

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
FINAL ENVIRONMENTAL ASSESSMENT
and
FINDING OF NO SIGNIFICANT IMPACT**

Special Permit Information:

Docket Number: PHMSA-2018-0099
Requested By: Gulf South Pipeline Company, LP
Operator ID#: 31728
Original Date Requested: September 28, 2018
Issuance Date: April 2, 2019
Effective Dates: April 2, 2019 to April 1, 2029
Code Section(s): 49 CFR 192.611

I. Background

The National Environmental Policy Act (NEPA), 42 United States Code (USC) 321 – 4375, Council on Environmental Quality regulations, 40 Code of Federal Regulations (C.F.R. or CFR) 1500-1508, and U.S. Department of Transportation (DOT) Order 5610.1C, requires the Pipeline and Hazardous Materials Safety Administration (PHMSA) Office of Pipeline Safety (OPS)¹ to analyze a proposed action to determine whether the action will have a significant impact on the human environment. PHMSA analyzes special permit requests from natural gas and hazardous liquid pipeline operators for potential risks to public safety and the environment that could result from our decision to grant, grant with additional conditions, or deny a request. As part of this analysis, PHMSA evaluates whether a special permit would impact the likelihood or consequence of a pipeline failure as compared to the operation of the pipeline in full compliance with the Federal Pipeline Safety Regulations. PHMSA’s environmental review associated with a special permit application is limited to impacts that would result from granting or denying the

¹ References to PHMSA in this document means PHMSA OPS.

special permit. PHMSA developed this assessment process to determine what effects, if any, our decision would have on the environment.

Pursuant to 49 U.S.C. 60118(c), PHMSA may issue a special permit to waive certain regulatory requirements. Special permits are typically contingent on the performance of additional measures beyond minimum Federal Pipeline Safety Regulations, in accordance with 49 CFR 190.341. PHMSA will impose conditions in a special permit if determined to be necessary for safety, environmental protection, or otherwise in the public interest. If PHMSA determines that a special permit would be inconsistent with pipeline safety or is not justified, the application will be denied.

The purpose of this final environmental assessment (FEA) is to comply with the National Environmental Policy Act (NEPA) for the Gulf South Pipeline Company, LP (GSPC)² application for a special permit to waive compliance from 49 CFR 192.611 for approximately 4.65 miles of gas transmission pipeline segments on its 30-inch diameter Index 130 Pipeline (Index 130 Pipeline) located in Ascension and Livingston Parishes, Louisiana. This FEA and the resultant finding of no significant impact (FONSI) assessed GSPC's special permit request in accordance with 49 CFR 190.341, and specifically analyzed any environmental impact associated with the waiver of certain pipeline safety regulations found in 49 CFR Part 192. The special permit, as approved, will require GSPC to implement additional conditions on the operations, maintenance, and integrity management of the approximately 4.65-miles (*special permit segments*) and approximately 32.8 miles (*special permit inspection area*) of the Index 130 Pipeline that are included in the special permit request.

II. Introduction

Pursuant to 49 U.S.C. 60118(b) and 49 CFR 190.341, GSPC submitted a special permit application to PHMSA on September 28, 2018, requesting that PHMSA waive the requirements of 49 CFR 192.611 for a Class 1 location to Class 3 location change, by allowing GSPC to

² GSPC is a wholly-owned, subsidiary of Boardwalk Pipeline Partners, LP.

implement alternative risk and integrity management procedures for the *special permit segments* located on GSPC's Index 130 Pipeline located in Ascension and Livingston Parishes, Louisiana.

III. Regulatory Background

PHMSA regulations at 49 CFR 192.611(a) require a pipeline segment upgrade or pressure reduction when a natural gas pipeline class location changes from class 1 to class 3 due to a population density increase near the pipeline. Below is the relevant text of 49 CFR 192.611(a):

49 CFR 192.611 Change in class location: Confirmation or revision of maximum allowable operating pressure.

(a) If the hoop stress corresponding to the established maximum allowable operating pressure of a segment of pipeline is not commensurate with the present class location, and the segment is in satisfactory physical condition, the maximum allowable operating pressure of that segment of pipeline must be confirmed or revised according to one of the following requirements:

(1) If the segment involved has been previously tested in place for a period of not less than 8 hours:

(i) The maximum allowable operating pressure is 0.8 times the test pressure in Class 2 locations, 0.667 times the test pressure in Class 3 locations, or 0.555 times the test pressure in Class 4 locations. The corresponding hoop stress may not exceed 72 percent of the SMYS of the pipe in Class 2 locations, 60 percent of SMYS in Class 3 locations, or 50 percent of SMYS in Class 4 locations.

