



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

FEB 11 2016

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. A. (Andy) Drake
Vice President, Operations and EHS
Spectra Energy Partners, L.P.
5400 Westheimer Court
Houston, TX 77056-5310

Re: Special Permit Renewal from October 28, 2015 to October 28, 2020

PHMSA-2008-0257

Dear Mr. Drake:

On March 4, 2015, the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), notified Spectra Energy Partners, L.P. (SEP) that special permit PHMSA-2008-0257 would expire on October 28, 2015, unless the special permit was renewed. Special permit PHMSA-2008-0257 is for the Texas Eastern Transmission, L.P. (TETLP) pipeline system (which is owned by SEP and Spectra Energy Corporation is managing partner of SEP). Special permit PHMSA-2008-0257 consists of 97.94 miles of 36-inch Line 1 and 169.54 miles of 36-inch Line 2 pipelines for a total mileage of 267.48 miles of the TETLP pipeline system. The special permit allows the TETLP pipeline system to operate in accordance with the alternative maximum allowable operating pressure (alternative MAOP Rule), which includes a maximum 80 percent of specified minimum yield strength in Class 1 locations and an alternative maximum allowable operating pressure (alternative MAOP) of 1,112 pounds per square inch gauge in all class locations with implementation of the special permit conditions.

On April 27, 2015, SEP applied for a renewal of the TETLP special permit. The special permit renewal is specifically for TETLP's 36-inch Line 1 and 36-inch Line 2 pipelines located in Fayette, Somerset, Bedford, Fulton, Franklin, Adams, York, and Lancaster Counties, Pennsylvania.

On June 16, 2015, PHMSA published a Federal Register notice (80 FR 34492) concerning the special permit renewal of PHMSA-2008-0257. No public comments were received. The special permit renewal request letter and all other pertinent documents are available for review in Docket Numbers PHMSA-2008-0257, in the Federal Docket Management System (FDMS) located at www.regulations.gov.

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PHMSA has reviewed all operational and maintenance data for the renewal of special permit PHMSA-2008-0257 and finds that TETLP pipeline system continues to meet the terms of the special permit. PHMSA updated the special permit renewal terms based upon conditions completed in the period from October 28, 2010 through October 28, 2015 that do not require further baseline assessments. Any special permit pipeline reassessments required to maintain pipeline safety are identified in the special permit conditions. Based on the information provided by SEP, PHMSA has determined that renewal of the TETLP special permit, as modified, would not be inconsistent with pipeline safety.

Accordingly, the special permit renewal application submitted by Spectra Energy Partners, L.P. for the Texas Eastern Transmission, L.P., (which is owned by Spectra Energy Partners, L.P. and operated by Spectra Energy Corporation as managing partner of Spectra Energy Partners, L.P), is granted to operate the specified segments from October 28, 2015, through October 28, 2020, for the Texas Eastern Transmission, L.P. pipeline system described in the special permit where alternative maximum allowable operating pressures are being implemented. Subject to the terms and conditions therein, this special permit renewal Order waives compliance with certain Federal regulations in 49 CFR §§ 192.112(a)(1), 192.112(c)(1), 192.112(c)(2), 192.112(c)(2)(i), 192.112(c)(2)(ii), 192.112(c)(2)(iii), 192.112(d)(2)(i), 192.112(f)(1), 192.620(d)(5)(iii), and 192.620(d)(11)(ii)(A) and allows an alternative maximum allowable operating pressure of 1112 pounds per square inch gauge for TETLP's 36-inch Line 1 and 36-inch Line 2 pipelines located in Fayette, Somerset, Bedford, Fulton, Franklin, Adams, York, and Lancaster Counties, Pennsylvania.

My staff would be pleased to discuss this special permit or any other regulatory matter with you. Mr. John Gale, Director, OPS Standards and Rulemaking Division, may be contacted at 202-366-0434 on regulatory matters. Mr. Kenneth Lee, Director, OPS Engineering and Research Division, may be contacted at 202-366-2694, for technical matters and the Mr. Byron Coy, Director, OPS Eastern Region, may be contacted at 609-989-2180, for operational matters specific to the renewal and ongoing operations of this special permit.

Sincerely,



Jeffrey D. Wiese
Associate Administrator for Pipeline Safety

Enclosure: Special Permit Renewal Order (PHMSA-2008-0257)

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
SPECIAL PERMIT**

Special Permit Information:

Docket Number: PHMSA-2008-0257
Requested By: Texas Eastern Transmission, L.P.
Original Date Requested: September 11, 2008
Modified on December 22, 2008, and July 26, 2010
Original Special Permit: October 28, 2010
Renewal Effective Dates: October 28, 2015 through October 28, 2020
Code Sections: 49 CFR §§ 192.112(a)(1), 192.112(c)(1), 192.112(c)(2),
192.112(c)(2)(i), 192.112(c)(2)(ii), 192.112(c)(2)(iii),
192.112(d)(2)(i), 192.112(f)(1), 192.620(d)(5)(iii), and
§192.620(d)(11)(ii)(A)

Renewal of Special Permit:

By this order, subject to the terms and conditions set forth below the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), grants this special permit renewal to Texas Eastern Transmission, L.P. (TETLP), effective from October 28, 2015 through October 28, 2020. This Special Permit renewal waives compliance from the sections of 49 CFR Part 192 codes listed above to operate in accordance with the alternative maximum allowable operating pressure (alternative MAOP Rule) natural gas transmission pipeline segments located in Fayette, Somerset, Bedford, Fulton, Franklin, Adams, York, and Lancaster Counties, Pennsylvania as described below.

Special Permit Segments:

PHMSA waives compliance from the sections of 49 CFR Part 192 listed above for TETLP's 36-inch Line 1 and 36-inch Line 2 pipeline systems originating at the TETLP

Uniontown, Pennsylvania compressor station and ending as shown in Table 1 below.

The *special permit segments* are defined as TETLP 36-inch Line 1 and 36-inch Line 2 pipelines located in Fayette, Somerset, Bedford, Fulton, Franklin, Adams, York, and Lancaster Counties, Pennsylvania. The *special permit segments* consist of 97.94 miles of 36-inch Line 1 and 169.54 miles of 36-inch Line 2 pipelines for a total mileage of 267.48 as outlined below in Table 1.

Table 1 – TETLP TEMAX Project - Special Permit Segments - Mile Posts (MP)				
Pipeline Name and Location	Diameter	Begin MP	End MP	Total Miles
36-inch Line 1, Beginning at Uniontown, PA Compressor Station (CS) to MP 1090.32	36-inch	1035.12	1090.32	55.20
36-inch Line 1, Beginning at Bedford, PA CS and ending at MP 1136.65	36-inch	1093.91	1136.65	42.74
36-inch Line 2, Beginning at Uniontown, PA CS and ending at Marietta, PA CS	36-inch	1171.88	1341.42	169.54
			TOTAL	267.48

This special permit allows TETLP to operate the *special permit segments* at the alternative maximum allowable operating pressure (alternative MAOP) of 1112 pounds per square inch gauge (psig) for the TETLP. The *special permit segments* had a maximum allowable operating pressure (MAOP) of 1000 psig prior to the grant of this special permit.

