

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 17, 1998

Mr. Walter Ferguson
Vice President, Pipeline Operations
NorAm Gas Transmission
Post Office Box 21734
Shreveport, Louisiana 71151

CPF No: 28107C

Dear Mr. Ferguson:

On 20 to 24 April 1998 a representative of the Southern Region, Office of Pipeline Safety (OPS) reviewed your records for the Southern Region in El Dorado, Arkansas and visited your pipeline facilities in Arkansas and Texas. The review disclosed some areas that are cause for concern. We hope you find these areas worthy of your attention.

Please consider the following:

1. **Right of Way Patrolling and Clearance**

NorAm Gas Transmission's (NGT) right of way (ROW) clearance program has not insured that the ROW can be clearly viewed by an observer from a patrol aircraft, which NGT now uses. At several locations, the ROW, or ROW canopy, was overgrown to the extent that surface conditions could not be observed from the air. Specific locations are: a) line AM-39 at both the Stamps and Waldo Metering and Regulating (M&R) stations and b) line SM-29 at US-79.

2. **Atmospheric Corrosion**

Atmospheric corrosion ranging from surface rust to light pitting was found at several locations on NGT's pipeline facilities. Specific locations are: a) line SM-23 take-off from line S, b) Arkadelphia M&R, c) Garland City M&R, d) Barton Station, e) line EM-12 take-off, f) Camden Town

Border # 1, g) main line valve on line KM-6 at line KM-7 take-off, and h) the Strong M&R.

3. **Protection of Valves from Tampering**

The main line valves were not locked on line K at 3400 + 96 and line KM-6 at the KM-7 take-off.

4. **Regulator and Relief Valve Inspections**

The 1996 inspections were missed for the regulators at M&R # 060720 and regulators and relief valves at M&R # 067704.

5. **Leak Surveys**

The line KT-1 road crossing at 191 + 62E to 192 + 13E in a class 3 area was only surveyed three (3) times in 1997.

6. **Prompt Remedial Action**

Prompt remedial action was not taken to correct low pipe-to-soil potential readings at two (2) locations. On line L at 2077 + 74, the 1994 to 1996 readings did not meet the 100 mV decay criteria, and on line A at 4456 + 30, the readings did not meet the -850 mV criteria for 1997 and 1998.

We hope you will consider these areas of concern and take action to maintain and further improve your present level of safety. If we can answer any question or be of any help, please call us at (404) 562-3530.

Please refer to CPF 28107C in any correspondence or communication on this matter.

Sincerely,

Frederick A. Joyner
Director, Southern Region
Office of Pipeline Safety

cc: Compliance Officer, OPS Headquarters

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