



February 19, 2009

Mr. R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
Suite 1110  
8701 South Gessner  
Houston, TX 77074



RE: CPF 4-2009-1003

Dear Mr. Seeley:

Northern Natural Gas (Northern) received a Warning Letter dated February 2, 2009, from the US Department of Transportation-Pipeline and Hazardous Material Safety Administration (PHMSA) resulting from PHMSA Southwest Region audits of Northern Natural Gas facilities in the Spearman and Spraberry, Texas areas during the period of September 15-19 and 23-26, 2008. Although Northern understands that a formal response is not required, Northern is submitting this letter for the record in response to the issues noted in the Warning Letter.

The following is an excerpt from the Warning Letter with Northern's response in *italics*:

**1. §192.317 Protection from hazards.**

**(b) Each above ground transmission line or main, not located offshore or in inland navigable water areas, must be protected from accidental damage by vehicular traffic or similar causes, either by being placed at a safe distance from the traffic or by installing barricades.**

**“The K-B pipeline Crossover facility in Gaines County is located away from regular domestic traffic but still needs protection from possible farm equipment activity. NNG must install a barrier to better protect this above ground piping assembly from being hit and causing possible component damage. ”**

*Northern has installed a barrier around the above ground piping and appurtenances at the K- B pipeline crossover facility. Pictures of the completed protection structure are attached.*

**2. §192.477 Internal Corrosion Control: Monitoring.**

**If corrosive gas is being transported, coupons or other suitable means must be used to determine the effectiveness of steps taken to minimize internal corrosion. Each coupon or other means of monitoring internal corrosion must be checked two times each calendar, but with an interval not exceeding 7 1/2 months.**

**“The most recent scale records available at the Brownfield and Spraberry Stations available during the inspection indicated substantial iron and sulfate presence but there were no coupons to collaborate if internal corrosion was present. NNG must develop procedures to monitor for internal corrosion at sites where there is probable occurrence of this pipeline threat.”**

*Northern’s operating procedure OP 40.105 and associated engineering standard ES 0015 are based on 49 CFR 192.477, and define corrosive gas or liquids on Northern’s system. A designation as corrosive involves gas containing water in a liquid phase and any of seven contaminant components at specific concentrations. Northern’s operating procedure 40.105 states that an internal monitoring program will be initiated if a potentially corrosive environment exists. The laboratory solids analysis reports for Brownfield and Spraberry were collected from pipeline pigging. The pigging and related samples have not indicated the presence of liquid phase water, and therefore a designation as corrosive environment was not indicated. Northern will continue to be diligent in monitoring for conditions which could lead to internal corrosion and mitigating those conditions when detected.*

**3. 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 acceptable 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-**
  - (a) Only be light surface oxide; or**

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

**“Very heavy atmospheric corrosion was evident at the Sunray Compressor Station piping. NNG’s O & M manual procedures state that all above ground piping will be recoated if found to be in need of repair. NNG should review and amend , as necessary, their procedures to specify requirements to be used by operations personnel for making a determination of how and when the maintenance work is to be completed in a timely fashion.”**

*Northern is reviewing its operating procedure regarding external corrosion as part of ongoing operating procedure review and updates. Northern has revisited the Sunray compressor station piping and has found surface rust only. However, the piping referenced, was previously scheduled to be repainted this summer and this project is still on track. Once the project is completed Northern will notify PHMSA Southwest region of the completed work.*

Northern trusts that this response adequately addresses the concerns of the Warning Letter. Please contact me at (402) 398-7715 if you have any questions or require additional information in regard to this letter.

Sincerely,



Thomas Correll

Director Pipeline Safety and Integrity

