incidents.

Our Director of Safety, Mr. Randy Knepper has been involved with NAPSRS pipeline safety technical committees, NARUC pipeline safety committees, Common Ground Alliance technical committees as well as regional and local committees within New Hampshire. Other staff members participate on the NFPA technical committees as well. It is with this in mind that New Hampshire will gladly participate in the Pipeline Safety Forum on April 18th in Washington, D.C. and is willing to contribute to the discussion regarding enhanced pipeline safety measures.

Our partnership with PHMSA and continued certification demonstrates New Hampshire's commitment to a strong pipeline safety program. I have attached a series of trends and graphical representations of replacement programs we use in evaluating pipeline risk monitoring.

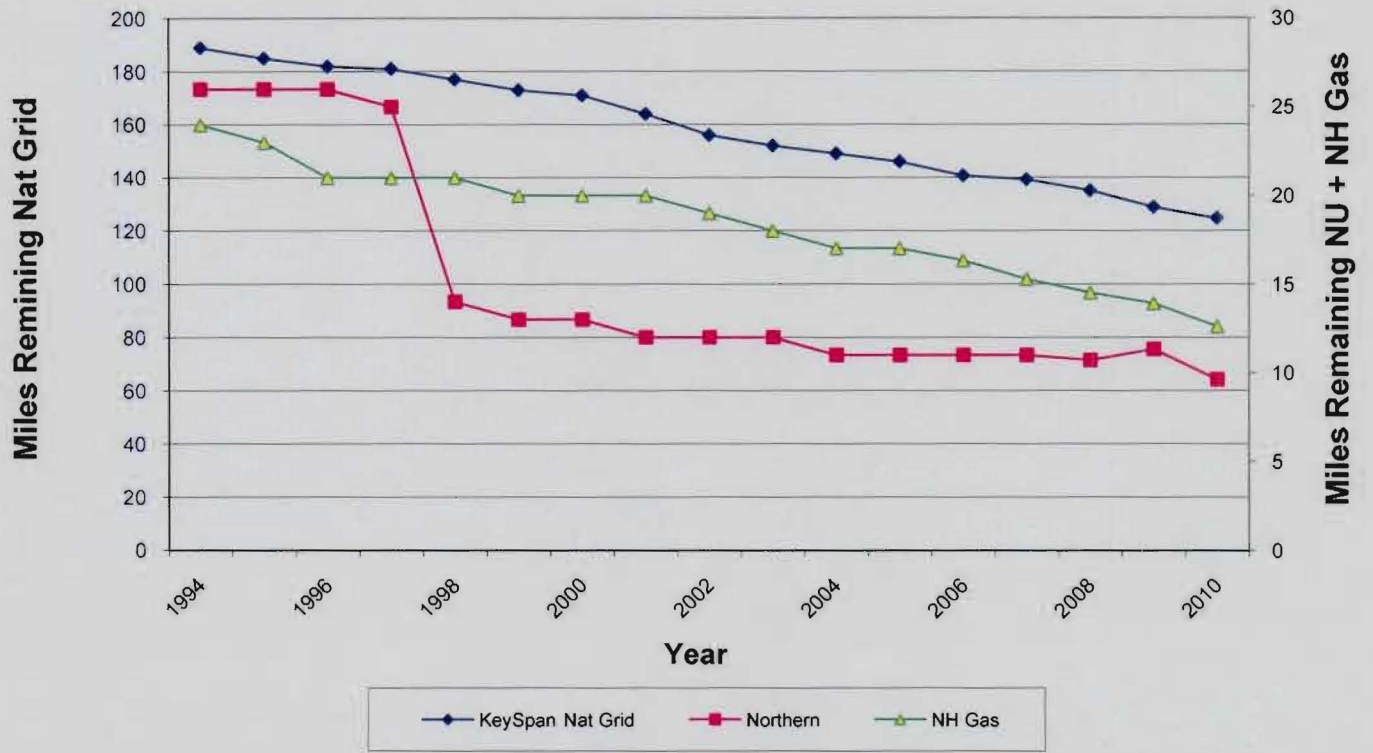
Please feel free to contact me at 603-271-2431 if you have any further questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas B. Getz', with a large, stylized flourish extending to the right.

Thomas B. Getz
Chairman

Cast Irons Natural Gas Mains in NH



Cast Irons Natural Gas Mains in NH Totals

