

April 12, 2010

U. S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety  
Southern Region Office  
233 Peachtree Street, Suite 600  
Atlanta, GA 30303

Attention: Ms. Linda Daugherty, Director

Re: CPF No. 2-2010-1005W  
Tennessee Gas Pipeline

Dear Ms. Daugherty:

Tennessee Gas Pipeline (TGP) is in receipt of and has reviewed the Warning Letter of March 11, 2010, CPF 2-2010-1005W, and would like to respectfully submit the following comments.

PHMSA's finding in the Warning Letter states:

"As a result of the inspection, it appears that TGP has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

§ 192.479 Atmospheric corrosion control: General.

(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

At TGP's Compressor Station 63 in Batesville, Mississippi, the compressor unit suction and discharge piping in the basements of Compressor Buildings A and B had numerous areas where the paint had disbanded from the pipe exposing the pipe. Several of the areas with disbanded paint have extensive surface rust."

**TGP Response:**

After review, we do not feel we have committed a violation but have fully complied with the regulations. The regulation in its entirety is:

192.479 Atmospheric corrosion control: General.

(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

(b) Coating material must be suitable for the prevention of atmospheric corrosion.

(c) Except portions of pipelines in offshore splash zones or soil-to-air interfaces, the operator need not protect from atmospheric corrosion any pipeline for which the operator demonstrates by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will—

(1) Only be a light surface oxide; or

(2) Not affect the safe operation of the pipeline before the next scheduled inspection.

We feel we have fully complied with the Federal Regulations and company procedures since the disbonded coating and surface corrosion did not affect the safe operation of the pipeline before the next scheduled inspection. Following are excerpts from the El Paso Corrosion Control Manual - Section 700 – Coatings:

Portions of the pipeline exposed to atmosphere at soil-to-air interfaces and in offshore splash zones shall be thoroughly cleaned and coated with a material suitable for protection against atmospheric corrosion. All other portions of the pipeline which are exposed to the atmosphere shall also be thoroughly cleaned and coated with a material suitable for the prevention of atmospheric corrosion unless it can be demonstrated by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will—

- Only be a light surface oxide; or
- Not affect the safe operation of the pipeline before the next scheduled inspection.

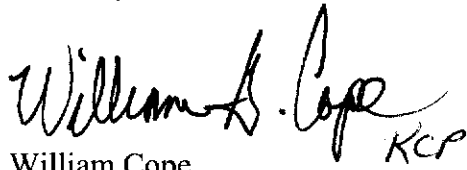
Grade 3

- Coating system failure (except offshore splash zone and soil-to-air interface); or
- Corrosion that does not affect safe operation before next scheduled inspection (except offshore splash zone and soil-to-air interface); or
- Underground coating system does not extend above grade at soil-to-air interface.

The areas of coating failure in question were inspected according to company procedures and assessed as a Grade 3 during the atmospheric inspection. Based on 192.479 (c) (2), which corresponds to our El Paso grading system as a Grade 3, we feel we have fully complied with the Federal Regulations since the disbonded coating and surface corrosion did not affect the safe operation of the pipeline before the next scheduled inspection. However, although we feel we have fully complied with applicable company procedures and all Federal Regulations, we have made the commitment to recoat the areas in question.

We appreciate the opportunity to provide comments in this matter. Also, since we believe no violation of the Pipeline Safety Regulations exists, we respectfully request that the Warning Letter be rescinded.

Sincerely,

Handwritten signature of William A. Cope in cursive, with the initials 'KCP' written in a smaller font to the right of the signature.

William Cope  
Vice President, Eastern Operations

cc: Mohammed Shoaib, Southern Region, PHMSA  
John Pannell  
Pat Carey  
Ken Peters  
William A. Cox