Southwest Region,
Office of Pipeline Safety

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U.S. Department
of Transportation

Research and
Special Programs
Administration

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 27, 1997

CPF No. 47103-C

Mr. Richard O. Baish
Vice President, Operations
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

Dear Mr. Baish:

In 1996, a representative of the Southwest Region, Office of Pipeline Safety, conducted an on-site safety inspection of your natural gas pipeline facilities and records in Texas and New Mexico. During the inspection causes of concern were noted. Please give the following concerns your attention.

1) **§192.463 External corrosion control: Cathodic protection.**

(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.

Appendix D, II. Interpretation of voltage measurement.
Voltage (IR) drops other than those across the structure electrolyte boundary must be considered for valid interpretation of the voltage measurement in paragraphs A(1) and (2) and paragraph B(1) of section I of this appendix.

El Paso Natural's O&M Manual does not require that the voltage drop other than those across the structure electrolyte boundary be considered (i.e., deleted) from the measured

pipe-to-soil potentials. In practice, however, we observed that El Paso's cathodic protection technicians actually are concerned with the IR drop and that potentials more negative than -0.850 volt are maintained on the pipelines to compensate for this possible error source. When queried about the magnitude of the IR drop, El Paso personnel responded that it had not been determined. Since the error source is unknown then we must conclude that the levels of protection on the pipelines are also unknown - they may be too high or too low. We believe this uncertainty exists because it is not required by the O&M Manual.

2) **§192.605 Procedural manual for operations, maintenance, and emergencies.**

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

We are also concerned with some conditions observed at El Paso's facilities that were considered to be unsafe and which were immediately repaired or made safe until permanent repairs could be made. Specifically, we were concerned with a 650 psig piping system that was not 'made safe' by the installation of a blind flange on a valve, and electrical heat tracing that was improperly wired and terminated in an area that was classified per NFPA No. 70 and El Paso's Engineering Standards.

We hope you will consider these areas of concern and take action to further improve your present level of safety. Should you have any questions regarding these concerns or other pipeline safety regulatory issues, please do not hesitate to call our office at the following number (713) 718-3746.

Sincerely,

James C. Thomas
Director, Southwest Region