

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 28, 2000

Mr. John Earley, President
Koch Gateway Pipeline Company
P.O. Box 1478
Houston, TX 77046-2002

CPF No. 220001004

Dear Mr. Earley:

During the interval from May 1 through August 25, 2000, a representative of the Southern Region, Office of Pipeline Safety, conducted an inspection and reviewed your records in Mobile, Alabama, Petal and Jackson Mississippi. The review disclosed some areas that are cause for concern. We hope you find these areas worthy of your attention.

- 1). All valves and regulators must be protected from unauthorized use by at least one of the following: A) six foot high fence with three strands of barred wire on top, B) a locking device to prevent the valves from being turned, C) by removal of valve handles. The operator may choose which to use but must use one or more of the above methods. A number of valves were found during the inspection that were not protected by one of the above.
- 2). Three sets of flange nuts were found that were not centered on the threaded rod so that only part of the nut threads were being used to hold the load. The rods should be centered so that at least part of a thread is exposed past the nut on all flanges.
- 3). Consistent use of units of measure should be used when stating capacities. Some capacities were listed as cubic feet per day and some were listed as cubic feet per hour, such differences

make comparison difficult.

- 4). A number of regulator stations were found that were using one tap and valve to supply gas to both pressure control devices. Each pressure control device should have its own independent sensor line and gas source.

We hope the appropriate action will be taken to improve these items.

Sincerely,

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

cc: Compliance Registry