(ii) The alternative maximum allowable operating pressure is 0.8 times the test pressure in Class 2 locations and 0.667 times the test pressure in Class 3 locations. For pipelines operating at alternative maximum allowable pressure per §192.620, the corresponding hoop stress may not exceed 80 percent of the SMYS of the pipe in Class 2 locations and 67 percent of SMYS in Class 3 locations.

(2) The maximum allowable operating pressure of the segment involved must be reduced so that the corresponding hoop stress is not more than that allowed by this part for new segments of pipelines in the existing class location.

3) The segment involved must be tested in accordance with the applicable requirements of subpart J of this part, and its maximum allowable operating pressure must then be established according to the following criteria:

(i) The maximum allowable operating pressure after the requalification test is 0.8 times the test pressure for Class 2 locations, 0.667 times the test pressure for Class 3 locations, and 0.555 times the test pressure for Class 4 locations.

(ii) The corresponding hoop stress may not exceed 72 percent of the SMYS of the pipe in Class 2 locations, 60 percent of SMYS in Class 3 locations, or 50 percent of SMYS in Class 4 locations.

(iii) For pipeline operating at an alternative maximum allowable operating pressure per §192.620, the alternative maximum allowable operating pressure after the requalification test is 0.8 times the test pressure for Class 2 locations and 0.667 times the test pressure for Class 3 locations. The corresponding hoop stress may not exceed 80 percent of the SMYS of the pipe in Class 2 locations and 67 percent of SMYS in Class 3 locations.

IV. Purpose and Need

GSPC requested a special permit in order to avoid replacement of four (4) pipeline *special permit segments* located on its Index 130 Pipeline in Ascension and Livingston Parishes, Louisiana, where the class locations have changed from Class 1 to Class 3, and to include additional areas that may experience further development and class location change in the near future. This special permit, if approved, would waive the requirements of 49 CFR 192.611 for the *special permit segments* and require the implementation of special permit conditions by GSPC. The *special permit segments* experienced class location changes during 1991, 1998, 2012, 2013, 2015 and 2017, and were not replaced with updated pipe; instead, the maximum allowable operating pressure (MAOP) was lowered for these *special permit segments*. The pipeline within the *special permit inspection area*, to include the *special permit segments*, will be updated from a MAOP of 780 pounds per square inch gauge (psig) to 936 psig. The Index 130 Pipeline was installed in 1952. The original MAOP of the Index 130 Pipeline was 936 psig. Attachments A and B, on pages 32 and 33 of this document, are Index 130 Pipeline route maps showing the *special permit segments*, *special permit inspection area*, high consequence areas (HCAs), class locations, and remote-controlled valves.

GSPC, a subsidiary of Boardwalk Pipeline Partners, LP, must apply the special permit conditions to the 4.65 miles of *special permit segments* and to the 32.8-mile long *special permit inspection area* of the Index 130 Pipeline to enable blanket approval for future class changes in the *special permit inspection area*.

V. Site Description

The 30-inch diameter Index 130 Pipeline is located in Ascension, Livingston, and St. Helena Parishes, Louisiana. The area consists primarily of single-dwelling rural homes, with a total of 390 residences, 5 businesses and 2 outside areas within the area of the approximately 4.65-miles of *special permit segments*.

The *special permit inspection area* contains eight (8) HCAs. The HCAs are calculated by Method 2 (49 CFR 192.903) and are caused by ≥ 20 dwellings for human occupancy adjacent to the pipeline and within the potential impact circle.

VI. Special Permit Segment and Special Permit Inspection Area

Ascension, Livingston, and St. Helena Parishes, Louisiana

On the condition that GSPC complies with the terms and conditions set forth below, the special permit waives compliance from 49 CFR 192.611 for 4.65 miles (24,527 feet) of natural gas transmission pipeline on the Index 130 Pipeline, where changes have occurred from Class 1 locations to Class 3 locations in Ascension and Livingston Parishes, Louisiana.

This special permit would allow GSPC to uprate the MAOP in the *special permit segments* and *special permit inspection area* of the Index 130 Pipeline from its current MAOP of 780 psig to 936 psig. Due to changing operating conditions, GSPC seeks this special permit for Class 1 to Class 3 location changes and to regain the previously de-rated MAOP on these *special permit segments* of the Index 130 Pipeline, through 49 CFR 192.555, subpart K - Uprating, for the MAOP uprate from 780 psig to 936 psig.

Special permit segments: Ascension and Livingston Parishes, Louisiana.

This special permit applies to the *special permit segments* defined as follows using the GSPC Index 130 Pipeline survey station references:

- *Special permit segment 1* – Index 130 — 1,522 feet, Survey Station 4408+56 to Survey Station 4423+78.
- *Special permit segment 2* – Index 130 – 5,294 feet, Survey Station 4519+98 to Survey Station 4572+92.
- *Special permit segment 3* – Index 130 – 2,486 feet, Survey Station 4729+62 to Survey Station 4754+48.³
- *Special permit segment 4* – Index 130 – 15,225 feet, Survey Station 4894+00 to Survey Station 5046+25.

³ Any survey station distance differences are due to a survey equation as follows: Survey Station 4729+93 Back (BK) = 4729+62 Ahead (AH), a total of 31 feet.

- **The four (4) special permit segments** total approximately 4.65 miles and are located in Ascension and Livingston Parishes, Louisiana.

Special permit inspection area⁴ is an area that extends 220 yards on each side of the centerline along the entire 32.8 miles of the Index 130 Pipeline from:

- Survey Station 4407+90 (valve site at Marchand Junction in Ascension Parish, Louisiana) to Survey Station 6139+99 at Montpelier Compressor Station located in St. Helena Parish, Louisiana. The Index 130 Pipeline **special permit inspection area** extends approximately 32.8 miles (173,237 feet) including field survey equations.
- HCAs located in the **special permit inspection area** are at the following survey stations:
 - Survey Station 4407+59 to 4436+05, (2,846 feet)
 - Survey Station 4451+96 to 4511+93, (5,996 feet)
 - Survey Station 4530+22 to 4559+81, (2,959 feet)
 - Survey Station 4572+17 to 4668+85, (9,671 feet)
 - Survey Station 4682+68 to 4708+63 (2,596 feet)
 - Survey Station 4785+26 to 0000+10, (1,436 feet)
 - Survey Station 4905+51 to 4926+92, (2,141 feet)
 - Survey Station 4962+63 to 4979+71, (1,708 feet)
 - Survey Station 4962+49 to 4979+57, (1,708 feet)

The **special permit inspection area**, which includes the **special permit segments** and HCAs, is located in Ascension, Livingston, and St. Helena Parishes, Louisiana.

The purpose of the special permit is to waive the requirements of 49 CFR 192.611, allowing GSPC to avoid replacing existing pipe, Class 1 pipe in a Class 3 location, by applying alternative risk control measures to the Index 130 Pipeline within the **special permit inspection area**. This permit would also allow GSPC blanket approval for future class location changes in the **special**

⁴ There are seven (7) survey station equations in the **special permit inspection area**, which explain the discrepancy between the reported length and the difference between the beginning and ending stations of the **special permit inspection area**: BK=4520+07 AH=4519+98, BK=4589+34 AH=4589+31, BK=4729+93 AH=4729+62, BK=4799+52 AH=0+00, BK=12+75 AH=4812+62, BK=5373+44 AH=5373+32, and BK=5747+73 AH=5747+65.

permit inspection area that meet the special permit conditions, thus eliminating duplicate work for future permit extensions for both GSPC and PHMSA.

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-2018-0099 in the Federal Docket Management System (FDMS) located on the internet at www.regulations.gov.

VII. ADDITIONAL DESIGN, CONSTRUCTION, OPERATIONS & MAINTENANCE REQUIREMENTS

To provide an equivalent level of safety in the absence of either lowering the pipeline operating pressure or upgrading the pipe, this special permit imposes conditions intended to decrease the likelihood of a release of gas. PHMSA believes that these additional measures designed to prevent leaks and ruptures will ensure an equivalent level of safety. An overview of the special permit conditions is below.

Overview of the Special Permit Conditions:

- 1) **Maximum Allowable Operating Pressure:** GSPC may uprate the 30-inch Index 130 Pipeline *special permit segments* and *special permit inspection area* from an existing MAOP of 780 psig to 936 psig after completing hydrostatic pressure testing, anomaly remediation, and implementation of any special permit condition that requires completion prior to pressure uprating. The original MAOP of the Index 130 Pipeline *special permit inspection area* was 936 psig, but the MAOP was de-rated to 780 psig for a Class 1 to 3 location change in 1993.
- 2) **Integrity Management Program:** GSPC must incorporate the *special permit segments* and *special permit inspection area* into its written integrity management program (IMP) as covered segments in an HCA in accordance with 49 CFR 192.903,⁵ except for the reporting requirements contained in 49 CFR 192.945.

⁵ GSPC is not required to report the mileage included as part of this special permit in its annual report in accordance with the requirements of 49 CFR 191.17, unless it is in a HCA.

- 3) **Close Interval Surveys**: GSPC must perform a close interval survey (CIS) along the entire length of the *special permit inspection area*⁶ no later than one (1) year after the grant of this special permit. GSPC must remediate any areas of inadequate cathodic protection prior to implementation of any MAOP uprating from 780 psig. A CIS and remediation need not be performed if GSPC has performed a CIS and remediation⁷ on the Index 130 Pipeline along the entire length of the *special permit inspection area* less than one (1) year prior to the grant of this special permit.
- 4) **Close Interval Surveys – Reassessment Interval**: GSPC must perform periodic CIS of the *special permit inspection area* at the applicable reassessment interval(s) for "covered segments" determined in concert and integrated with in-line inspection (ILI) in accordance with 49 CFR Part 192, subpart O, reassessment intervals as contained in 49 CFR 192.937 (a) and (b) and 192.939, not to exceed a 7 calendar year reassessment interval in accordance with 49 CFR 192.939(a). CIS data must be integrated with ILI data.
- 5) **Coating Surveys and Remediation**: GSPC must perform a direct current voltage gradient (DCVG) survey or an alternating current voltage gradient (ACVG) survey of the Index 130 Pipeline within the *special permit inspection area* no later than one (1) year after the grant of this special permit and prior to implementation of any MAOP uprating from 780 psig to verify the pipeline coating conditions and to remediate any integrity issues in the *special permit inspection area*.
- 6) **Stress Corrosion Cracking Direct Assessment**: Should GSPC find stress corrosion cracking (SCC) on the Index 130 Pipeline at any time, GSPC must evaluate the Index 130 Pipeline along the entire length of the *special permit inspection area* for SCC.
- 7) **O&M Manual – In-line Inspections, Close Interval Survey Inspections, and Reassessment Intervals**: GSPC must amend applicable sections of its operations and maintenance (O&M) manual(s) to incorporate the inspection and reassessment intervals by ILI, including both high resolution metal loss and deformation/geometry tools, of the

⁶ Each condition in this special permit that requires GSPC to perform an action with respect to the *special permit inspection areas* shall also require GSPC to perform that action on all *special permit segments* within such areas, unless there is a condition that is more stringent.

⁷ The terms “remediate” or “remediation” of pipe coating shall include repair of damaged external pipe coating, where required to maintain cathodic protection of the pipeline in accordance with 49 CFR 192.463.

Index 130 Pipeline along the entire length of the *special permit inspection area* at a frequency consistent with 49 CFR Part 192, subpart O, but not to exceed a seven (7) calendar year reassessment interval as defined in 49 CFR 192.939(a).

- 8) **Close Interval Survey Intervals in O&M Manuals**: GSPC must amend applicable sections of its O&M manual(s) to incorporate the inspection and reassessment intervals by CIS of the Index 130 Pipeline *special permit inspection area* at a frequency consistent with 49 CFR Part 192, subpart O reassessments.
- 9) **Inline Inspection**: The assessments of the Index 130 Pipeline along the entire length of the *special permit inspection area* using ILI must conform to the required maximum reassessment intervals specified in 49 CFR 192.939. GSPC must conduct instrumented ILI, to meet 49 CFR 192.917 for threats and 49 CFR 192.939 for reassessment intervals, in 2019 for the *special permit inspection area*. ILI must include the use of a high resolution magnetic flux leakage (HR-MFL) tool and a high resolution (HR) deformation tool with deformation extended sensor arms not limited by pig cups. Should the hydrostatic tests in the *special permit inspection area* conducted to 1301 psig in 2018 and 2019 show integrity threats, such as cracking (pipe body, seam or girth weld), an Electro-Magnetic Acoustical Transducer (EMAT) ILI or appropriate ILI tool assessment for the type of cracking found must be conducted, or a pipe cracking remediation plan must be submitted to the appropriate PHMSA OPS Region Director with a copy to the Director, PHMSA OPS Engineering and Research Division no later than 60 days after the finding and prior to raising the MAOP above 780 psig. If the cracking is from hard spots, an instrumented ILI to find hard spots must be conducted for the entire length of the *special permit inspection area* prior to uprating the MAOP above 780 psig.
- 10) **Integrity Reassessment Intervals**: GSPC must schedule ILI reassessment dates for the Index 130 Pipeline *special permit inspection area* according to 49 CFR 192.939 intervals by adding the required time interval to the previous assessment date.
- 11) **Damage Prevention Program**: GSPC's damage prevention program must incorporate the applicable Common Ground Alliance (CGA) Best Practices within the *special permit inspection area*.

- 12) **Field Activity Notices to PHMSA**: GSPC must give a minimum 14-day notice to the appropriate PHMSA OPS Region Director to enable PHMSA to observe the excavations for conditions related to field activities in the *special permit inspection area*.
- 13) **HCA Assessments**: GSPC must not let this special permit impact or defer any of the operator's assessments for HCAs under 49 CFR Part 192, subpart O.
- 14) **Annual Report to PHMSA**: GSPC must provide an annual report of identified activities and integrity findings to PHMSA and post the report on the docket for public review.
- 15) **Cathodic Protection Test Stations**: 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 the *special permit inspection area*.
- 16) **Annual CP Test Station Readings**: If any annual CP test station readings on the Index 130 Pipeline within the *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 any identified corrosion system modifications to ensure corrosion control.
- 17) **Interference Currents Control**: GSPC must address induced alternating-current (AC) from parallel electric transmission lines and other interference issues such as direct-current (DC) in the *special permit inspection area* that may affect the pipeline. An induced AC or DC program and remediation plan 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.
- 18) **Mainline Valve – Monitoring and Remote Control for Leaks or Ruptures**: GSPC must automate for closure or manually close mainline valves during leaks or ruptures as shown in Attachment C of this document, and must develop and implement procedures for isolation of the Index 130 Pipeline *special permit inspection area*. Closure of the appropriate valves following a pipeline leak or rupture meeting the criteria of Special Permit Condition 18(d)(i) must occur as soon as practicable from the time the pipeline leak or rupture location is confirmed, not to exceed 30 minutes from such confirmation.
- 19) **Anomaly Evaluation and Repair**: GSPC must account for ILI tool tolerance and corrosion growth rates in scheduled response times and repairs and document and justify the values used. Repair criteria will apply to all anomalies located on the Index 130

Pipeline within the *special permit segments* and *special permit inspection area* when they have been evaluated, excavated, or investigated in accordance with 49 CFR 192.485 and 192.933, and in the *special permit segments* using a failure pressure ratio based upon pipeline Class location and anomaly depth greater than 40% of pipe wall thickness.

- 20) **Girth Welds**: GSPC must provide records to PHMSA demonstrating girth welds on the Index 130 Pipeline were nondestructively tested at the time of construction.
- 21) **Pipe Casings**: GSPC must identify all shorted casings within a *special permit segment* 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. GSPC has reported one (1) casing as being metallicity shorted in the *special permit inspection area* at Survey Station 5746+78 and it will be remediated before the Index 130 pressure is updated above 780 psig.
- 22) **Pipe - Seam Evaluations**: GSPC must identify any pipeline in a *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.
- 23) **Special Permit Segment Specific Conditions**: GSPC must comply with the following requirements:
 - a. **Line-of-Sight Markers**: GSPC must install and maintain line-of-sight rights-of-way (ROW) markers on the pipeline in the *special permit inspection area*, except in agricultural areas or large water crossings such as lakes where line-of-sight signage is not practical.
 - b. **Data Integration**: GSPC must maintain data integration of special permit condition findings and remediations in the *special permit inspection area*.
 - c. **Pipe Properties Testing**: GSPC must test the pipe in the *special permit segments*, Class 2 or 3 locations, or HCAs without pipe material records by conducting non-destructive or destructive tests, examinations, and assessments.
 - d. **Pipeline System Flow Reversals**: For pipeline system flow reversals lasting longer than 90 days and where the MAOP for class location changes are

exceeded under either 49 CFR 192.619(a)(1) or 192.611⁸ in a *special permit segment*, GSPC must prepare a written plan that corresponds to those applicable criteria identified in PHMSA Advisory Bulletin (ADB-2014-04), “Guidance for Pipeline Flow Reversals, Product Changes and Conversion of Service” issued on September 18, 2014 (79 FR 56121, Docket PHMSA-2014-0040).

- e. **Environmental Assessments and Permits**: GSPC must evaluate the potential environmental consequences and affected resources of any land disturbances and water body crossings needed to implement the special permit conditions for the *special permit segments* or a *special permit inspection area* prior to the disturbance. If a land disturbance or water body crossing is required, GSPC must obtain and adhere to all applicable Federal, state, and local environmental permit requirements when conducting the special permit conditions activity
 - f. **Depth of Cover**: GSPC must mitigate shallow pipe soil cover that is less than 24-inches in depth. Depth of cover recorded by a CIS survey lists one (1) Index 130 Pipeline location with depth of cover being less than 24 inches in the *special permit inspection area*, which is a creek exposure at Survey Station 5394+ 87 - Colyell Creek.
- 24) **Documentation**: GSPC must maintain the following records for each *special permit segment* and *special permit inspection area*: pressure test, pipe properties, and compliance with the special permit conditions.
- 25) **Extension of Special Permit Segments**: PHMSA may extend the original *special permit segments* to include contiguous segments of the Index 130 Pipeline up to the limits of the *special permit inspection area*. Any extensions of the *special permit segments* must meet the following requirements prior to the class location change or within one (1) year after the class location change:
- a. All anomalies must be remediated in accordance with Condition 19, and
 - b. The *special permit segments* must be hydrostatically tested to 1301 psig (which is a minimum of 1.39 times the MAOP of 936 psig) for 8 continuous hours in accordance with 49 CFR Part 192, subpart J.

⁸ An example of exceedance of 49 CFR 192.619(a)(1) is a Grandfathered MAOP which has a design factor above 0.72. An example of exceedance of 49 CFR 192.611 is a Class 1 to 3 location change.

26) **Certification**: A senior executive officer, vice president or higher, of GSPC must certify in writing the following:

- a. The GSPC pipeline *special permit inspection area*, *special permit segments*, and HCAs meet the conditions described in this special permit;
- b. The written manual of O&M procedures for the GSPC Index 130 Pipeline has been updated to include all additional operating and maintenance requirements of this special permit; and
- c. GSPC has implemented all conditions required by this special permit.
- d. GSPC must send the certifications required in these conditions with completion dates, compliance documentation summaries, and required senior executive signatures and dates of signature to PHMSA.

