



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

SEP 02 2015

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

Mr. Shawn L. Patterson
President, Operations and Project Delivery
Columbia Pipeline Group, Inc.
1700 MacCorkle Avenue, SE
Charleston, WV 25314

Ref: Special Permit Renewal -April 13, 2015 to December 31, 2016

PHMSA-2008-0345

Dear Mr. Patterson:

By letter dated July 30, 2014, the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), notified Columbia Pipeline Group, Inc. (CPG), owner of the Columbia Gas Transmission, LLC (CGT) pipeline system, that special permit PHMSA-2008-0345 would expire on April 13, 2015, unless renewed. By letter dated August 28, 2014, CPG applied for a renewal of the CGT special permit. On November 4, 2014, PHMSA published a Federal Register notice concerning this special permit renewal (79 FR 65477). No public comments were received. The special permit renewal request letter and all other pertinent documents are available for review in Docket No. PHMSA-2008-0345, in the Federal Docket Management System (FDMS) located at www.regulations.gov.

On July 14, 2015, CPG notified PHMSA that the three (3) CGT special permit segments located in Lawrence County, Ohio, would be replaced in accordance with 49 Code of Federal Regulations (CFR) Part 192 for the current class location and a special permit renewal would only be needed through December 31, 2016.

Renewal of this special permit would continue the waiver of compliance with 49 CFR § 192.611 for three (3) natural gas transmission segments of the 24-inch CGT pipeline system, where the pipeline class location has changed from a Class 1 to a Class 3 location.

PHMSA has reviewed all operational and maintenance data submitted by CPG for the CGT special permit renewal and finds that CGT continues to meet the terms of the special permit. PHMSA has updated the special permit renewal terms based on changes in the special permit segments and operations. Specifically, this special permit renewal will expire on December 31, 2016, when the CGT pipeline segments must meet 49 CFR Part 192 for the current class location or the maximum allowable operating pressure (MAOP) must be lowered to meet §§ 192.611 and 192.619 for the current class location. Based on the information provided by CPG, PHMSA has determined that renewal of the CGT special permit, as modified, would not be inconsistent with pipeline safety.

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Accordingly, the special permit renewal request for PHMSA-2008-0345, submitted by Columbia Gas Transmission, LLC, owned by Columbia Pipeline Group, Inc., is granted to operate the specified segments from April 13, 2015, through December 31, 2016, for the Columbia Gas Transmission, LLC pipeline system described in the special permit where Class 1 to Class 3 location changes have occurred. Subject to the terms and conditions therein, this special permit renewal Order waives compliance with certain Federal regulations in 49 CFR § 192.611 for three (3) segments of the 24-inch Columbia Gas Transmission, LLC pipeline system located in Lawrence County, Ohio.

My staff would be pleased to discuss this special permit or any other regulatory matter with you. Mr. John Gale, Director, Standards and Rulemaking Division, may be contacted at 202-366-0434 on regulatory matters. Mr. Kenneth Lee, Director, Engineering and Research Division, may be contacted at 202-366-2694, for technical matters and 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-2008-0345)

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

Special Permit Information:

Docket Number: PHMSA – 2008-0345
Requested By: Columbia Gas Transmission, LLC¹
Original Date Requested: December 11, 2008
Original Special Permit: April 13, 2010
Renewal Period: April 13, 2015 through December 31, 2016
Code Section(s): 49 CFR § 192.611

Renewal of Special Permit:

By this order, subject to the terms and conditions set forth below the Pipeline and Hazardous Materials Safety Administration (PHMSA) grants this special permit renewal (PHMSA-2008-0345) from April 13, 2015 through December 31, 2016, to Columbia Gas Transmission, LLC (CGT) waiving compliance from 49 CFR § 192.611(a) for three (3) natural gas transmission pipeline segments located in Lawrence County, Ohio.

Special permit segments 1, 2 and 3 must be completely replaced with pipe compliant with 49 Code of Federal Regulations (CFR) Part 192 for the current class location, by December 31, 2016² or the maximum allowable operating pressure (MAOP) must be lowered to meet §§ 192.611 and 192.619 for the current class location. This special permit renewal eliminates a fourth segment, **special permit segment 4**³, as it is no longer needed due to a change in class

¹ Columbia Gas Transmission, LLC (CGT) is owned by Columbia Pipeline Group, Inc. (CPG). When this special permit was originally issued on April 13, 2010, CGT was previously named Columbia Gas Transmission Company and was owned and operated by NiSource Inc. The CGT pipeline segments described in this special permit are operated by CGT.

² On July 14, 2015, CPG notified PHMSA that *special permit segments 1, 2, and 3* pipe would be replaced in accordance with 49 CFR Part 192 for the current class location and special permit renewal would only be needed through December 31, 2016.

³ *Special permit segment 4* was from survey station 2430+78 to 2441+07 on 24-inch Line R-701.

location from a Class 3 location to a Class 1 location⁴.

Special Permit Segments and Inspection Area:

Lawrence County, Ohio

PHMSA waives compliance from 49 CFR § 192.611(a) for three (3) natural gas transmission pipeline segments on the 24-inch Line R-701 pipeline, where a change has occurred from an original Class 1 location to a Class 3 location or a Class 2⁵ location to Class 3 location in Lawrence County, Ohio. The Federal pipeline safety regulations in 49 CFR § 192.611(a) require natural gas pipeline operators to confirm or revise the maximum allowable operating pressure (MAOP) of a pipeline segment after a change in class location. This special permit allows CGT to continue to operate each *special permit segment* at its current maximum allowable operating pressure (MAOP) of 900 pounds per square inch gauge (psig) for the 24-inch Line R-701.

This special permit applies to the *special permit segments* defined as follows using the CGT 24-inch Line R-701 pipeline survey stationing (Sta.):

- *Special permit segment 1 - 24-inch Line R-701* – 148 feet, Sta. 28+34 to Sta. 29+82
- *Special permit segment 2 - 24-inch Line R-701* - 544 feet, Sta. 133+06 to Sta. 138+50
- *Special permit segment 3 - 24-inch Line R-701* - 2211 feet, Sta. 152+85 to Sta. 174+96

This special permit applies to the *special permit inspection area* defined as follows using the CGT 24-inch Line R-701 pipeline stationing as a reference.