PHMSA originally granted this special permit based on the findings set forth in the “*Special Permit Analysis and Findings*” document, which can be read in its entirety in Docket No. PHMSA-2008-0257 in the Federal Docket Management System (FDMS) located on the internet at www.Regulations.gov. These findings are still applicable for this special permit renewal.

Conditions:

PHMSA grants this special permit renewal subject to the following conditions:

1. **Design, Construction and Operations in accordance with 49 CFR Part 192:**

All new pipe installed, relocated pipe, any new pipe installed for class location changes, and all Operations and Maintenance (O&M) on the TETLP pipeline *special permit segments* after issuance of the original special permit must meet all requirements of 49 CFR Part 192. All existing pipeline *special permit segments* must meet the requirements of 49 CFR Part 192 with the exception of 49 CFR §§ 192.112(a)(1), 192.112(c)(1), 192.112(c)(2), 192.112(c)(2)(i), 192.112(c)(2)(ii), 192.112(c)(2)(iii), 192.112(d)(2)(i), 192.112(f)(1), 192.620(d)(5)(iii), and 192.620(d)(11)(ii)(A) which are waived for pipeline facilities in the *special permit segments* provided TETLP complies with **Conditions 2 through 15** referenced below. The *special permit segments* may operate up to the alternative MAOP pressure of 1112 psig.

2. **Design Factor – Existing Pipelines:** Existing pipe installed in the *special permit segments* in Class 1 locations may use a maximum design factor of 0.80, in Class 2 locations may use a maximum design factor of 0.67, and in Class 3 locations may use a maximum design factor of 0.56, except as stated in **Condition 7** for high consequence areas (HCAs).

- a. Existing road and railroad crossing pipe in Class 1 and 2 locations may use a maximum design factor of 0.67 and 0.56, respectively, and Class 3 location road and railroad crossing pipe may use a maximum design factor of 0.56.
- b. New road crossings, railroad crossings, fabricated assemblies, meter stations and compressor stations must be designed using the existing design factors in 49 CFR §§ 192.111(b), (c) and (d).
- c. New pipe used for all pipeline relocations, repairs, and replacements must meet all applicable requirements of 49 CFR Part 192.

3. **Depth of Cover:** Existing TETLP pipeline *special permit segments* must conduct depth of cover surveys as required by **Condition 10(g)** and implement remediation measures to ensure that pipeline cover meets the requirements of 49

CFR § 192.328(c).

- a. Remediation measures to meet 49 CFR § 192.328(c)(1) must include: engineered solutions (rip-rap, matting, and concrete barriers), adding soil and regrading; adding markers; adding warning mesh or marker tape above the buried pipeline; increased communication with landowners and residents; and increased surveillance. Short distances, less than 200 continuous feet, where soil cover is over 30-inches deep, but less than 36-inches in soil cover, will not require remediation in accordance with this paragraph.
- b. Remediation measures to meet 49 CFR § 192.328(c)(2) in areas where deep tilling or other activities could threaten the pipeline, the top of the pipeline must be installed at least one (1) foot below the deepest expected penetration of the soil. TETLP may modify right-of-way agreements in these areas to restrict tilling or plowing, so there will not be tilling or plowing within one (1) foot of the pipeline.
- c. If future routine patrols (ground and aerial), observe conditions during maintenance, where farming, excavation, or construction activities are ongoing, or weather events indicate the possible loss of cover over the pipeline, TETLP shall perform a depth of cover study and remediate any shallow cover in accordance with **Condition 3(a)** within 90 days of each occurrence.
- d. Remediation measures must be submitted to the Director, PHMSA, OPS Eastern Region and the Director, PHMSA, OPS Engineering and Research Division for approval 21 days prior to implementation.
- e. If TETLP does not replace or remediate loss of cover identified from the depth of cover surveys performed in accordance **Conditions 3 and 10(g)**, within three (3) months of such survey, TETLP must provide an engineering assessment with alternative integrity solutions or timing of remediation to the Director, PHMSA, OPS Eastern Region, for approval. TETLP shall implement any such alternative integrity solutions upon a “no objection letter” from the Director, or, if the Director objects to such

solutions, proceed to replace any loss of cover within the timing of this **Condition 3.**

4. **Field Coating:** The coatings used on the existing pipeline in *special permit segments* and girth weld joints in the *special permit segments* must be non-shielding to cathodic protection (CP). In the event that the coating type is unknown or is known to shield CP for girth weld joints TETLP must conduct evaluations in accordance with **Conditions 4(a), (b), (c), (d) and (e) below:**
- a. Complete a technical assessment of the existing shrink sleeves located in the *special permit segments*. The purposes of this assessment are to characterize the condition of shrink sleeves on the pipeline and to demonstrate the absence of any stress corrosion cracking (SCC) activity under the shrink sleeves. TETLP must implement a shrink sleeve management program that consists, at a minimum, of the following elements:
 - i. A minimum of 100 shrink sleeves must be excavated, examined, removed, and replaced with a non-shielding coating prior to operating at the alternative MAOP and/or December 31, 2010, whichever is first for indications of SCC. No shrink sleeves in the 2009 and 2010 excavations may have any indication of SCC¹ (SCC greater than a maximum of 15 percent wall loss and 2 inches critical length), if so then all remaining shrink sleeves in the *special permit segments* must be removed prior to operating at the alternative MAOP.
 - ii. After 2010, TETLP must remove a minimum of 50 shrink sleeves per year until all known shrink sleeves have been removed. All shrink sleeves must be removed within five (5) years from the

¹ SCC activity in shrink sleeve evaluations shall be defined as a maximum of 15 percent depth and 2-inches in length.

issue date of the special permit² and prior to the special permit being renewed for an additional five (5) year period in accordance with **Limitation 7**.

- iii. In the event any SCC³ activity is found in any of the pipe girth welds with shrink sleeve excavations during assessments after operating at alternative MAOP, TETLP must remove all known shrink sleeves within one (1) year following the significant SCC finding⁴, and repair all or run an in-line inspection (ILI) tool capable of detecting and sizing SCC, and remove all significant SCC identified by the ILI tool.
- iv. If a SCC ILI tool is utilized, TETLP must develop a remediation plan to respond to SCC indications. This plan must be submitted to the Director, PHMSA, OPS Eastern Region with a copy to the Director, PHMSA, OPS Engineering and Research Division, for approval prior to running the tool. Any shrink sleeve SCC finding that is: greater than 15 percent depth and 2-inches in length; or with 30 percent wall loss that is located in large water crossings, wetlands, or directional bores with heavy wall pipe must be removed within one (1) year or the pressure must be reduced below the alternative MAOP pressure for that section of pipe.
- v. In the event any SCC activity is found in one (1) or more excavations with SCC indications (15 percent depth and 2-inches

² Shrink sleeves under large water crossings, wetlands, or directional bores with heavy wall pipe may be exempted provided a detailed engineering study can provide a technical justification that these remaining shrink sleeves will not pose an increased risk to the integrity of the pipeline and consequence to the surrounding environment and public safety. The five (5) year time period does not apply to shrink sleeves located in HCAs, Class 2 locations, and Class 3 locations as noted in **Conditions 4(d) and (e)**.