27) **Limitations**:

- a. PHMSA has the sole authority to make all determinations on whether GSPC has complied with the specified conditions of this special permit. Failure to comply with any condition of this special permit may result in revocation of the permit.
- b. Any work plans and associated schedules for the Index 130 Pipeline *special permit segments* and *special permit inspection area* are automatically incorporated into this special permit and are enforceable in the same manner.
- c. Failure by GSPC to submit the certifications required by Condition 26 (Certification) within the time frames specified may result in revocation of this special permit.
- d. As provided in 49 CFR 190.341, PHMSA may issue an enforcement action for failure to comply with this special permit. 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.
- e. If GSPC sells, merges, transfers, or otherwise disposes of all or part of the assets known as the Index 130 Pipeline *special permit segments*, GSPC must provide PHMSA with written notice of the change within 30 days of the consummation date. In the event of such transfer, PHMSA reserves the right to revoke, suspend,

or modify the special permit if the transfer constitutes a material change in conditions or circumstances underlying the permit.

VIII. Alternatives

PHMSA’s review of the potential alternatives is limited to review of the special permit and possible alternatives as well as associated impacts to *special permit segments*. In terms of the potential alternatives for PHMSA action, the options include: **(1)** “no action”/PHMSA denies the requested special permit, in which case the GSPC Index 130 Pipeline and its operation would need to be fully compliant with 49 CFR 192.611 or **(2)** grant the requested special permit and impose additional operations and maintenance requirements, including integrity management activities, beyond those required under 49 CFR Part 192.

ALTERNATIVES

Alternative 1: “No Action” Alternative

The “no action” alternative would entail full compliance with existing regulations, specifically 49 CFR 192.611. This alternative would require pressure reduction, pressure testing, or pipe replacements to address the class location changes when the pipeline is not commensurate with the new class location. The use of stronger pipe is intended to decrease risks of failure posed to population in the vicinity of the pipeline. If the special permit application is denied, then GSPC would be required to replace pipe in the current and future class change areas in order to uprate to the desired MAOP. Impacts would include construction and testing along the ROW, and possible service disruption as the line is taken out of service.

Alternative 2: Applicant’s Preferred Alternative

GSPC’s preferred alternative is to obtain a special permit, allowing the Class 1 location pipe to operate at an increased MAOP in the Class 3 location without replacing the pipe. The Index 130 Pipeline would be uprated in this alternative, returning to a previous MAOP of 936 psig from the current 780 psig, and would be subject to the implementation of additional safety inspections and criteria.

The special permit would avoid possible construction-related inconveniences for businesses located near the affected areas and would avoid service disruptions that could result from taking

the line out of service during replacement activities. GSPC will comply with the Federal Energy Regulatory Commission (FERC) Environmental Guidelines and all federal, state and county permitting requirements in performing the alternative risk control activities.

IX. AFFECTED RESOURCES AND ENVIRONMENTAL CONSEQUENCES

A. Affected Resources and Environmental Consequences of the Proposed Action and the “No Action” Alternative

Aesthetics: The “no action” alternative would impact the visual character of the *special permit segments* ROW. Pipe replacement would require excavation and removal of the existing pipe and construction, installation, and testing of new pipe. This would result in the use of heavy equipment and ground disturbance. Therefore, issuance of the special permit would result in less aesthetic impacts to the areas around the affected *special permit segments*.

Agricultural Resources: The ROW of the *special permit segments* is within residential areas, pastures, and woodlands. Granting of the special permit would not impact any agricultural resources. If the permit is not granted then pipe replacement would be required for GSPC to uprate to the desired MAOP, which may disturb agricultural resources and operations.

Air Quality: The special permit would not affect the air quality of the *special permit inspection area*. If the permit is not granted and GSPC elected to replace the pipe, this would necessitate blowing down the pipeline, thus releasing natural gas which is a known greenhouse gas. The “no action” alternative would also require the temporary use of heavy equipment, resulting in further emissions.

Biological Resources: The primary wildlife habitat occurring within and in the vicinity of the *special permit inspection area* includes agricultural and residential land and forested areas in the Lower Mississippi Riverine Forest Province. Granting the special permit would result in no modifications to any wildlife habitat, or impact wetlands or waterbodies, and would have no effect on fishery resources or essential fish habitats.