Special permit inspection area – means the area that extends 220 yards on each side of the pipeline centerline along the entire length of the 24-inch Line R-701 pipeline from:

⁴ *Special permit segment 4* was originally classified by CGT as a Class 3 location due to the identification of a single structure that was thought to be occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12 month period. After field verification and further analysis, CGT determined that the structure was not occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12 month period. *Special permit segment 4* is not a Class 3 location and has been confirmed to be a Class 1 location and is being deleted from this special permit. CGT sent a letter to PHMSA confirming the class location survey and results on September 30, 2010, and reconfirmed this survey on July 1, 2015.

⁵ The Class 3 location *special permit segments* were originally a Class 1 location that were upgraded to Class 2 location in accordance with § 192.611 (a) hydrostatic test.

- **Special permit inspection area:** 24-inch Line R-701 - 28.31 miles, Sta. 0+00 to Sta. 1494+96

The **special permit inspection area** is located in Lawrence County, Ohio. The **special permit inspection area** starts downstream of the CGT Burlington, Ohio, pig launcher at Sta. 0+00 and ends at Sta. 1494+96 at approximately 0.76 miles north of Cauley Creek Road. The total length of the **special permit inspection area** is approximately 28.31 miles and includes the **special permit segments**.

PHMSA grants 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-2008-0345 in the Federal Docket Management System (FDMS) located on the internet at www.Regulations.gov.

Conditions:

PHMSA grants this special permit subject to the following conditions:

- 1) **MAOP:** No later than December 31, 2016, **special permit segments 1, 2 and 3** must be completely replaced with pipe compliant with 49 CFR Part 192 for the current class location and a certification letter sent to PHMSA in accordance with Condition 27(a), or the MAOP must be lowered by that date to meet the requirements of §§ 192.611 and 192.619 for the current class location. In the interim, CGT must continue to operate the **special permit segments** at or below their existing MAOP as follows: 24-inch Line R-701 - MAOP 900 psig.
- 2) **Integrity Management Program:** CGT must incorporate each of the **special permit segments** and **special permit inspection area**⁶ into its written integrity management program (IMP) as a “*covered segment*” in a “*high consequence area (HCA)*” per § 192.903, except for the reporting requirements contained in § 192.945. CGT need not include the **special**

⁶ “Each condition that requires CGT to perform an action with respect to the **Special Permit Inspection Area** shall also require CGT to perform that action on all **Special Permit Segments** within such Areas.”

permit segments described in this special permit in its IMP baseline assessment plan unless those segments are in HCAs, in accordance with § 192.905.

- 3) **Close Interval Surveys:** CGT must perform a close interval survey (CIS) of the 24-inch Line R-701 pipeline along the entire length of all *special permit segments* and *special permit inspection area* and remediate any areas of inadequate cathodic protection no later than 21 months after the renewal of this special permit⁷. A CIS and remediation need not be performed if CGT has performed a CIS and remediation on the 24-inch Line R-701 pipeline along the entire length of the *special permit inspection area* less than two (2) years prior to the grant or renewal of this special permit. If factors beyond CGT's control prevent the completion of the CIS and remediation within 21 months, a CIS and remediation must be completed as soon as practicable and a letter justifying the delay and providing the anticipated date of completion must be submitted to the Director, PHMSA Eastern Region⁸ no later than 21 months after the grant or renewal of this special permit.

- 4) **Close Interval Surveys – Reassessment Interval:** CGT must perform periodic CIS of the *special permit segments* and *special permit inspection area* no later than 21 months after the renewal of this special permit. A CIS need not be performed if CGT has performed a CIS of the 24-inch Line R-701 pipeline along its entire length of the *special permit inspection area* less than two (2) years prior to renewal of this special permit. CGT must also integrate CIS data with in-line inspection (ILI) data, and data on any other threats, in accordance with 49 CFR §§ 192.937 (a) and (b), 192.917, and 192.939.

- 5) **Coating Condition Surveys:** Within 21 months of the grant or renewal of this special permit⁹ CGT must perform a Direct Current Voltage Gradient (DCVG) survey or an

⁷ CGT may replace the *special permit segments* with pipe compliant with 49 CFR Part 192 for the current class location, no later than December 31, 2016, instead of conducting a CIS as defined in Conditions 3 and 4.

⁸ “In the case of any Special Permit condition that requires CGT to provide documentation to the PHMSA Region, CGT must also send a copy of such documentation to the appropriate state authorities, in states that have interstate agent agreements with PHMSA.”

⁹ CGT may replace the *special permit segments* with pipe compliant with 49 CFR Part 192 for the current class location, no later than December 31, 2016, instead of conducting a Coating Condition Survey as defined in Condition 5.

Alternating Current Voltage Gradient (ACVG) survey of each *special permit segment* to determine the pipeline coating conditions and must then remediate any integrity issues in the *special permit segments*. A DCVG or ACGV survey and remediation need not be performed on the *special permit segments* if CGT has performed a DCVG or ACGV and remediation in accordance with this special permit condition on the 24-inch Line R-701 pipeline along the entire length of the *special permit inspection area* less than two (2) years prior to the grant or renewal of this special permit. CGT must remediate any damaged coating indications found during these assessments that are classified as moderate (i.e. 35% IR and above for DCVG or 50 dB μ V and above for ACGV) or severe based on NACE International Recommended Practice 0502-2002, "*Pipeline External Corrosion Direct Assessment Methodology*," (NACE RP 0502-2002¹⁰). A minimum of two (2) coating survey assessment classifications must be excavated, classified and/or remediated per each survey crew per each time the survey is performed. If factors beyond CGT's control prevent the completion of the DCVG or ACGV survey and remediation within 21 months of this special permit renewal, a DCVG or ACGV survey and remediation must be performed as soon as practicable and a letter justifying the delay and providing the anticipated date of completion must be submitted to the Director, PHMSA Eastern Region no later than 30 days prior to the expiration date to conduct the survey.

- 6) **Stress Corrosion Cracking Direct Assessment (SCCDA)** : CGT must evaluate the 24-inch Line R-701 pipeline for stress corrosion cracking (SCC) as follows:
 - a) CGT must perform a SCCDA or other appropriate assessment method for SCC [such as pressure test or ILI with a crack detection tool] of the 24-inch Line R-701 pipeline along the entire length of the *special permit inspection area*, according to the requirements of § 192.929 and/or NACE SP 0204-2008 and remediate any SCC found or replace the *special permit segment(s)* with pipe compliant with 49 CFR Part 192 for the current class location, no later than December 31, 2016, after the renewal of this special permit. The SCCDA or other approved method must address both high pH SCC and near neutral pH SCC. A SCCDA need not be performed if CGT has performed a SCCDA of the 24-

¹⁰ When PHMSA adopts a revised edition of a referenced NACE or ASME standard into 49 CFR Part 192, the referenced requirements of those revised standards are automatically incorporated into these special permit conditions.

inch Line R-701 pipeline along the entire length of the *special permit inspection area* less than two (2) years prior to the renewal of this special permit. If factors beyond CGT's control prevent the completion of the SCCDA survey and remediation within 21 months, a SCCDA and remediation must be performed as soon as practicable and a letter justifying the delay and providing the anticipated date of completion must be submitted to the Director, PHMSA Eastern Region no later than 21 months after the renewal of this special permit. CGT may eliminate this Condition 6(a), provided CGT provides an engineering assessment showing that the pipeline does not meet any of the criteria for both near neutral and high pH SCC per the applicable edition of the American Society of Mechanical Engineers Standard B31.8S, "Managing System Integrity of Gas Pipelines" (ASME B31.8S) Appendix A3, or NACE SP 0204-2008, "Stress Corrosion Cracking (SCC) Direct Assessment Methodology", Section 1.2.1.1 and 1.2.2).

- b) When the CGT 24-inch Line R-701 pipeline is exposed for any reason in the *special permit segments* and *special permit inspection area* and the coating has been identified as poor during the pipeline examination, then CGT must directly examine the pipe for SCC using an accepted industry detection practice such as dry or wet magnetic particle tests. Poor coating is a coating that has become damaged and is losing adhesion to the pipe which is shown by falling off the pipe, is porous, has pin holes, and/or shields the cathodic protection. Visual inspection is not sufficient to determine if the coating is damaged and a holiday detection test at the correct voltage must be performed. CGT must keep coating records of all excavation locations for the *special permit segments* and *special permit inspection area* to demonstrate the coating condition.
- 7) **Reporting of Pipe and Coating Remediation:** CGT must submit the DCVG or ACVG, CIS and SCCDA [or other PHMSA approved methods of determining SCC] findings including remediation actions in a written report to the Director, PHMSA Eastern Region, no later than 21 months after the grant or renewal of this special permit.
- 8) **O&M Manual – In-Line Inspection and Reassessment Intervals:** CGT must amend applicable sections of its operations and maintenance (O&M) manual(s) to incorporate the inspection and reassessment intervals by in-line inspection (ILI) including both metal loss

and geometry tools of the 24-inch Line R-701 pipeline along the entire length of the *special permit segments* and *special permit inspection area* at a frequency consistent with 49 CFR Part 192, Subpart O. [Deformation tools may be substituted for geometry tools in accordance with Condition 20 (c).] Condition 20(c) requires CGT to run deformation tools on the pipelines.

- 9) **O&M Manual - CIS Inspection and Reassessment Intervals**: CGT must amend applicable sections of its O&M manual(s) to require CIS inspection and reassessment intervals of the 24-inch Line R-701 pipeline *special permit segments* and *special permit inspection area* at a frequency consistent with 49 CFR Part 192, Subpart O, but at least once every five (5) calendar years at reassessment intervals not exceeding 63 months.

- 10) **In-Line Inspection Initial Assessment**: CGT must perform an ILI assessment along the entire length of the *special permit segments* and *special permit inspection area* using high resolution MFL and deformation in-line inspection tools within six (6) months of issuance of this permit and must remediate discovered conditions in accordance with Condition 20 of this permit. Subsequent ILI assessments of the 24-inch Line R-701 pipeline along the entire length of the *special permit inspection area* must conform to the required maximum reassessment intervals specified in § 192.939, but at least once every five (5) calendar years at reassessment intervals not exceeding 63 months.

- 11) **In-Line Inspection Reassessment Intervals**: CGT must schedule ILI reassessment dates for the 24-inch Line R-701 pipeline along the entire length of the *special permit segments* and *special permit inspection area* according to § 192.939 by adding the required time interval to the previous assessment date, but reassessments must be at least once every five (5) calendar years at reassessment intervals not exceeding 63 months.

- 12) **Damage Prevention Best Practices**: CGT must incorporate the applicable best practices of the Common Ground Alliance (CGA) into its damage prevention program within the *special permit segments* and *special permit inspection area*.

- 13) **Field Activity Advance Notice to PHMSA**: CGT must give a minimum of 14 days advance notice¹¹ to the Director, PHMSA Eastern Region to enable him/her to observe the excavations relating to Conditions 5, 6 (b), 19, 20, 21, 22, 23 and 24 in the *special permit segments* and *special permit inspection area*. Immediate response conditions do not require a 14-day advance notice, but the PHMSA Regional Director must be notified by CGT no later than two (2) business days after the immediate condition is discovered.
- 14) **High Consequence Area Assessments**: CGT must not use this special permit as a basis for deferring any of its assessments for HCAs under 49 CFR Part 192, Subpart O.
- 15) **Annual Reports to PHMSA**: Within three (3) months following the grant or renewal of this special permit and annually¹² thereafter, CGT must report the following to the Director, PHMSA Eastern Region; Director, PHMSA Standards and Rulemaking Division; and submit a copy to the Federal Register Docket (PHMSA-2008-0345) at www.Regulations.gov:
- a) In the first annual report, CGT must describe the economic benefits of the special permit including both the costs avoided from not replacing the pipe and the added costs of the inspection program. Subsequent annual reports should address any changes to these economic benefits.
 - b) In the first annual report, fully describe whether the public benefits from energy availability. This should address the benefits of avoided disruptions as a consequence of pipe replacement and the benefits of maintaining system capacity. Subsequent reports must indicate any changes to this initial assessment.
 - c) The number of new residences, other structures intended for human occupancy and public gathering areas built within the *special permit segments* and *special permit inspection area*.
 - d) Any new integrity threats identified during the previous year and the results of any ILI or direct assessments performed (including any un-remediated anomalies over 30% wall

¹¹ CGTC must give notice of any planned field activities under this special permit to the Director, PHMSA Eastern Region. PHMSA Region Director may elect to not witness and be noticed on some field activities.

