

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 20, 1999

Mr. John Zurcher
Manager - Pipeline Safety
Columbia Gas Transmission Company
1700 Maccorkle Ave. SE
Charleston, WV 25314

CPF No. 39111W

Dear Mr. Zurcher,

On September 4-24, 1997, a representative of the Public Utilities Commission of Ohio, acting as an agent for interstate pipelines for the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an inspection of your records and pipeline facilities in Sugar Grove, Ohio. A letter for specific information was mailed to you on January 14, 1998.

As a result of the inspection and information received over the last year, it appears that you have committed probable violations, as noted below, of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violations are:

1) **§ 192.731 - Compressor stations: Inspection and testing of relief devices.**

(a) Each pressure relieving device in a compressor station must be inspected and tested in accordance with §§ 192.739 and 192.743, and must be operated periodically to determine that it opens at the correct set pressure.

Although annual set point testing was performed within interval requirements, relief capacity verifications were not performed in a timely manner. An average of 7 months from the time of annual testing was performed elapsed until the verification was performed, and some capacity reviews fell into the following evaluation year. This was

supported by records for devices at McArthur, Benton, Meigs, and Lebanon compressor stations.

2) **§ 192.731 - Compressor stations: Inspection and testing of relief devices.**

(b) Any defective or inadequate equipment found must be promptly repaired or replaced.

The Company stated in their response dated March 6, 1998, to a Letter of Specific Information, that 2 relief valves did not satisfy relief valve sizing requirements in 1996 and one still did not satisfy the requirements in 1997, at the time of the inspection. This time frame is not typical of prompt repair or replacement.

Under 49 United States Code § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations. We have reviewed the circumstances and supporting documentation involved in the above probable violations and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations we will take enforcement action when and if the continued violations come to our attention.

You will not hear from us again with regard to the above probable violations and our subsequent actions. Because of the good faith that you have exhibited up to this time, we expect that you will act to bring your operations into compliance with pipeline safety regulations.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety