

Executive Office: 321 St. Charles Avenue, New Orleans, La. 70130 (U.S.A.) Phone: (504) 586-8300, Fax: (504) 525-9537

October 5, 2012

Mr. Byron Coy, PE Director, Eastern Region Pipeline and Hazardous Materials Safety Administration 820 Bear Tavern Road, Suite 103 West Trenton, NJ 08628

RE: CPF 1-2012-5016

Dear Mr. Coy:

In response to the Notice of Probably Violation and Proposed Civil Penalty Letter dated 10 August 2012, IMTT respectfully submits the following responses to the cited probable violations. IMTT conducted a thorough records review and has summarized its findings to each probable violation below. IMTT does have construction records which are housed at an alternate location.

Probable Violation #1 §195.266 Construction Records.

A complete record that shows the following must be maintained by the operator involved for the life of each pipeline facility.

(a) The total number of girth welds and the number nondestructively tested, including the number of rejected and the disposition of each rejected weld.

PHMSA Citation: IMTT-Pipeline (IMTT) did not have a complete record related to the construction records required by §195.266(a).

The number of welds that were inspected by non-destructive testing (NDT), the number of welds rejected, and the disposition of the rejected welds were not available. IMTT claimed to have the records, but did not provide the records to the NYSDPS.

IMTT Response: IMTT has a complete set of construction records for the horizontal directional drill (HDD) projects completed in 10 construction project books. These project books include HDD projects for the Arthur Kill River Crossing and the Newark Bay Crossing. An overview summary of the contents of each book appears in Exhibit #1. Project Book #3 contains all of the Welding Inspection Records and includes all results of

both visual and welding inspection reports for each project date starting 2002 December 10 and ending 2003 May 6. IMTT compiled a summary of all of the Welding Inspection Reports as shown in Exhibit #2. IMTT's contractor, U.S. Pipelines, conducted x-ray examination of all project welds as shown in the exhibit. Through the course of the project, 9 welds were rejected and repaired. All other welds passed both visual and X-ray inspection as shown in the summary report.



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Probable Violation #2 §195.266 Construction Records.

A complete record that shows the following must be maintained by the operator involved for the life of each pipeline facility.

(b) The amount, location, and cover of each size of pipe installed.

PHMSA Citation: IMTT did not have a complete record related to the construction records required by §195.266(b). IMTT did not have a record showing the location of the pipeline and the depth of cover of the pipe.

IMTT Response: IMTT has maps depicting the pipeline location starting at the Linden Block Valve and ending at the IMTT Terminal. Exhibit 3 includes 3 pipeline maps showing the location of the pipeline along with the Block Valves on the pipeline system.

IMTT has detailed depth of cover records as part of its construction records. Detailed review of the pipeline construction records show that the depth of cover for this pipeline ranges from 3 feet at the tie-in points to a depth of 67.6 feet in the Arthur Kill Crossing and 98 feet at the South Beach Portion of the Newark Bay Crossing. A summary of the depth of cover records appears in Exhibit 4 along with the Inspection report that shows cover exceeded specifications.

In addition, upon completion of the construction project, IMTT conducted a hydrostatic pressure test of the entire pipeline in 3 segments and has records of these tests.

IMTT believes review of this response and the supporting exhibits demonstrate that IMTT has the requisite pipeline construction records as required by §195.266(a) and (b). IMTT respectively requests that PHMSA acknowledge that IMTT has sufficiently addressed the cited probable violations and that PHMSA eliminate the associated proposed civil penalties.

If you have questions or comments, please feel free to contact me (contact details below).

Sincerely,

Richard Fisette

Vice President International Matex Tank Terminals (IMTT-Pipeline)

n the

Office: (201) 823-5301

Email: richardfisette@imtt.com

Cc: Randy Waters

Exhibit #1 – Overview Summary of Pipeline Construction Records Project Books



Project Books

1 Contract for Newark Bay Pipeline Crossings - Contract No. EP-EPC-02-578

Includes contract and exhibits

Contract signed on 11/14/02

Exhibit B-3 has planned dates of project by activity - covers 11/26/02 through 3/28/03

Exhibit Q - Permits
Exhibit R - Specifications

2

Contract for Arthur Kill/Staten Island, NY Pipeline Replacement - Contract No. EP-EPC-02-609

Includes contract and exhibits

Contract signed on 11/14/02

Exhibit B-3 has planned dates of project by activity - covers 1/17/03 through 3/28/03

Exhibit Q - Permits
Exhibit R - Specifications

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Welding and X-Ray Reports for Newark Bay Pipeline Crossings, Arthur Kill/Staten Island, NY Pipeline Replacement

Welding Procedures December 2002

Welders Qualifications (By Welder) December 2002 (for all)

Welding Log

Hot Work Permits (By Facility)

GATX December 2002 - April 2003 Coastal P/L December 2002 - April 2003 PSE&G February 2003 - April 2003

X-Ray Reports (By Location)

Newark Bay South

Newark Bay North

Arthur Kill

Staten Island Replacement

December 2002 - April 2003

January 2003 - April 2003

December 2002 - April 2003

January 2003 - April 2003

X-Ray Qualifications December 2002

X-Ray Procedures December 2002 - January 2003

4 Inspector Daily Reports for Newark Bay Pipeline Crossings, Arthur Kill/Staten Island, NY Pipeline

Replacement Daily Reports (By Inspector) - Mustang Engineering, Inc.

Taylor (Chief)December 2002 - May 2003Green (Inspector)December 2002 - May 2003Whitaker (Inspector)December 2002 - May 2003Fussell (Inspector)January 2003 - February 2003

5 Project Documents File for Newark Bay Pipeline Crossings (EP-EPC-02-578)

Index

Correspondence July/August 2002 E-Mails Received January/February 2003

One Call Reports January 2003
Letters of Agreement January/March 2003

Coast Guard Notices January 2003

Minutes from Meetings December 2002/January 2003

Change Orders (2) 1/28/03 and 2/4/03

Hydro Test Reports Test Report/Test Log/ Charts/Calibrations for 3 Hydro Tests

4/30/03 from GATX - Bergen Point

4/23/03 from Bergen Point - IMTT Terminal 1/9/03 from Bayonne Terminal - Newark Bay

Certificate of Calibration See above

Safety Meetings January - March 2003 Invoices December 2002 - April 2003

6 Project Documents File Reports for Arthur Kill/Staten Island, NY Pipeline Replacement

Index

Correspondence January 2003

E-Mails Received January/February 2003

One Call Reports January 2003 Letters of Agreement February 2003 Coast Guard Notices No Info Minutes from Meetings January 2003 US Pipeline - List of Personnel February 2003 US Pipeline - Sequence of Events January 2003 Additional Pay Items No Info Change Order Log No Info

Change Orders (3) 1/28/03, 1/31/03, and 1/31/03

Hydro Test Reports Test Report/Test Log/ Charts/Calibrations for 4 Hydro Tests

5/1/03 from Linden to GATX

2/3/03 Ivory Point Drill Section and Arthur Kill Drill Section

4/4/03 from PSE&G to GATX Metering Station 3/20/03 from 6th Street to Richmond Terrace & Extra

Certificate of Calibration See above Safety Meetings February 2003

Invoices December 2002 - April 2003 EcolSciences Inspection January/February 2003

Project Accounting w/ Code of Accounts

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Contractor's Book for Newark Bay Pipeline Crossings & Arthur Kill/Staten Island, NY Pipeline Replacement

US Pipeline - Daily Progress Reports

Request for Monthly Payments

December 2002 - May 2003

February 2003 - May 2003

8 Materials Book for Newark Bay Pipeline Crossings & Arthur Kill/Staten Island, NY Pipeline Replacement

Material Tracking Report (Based on PO) August 2002 - February 2003

Purchase Orders December 2001 - December 2002

Material Receipts April 2002 - January 2003

Pipe Tally Sheets (Material Received) December 2002 and January 2003

9 Document Transmittal & Weld Map

Document Transmittal May 2003 Weld Map Index and Pipe Tally May 2003

10 Safety Book for Newark Bay Pipeline Crossings & Arthur Kill/Staten Island, NY Pipeline Replacement

Incident/Accident Log No Info
Incident/Accident Reports No Info

Weekly Safety Audits

December 2002 - April 2003

Safety Meetings

December 2002 - April 2003

Safety Video Sign-in Sheets

January 2003 - March 2003

Exhibit #2 – Welding Inspections Summary Report



Part A Welds: # Welds/ # Tested/ # Rejected/ Disposition of each Rejected

US Pipelines - Contractor Welds and X-Rays - By Date

SI-Staten Island: AK-Arthur Kill,

		Welds								X	-Rays	}		DD-Directional Drill			
# Days on Job	<u>Date</u>	HDD Welds	Land Welds	Tie-In Welds	Fab Welds	Daily Welds	# Rejected	# Repaired	XR	TW	FB	TI	FTI	Total X-Rays	Remarks	Approximate Location	Repair Comments
5	12/10/2002	11				11		0						0		Newark Bay	
6	12/11/2002	11				11		0						0		Newark Bay	
7	12/12/2002	12				12		0						0		Newark Bay	
8	12/13/2002	15				15		0						0		Newark Bay	
9	12/16/2002	14				14		0						0		Newark Bay	
10	12/17/2002	14				14		0	12					12	DD #1	Newark Bay	
11	12/18/2002	18				18		0	31					31	DD #1	Newark Bay	
12	12/19/2002	17				17		0	33					33	DD #1	Newark Bay	
13	12/20/2002	0				0		0	12	2				14	DD #1	Newark Bay	
14	12/30/2002	0				0		0						0		AK	
15	12/31/2002	13				13		0	2					2	DD #3	AK	
16	1/2/2003	15				15		0	10					10	DD #3	AK	
17	1/3/2003	2				2		0		2				2	DD #1	Newark Bay	
18	1/4/2003	0				0		0						0			
19	1/5/2003	0				0		0						0			
20	1/6/2003	9				9		0	15					15	DD #3	AK	
21	1/7/2003	14				14		0	2	4				6	DD #1	Newark Bay	
22	1/8/2003	6	10			16		0	12					12	DD #3	AK	
23	1/9/2003	0	10			10		0						0			
24	1/10/2003	0	13			13		0						0			
25	1/13/2003	0	7			7		0						0			
26	1/14/2003	0	9			9		0						0			
27	1/15/2003	15				15		0	17					17	DD #2	Newark Bay	
28	1/16/2003	12	3			15	1	1	20					20	DD #2	Newark Bay	1 Rejected/Repaired
29	1/17/2003	0	13			13	1	1	7	3				10	DD #2 & 3	Newark Bay &AK	1 Rejected/Repaired

Part A Welds: # Welds/ # Tested/ # Rejected/ Disposition of each Rejected

US Pipelines - Contractor Welds and X-Rays - By Date

SI-Staten Island: AK-Arthur Kill,

SI

SI

SI Replacement

SI Replacement

			Welds								X	-Rays			DD-Directional Drill		
# Days on Job	<u>Date</u>	HDD Welds	Land Welds	Tie-In Welds	Fab Welds	Daily Welds	# Rejected	# Repaired	XR	TW	FB	TI	FTI	Total X-Rays	Remarks	Approximate Location	Repair Comments
30	1/20/2003	0	7			7		0	9					9	DD #3 & SI	AK & SI Replacement	
31	1/21/2003		15			15		0	24					24	SI	SI Replacement	
32	1/22/2003	0	6			6		0	14					14	SI	SI Replacement	
33	1/23/2003	0	6			6		0	12					12	SI	SI Replacement	
34	1/24/2003	0	2			2	3	0			8			8	SI	SI Replacement	3 Welds Rejected
35	1/28/2003	0	5			5		3		3	9	1		13	DD #1 & 3/ SI	Newark Bay, AK & SI Replacement	3 Repaired from 1/24
36	1/29/2003	0	2			2		0	9					9	SI	SI Replacement	
37	1/30/2003	0	1			1		0	2	2				4	DD #2 & SI	Newark Bay & SI Replacen	nent
38	1/31/2003	0	3			3		0	6					6	SI	SI Replacement	
40	2/3/2009	0	0	2		2		0	2			2		4	SI	SI Replacement	
41	2/4/2003	0	0	0		0		0	1					1	SI	SI Replacement	
42	2/5/2003	0	0	0	7	7		0			2			2	SI	SI Replacement	
43	2/6/2003	0	0	0	4	4		0			5			5	SI	SI Replacement	
44	2/7/2003	0	0	0	3	3		0			2			2	SI	SI Replacement	
45	2/8/2003	0	2	0	0	2		0						0		SI Replacement	
46	2/10/2003	0	0	0	0	0		0	1		2			3	SI	SI Replacement	
47	2/11/2003	0	3	0	0	3		0	2					2	SI	SI Replacement	
48	2/12/2003	0	5	0	0	5		0	5					5	SI	SI Replacement	
49	2/13/2003	0	1	0	0	1		0	2					2	SI	SI Replacement	
50	2/14/2003	0	0	0	0	0		0			2			2	SI	SI Replacement	
51	2/18/2003	0	0	0	0	0		0						0		SI Replacement	
52	2/19/2003	0	1	0	0	1		0				1		1	SI	SI Replacement	

5

2/20/2003

2/21/2003

2

5

0

53

54

Part A Welds: # Welds/ # Tested/ # Rejected/ Disposition of each Rejected

US Pipelines - Contractor Welds and X-Rays - By Date

SI-Staten Island: AK-Arthur Kill,

		Welds							X-Rays							DD-Directional Drill		
# Days on Job	<u>Date</u>	HDD Welds	Land Welds	Tie-In Welds	Fab Welds	Daily Welds	# Rejected	# Repaired	XR	TW	FB	TI	FTI	Total X-Rays	Remarks	Approximate Location	Repair Comments	
55	2/22/2003	0	0	0	0	0		0						0		SI Replacement		
56	2/24/2003	0	2	0	0	2		0				2		2	SI	SI Replacement		
57	2/25/2003	0	0	0	0	0		0				3		3	SI	SI Replacement		
58	2/26/2003	0	2	0	0	2		0			1	2		3	SI	SI Replacement		
59	2/27/2003	0	1	0	0	1		0		1		1		2	SI	SI Replacement		
60	2/28/2003	0	0	0	6	6		0	1		3			4	SI	SI Replacement		
61	3/3/2003	0	0	0	5	5		0	3	2	7			12	SI	SI Replacement		
62	3/4/2003	0	0	0	2	2		0	1		3			4	SI	SI Replacement		
63	3/5/2003	0	1	0	0	1		0				1		1	SI	SI Replacement		
64	3/6/2003	0	0	1	0	1		0				1		1	SI	SI Replacement		
65	3/7/2003	0	0	0	0	0		0			8			8	SI	SI Replacement		
66	3/10/2003	0	0	0	0	0		0			3			3	SI	SI Replacement		
67	3/11/2003	0	1	0	2	3		0			1	1		2	SI	SI Replacement		
68	3/12/2003	0	2	0	0	2		0				2		2	SI	SI Replacement		
69	3/13/2003	0	1	0	2	3		0			3	1		4	DD #3 & SI	AK & SI Replacement		
70	3/14/2003	4	0	0	0	4		0			3			3	SI	SI Replacement		
71	3/17/2003	0	0	0	0	0		0	2	2				4	DD #2	Newark Bay		
72	3/18/2003	0	5	0	0	5	1	1	5		1			6	SI	SI Replacement	1 Rejected/Repaired	
73	3/19/2003	0	2	0	0	2		0	5					5	DD #2 & SI	Newark Bay & SI Replacer		
74	3/20/2003	1	0	0	0	1		0	1			1		2	DD #2 & SI	Newark Bay & SI Replacer	nent	
75	3/21/2003	1	3	0	0	4		0	1			2		3	DD #2 & SI	Newark Bay & SI Replacer	nent	
76	3/24/2003	2	1	0	0	3		0			2			2	SI	SI Replacement		
77	3/25/2003	0	0	0	0	0		0	1		2	1		4	DD #2 & SI	Newark Bay & SI Replacer	nent	
78	3/26/2003	0	3	0	0	3		0			4			4	SI	SI Replacement		
79	3/27/2003	0	2	0	0	2		0	3	1	1			5	SI	SI Replacement		

Part A Welds: # Welds/ # Tested/ # Rejected/ Disposition of each Rejected

US Pipelines - Contractor Welds and X-Rays - By Date

SI-Staten Island: AK-Arthur Kill,

		Welds							X-Rays						DD-Directional Drill		
# Days on Job	<u>Date</u>	HDD Welds	Land Welds	Tie-In Welds	<u>Fab</u> <u>Welds</u>	<u>Daily</u> <u>Welds</u>	# Rejected	# Repaired	XR	TW	FB	TI	FTI	Total X-Rays	Remarks	Approximate Location	Repair Comments
80	3/28/2003	0	2	0	3	5		0	3			3		6	SI	SI Replacement	
81	3/31/2003	0	5	0	0	5		0	1					1	SI	SI Replacement	
82	4/1/2003	0	5	0	1	6		0	4	1	2			7	SI	SI Replacement	
83	4/2/2003	0	3	0	3	6		0	7					7	SI	SI Replacement	
84	4/3/2003	0	1	0	0	1		0			1	3		4	SI	SI Replacement	
85	4/4 and 4/5/03	2	2	0	0	4		0	2	2				4	DD #2 & SI	Newark Bay &SI Replacem	ent
86	4/7/2003	0	0	0	1	1		0			1			1	SI	SI Replacement	
87	4/8/2003	0	0	0	0	0		0						0			
88	4/9/2003	0	0	0	0	0		0						0			
89	4/10/2003	0	0	0	0	0		0						0			
90	4/11/2003	0	1	0	0	1		0						0			
91	4/14/2003	0	0	0	0	0		0					2	2	SI & Bayonne	Newark Bay & SI Replacen	ent
92	4/15/2003	0	0	0	0	0		0						0	SI	SI Replacement	
93	4/16/2003	0	0	1	0	1		0				3	1	4	SI & Bayonne	Newark Bay & SI Replacen	nent
94	4/17/2003	0	0	3	0	3	1	1					3	3	DD #2 & SI	Newark Bay & SI Replacen	1 Rejected/Repaired
95	4/18/2003	0	0	4	0	4		0					4	4	SI	SI Replacement	
96	4/19/2003	0	0	2	0	2		0					2	2	DD #2 & SI	Newark Bay & SI Replacem	ent
97	4/21/2003	0	0	2	8	10	2	1					9	9	Bayonne	Newark Bay	2 Rejected/1 Repaired
98	4/22/2003	0	0	4	0	4		1					5	5	Bayonne	Newark Bay	2nd Repair completed
99	4/23/2003	0	0	1	0	1		0					1	1	PSE&G	AK	
100	4/24/2003	0	0	5	0	5		0					4	4	PSE&G	AK	
101	4/25/2003	0	0	2	0	2		0					2	2	PSE&G	AK	
102	4/26/2003	0	0	0	0	0		0						0			
103	4/28/2003	0	0	0	0	0		0						0			
104	4/29/2003	0	0	0	0	0		0						0			

Part A Welds: # Welds/ # Tested/ # Rejected/ Disposition of each Rejected

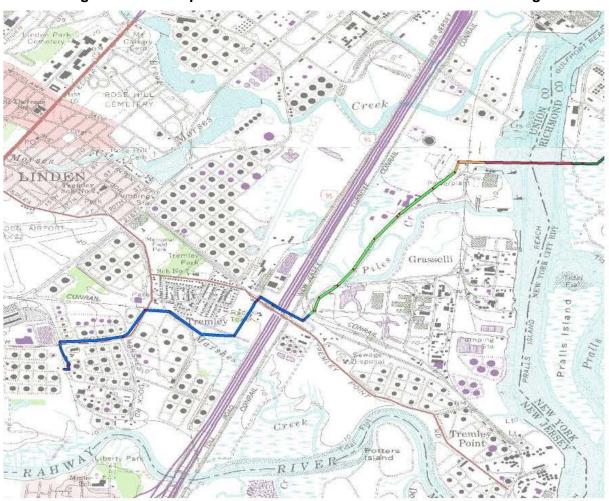
US Pipelines - Contractor Welds and X-Rays - By Date

SI-Staten Island: AK-Arthur Kill,

				Welds							X	-Rays				DD-Directional Drill	
# Days on Job	<u>Date</u>	HDD Welds	Land Welds	Tie-In Welds	<u>Fab</u> <u>Welds</u>	Daily Welds	# Rejected	# Repaired	XR	TW	FB	TI	FTI	Total X-Rays	Remarks	Approximate Location	Repair Comments
105	4/30/2003	0	0	0	0	0		0						0			
106	5/1/2003	0	0	0	0	0		0						0			
107	5/2/2003	0	0	0	0	0		0						0			
108	5/3/2003	0	0	0	0	0		0						0			
109	5/5/2003	0	0	0	0	0		0						0			
110	5/6/2003	0	0	0	0	0		0						0			
Total		208	176	27	47	458	9	9	309	25	76	31	33	474			

Exhibit #3 – Pipeline Location Maps

Figure 1: IMTT Pipeline: Linden Block Valve to Arthur Kill Crossing



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Figure 2: IMTT Pipeline: Arthur Kill Crossing to Newark Crossing

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Figure 3: IMTT Pipeline: Newark Crossing East to IMTT Terminal

Exhibit #4 – Pipeline Depth of Cover Summary





Pipe Cover - Proposed 1/22/02, 3/15/02, and 3/22/02 Specifications - Minimum 3'

Newark Bay - South Reach	<u>Description</u>	Approx. Length	<u>Depth</u>
Beginning Tie-In Point	Bergen Point	200'	3'
	Directional Drill Start to Beginning Bay	700'	98'
	Bay to 14+57	500'	68'
Directional Drill (Approximate 3600')	14+57 to South Reach Channel	600'	38-78'
98' below Natural Ground at Center	South Reach Channel to 28+22	700'	30-40'
	28+22 to Edge of South Reach Channel	600'	30-40'
	Edge of South Reach Channel to 36+74 - Ending Tie-In	500'	3-30'
Ending Tie-In	Directional Drill to Existing Pipe	3,600'	3'
Proposed Total		3,800'	

Newark Bay - North Reach									
Beginning Tie-In Point	Staten Island (Richmond)		3'						
	Directional Drill Start to Beginning Bay	300'	60'						
Directional Drill - 1690'	Beginning Bay to 3+21	35'	40'						
(To NY/NJ line - 585')	3+21 to NY/NJ Line	250'	50'						
(To Ending Tie-In - 1105')	NY/NJ Line to North of Shooters Island Reach	200'	50'						
94.5' Below Natural Ground at Center	North of Shooters Island Reach to Edge of Shooters Island Reach	800'	10-40'						
	Edge of Shooters Island Reach to 16+90 - Ending Tie-In	105'	3-10'						
Ending Tie-In Point	Directional Drill to Existing Pipe	1,690'	3'						
Proposed Total		1,690'							

Newark Bay Totals								
South Reach Proposed		3,800'						
North Reach Proposed		1,690'						
Old Pipe		5,002'						
Difference	Directional Drill went deeper than proposed	448'						
Footage Verified by Smart Pig 09/2011	Bergen Point to Richmond	10,940'						

Pipe Cover - Proposed 1/22/02, 3/15/02, and 3/22/02 Specifications - Minimum 3'