¹² 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 April 13, 2010, must be received by PHMSA no later than April 30, each year beginning in 2011. For special permit renewals the annual report date would remain the same reporting month as previously established.

loss; cracking found in the pipe body, weld seam or girth welds; and dents with metal loss, cracking or stress riser) during the previous year in the *special permit segments* and *special permit inspection area*.

- e) Any reportable incident, any leak normally indicated on the DOT Annual Report and all repairs on the pipeline that occurred during the previous year in the *special permit segments* and *special permit inspection area*.
- f) Any on-going damage prevention initiatives affecting the *special permit segments* and *special permit inspection area* and a discussion of the success of the initiatives.
- g) Any mergers, acquisitions, transfer of assets, or other events affecting the regulatory responsibility of the company operating the pipeline.

16) **Cathodic Protection Test Station – Location**: At least one (1) cathodic protection (CP) pipe-to-soil test station must be located within each HCA with a maximum spacing between test stations of one-half mile within an HCA. In cases where obstructions or restricted areas prevent test station placement, the test station must be placed in the closest practical location. This requirement applies to any HCA within the *special permit segments* and *special permit inspection area*.

17) **Cathodic Protection Test Station - Remediation**: If any annual CP test station readings on the 24-inch Line R-701 pipeline within the *special permit segments* and *special permit inspection area* fall below 49 CFR Part 192, Subpart I requirements, remediation must occur within six (6) months and include a CIS on each side of the affected test station to the next test station and perform any identified corrosion system modifications to ensure acceptable corrosion control. If factors beyond CGT's control prevent the completion of remediation within six months, remediation must be completed as soon as practicable and a letter justifying the delay and providing the anticipated date of completion must be submitted to the Director, PHMSA Eastern Region no later than the end of the six (6) months completion date. Any extended evaluation and remediation schedules submitted to PHMSA from CGT must receive a "no objection" from the Director, PHMSA Eastern Region.

18) **Interference Currents Control**: CGT must address induced AC from parallel electric

transmission lines and other interference issues in the *special permit segments* and *special permit inspection area* that may affect the pipeline. An induced AC program or DC program and remediation to protect the pipeline from corrosion caused by stray currents must be in place within one (1) year of the date of this special permit.

19) **Field Coating:** The coatings used on the pipeline and girth weld joints in the *special permit segments* and *special permit inspection area* must be non-shielding to CP. In the event that the coating type is unknown or is known to shield CP for girth weld joints then CGT must take special care to:

- a) Analyze ILI logs in the areas of girth welds for potential corrosion indications.
- b) Any ILI corrosion indications above 30% wall loss at girth welds where the coating type is unknown or is known to shield CP, girth weld joints must be exposed and evaluated each time the ILI is run or until the girth weld coating is replaced.
- c) A minimum of two (2) girth weld joints at locations most likely to have shielding and corrosion shall be exposed and evaluated each time ILI is run. If corrosion is found, the next most likely joint is to be exposed and evaluated until no corrosion is found.

20) **Anomaly Investigation, Evaluation, and Repair:**

- a) **General:** CGT must account for ILI tool tolerance and corrosion growth rates in scheduled response times and repairs with documentation and technical justification of the values used. CGT must demonstrate ILI Tool tolerance accuracy for each ILI Tool run by usage of calibration excavations (minimum of 5 excavations 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: a) actual anomaly depth versus predicted depth and b) actual failure pressure/MAOP versus predicted failure pressure/MAOP. Discovery date must be within 60 days of an ILI Tool run for each type ILI Tool (geometry, deformation or high resolution MFL)
- b) **Dents:** CGT must repair dents to the 24-inch Line R-701 pipeline in the special permit inspection areas in accordance with § 192.933 repair criteria. *Special permit segments* and the *special permit inspection area* must have a geometry tool inspection as part of the initial ILI and all dent repairs made in accordance with § 192.933 repair criteria. The

geometry tool can be from past ILI inspections. The timing for these dent repairs should follow CGT's O&M Manual but must not be longer than one (1) year after discovery.

- c) **Deformation Tool**: CGT must run a deformation tool through all *special permit segments* and the *special permit inspection area* within six (6) months of the grant of this special permit and remediate all expanded pipe in accordance with PHMSA's "Interim Guidelines for Confirming Pipe Strength in Pipe Susceptible to Low Yield Strength" dated September 10, 2009, within 12 months of grant date of this special permit.
- d) **Investigation and Repair Criteria**: Investigation, evaluation, and repair criteria applies to all anomalies located on the 24-inch Line R-701 pipeline within the *special permit segments* and the *special permit inspection area* when they have been excavated, investigated, and remediated in accordance with §§ 192.485 and 192.933 incorporating appropriate class location design factors in the anomaly repair criteria, including HCAs as follows:
- **Special permit segments** - Repair any anomaly within a *special permit segment* that meets either: (1) a failure pressure ratio¹³ (FPR) less than or equal to 1.39 for original Class 1 location pipe in a Class 3 location operating up to 72% of the specified minimum yield strength (SMYS); (2) an anomaly depth greater than or equal to 40% of pipe wall thickness.
 - **Special permit inspection areas** – Repair any anomaly within a *special permit inspection area* that meets either: (1) an FPR less than design factor – for Class 1 location – FPR equal to or less than 1.39; for Class 2 location – FPR equal to or less than 1.67; and for Class 3 location – FPR equal to or less than 2.0; (2) an anomaly depth equal to or greater than 60% wall thickness loss.
 - Repair anomalies in original Class 1 location pipe that are now in a Class 2 location in accordance with §§ 192.5 and 192.611 that meets either: (1) is equal to or less than the Class 1 location FPR of 1.39; (2) an anomaly depth equal to or greater than 50% wall thickness loss for anomaly repairs.

¹³ Failure pressure ratio (FPR) is based upon the class location where the *special permit segment* or *special permit inspection area* pipe is located in accordance with § 192.5 and is the reciprocal of the class location design factor in § 192.111(a).

- Repair anomalies in original Class 2 location pipe that is now in a Class 3 location in accordance with § 192.611 that meets either: (1) is equal to or less than the Class 2 location FPR of 1.67; (2) an anomaly depth equal to or greater than 50% wall thickness loss for anomaly repairs.
- e) **Response Time for ILI Results:** The following guidelines provide the required timing for excavation, investigation, and remediation of anomalies based on ILI data results in accordance with §§ 192.485 and 192.933, and must incorporate appropriate class location design factors in the anomaly repair criteria for *special permit segments* and *special permit inspection area* including all HCAs. Reassessment by ILI will reset the timing for anomalies not already investigated and/or repaired. CGT must evaluate ILI data by using either the ASME Standard B31G, “*Manual for Determining the Remaining Strength of Corroded Pipelines*” (ASME B31G), the modified B31G (0.85dL) or R-STRENG for calculating the predicted FPR to determine anomaly responses.
- **Special permit segments:**
 - Immediate response: Any anomaly within a *special permit segment* operating up to 72% SMYS that meets either: (1) an FPR equal to or less than 1.1; (2) an anomaly depth equal to or greater than 80% wall thickness loss.
 - One-year response: Any anomaly within a *special permit segment* with original Class 1 location pipe in a Class 3 location operating up to 72% SMYS that meets either: (1) an FPR equal to or less than 1.39; (2) an anomaly depth equal to or greater than 40% wall thickness loss.
 - Monitored response: Any anomaly within a *special permit segment* with original Class 1 location pipe in a Class 3 location operating up to 72% SMYS that meets both: (1) an FPR greater than 1.39; (2) an anomaly depth less than 40% wall thickness loss. The schedule for the response must take tool tolerance and corrosion growth rates into account.
 - **Special permit inspection areas:**
 - Immediate response: Any anomaly within a *special permit inspection area* operating up to 72% SMYS that meets either: (1) an FPR equal to or less than 1.1; (2) an anomaly depth equal to or greater than 80% wall thickness loss.

- One-year response: Any anomaly within a *special permit inspection area* that meets either: (1) an FPR less than design factor – for Class 1 location- FPR equal to or less than 1.39; Class 2 location – FPR equal to or less than 1.67; and for Class 3 location – FPR equal to or less than 2.0; (2) an anomaly depth equal to or greater than 60% wall thickness loss.

Any anomaly for Class location changes from original Class 1 to 2 location or original Class 2 to 3 location in accordance with §§ 192.5 and 192.611 that meets either: (1) an anomaly FPR equal to or less than the FPR of the original Class location; (2) an anomaly depth equal to or greater than 50% wall thickness loss.

- Monitored response: Any anomaly within a *special permit inspection area* that meets both: (1) an FPR less than design factor – for Class 1 location – FPR greater than 1.39; Class 2 location – FPR greater than 1.67; and for Class 3 location – FPR greater than 2.0; (2) an anomaly depth less than 60% wall thickness loss.

Any anomaly repairs for Class location changes from original Class 1 to 2 location or original Class 2 to 3 location in accordance with §§ 192.5 and 192.611 that meets both: (1) an anomaly FPR greater than the FPR of the original Class location; (2) an anomaly depth less than 50% wall thickness loss. The schedule for the response must take tool tolerance and corrosion growth rates into account.

21) Girth Welds: CGT must provide records to PHMSA to demonstrate the girth welds on the 24-inch Line R-701 pipeline were nondestructively tested at the time of construction in accordance with:

- a) The Federal pipeline safety regulations at the time the pipelines were constructed. If not, show that at least 10% of the girth welds in each *special permit segment* were non-destructively tested after construction but prior to the application for this special permit provided at least two (2) girth welds in each *special permit segment* were excavated and inspected. If CGT cannot provide girth weld records to PHMSA to

demonstrate either of the above in Condition 21 (a), CGT must accomplish either: (i); or (ii) and either (iii) or (iv) of the following:

- i) Certify to PHMSA in writing that there have been no in-service leaks or breaks in the girth welds on the 24-inch Line R-701 pipeline within the entire *special permit inspection area* for the entire life of the pipelines; or
 - ii) Evaluate the terrain along the *special permit segments* for threats to girth weld integrity from soil or settlement stresses and remediate all such integrity threats; and
 - iii) Excavate¹⁴, visually inspect and nondestructively test at least two girth welds on the 24-inch Line R-701 pipeline in each *special permit segment* in accordance with the American Petroleum Institute Standard 1104, "*Welding of Pipelines and Related Facilities*" (API 1104) as follows:
 - A. Use the edition of API 1104 current at the time the pipelines were constructed; or
 - B. Use the edition of API 1104 recognized in the Federal pipeline safety regulations at the time the pipelines were constructed; or
 - C. Use the edition of API 1104 currently recognized in the Federal pipeline safety regulations.
 - iv) As an alternative to Condition 21 (a) (iii), CGT may perform an HRMFL in-line inspection capable of identifying girth weld anomalies. If this technique is employed, CGT must develop a technical basis for evaluating the serviceability of the girth welds based on HRMFL ILI data. The girth weld ILI inspection plan including ILI findings, technical determination for identifying weld anomalies and confirmation excavations must be submitted to Director, PHMSA Eastern Region for approval 14 days prior to confirmation excavations.
- b) If any girth weld in any of the *special permit segments* does not comply with API 1104, CGT must repair the girth weld immediately¹⁵ and then prepare an inspection

¹⁴ CGTC must evaluate for SCC any time the 24-inch Line R-701 pipeline is uncovered in accordance with Condition 6 (b) of this special permit.

¹⁵ Any extended evaluation and remediation schedules submitted to PHMSA from CGT must receive a "no objection" from the Director, PHMSA Eastern Region.

and remediation plan for all remaining girth welds in the *special permit segments* based upon the repair findings and the threat to the *special permit segments*. CGT must submit the inspection and remediation plan for girth welds to the Director, PHMSA Eastern Region and remediate girth welds in the *special permit segments* in accordance with the inspection and remediation plan within 60 days of finding girth welds that do not meet this Condition 21 (c).

- c) Additionally, all oxy-acetylene girth welds, mechanical couplings and wrinkle bends in *special permit segments* must be removed.
- d) CGT must complete the girth weld testing, and the girth weld inspection and remediation plan, within six (6) months after the grant of this special permit. If factors beyond CGT's control prevent the completion of these tasks within six (6) months, the tasks must be completed as soon as practicable and a letter justifying the delay and providing the anticipated date of completion must be submitted to the Director, PHMSA Eastern Region no later than six (6) months after the original grant of this special permit. Any extended evaluation and remediation schedules submitted to PHMSA from CGT must receive a "no objection" from the Director, PHMSA Eastern Region.

22) **Casings:** CGT must identify all shorted casings (metallic or electrolytic) within the *special permit segments* and the *special permit inspection area* no later than six (6) months after the grant of this special permit and classify any shorted casings as either having a "metallic short" (the carrier pipe and the casing are in metallic contact) or an "electrolytic short" (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:** CGT must clear any metallic short on a casing in the *special permit segments* and the *special permit inspection area* no later than six (6) months after the short is identified.
- b) **Electrolytic Shorts:** CGT must remove the electrolyte from the casing/pipe annular space on any casing in the *special permit segments* and the *special permit inspection area* that has an electrolytic short no later than six (6) months after the short is identified.

- c) **All Shorted Casings:** CGT must install external corrosion control test leads on both the carrier pipe and the casing in accordance with § 192.471 to facilitate the future monitoring for shorted conditions 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 repairs were completed.

If CGT identifies any shorted casings within the *special permit segments* and *special permit inspection area*, they must monitor¹⁶ all casings within the *special permit segments* and the *special permit inspection area* for shorts at least once each calendar quarter, but at intervals not to exceed 100 days, for four consecutive calendar quarters after the grant of this special permit. The intent is to identify through monitoring the calendar quarter(s) when electrolytic casing shorts are most likely to be identified. CGT must then monitor all casings for shorts within the *special permit segments* and *special permit inspection area* at least once each calendar year during the calendar quarter(s) when electrolytic casing shorts are most likely to be identified. Any casing shorts found in the *special permit segments* and *special permit inspection area* at any time must be classified and cleared as explained above.

- 23) **Pipe Seam Evaluations:** CGT must identify any pipeline in the *special permit segments* and *special permit inspection area* that may be susceptible to pipe seam issues because of the vintage of the pipe, the manufacture of the pipe, or other issues. Once CGT has identified such issues, they must complete one or all of the following:

- a) CGT must perform an engineering analysis to determine if there are any pipe seam threats on the 24-inch Line R-701 pipeline located in the *special permit segments* and *special permit inspection area*. This analysis must include the documentation that the processes in 'M Charts' in "Evaluating the Stability of Manufacturing and Construction Defects in Natural Gas Pipelines" by Kiefner and Associates updated April 26, 2007, under PHMSA Contract DTFAA-C0SP02120 and Figure 4.2, 'Framework for Evaluation with Path for the Segment Analyzed Highlighted' from TTO-5 "Low Frequency ERW and Lap Welded Longitudinal Seam Evaluation" by

¹⁶ Monitoring of casings in this situation means an acceptable test method in accordance with 49 CFR Part 192 to determine if the casing and carrier pipe have either a metallic or electrolytic short (connection or contact).

Michael Baker Jr., and Kiefner and Associates, et. al. under PHMSA Contract DTRS56-02-D-70036 were utilized along with other relevant materials. If the engineering analysis shows that the pipe seam issues on the 24-inch Line R-701 pipeline located in the *special permit segments* and *special permit inspection area* are not a threat to the integrity of the pipeline, CGT does not have to complete Conditions 23 (b) through 23 (e). If there is a seam integrity threat to the integrity of the pipeline, then one or more of Conditions 23 (b) through 23 (e) must be completed; or

- b) The *special permit segments* in the pipeline must be hydrostatically tested to a minimum pressure of 100 percent SMYS, per 49 CFR Part 192, Subpart J requirements for eight (8) continuous hours, within 21 months of issuance of this special permit if no 49 CFR Part 192, Subpart J test has been performed since 1971. The hydrostatic test must confirm no systemic issues with the weld seam or pipe. A root cause analysis, including metallurgical examination of the failed pipe, must be performed for any failure experienced to verify that it is not indicative of a systemic issue. The results of this root cause analysis must be reported to each PHMSA pipeline safety regional office where the pipe is in service within 60 days of the failure; or
- c) If the pipeline in the *special permit inspection area* has experienced a seam leak or failure in the last five (5) years and no hydrostatic test meeting the conditions per 49 CFR Part 192, Subpart J was performed after the seam leak or failure, then a hydrostatic test must be performed within one (1) year after the grant of this special permit on the *special permit segment* pipeline; and
- d) If the pipeline in the *special permit segment* has any LF ERW seam or EFW seam conditions as noted in (i), (ii), or (iii) below, the *special permit segment* pipeline must be replaced:
 - i) constructed or manufactured prior to 1954 and has had any pipe seam leaks or ruptures in the *special permit inspection area*,
 - ii) has unknown manufacturing processes, or
 - iii) has known manufacturing or construction issues that are unresolved [such as concentrated hard spots, hard heat-affected weld zones, selective seam corrosion,

pipe movement that has led to buckling, have had past leak and rupture issues, or any other systemic issues].