³ For compliance with this special permit, TETLP must remove all shielding coatings for the particular and similar vintage pipe that shows SCC from the special permit segments and repair or replace the pipe that does not meet "footnote 2" criteria within 90 days of discovery of the non-compliant SCC.

⁴ Shrink sleeves under large water crossings, wetlands, or directional bores with heavy wall pipe may be exempted provided a detailed engineering study can provide a technical justification that these remaining shrink sleeves will not pose an increased risk to the integrity of the pipeline and consequence to the surrounding environment and public safety. This footnote does not apply to shrink sleeves located in HCAs, Class 2 locations, and Class 3 locations as noted in **Conditions 4(d) and (e)**.

in length), TETLP must perform the following:

1. Notify the Director, PHMSA, OPS Eastern Region and Director, PHMSA, OPS Engineering and Research Division of the finding within three (3) days.
 2. All identified shrink sleeves or other shielding coatings must be removed prior to operating at the alternative MAOP.
- **TETLP completed removal of coatings identified in Conditions 4(a)(i), 4(a)(ii), and 4(a)(iii) prior to the October 28, 2015 renewal of this special permit. Thirty-seven (37) shrink sleeves were not removed due to their location in non- high consequence areas or non-populated areas as described in Footnote 5. PHMSA granted relief from the removal requirements for these shrink sleeve by letter dated February 10, 2011.**
 - **Conditions 4(a)(i), 4(a)(ii), and 4(a)(iii) are not required during this special permit renewal period (October 28, 2015 through October 28, 2020).**
- b. When high resolution MFL in-line inspections on the special permit segments are conducted in accordance with **Condition 10(b)**, particular attention must be paid to all girth weld locations with unknown coating types or coatings known to shield CP. Any measureable metal loss indications (wall loss of 30 percent wall thickness) associated with girth weld locations with unknown coating types or coatings known to shield CP must be excavated and, if a shrink sleeve or any shielding coating is present, a SCC assessment must be performed within 90 days. If the resulting assessment identifies SCC, then TETLP must remove all known shrink sleeves within one (1) year following the finding, or run an in-line inspection tool capable of detecting and sizing SCC and repair all SCC findings above a maximum of 15 percent depth and 2-inches in length within one (1) year of the SCC finding.

- c. Corrosion growth rates beneath shielded coatings must be determined using vendor software designed to evaluate matching corrosion anomaly features. Subsequent in-line inspection reassessment intervals must be determined using this analysis method and on a **reassessment interval of not less than five (5) calendar years (for subsequent reassessments), not exceeding 66 months.** Until all shrink sleeves or other shielding coatings are removed, compressor station discharge sections with shrink sleeves must be ILI inspected and anomalies repaired on an interval of no less than every five (5) calendar years (for subsequent reassessments), not to exceeding 66 months.
- d. All shielded coatings including shrink sleeves identified within *special permit segments* that are non-piggable must be removed prior to operating at the alternative MAOP.
- e. All shielded coatings including shrink sleeves identified within *special permit segments* that are within an HCA, Class 2 location, or Class 3 location must be removed within one (1) year of grant of this special permit.
- **TETLP completed removal of coatings identified in Condition 4(e) prior to the October 28, 2015 renewal of this special permit. Condition 4(e) is not required during this special permit renewal period (October 28, 2015 through October 28, 2020).**
- f. TETLP must develop a technical report that will define the results from the in-line inspections, the excavation inspections, the corrosion growth model and the technical basis for determining the re-inspection frequency to monitor corrosion associated with shrink sleeves proactively. Results of this technical report must be submitted with the Annual Report in accordance with **Condition 14.**
- **TETLP completed removal of coatings identified in Condition 4(f) prior to the October 28, 2015 renewal of this special permit and is not required during this special permit renewal interval (October 28, 2015**

through October 28, 2020).

- g. The results of the work conducted to comply with **Conditions 4 (a), (b), (c), (d) and (e)** must be submitted annually as required in **Condition 14** to the Director, PHMSA, OPS Eastern Region with a copy sent to the Director, PHMSA, OPS Engineering and Research Division.

- 5. **Cased Crossings:** TETLP must identify all casings within the *special permit segments* and identify any casings which are “metallically shorted” (the carrier pipe and the casing are in metallic contact) or “electrolytically coupled” (the casing is filled with an electrolyte) using a commonly accepted method such as the Panhandle Eastern, Pearson, DCVG, ACVG, or AC Attenuation.
 - a. **Metallic Shorts:** TETLP must clear any metallic short on a casing in the *special permit segments* after the short is identified.
 - b. **Electrolytic Couple:** TETLP must remove the electrolyte from the casing/pipe annular space on any casing in the *special permit segments* that has an electrolytic couple after the couple is identified.
 - c. **All Shorted or Coupled Casings:** TETLP must install external corrosion control test leads as required to facilitate the future monitoring for shorted or coupled conditions (when access to a feature such as a casing vent pipe is available at the surface, test leads may not be necessary) and may then choose to fill the casing/pipe annular space with a high dielectric casing filler or other material which provides a corrosion inhibiting environment provided an assessment and all associated repairs were completed.

If TETLP identifies any electrolytically coupled casings within the *special permit segments*, they must monitor all casings within the *special permit segments* for couples at least once each calendar quarter, but at intervals not to exceed 100 days, for four (4) consecutive calendar quarters. The intent is to identify through monitoring the calendar quarter(s) when electrolytically coupled casings are most likely to be identified. TETLP must then monitor all casings within the *special*

permit segments at least once each calendar year during the calendar quarter(s) when electrolytic casing couples are most likely to be identified. Any casing shorts or couples found in the *special permit segments* at any time must be classified and cleared as explained above, within six (6) months of finding the casing short or couple.

6. **Temperature Control:** The compressor station discharge temperature must be limited to 120° Fahrenheit. A temperature above this maximum temperature of 120° Fahrenheit may be approved up to 150° Fahrenheit if TETLP's technical coating long-term operating tests show that the pipe coating will properly withstand the higher operating temperature for long-term operations. TETLP does not have a history of routine operation at temperatures exceeding 120° Fahrenheit. If the temperature exceeds 120° Fahrenheit, TETLP must also institute a coating monitoring program in these areas, using ongoing Direct Current Voltage Gradient (DCVG) surveys or Alternating Current Voltage Gradient (ACVG) surveys or other testing to demonstrate the integrity of the coating. This monitoring program and results must be provided to the Director, PHMSA, OPS Eastern Region; Director, PHMSA, OPS Standards and Rulemaking Division; and Director, PHMSA, OPS Engineering and Research Division at least 60 days prior to implementation of the increased temperature or special permit operations.

Compressor Discharge Temperature – operating above 120° F and up to 150° F maximum, FBE coating:

- a. TETLP must monitor coating and corrosion protection systems performance in areas where operating temperatures have exceeded or will exceed 120° F to provide additional data on the long-term durability and integrity of FBE coatings at these temperatures. CP current requirements and coating surveys with DCVG or ACFG will indicate if there is deterioration in the coating at the higher temperatures. TETLP may be approved by Director, PHMSA, OPS Eastern Region and Director,

PHMSA, OPS Engineering and Research Division to run other technically equivalent surveys.

- b. DCVG or ACVG coating evaluation survey results must be addressed as specified in **Condition 10**.
- c. Holiday voltage tests (jeep) and coating adhesion tests must be performed at excavations.
- d. Disbonded or blistered coating (with cracking and other damage that will compromise cathodic protection) found during excavations must be removed, and new coating applied to restore the coating to at least its original dielectric and adhesion properties.
- e. Schedule – baseline coating assessment, and DCVG or ACVG must be completed within the two (2) year period prior to the increase in operating pressure, and after one (1) year, three (3) years, and in concert with ILI survey, both initial and second ILI Tool run (future ILI runs).
- f. Surface temperatures of the pipe must be monitored during winter and summer operating conditions at '0' miles and at a downstream mileage to assure that the surface temperatures do not exceed 120° F. If it is determined that the temperature at this point exceeds 120° F, the survey distance will be increased to the point where the temperature is below 120° F.
- g. TETLP must submit to Director, PHMSA, OPS Eastern Region with a copy sent to the Director, PHMSA, OPS Engineering and Research Division a summary report of any coating evaluation surveys and excavation/remediation results with the Annual Report required under **Condition 14**.
- h. Repairs to fusion bond epoxy coatings must be with a compatible coating system that will bond together, be resistant to soil stresses, and not shield cathodic protection.
- i. If the results of the coating monitoring program show operating temperatures that are in excess of 120° F are causing coating degradation in excess of the coating degradation for pipe operating below 120° F,

TETLP will install facilities or change operating conditions as needed to lower operating temperature below 120° F, within one (1) year of the findings.

7. **Uprating Existing Pipeline Segments:** TETLP must meet the following criteria on any *special permit segment* operating at the alternative MAOP above 72% SMYS in Class 1 locations, 60% SMYS in Class 2 locations, or 50% SMYS in Class 3 locations. Class 1, 2, and 3 locations, and HCAs in the *special permit segments* must meet the following conditions:
- a. All existing pipeline *special permit segments* in Class 1, 2, and 3 locations must be hydrostatically tested to meet the requirements of 49 CFR § 192.620(a)(2)(ii).
 - b. All pipeline *special permit segments* that have a change in class location from a Class 1 to Class 2 location or Class 2 to Class 3 location must meet the operating hoop stress and hydrostatic test requirements of 49 CFR § 192.611(a) for the alternative MAOP.
 - c. All pipeline *special permit segments* located in HCAs must not be operated above 72% specified minimum yield strength (SMYS). When future Class location and integrity management (IM) surveys, as required in 49 CFR § 192.609 and 49 CFR Part 192, Subpart O, identify new HCAs in *special permit segments* that operate above 72% SMYS, the pipe must be replaced to ensure the design factor remains at 72% SMYS (0.72 design factor) or below. These pipe replacements must be completed within two (2) years of survey identification of new HCAs located in *special permit segments* operating above 72% SMYS.
- **TETLP completed all hydrostatic testing required under Condition 7(a) prior to the October 28, 2015 renewal of this special permit.**
 - **Condition 7(a) is not required during this special permit renewal period (October 28, 2015 through October 28, 2020) unless new pipe or other facilities are added to the *special permit segment*.**

8. **Interference Currents Control:** Control of induced Alternating Current (AC) from parallel electric transmission lines and other interference issues in the *special permit segments* that may affect the pipeline must be incorporated into the operations of the pipeline and must be addressed. An induced AC and/or Direct Current (DC) program to protect the pipeline *special permit segments* from corrosion caused by stray currents must be in place. TETLP must have procedures that include a continuing program for interference current mitigation including a high voltage AC program and DC program.
9. **Initial Close Interval Survey (CIS):** TETLP must have performed a CIS on the pipeline in the *special permit segments* within the two (2) years immediately prior to the increase in operating pressure above the existing MAOP to the alternative MAOP. For all CIS readings that no longer meet 49 CFR Part 192, Subpart I, TETLP must remediate low cathodic protection (CP) in the *special permit segments* within six (6) months of the grant of this special permit and prior to operating at the alternative MAOP pressure. TETLP must integrate the CIS results with the In-Line Inspection (ILI) Tool results to determine whether any further action is needed.
- **TETLP completed the initial close interval survey identified in Condition 9 prior to the October 28, 2015 renewal of this special permit.**
 - **Condition 9 is not required during this special permit renewal period (October 28, 2015 through October 28, 2020).**
10. **Pipeline Integrity Assessments:** To verify the pipeline coating conditions and to remediate any integrity issues, TETLP must comply with the following requirements:
- a. Prior to operating at the alternative MAOP, TETLP must verify pipeline coating conditions by performing either a DCVG⁵ or ACVG survey in all Class 2, Class 3 locations, and HCAs in the *special permit segments*.

⁵ Where TETLP has performed both DCVG and/or ACVG surveys and a discrepancy exists regarding the severity, TETLP must provide a technical basis for using the lesser of the two readings.

- i. Prior to operating at the alternative MAOP, TETLP must excavate, evaluate and repair/remediate:
 1. All Severe⁶ coating indications that are located in Class 2, Class 3, or HCAs, and that are aligned with any of the following conditions.
 - a. ILI indications of external corrosion greater than 10% through wall.
 - b. CIS areas that do not meet a CP criterion per Part 192, Subpart I.
 - c. ILI indications of dents greater than 4% but less than 5%, or with a strain 5% or greater.
 2. Some⁷ moderate coating indications that are located in Class 2, Class 3, or HCA areas, and that are aligned with any of the following conditions.
 - a. ILI indications of external corrosion greater than 10% through wall.
 - b. CIS areas that do not meet a CP criterion per 49 CFR Part 192, Subpart I.
 - c. ILI indications of dents greater than 4% but less than 5% with a strain 5% or greater
 3. Some of the remaining⁸ severe coating indications that are located in Class 2, Class 3, or HCAs but are not aligned with ILI, CIS or dent indications.
- ii. After operating at the alternative MAOP, TETLP must excavate, evaluate and repair/remediate 25% of the remaining Severe coating indications in each year so that all Severe coating indications have

⁶ A Severe coating indication is defined as having a DCVG value equal to or greater than 55% IR or an ACVG value of equal to or greater than 75 dB μ V. All other coating indications are defined as moderate.

⁷ “Some” in **Condition 10(a)(i)(2)** means a statistically valid sample of not less than 20% of the aligned moderate coating indications.

⁸ “Some of the remaining” in **Condition 10 (a)(i)(3)** means a statistically valid sample of not less than 20% of the non-aligned severe coating indications.

been excavated, evaluated, and repaired/remediated within four (4) years from the issue date of this special permit and prior to any renewal of this special permit.

As noted above in **Condition 10(a)**, TETLP must remediate and repair any damaged coating indications found during these assessments that are classified as severe (equal to or above 55% IR for DCVG surveys and equal to or above 75 dB μ V for ACVG surveys) as found in surveys between Uniontown and Marietta compressor stations. If during any of these coating surveys or excavations TETLP finds coating indications that threaten the integrity of the pipeline, TETLP must provide a technical justification to the Director, PHMSA, OPS Eastern Region (and appropriate local authorities) with a copy sent to the Director, PHMSA, OPS Engineering and Research Division for continuing to operate at the alternative MAOP. Such technical justification could be (but not limited to) a root cause analysis showing that the threat identified is unique and localized and not systemic.

- **TETLP completed verification of pipeline coating conditions by performing either DCVG or ACVG surveys identified in Condition 10(a) prior to the October 28, 2015 renewal of this special permit.**
 - **Condition 10(a) is not required during this special permit renewal period (October 28, 2015 through October 28, 2020).**
- b. Within one (1) year of the special permit grant date, TETLP must perform in-line inspection (ILI) assessment of any portions of the *special permit segments* that have not been inspected with ILI in the preceding two (2) years prior to the granting of this special permit. For any such ILI assessment and any future ILI assessment, TETLP shall use ILI tools (both high resolution magnetic flux leakage (MFL), and either geometry or deformation tools). TETLP must remediate any conditions discovered from any ILI assessment in accordance with **Condition 12** of the special

permit. TETLP must reassess its pipelines with such ILI tools along the entire length of the *special permit* segments every five (5) calendar years, not exceeding 66 months provided that the coating surveys performed show no further deterioration in coating condition. If there continues to be coating degradation, then the ILI and CIS interval shall remain at four (4) calendar years not to exceed 54 months as required in the original special permit.

- **TETLP completed baseline ILI assessments identified in Condition 10(b) prior to the October 28, 2015 renewal of this special permit.**
 - **Baseline ILI assessments required by Condition 10(b) are not required during this special permit renewal period (October 28, 2015 through October 28, 2020).**
 - **ILI reassessments and remediation defined in Conditions 10(b) and 12 are required during this special permit renewal period (October 28, 2015 through October 28, 2020)**
- c. TETLP must perform close interval surveys (CIS) of the *special permit segments* in accordance with 49 CFR 192.620(d)(7)(iv)(A) in concert and integrated with future ILI assessments, within six (6) months of completion of such ILI assessments, and no less than initially in four (4) calendar years not exceeding 54 months, and thereafter every five (5) calendar years, not exceeding 66 months. For all CIS readings or areas that no longer meet 49 CFR Part 192, Subpart I, TETLP must remediate low cathodic protection (CP) in the *special permit segments* within six (6) months. Remediation shall include repair in accordance with **Condition 12** of any conditions discovered, repair of any damaged pipe coating and/or CP system modifications necessary to ensure corrosion control in accordance with 49 CFR Part 192, Subpart I. Remediation of these areas shall be achieved such that the synchronously interrupted ‘off’ potentials are not below -900 mV and are not more negative than -1200 mV; or the

'on' potentials are not more negative than -3 volts with the protective current applied.

- d. TETLP must provide data integration from all surveys to the Director, PHMSA, OPS Eastern Region; Director, PHMSA, OPS Engineering and Research Division; and the Director, PHMSA, OPS Standards and Regulations Division with the annual report required under **Condition 14**. Data integration must include ILI surveys, CIS surveys, depth of cover surveys, rectifier readings, test point survey readings, AC/DC interference surveys, and pipe coating and anomaly evaluations from pipe excavations and pipe exposures from encroachments.
- e. In the Annual Reports required under **Condition 14**, TETLP must provide to the Director, PHMSA, OPS Eastern Region; the Director, PHMSA, OPS Engineering and Research Division; and the Director, PHMSA, OPS Standards and Rulemaking Division, written documentation of:
 - i. All anomalies repaired or scheduled for repair in the preceding calendar year.
 - ii. Status of the cathodic protection (CP) system on the entire TETLP pipeline *special permit segments* and any changes, proposed changes, or actual changes to the CP system for the preceding two (2) calendar years.
- f. If any annual cathodic protection (CP) test station readings on the TETLP pipeline *special permit segments* fall below 49 CFR Part 192, Subpart I requirements, TETLP must take the following actions:
 - i. Within three (3) months of a low CP test station reading, perform CIS on each side of the affected test station to the next test station in either direction from the test site.
 - ii. Within 30 days of CIS readings that indicate low CP, perform a DCVG or ACVG survey in accordance with NACE RP 0502-2002, Appendix A, of all pipe locations where CIS results reveal CP levels below the requirements of 49 CFR Part 192, Subpart I.

- iii. Within six (6) months of such low CP test station reading, remediate any low CP discovered from the CIS. Remediation shall include repair in accordance with **Condition 12** of any conditions discovered, repair of any damaged pipe coating, and modifications to corrosion protection system necessary to ensure corrosion control in accordance with 49 CFR Part 192, Subpart I, including repair of damaged pipe coating and/or CP system modifications.
 - 1. Conduct CIS, remediate, and repair any coating indication greater than 35 % IR found as a result of the DCVG (or 50 dB μ V on ACVG) surveys within six (6) months of discovery.
- iv. TETLP may not use high CP impressed currents, outside of -900 mVDC to -1200 mVDC with the protective current synchronously interrupted or more negative than -3.0 volts with the protective current applied to supplement damaged pipe coating.
- v. If factors beyond TETLP's control prevent the completion of any remediation within six (6) months, remediation must be completed as soon as practicable or a letter justifying the delay and providing the anticipated date of completion must be submitted to the Director, PHMSA, OPS Eastern Region, no later than the end of the six (6) months completion date.
- g. Within six (6) months of each CIS required by **Condition 10(c)**, TETLP must perform a depth of cover survey as described in **Condition 3** for the *special permit segments*. Within six (6) months of completion of each ILI required in **Condition 10(b)**, TETLP shall integrate the data from the depth of cover survey, CIS, and ILI assessments.
- h. For all ILI runs, TETLP must perform a run-by-run analysis of the latest vs. the prior ILI runs highlighting any anomalies that have grown by a 10% increase in wall loss, 10% in length or width or a reduction in the safe pressure by 10%. In addition, TETLP must recalculate the corrosion growth rate and apply that rate along with tool tolerances to all safe

pressure calculations and scheduled repair dates. TETLP must submit such run-by-run analysis to the Director, PHMSA, OPS Eastern Region; Director, PHMSA, OPS Engineering and Research Division; and the Director, PHMSA, OPS Standards and Rulemaking Division with the annual report required under **Condition 14**.

- i. For all ILI runs, TETLP must account for ILI tool tolerance and corrosion growth rates when scheduling response times and repairs. TETLP must record, and provide upon request, documentation and technical justification of the values used. TETLP must demonstrate ILI tool tolerance accuracy for each ILI tool run by usage of calibration excavations (minimum of five (5) excavations or known mitigated defects from previous excavations⁹ for each ILI Tool run) and unity plots that demonstrate ILI tool accuracy for depth within +10% accuracy for 80% of the time. The unity plots must show: (i) actual anomaly depth versus predicted depth: and (ii) actual failure pressure/alternative maximum allowable operating pressure (alternative MAOP) versus predicted failure pressure/MAOP. Discovery of a condition is deemed to have occurred within 90 days of any ILI tool run (geometry, deformation or high resolution MFL).
- j. TETLP must take readings at each alternating current (AC) mitigation test coupon location every three (3) months, not to exceed 100 days, for the first five (5) years of operating at alternative MAOP and subsequently take semi-annual readings, not to exceed seven (7) months, with one reading during the calendar quarter of the known or anticipated highest voltage reading. TETLP must also take 24 hour recordings of AC interference voltages at three different AC interference coupon test stations each quarter in each AC mitigation area in conjunction with the test coupon readings. When TETLP subsequently takes semi-annual test coupon

⁹ This will be allowed only when the ILI tool used has similar settings and magnetic flux used along with the same or upgraded software. Any changes to the tools, magnetic flux, setup, software and algorithms will require at least five (5) additional excavations to develop a 'unity' plot or chart.

readings, then the 24 hour test readings are to be taken in conjunction with those test coupon readings. If there are any changes to the amount of electricity/current flowing in any of the co-located high voltage alternating current (HVAC) power lines, such as from additional generation, a voltage up rating, additional lines, or new or enlarged substations, TETLP must perform an AC mitigation survey along the entire co-located pipeline right of way within six (6) months of any such change. TETLP must evaluate any interference greater than 20 Amps per meter squared with the most recent ILI results to determine remediation measures and must remediate any interference greater than 50 Amps per meter squared within six (6) months of the AC mitigation survey. Failure to timely complete this survey and remediation will require TETLP to reduce the pipeline pressure to the pre-special permit MAOP level, 1000 psig, until the survey and remediation has been completed and approved by the Director, PHMSA, OPS Eastern Region.

- k. At least once every five (5) calendar years not exceeding 66 months, TETLP must perform an engineering analysis on the effectiveness of the alternating current (AC) and direct current (DC) mitigation measures and must evaluate any AC interference between 20 and 50 Amps per meter squared. In evaluating such interference, TETLP shall integrate AC interference data with the most recent ILI results to determine remediation measures. If TETLP does not remediate AC interference between 20 and 50 Amps per meter squared, TETLP shall provide an engineering justification for not remediating such interference to the Director, PHMSA, OPS Eastern Region, who may accept or reject the justification and require remediation. Within three (3) months of the engineering analysis, TETLP shall remediate any AC interference greater than 50 Amps per meter squared. Remediation means the implementation of performance measures including, but not limited to, additional grounding along the pipeline to reduce interference currents. Any DC interference that results in CP levels that do not meet the requirements of 49 CFR Part

192, Subpart I, must be remediated within three (3) months of this evaluation.

1. TETLP must install and perform continuous remote monitoring of all rectifiers on the pipe in the *special permit segments* within six (6) months of the date of grant of this special permit. The remote monitoring units will be set to alarm for a power outage, 25% drop in DC output voltage and 25% drop in DC output current. The alarms may be set for a 6-hour delay to accommodate maintenance and short duration power outages. TETLP must investigate alarms received within seven (7) calendar days. Remediation must take place as soon as practical depending on the type of problem encountered with the rectifier unit but in less than two (2) months as a maximum. TETLP must install and monitor a remote reference cell to ensure that there is proper cathodic protection on the line in the vicinity of the rectifier.
 - **TETLP completed installation of continuous remote monitoring units prior to the October 28, 2015 renewal of this special permit.**

11. Initial In-Line Inspection: TETLP must have performed an initial In-Line Inspection (ILI) of the pipeline in the *special permit segments* within the two (2) years immediately prior to operating at the alternative MAOP using a high-resolution magnetic flux leakage (MFL) tool and a deformation and/or geometry tool(s) (with sensing multi-finger calipers which contact the pipe internally, with a tolerance of +/- 1% accuracy for deformation tools, to find expanded pipe and dents). The results of the initial ILI must be integrated with the initial CIS and DCVG/ACVG surveys required in accordance with 49 CFR § 192.620(d) and **Conditions 9 and 10** of this special permit. TETLP must evaluate and repair all “Repair Immediately” and “Repair within One Year” anomalies in accordance with **Condition 12** below prior to increasing the pressure above the existing MAOP to the alternative MAOP.

- a. The results of all deformation and geometry tool run results for expanded pipe and dents must be analyzed and submitted to the PHMSA Director,

OPS Eastern Region. TETLP must review with PHMSA Director, OPS Eastern Region, the deformation and/or geometry tool reports. This analysis will consider pipe properties and property distributions, hydrostatic test pressures and reported test behavior, and pipe end to center variations. TETLP must evaluate and remediate all pipe prior to implementing the alternative MAOP in accordance with the guidelines in PHMSA document titled “Interim Guidelines for Confirming Pipe Strength in Pipe Susceptible to Low Strength” dated September 10, 2009, (“interim guidelines”) in conducting deformation tool runs, evaluation, excavation and remediation. All expanded pipe “interim guidelines” are subject to change as new integrity information is acquired through pipe properties testing and research from this and other projects.

- b. TETLP must remove, replace, and metallurgically test all low strength pipe in accordance with **Condition 11(a)**. TETLP must report all removals, replacements, and metallurgical tests for low strength pipe to the Director, PHMSA, OPS Eastern Region with a copy sent to the Director, PHMSA, OPS Engineering and Research Division prior to increasing the MAOP up to the alternative MAOP.
 - **TETLP completed initial ILI (high-resolution magnetic flux leakage (MFL) tool and a deformation and/or geometry tool(s)) identified in Condition 11 prior to the October 28, 2015 renewal of this special permit.**
 - **Condition 11 is not required during this special permit renewal period (October 28, 2015 through October 28, 2020).**
 - **ILI reassessment intervals for the *special permit segments* are in Condition 10(b).**

12. **Anomaly Evaluation and Repair:** All anomaly evaluations and repairs in the *special permit segments* for the life of this special permit, regardless of HCA status, must be performed, based upon the following:

- a. Anomaly Response Time: **Repair Immediately**

- i. Any anomaly within a *special permit segment* operating up to 80% SMYS with either: (1) a failure pressure ratio (FPR) equal to or less than 1.1; (2) an anomaly depth equal to or greater than 60% wall thickness loss.
 - ii. Any anomaly within a *special permit segment* operating up to 67% SMYS with either: (1) an FPR equal to or less than 1.25; (2) an anomaly depth equal to or greater than 60% wall thickness loss.
 - iii. Any anomaly within a *special permit segment* operating up to 56% SMYS with either: (1) an FPR equal to or less than 1.4; (2) an anomaly depth equal to or greater than 60% wall thickness loss.
- b. Anomaly Response Time: **Repair Within One Year**
- i. Any anomaly within a *special permit segment* operating at up to 80% SMYS with either: (1) an FPR equal to or less than 1.25; (2) an anomaly depth equal to or greater than 40% wall thickness loss.
 - ii. Any anomaly within a *special permit segment* operating at up to 67% SMYS with either: (1) an FPR equal to or less than 1.5; (2) an anomaly depth equal to or greater than 40% wall thickness loss.
 - iii. Any anomaly within a *special permit segment* operating at up 56% SMYS with either: (1) an FPR equal to or less than 1.8; (2) an anomaly depth equal to or greater than 40% wall thickness loss.
 - iv. Removal of all shrink sleeves over girth welds with pipe wall loss of 30% or greater under the shrink sleeve
- c. Anomaly Response Time: **Monitored Conditions**
- i. Anomalies not requiring immediate or one-year repairs in accordance with **Conditions 12(a) and (b) above** must be reassessed according to 49 CFR Part 192, Subpart O reassessment intervals.
 - ii. Each anomaly not repaired under the immediate or one (1) year repair requirements must have a corrosion growth rate and ILI tool tolerance assigned per TETLP's Gas Integrity Management Program (IMP) to determine the maximum re-inspection interval.

d. Anomaly Assessment Methods

- i. TETLP must confirm the remaining strength (R-STRENG) effective area method, R-STRENG - 0.85dL, and ASME B31G assessment methods are valid for the pipe diameter, wall, thickness, grade, operating pressure, operating stress level, and operating temperature.
- ii. Dents in the pipe in the *special permit segments* must be evaluated using high resolution MFL and high resolution caliper or deformation ILI methods and repaired in accordance with the following table. TETLP will also integrate the results of the DCVG surveys with MFL and caliper or deformation tool ILI data to identify areas of potential mechanical damage.
 1. TETLP must excavate, evaluate, and repair (if required) a minimum of two (2) plain dents $\leq 5\%$ or $> 2\%$ OD Deep for each ILI Tool run for coating repair and cracking. TETLP may elect to perform a technical study to evaluate the coating condition and pipe integrity as determined from these excavations, after the ILI reassessment and prior to submitting special permit renewal, and submit this report to the Director, PHMSA, OPS Eastern Region and the Director, PHMSA, OPS Engineering and Research Division for review. If this technical report demonstrates dents do not cause coating or pipe integrity concerns, the Director, PHMSA, OPS Eastern Region may waive or modify future excavation requirements. If TETLP elects to conduct a technical study, it must be conducted after completion of the first ILI reassessment, completion of excavations, and prior to submitting special permit renewal as required in **Limitation 7**.
 2. TETLP must conduct a fatigue analysis of all in-service dents above 4% or with total strain above 4% after each

high resolution MFL and high resolution caliper or deformation ILI evaluations that have not been evaluated and a fatigue analysis conducted from past ILI runs that meets this paragraph. Dent fatigue analysis must include as a minimum the following:

- a. Gross geometry of dent,
- b. Orientation of dent,
- c. Soil cover and type
- d. Pressure and temperature, including cycles
- e. Stress and strains caused by terrain

The overall remaining fatigue life of the dents must be either twice the designated remaining life of the pipeline or at least 500 years. In the event the fatigue analysis indicates a remaining life less than 500 years and is less than twice the designated remaining life of the pipeline, TETLP shall excavate and investigate a statistically representative sample of the most significant dents (per the analysis) and define their fitness for service. TETLP must provide a technical report to PHMSA defining the test results, the fatigue analysis of the dents and the re-inspection plan (including frequency) to ensure fitness for service of all dents above 4% or with total strain above 4%.

- **TETLP completed the dent fatigue life analysis of all existing in-service dents identified in Condition 12(d)(ii)(2) prior to the October 28, 2015 renewal of this special permit.**
- **Condition 12(d)(ii)(2) is not required during this special permit renewal period for dents over 4% that been evaluated and a fatigue analysis conducted from past ILI runs with either twice the designated remaining life of the pipeline or at least 500 years.**
- **Condition 12(d)(ii) is for the evaluation of past construction dents and will be reviewed in the next renewal period (2020) for possible replacement with § 192.933 for dent evaluation.**

3. TETLP must conduct a DCVG or ACVG survey and excavate, evaluate, and repair all dents above 4% depth with coating damage found that does not meet Condition 10 (f)(iii)(1) criteria.

- TETLP completed the excavation and repair of dents above 4% depth which coating damage found that did not meet Condition 10(f)(iii)(1) criteria prior to the October 28, 2015 renewal of this special permit.
- Condition 12(d)(ii)(3) is required during this special permit renewal period (October 28, 2015 through October 28, 2020), if dents are found that meet this criteria.

Defect Type	Orientation	Required Response
Dent Associated with Metal Loss ¹⁰ , Cracks or Stress Risers	Top or Bottom	Immediate
Plain Dent (any depth)	Top	1 Year Scheduled
Plain Dent > 5 % OD Deep or that exhibits total strain > 5 %	Bottom	1 Year Scheduled
Plain Dent ≤ 5 % OD Deep or that exhibits total strain ≤ 5%	Bottom	Monitored
Plain Dent > 2% OD Deep Associated with Girth or Seam Weld	Top or Bottom	1 Year Scheduled
Definitions		
1. <u>Plain Dent</u> – Dent without metal loss or stress riser. 2. <u>Immediate Response</u> – Reduce pressure to 80% of the maximum pressure observed between the time the ILI was performed and receipt of the final report. To the extent possible, reduce operating pressure within five (5) days of finding, then review and implement safe digging pressure, perform excavation, evaluate deformation, and perform mitigation and repair as necessary. 3. <u>Scheduled Response</u> – Schedule excavation within an appropriate time frame based on the opinion of the SME (not to exceed 365 days).		

¹⁰ “Metal loss” is defined as any gouges or any identified corrosion metal loss or any wall thickness loss amount, from any process including but not limited to mechanical damage, external corrosion, etc.

4. Monitored – Catalog data for future monitoring.

e. Change in Class: Anomaly Repair

- i. TETLP may upgrade pipe in *special permit segments* in accordance with §§ 192.609 and 192.611 from a Class 1 location to a Class 2 location, or from a Class 2 location to a Class 3 location. These upgraded class location *special permit segments* must have all anomalies evaluated and repaired prior to operating at the alternative MAOP based upon the “original pipeline class location” and **Condition 12**.
 - ii. TETLP must evaluate and repair all future class location changes from Class 1 location to Class 2 location and Class 2 location to Class 3 location in accordance with § 192.611, based upon the “original pipeline class location” and **Condition 12**.
- **TETLP completed the evaluation and repair of anomalies areas that have changed from Class 1 locations to Class 2 locations and from Class 2 locations to Class 3 locations based on the original pipeline class location and Condition 12 prior to the October 28, 2015 special permit renewal.**
 - **Condition 12(e)(i) is not required during this special permit renewal period (October 28, 2015 through October 28, 2020) since this was conducted prior to the October 28, 2015 special permit renewal. Anomalies found in a special permit segment must meet Condition 12 repair criteria for the class location.**

13. **Controlling Internal Corrosion:** For low volume, less than 1 MMCFD, natural gas receipt tie-ins to the *special permit segments*, TETLP may use a dual channel gas analyzer for moisture and carbon dioxide measurement instead of a

chromatograph specified in 49 CFR § 192.620 (d)(5)(iii) for a maximum of five (5) receipt tie-ins.

