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May 23, 2013

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, Colorado 80228

Re: **CPF 5-2013-1006M**

Dear Mr. Hoidal:

Kern River Gas Transmission Company (KRG T) is submitting its procedures which have been modified to address the concerns of the Pipeline and Hazardous Materials Safety Administration (PHMSA) as expressed in the referenced Notice of Amendment. PHMSA's concerns relate to the requirements of §192.605 and §192.463 as described below.

At the time of inspection, PHMSA found that KRG T's procedure 20.06.03, Establish Cathodic Protection Criteria, did not include IR drop consideration in accordance with Appendix D, Section II of 49 CFR, Part 192.

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (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.
 - (2) **Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**
2. **§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.**

In order to address these concerns, KRG T modified section 8.0 of procedure 20.06.03, Establish Cathodic Protection Criteria to ensure that the criteria used by KRG T meet the requirements of

Appendix D, Section II. KRGT also introduced procedure 20.06.02, Methods for IR Drop Consideration to its operations and maintenance procedures to establish a methodology to consider IR drop when required per the above-mentioned procedure 20.06.03.

KRGT is strongly committed to maintaining and following an effective integrity management program to ensure safe operation of its system. We are confident that the corrections made to the enclosed procedures will be to PHMSA's satisfaction. Please contact Von McAllister at 801-937-6333 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding these matters.

Sincerely,



Robert Checketts

cc: David Mulligan, PHMSA
Von McAllister, KRGT

Enclosure: Procedure 20.06.02 Methods for IR Drop Consideration
Procedure 20.06.03 Establish Cathodic Protection Criteria