- e) If the pipeline in the *special permit segment* has a reduced longitudinal joint seam factor, below 1.0, as defined in § 192.113 the *special permit segment* pipeline must be replaced.
- f) All pipe in *special permit segments* and *special permit inspection area* must have all weld seam or girth weld repairs that have been made by the usage of fittings such as weldolets, threadolets, repair clamps and pipe sleeves removed and replaced with pipe in accordance with 49 CFR Part 192 requirements.
- g) If a *special permit segment* has low frequency electric resistance welded (LF-ERW) seam pipe, CGT must replace the LF-ERW pipe or operate the *special permit segment* with LF-ERW pipe in accordance with § 192.611 requirements.

24) **Special Permit Segment Specific Conditions:** CGT must comply with the following requirements.

- a) **Pipe Properties Records:** CGT must mechanically and hydrostatically test pipe in each *special permit segments* that does not meet Condition 25 (b) as follows:
 - i) Test a minimum of 10% of pipe lengths/joints, or at least two (2) pipe lengths/joints when the percentage is less than two (2) pipe lengths/joints, in accordance with §§ 192.109 and 192.107(b).
 - ii) *Special permit segments* pipe must meet the requirements of § 192.107 (b).
 - iii) *Special permit segments* pipe must be tested for mechanical and chemical properties (properties) as required in 49 CFR Part 192, Appendix B, Section III (B) and (C).
 - iv) Pipe that is tested for properties in accordance with Condition 24 (a) (i),(a) (ii) and (a)(iii), must meet the hydrostatic test requirements of 49 CFR Part 192, Appendix B, Section III (C)(2). Original Class 1 location pipe that is approved for Class 3 locations per this special permit must be tested to a minimum of 100% SMYS for 8 continuous hours in accordance with 49 CFR Part 192, Subpart J.
 - v) The requirements in Condition 24 (a) must be completed within one (1) year of

issuance of this special permit and must meet pipe properties requirements for the pipe designed class location factor in accordance with § § 192.103, 192.105, 192.107, 192.109, 192.111 and 192.113.

- b) **Depth of Cover Survey**: CGT must complete by December 31, 2016, of the renewal of this special permit a depth of cover survey of the *special permit segments*¹⁷. A depth of cover survey need not be performed if CGT has performed a depth of cover survey of the special permit segments less than two (2) years prior to renewal of this special permit. For any pipe in the *special permit segments* that does not meet § 192.327(a), CGT must implement additional safety measures in areas with reduced depth of cover. CGT must submit to the Director, PHMSA Eastern Region for PHMSA approval remedial measures to implement based upon the threat, such as lowering the pipeline, increased pipeline patrols and/or additional line markers.
- c) **Line-of-Sight Markers**: CGT must install and maintain line-of-sight markings on the pipeline in the *special permit segments* and *special permit inspection area* except in agricultural areas or large water crossings such as lakes where line-of-sight signage is not practical.
- d) **Pipeline Warning Tape**: CGT must install pipeline warning tape above the pipe for the length of the excavation in all integrity excavations in the *special permit segments* and *special permit inspection area*.

25) **Documentation**: CGT must maintain the following records for each *special permit segment*:

- a) Documentation showing that each *special permit segment* has received a § 192.505, Subpart J, hydrostatic test for 8 continuous hours and at a minimum pressure of 1.25 X MAOP. If CGT does not have hydrostatic test documentation, then the *special permit segment* must be hydrostatically tested to meet this requirement within 21 months of receipt of this special permit renewal.

¹⁷ CGT may replace the *special permit segments* with pipe compliant with 49 CFR Part 192 for the current class location, no later than December 31, 2016, instead of conducting a Depth of Cover Survey as defined in Condition 24 (b).

- b) Documentation (mill test reports) showing that the pipe in each *special permit segments* meets the wall thickness, yield strength, tensile strength and chemical composition of either the American Petroleum Institute Standard 5L, 5LX or 5LS, “*Specification for Line Pipe*” (API 5L) referenced in the 49 CFR § 192 code at the time of manufacturing or if pipe was manufactured and placed in-service prior to the inception of 49 CFR § 192 then the pipe meets the API 5L standard in usage at that time. Any *special permit segment* that does not have mill test reports for the pipe can not be authorized per this special permit unless it is qualified in accordance with Condition 24 (a) above.
- c) Documentation of compliance with all conditions of this special permit must be kept for the applicable life of this special permit for the referenced *special permit segments* and *special permit inspection area*.

26) **Extension of Special Permit Segments**: PHMSA may extend the *special permit segments* to include contiguous segments of the 24-inch Line R-701 pipeline up to the limits of the *special permit inspection area* pursuant to the following conditions. CGT must:

- a) Provide notice to the Director, PHMSA Eastern Region and PHMSA Headquarters of an extension request of the 24-inch Line R-701 pipeline *special permit segments* based on actual class location change, and include a schedule of inspections and of any anticipated remedial actions. All requests for *special permit segment extensions* must be submitted in the first nine (9) months of the § 192.611(d) timing limits and must include information on the potential environmental impacts of the extension.
- b) Complete all inspections and remediation of the proposed *special permit segment or extension* to the extent required by the special permit.
- c) Comply with all the special permit conditions and limitations included herein on all future *special permit segments or extensions*.
- d) Comply with the conditions of this special permit for the contiguous new *special permit segments or extensions* required for implementation and certification in accordance with § 192.611(d) timing limits, including submittal of documents to PHMSA required in Condition 27.