- a. Gas and moisture analyzers must continuously monitor the gas stream and must be calibrated on a monthly basis using a certified sample.
- b. Hydrogen sulfide in these natural gas receipt tie-ins must be less than or equal to 8 ppm and sampled on a quarterly basis. If hydrogen sulfide concentrations exceed 8 ppm, TETLP must start continuous monitoring of hydrogen sulfide.

14. **Annual Reporting:** TETLP must report the following to the Director, PHMSA, OPS Eastern Region; the Director, PHMSA, OPS Engineering, Research; and the Director, PHMSA, OPS Standards and Rulemaking Division annually¹¹:

- a. The results of ILI or direct assessment results performed within the *special permit segments* during the previous year;
- b. The results of shrink sleeve assessments performed within the *special permit segments* during the previous year;
- c. A list of all repairs on the pipeline in the *special permit segments* made during the previous year;
- d. The status of the CP system, any changes made to the CP system during the previous year and any proposed changes, as specified in **Condition 10(e)**;
- e. Any new integrity threats identified within the *special permit segments* during the previous year;
- f. The number of new residences, other structures for human occupancy and public gathering areas built within the *special permit segments*;
- g. Any class or HCA changes in the *special permit segments* during the previous year including location – Length, Mile Post, County, and State;

¹¹ Annual reports must be received by PHMSA by the last day of the month in which the Special permit is dated. For example, the annual report for a Special Permit dated August 4, 2010, must be received by PHMSA no later than August 31st each year beginning in 2011.

- h. Any reportable incidents associated with the *special permit segments* that occurred during the previous year;
- i. Any leaks on the pipeline in the *special permit segments* that occurred during the previous year;
- j. On-going damage prevention initiatives on the pipeline in the *special permit segments* and a discussion of their success or failure; and
- k. Any company mergers, acquisitions, transfers of assets, or other events affecting the regulatory responsibility of the company operating the pipeline to which this special permit applies.
- l. Summary report of all annual findings in **Condition 10(d)** (data integration) and **Condition 10(h)** (ILI run-by-run analysis for anomaly growth).

15. **Certification:** A senior executive officer of TETLP must certify in writing the following:

- a. That the TETLP pipeline meets the conditions described in this special permit and 49 CFR Part 192 for the *special permit segments*,
- b. TETLP has maintained the following records for each *special permit segment*:
 - i. Documentation showing that each *special permit segment* has received a 49 CFR § 192.505, Subpart J, hydrostatic test for 8 continuous hours and at a minimum pressure as required by **Condition 7** of this special permit. If TETLP does not have hydrostatic test documentation, then the *special permit segment* must be hydrostatically tested to meet this requirement within one year of receipt of this special permit in accordance with 49 CFR Part 192 and prior to operating at the alternative MAOP.
 - ii. Documentation (mill test reports) certifying that the pipe in each *special permit segment* meets the requirements for wall thickness, yield strength, ultimate tensile strength and chemical composition of either the American Petroleum Institute Standard 5L, 5LX or

- 5LS, “Specification for Line Pipe” (API 5L) approved by the 49 CFR Part 192 code at the time of manufacturing or if pipe was manufactured and placed in-service prior to the inception of 49 CFR Part 192, that the pipe meets the API 5L standard in use at that time. Any *special permit segment* that does not have mill test reports for the pipe cannot be authorized per this special permit.
- iii. Documentation of compliance with all conditions of this special permit must be retained for the applicable life of this special permit for the referenced *special permit segments*.
 - c. TETLP must notify the Director, PHMSA, OPS Eastern Region, at least 14 days prior to conducting all field activities for **Conditions 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12** of this special permit in the *special permit segments*.
 - d. That the written manual of O&M procedures for the TETLP pipeline has been updated to include all additional operating and maintenance requirements of this special permit and 49 CFR Part 192 applicable sections; and
 - e. That TETLP has reviewed and modified its damage prevention program relative to the TETLP pipeline to include any additional elements required by special permit.

TETLP must send a copy of the certification, with the required senior executive signature, and date of signature to the PHMSA Director, OPS Eastern Region; Deputy Associate Administrator, PHMSA, OPS Policy and Programs; Director, PHMSA, OPS Standards and Rulemaking Division; and the Director, PHMSA, OPS Engineering and Research Division within one (1) year after renewal of this special permit.

Limitations:

PHMSA grants this special permit subject to the following limitations:

- 1) PHMSA has the sole authority to make all determinations on whether TETLP has complied with the specified conditions of this special permit.
- 2) Failure to submit the certifications required by **Condition 15** within the time frames specified therein may result in automatic revocation of this special permit.
- 3) PHMSA may revoke, suspend, or modify a special permit based on any finding listed in 49 CFR § 190.341(h)(1) and may then require TETLP to comply with the regulatory requirements in 49 CFR §§ 192.112 and 192.620. As provided in 49 U.S.C. Chapter 601 and 49 CFR Part 190, PHMSA may also issue an enforcement action for failure to comply with this Order. Any work plans and associated schedules shall be automatically incorporated into this order and are enforceable in the same manner.
- 4) Should PHMSA revoke, suspend or modify a special permit based on any finding listed in 49 CFR § 190.341(h)(1), PHMSA will notify TETLP in writing of the proposed action and provide TETLP an opportunity to show cause why the action should not be taken. In accordance with 49 CFR § 190.341(h)(3), if necessary to avoid the risk of significant harm to persons, property, or the environment, PHMSA will not give advance notice and will declare the proposed action (revocation, suspension, or modification) immediately effective.
- 5) The terms and conditions of any corrective action order, compliance order or other order applicable to a pipeline facility covered by this special permit will take precedence over the terms of this special permit in accordance with 49 CFR § 190.341(h)(4).
- 6) If TETLP sells, merges, transfers, or otherwise disposes of the assets known as the *special permit segments*, TETLP must provide PHMSA with written notice of the transfer within 30 days of the consummation date. In the event of such transfer, PHMSA reserves the right to revoke, suspend, or modify the permit if the transfer constitutes a material change in conditions or circumstances pursuant to 49 CFR § 190.341(h)(1)(ii) or any other circumstances listed under 49 CFR § 190.341(h)(1).

7) PHMSA grants this special permit renewal from October 28, 2015, through October 28, 2020. If TETLP elects to seek further renewal of this special permit, TETLP must submit its renewal request at least 180 days prior to expiration of the five (5) year period to the PHMSA Associate Administrator for Pipeline Safety with copies to the Deputy Associate Administrator, PHMSA, OPS Policy and Programs; Director, PHMSA, OPS Eastern Region; Director, PHMSA, OPS Standards and Rulemaking Division; and the Director, PHMSA, OPS Engineering and Research Division. PHMSA will consider requests for a special permit renewal for up to an additional five (5) year period. All requests for a special permit renewal must include a summary report in accordance with the requirements in **Condition 14** above and must demonstrate that the special permit is still consistent with pipeline safety. PHMSA may seek additional information from TETLP prior to granting any request for special permit renewal.

AUTHORITY: 49 U.S.C. 60118 (c)(1) and 49 CFR § 1.53.

Issued in Washington, DC on FEB 11 2016.



Jeffrey D. Wiese
Associate Administrator for Pipeline Safety