

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 18, 1999

Mr. Keith Mitchell
Vice President
Ozark Gas Transmission, LLC
515 Central Park Drive
Suite 600
Oklahoma City, Oklahoma 73105

CPF No. 29103C

Dear Mr. Mitchell:

On 28 March - 1 April 1999, a representative of the Southern Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline records at Fort Smith, Arkansas and pipeline facilities in Arkansas and Oklahoma. The review disclosed some areas that are cause for concern. We hope you find these areas worthy of your attention.

Please consider the following:

Operations and Maintenance Plan Manual (OMPM)

The OMPM should be corrected for the following items:

- Safety Related Conditions (SRC): the wording of the procedure in the OMPM does not meet the requirements. §191.25(a) does not require the reporting of SRC's if repaired within 5 working days of determining the condition exists but not later than 10 working days of discovery, the OMPM states that an SRC does not have to be reported if repaired within 10 days of discovery.
- Line Markers, page 2.5: The procedure incorrectly states that line markers are not required in Class 3 and 4 locations when a Damage Prevention Program is in effect.
- Odorization, page 2.7: the procedure references §192.625(b) but does not state Ozark's policy
- Corrosion Control Procedure, External Corrosion, page 4-2: the procedures refers to Appendix D, Part 192 but does not state the criteria used by Ozark.

- Pipeline Repair Procedures, pages 3-5/6, 3-16: the procedure does not list the requirements of §192.715 (Permanent field repair of welds) and §192.719 (Testing of Repairs)

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 questions or be of any help, please call us at (404) 562-3530.

Please refer to CPF 29103C in any correspondence or communication on this matter.

Sincerely,

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

cc: Compliance Officer, OPS Headquarters
DPS-20.1
Regions