27) **Certification:** A senior executive officer (Executive Vice President or higher) of CGT must certify completion of the following in writing to the PHMSA Associate Administrator by December 31, 2016, for the renewal of this special permit as provided below:

- a) CGT pipeline *special permit inspection area* and *special permit segments* meet the conditions described in this special permit or the pipeline complies with § 192.611 requirements.
 - i) If *special permit segments 1, 2 and 3* have been replaced with 49 CFR Part 192 compliant pipe, CGT must document to PHMSA the following: diameter, wall thickness, grade, seam type, coating type, pressure test (pressure, and duration), replacement length, weld procedures, non-destructive examination (NDE) procedures for girth welds, girth weld NDE documentation, depth of cover, pipe mill test reports and class location survey results.
 - ii) If the pipe has been replaced by December 31, 2016, with pipe compliant with 49 CFR Part 192 for the current class location, remaining Conditions 27(c) through (g) will not be required to be conducted or confirmed.
- b) The written manual of O&M procedures for the CGT pipeline has been updated to include all additional requirements of this special permit renewal.
- c) CGT's Senior Executive Management (Executive Vice President and Group CEO, Vice President of Operations and Vice President of Engineering), Engineering and Operations Managers and Supervisors, and Technical/Construction/Operational Personnel (Engineers and Operations Technicians) involved in pipeline integrity construction and operations reviewed this special permit prior to undertaking to comply with these special permit conditions and within ninety (90) days of the grant date of this special permit. This review shall include but not be limited to:
 - i) An overview of each *special permit inspection segment* and *special permit inspection area*,
 - ii) An overview of the pipe properties, operating history and geographic area along each *special permit inspection segment* and *special permit inspection area*,
 - iii) An overview of the special permit conditions and timelines associated with

the conditions,

- iv) An overview of documentation and reporting requirements for compliance with the special permit conditions, and
 - v) An overview and risk assessment of each *special permit segment* for operating until the next ILI interval.
- d) CGT must show a commitment from the responsible employees, as listed in Condition 27 (f) below, involved in implementing the special permit by CGT requiring that these individuals commit in writing to specific quality assurance and quality control elements of the Special Permit to reinforce and demonstrate the full commitment of CGT throughout the organization within ninety (90) days of the issue date of this special permit.
- e) CGT Executive Management must provide the Director, PHMSA Eastern, a quarterly certified summary of activities conducted for each special permit condition, including any integrity issues identified during this period. Each summary must be signed by the CGT Executive Vice President and Group CEO.
- f) CGT must complete the training of Senior Executive Management (Executive Vice President and Group CEO, Vice President of Operations and Vice President of Engineering), Engineering and Operations Managers and Supervisors, and Technical Personnel (Engineers and Operations Technicians) in natural gas pipeline integrity management, corrosion control, anomaly evaluation, validation, and repairs to meet Part 192, and these special permit conditions. Training shall cover but not be limited to:
- i) Performance requirements and procedures for above ground surveys required as a condition of this permit, including close interval survey, voltage gradient surveys, and depth of cover surveys.
 - ii) Performance requirements and procedures for SCCDA required as a condition of this permit.
 - iii) Performance requirements and procedures for in-line inspection required as a condition of this permit, including assessment timelines, anomaly evaluation criteria and response times.
 - iv) Additional preventive and mitigative activities required by this permit, such

as the placement and monitoring of cathodic protection test points and the incorporation of damage prevention requirements (line of sight markers and pipeline warning tape).

- v) Requirements for the monitoring and management of casings within the *special permit segments* and *special permit inspection area*.
- vi) Requirements and procedures for the evaluation of seam weld integrity of pipe located within the *special permit segments* and *special permit inspection area*.
- vii) Documentation and reporting requirements required under this permit.
- viii) Overall review and training of CGT O&M Plan, Integrity Management Plan and Engineering and Design Procedures and Specifications to all engineering, construction and operational employees on a yearly basis. This training must include a “lessons learned” from the incidents that led to PHMSA Corrective Action Orders (CAO) and PHMSA workshops for the past four years (2006 through 2009) on operational, integrity management, and construction issues.
- g) CGT (CPG) must maintain an open and transparent relationship with PHMSA to ensure compliance with this special permit.

28) **Demonstration of Overall Improvement:** CGT (CPG) must prepare and present a report describing the actions it has taken and the results of any initiatives, not limited to the Special Permit inspection areas, to improve its programs for compliance with 49 CFR Part 192. CGT (CPG) shall present the report to the PHMSA Associate Administrator.

- CGT has previously submitted a report to PHMSA that meets the requirements of Condition 28. Condition 28 is not required for the special permit renewal period.

CGT must send a copy of the certifications required in Condition 27 (a) through (g) with completion date, compliance documentation summary, list of trainees, and the required senior executive signature and date of signature to the PHMSA Associate Administrator of Pipeline Safety with copies to the Deputy Associate Administrator, PHMSA Policy and Programs; Director, PHMSA Eastern Region; Director, PHMSA Standards and Rulemaking Division;

Director, PHMSA Engineering and Research Division; and to the Federal Register Docket (PHMSA-2008-0345) at www.Regulations.gov by December 31, 2016.

Limitations:

PHMSA grants this special permit subject to the following limitations:

- 1) PHMSA has the sole authority to make all determinations on whether CGT has complied with the specified conditions of this special permit.
- 2) Failure to submit the certifications required by Condition 27 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 as provided by 49 CFR § 190.341(h)(1) and may then require CGT to comply with the regulatory requirements in 49 CFR § 192.611. 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 as provided by 49 CFR § 190.341(h)(1), PHMSA will notify CGT in writing of the proposed action and provide CGT 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 CGT sells, merges, transfers, or otherwise disposes of the assets known as the *special permit segments* or the *special permit segment extension*, CGT 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 April 13, 2015 through December 31, 2016. If CGT elects to seek further renewal of this special permit, CGT must submit its renewal request at least 180 days prior to special permit renewal expiration to the PHMSA Associate Administrator of Pipeline Safety with copies to the Deputy Associate Administrator, PHMSA Policy and Programs; Director, PHMSA Eastern Region; Director, PHMSA Standards and Rulemaking; and Director, PHMSA Engineering and Research Division. PHMSA will consider requests for a special permit renewal for up to an additional five- year period. All requests for a special permit renewal must include a summary report in accordance with the requirements in Condition 15 above and must demonstrate that the special permit is still consistent with pipeline safety. PHMSA may seek additional information from CGT prior to granting any request for special permit renewal.

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

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