Arthur Kill			
Beginning Tie-In Point	PSE&G	250'	3'
	Directional Drill Start to 147+00 - Beginning Arthur Kill	550'	3-63'
Directional Drill (Approx 2650)	147+00 - Beginning Arthur Kill to 154+00	700'	52-64'
Directional Drill (Approx 2650') 68' Below Natural Ground at Center	154+00 to 157+00 (NJ/NY)	300'	28-64'
os Below Natural Ground at Center	157+00 to 165+00	800'	16-28'
	165+00 to 168+00 - Tie-In - GATX Terminal	300'	3-16'
Ending Tie-In Point	Directional Drill to Existing Pipe	2650'	3'
Proposed Total		2900'	
Footage Verified by Smart Pig 09/2011		2805'	

Staten Island Replacement			
Beginning Tie-In Point	GATX Terminal 168+00		3'
	GATX Terminal 168+00 to 188+00	2000'	3'
	GATX Terminal 188+00 to Meter Station 196+00	800'	3'
GATX Terminal	GATX Terminal Meter Station 196+00 to 204+00	800'	3'
GATA Terminar	GATX Terminal 204+00 to Old Place Creek 217+00	1,300'	3-4'
	GATX Terminal Old Place Creek 217+00 to 219+00 - Bridge	200'	8' above ground
	GATX Terminal 219+00 to 220+00	100'	3'
Ending Tie-In Point	GATX Terminal 220+00		3'
Proposed Total		5,200'	
Footage Verified by Smart Pig 09/2011		5,257'	

NOTE: Depth per e-mail dated 6/19/02 - (Used these figures above)

(Proposed depths to the top of the pipelines beneath the center of the channels - Referenced to 0' NGVD 1988)

Proposed	Depth (ft)
Arthur Kill	67.6
Shooters Island Reach	94.5
South Reach	98

Mustang Engineering, Inc Pipeline Division ACTING AS AGENT FOR

Report Number	130
Job Number	350401
Work Order	
Spread	

COASTAL PIPELINE COMPANY

Date 5/7/2003

CHIEF INSPECTOR'S DAILY REPORT

Contractor: US Pipeline Project: Coastal Pipeline (Staten Island) Pipe Size: 12" **Work Activity** Station Progress From To Previous To Date Today Clear Grade String Pipe 13728' 13728' Ditch 5162' 5162' Bend & Lay Weld 13728 13728' Coat & Wrap 13728 13728' Lower-in 5162' 5162' Backfill 5162' 5162' Test Clean-up 1610' 1610' **Horizontal Directional Drill** Weights Installed Pilot Station Total Ream Case Pipe Feet Feet Feet Previous To Date Crossing Feet Type From Today Today/Total Today/Total Today/Total Today/Total 69 River 69 0 Newark Bay 3520 3520 3520 96 0 Arthur Kill 2735 2735 0 2735 0 0 0 1668 1668 1668 0 Richmond **DITCH: Cover in excess of Specifications** ADDITIONAL PAY ITEMS To Date Inches From Linear Feet **UOM** Today To Silt Fence FT Haybales EA 0 0 Hauling Select Backfill CY Hauling Soil from Site CY WELDING WELDING Completed / Accepted Completed / Accepted PROGRESS TODAY PROGRESS TO DATE REJECTED REPAIRED REJECTED REPAIRED GOOD CUTOUTS GOOD CUTOUTS Pipeline 0 0 0 0 Pipeline 484 8 8 Fabrication Fabrication Tie-ins Tie-ins WELDS X-Rayed Completed / Accepted WELDS X-Rayed Completed / Accepted PROGRESS TODAY PROGRESS TO DATE GOOD REJECTED REPAIRED CUTOUTS GOOD REJECTED REPAIRED CUTOUTS 0 0 0 Pipeline 465 8 8 Pipeline 0 Fabrication Fabrication Tie-ins Tie-ins

Weather Conditions	Cloudy/Warm	Morris Taylor
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Remarks

Newark Bay South Shooter Reach - ITG installing concrete bags between Coastal
pipeline and dual abandoned 10" pipeline near exit of directional drill.
Linden Station No Progress
GATX Site US Pipeline removed old pipeline on east side of Arthur Kill river edge
past old valve. Started removing old pipeline along sixth avenue.
PSE&G Site No Progress.