



U.S. Department of Transportation

**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

**AUG 22 2012**

Mr. Robert Henry  
Chief, Pipeline Safety Office  
Arkansas Public Service Commission  
1000 Center Street  
Little Rock, Arkansas 72203-0400

Dear Mr. Henry:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) reviewed your letter received June 25, 2012, notifying us that the Arkansas Public Service Commission (Commission) has granted CenterPoint Energy Resources Corp. D/B/A CenterPoint Energy Arkansas (CEA) a waiver from Arkansas Gas Pipeline Code Part 192.59 (a)(1) to allow the use of yellow medium density Polyethylene (PE) pipe purposely exposed to ultraviolet (UV) past the two-year outdoor storage requirements in ASTM D2513-99, currently referenced in the Arkansas Gas Pipeline Code and incorporated by reference in the Federal regulations. The waiver allows the use of performance standards established in ASTM D2513-09a which allow for three years of outdoor storage for yellow PE pipe and 10 years of outdoor storage for black PE pipe. The installation is intended as part of a project to help evaluate UV degradation through in-service testing to determine whether UV has an effect on long term integrity of PE pipe, and if longer exposure timeframes and adoption of ASTM D2513-09a into the Federal code are justified.

The waiver applies to pipeline facilities in a rural wooded location tied in to an existing 20-inch PE main in the 5300 block of West Knight Avenue, Pine Bluff, Arkansas, and extend east laterally for approximately 300 feet from tie-in. The maximum allowable operating pressure of the main to be tied into is 60 pounds per square inch gauge (psig). The location for the project was carefully selected for its rural and relatively unpopulated surroundings. Based on observation of location by Commission staff, the location is void of residents, paved open roads, or public meeting places, making it an ideal location posing little risk to the public.

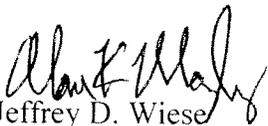
Your letter indicated the line will be leak surveyed annually, and test samples will be removed from the project location at intervals of three and five years after installation in order to test the integrity of the installed material. The annual leak survey combined with the testing of samples at three and five years will help to provide an equivalent or better level of safety than the current pipeline code that requires leak surveying every five years in a non-business location. Additional correspondence indicated integrity tests to be performed at three- and five-year intervals include a long term sustained pressure test at elevated temperature and a melt flow index test consistent with the approach being developed and balloted under the latest ASTM standards.

Based on the conditions detailed in the waiver issued by the Commission and related materials on Commission Docket No. 11-059-U, PHMSA does not object to the waiver provided the following additional conditions are met:

- As frequently as practical, but at intervals not to exceed one year in-line with the annual leak surveys, CEA will survey the surrounding project area for any population increases or other development that may indicate the project could pose additional risks to the public. If such changes are identified, CEA will notify and work with the Commission on any additional measures needed to provide an equivalent or better level of safety.
- If pipe integrity is ever found to be deficient, poses any additional risks to the public or fails, CEA must inform the Commission immediately and employ the necessary mitigative measures to ensure safety up to and including replacing the pipe with pipe currently accepted under 49 CFR Part 192.

Thank you for your participation in the State waiver review process and follow-up communications with my technical staff. If you wish to discuss this or any other pipeline safety matter related to this request, my staff would be pleased to assist you. Please call John Gale, Director, Standards and Rulemaking at 202-366-0434 for any regulatory matters or Jeffery Gilliam, Director, Engineering and Research Division at 202-366-0568 for any technical matters.

Sincerely,

*for:*   
Jeffrey D. Wiese  
Associate Administrator  
for Pipeline Safety