No protected or sensitive areas occur within 1-mile of the *special permit segments*. The *special permit segments* do not cross any land administered by federal, state, or local agencies, or non-governmental organizations, that could provide sensitive wildlife habitat. No lands enrolled in

the Conservation Reserve Program (CRP) or the Wetland Reserve Program (WRP), both administered by the Natural Resource Conservation Service (NRCS), would be affected by granting this special permit.

The United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation System was utilized to identify the federally listed threatened and endangered species that could potentially inhabit or traverse the *special permit segments* in Ascension and Livingston Parishes. Information regarding state listed species was obtained from the Louisiana Department of Wildlife and Fisheries (LDWF) (2018c).

Three (3) federally listed and six (6) state listed species (three of which are also federally listed) were identified as potentially occurring within the *special permit segments*. GSPC conducted field surveys in May and June 2018 to determine if any of the habitats of listed species are present within the *special permit segments*. The common name, scientific name, federal status, state status, habitat description, impact assessment, and determination of affect for each federally and state listed species are provided in the table below.

Federally and State Listed Threatened and Endangered Species Potentially Occurring within the Area							
Common Name	Scientific Name	Federal Status	State Status	Parish	Habitat Description	Project Impact Assessment	Determination of Effect
Mammals							
West Indian Manatee	<i>Trichechus manatus</i>	T	E	Ascension	Inhabits marine open water, bays, and rivers, often with submerged aquatic beds or floating vegetation. Predominantly found in rivers and estuaries, although may travel through salt water.	The closest known occurrence of the West Indian Manatee is 0.89 mile northwest of the Project area in the Amite River. Although the Project crosses several streams, none would provide suitable habitat for this species. Therefore, suitable habitat is not present in the Project area.	<i>No effect</i>
Birds							
Bald Eagle	<i>Haliaeetus leucocephalus</i>	--	E	Ascension, Livingston	Breeds and winters in areas close to a coast, river, or lake. Prefer conifers for nesting and roosting and tend to avoid areas with high human traffic.	Suitable habitat is present within the Project area; however, no nests were observed during field surveys and there are no documented occurrences in the Project area. If individuals are present during winter clearing activities, they will likely relocate to adjacent suitable habitat.	<i>Not likely to adversely affect</i>

Federally and State Listed Threatened and Endangered Species Potentially Occurring within the Area							
Common Name	Scientific Name	Federal Status	State Status	Parish	Habitat Description	Project Impact Assessment	Determination of Effect
Red-cockaded Woodpecker	<i>Picoides borealis</i>	E	E	Ascension, Livingston	Nests in longleaf pine forests or mixed pine-upland hardwood forests with little or no hardwood mid-story. The average cavity tree ranges from 60 to 126 years for longleaf pine, 70 to 90 years for loblolly pine, and 75 to 149 years for shortleaf pine. Suitable foraging habitat consists of “park-like” forests in nature that possess an abundance of native grasses and forbs as groundcover, a low density of small pines, and have no hardwood or pine midstory.	No suitable nesting habitat within the Project area. Potential foraging habitat is present within the Project area.	<i>Not likely to adversely affect</i>
Fishes							
Gulf Sturgeon	<i>Acipenser oxyrinchus desotoi</i>	T	T	Ascension, Livingston	Found in long, free-flowing, spring-fed rivers, with a hard bottom, steep banks, and temperature ranging from 60 to 72°F. Spawn in natal freshwater streams and migrate to marine water of Gulf of Mexico to forage and overwinter. Juveniles inhabit rivers 2-3 years before migrating to marine waters.	Suitable habitat is not present in the Project area. In addition, this species is not known to occur in any of the waterbodies impacted by the Project.	<i>No effect</i>

Federally and State Listed Threatened and Endangered Species Potentially Occurring within the Area							
Common Name	Scientific Name	Federal Status	State Status	Parish	Habitat Description	Project Impact Assessment	Determination of Effect
Pallid Sturgeon	<i>Scaphirhynchus albus</i>	--	E	Ascension	Found in main channels of rivers with strong currents in the Southeast U.S. Waterbodies inhabited tend to be large and excessively turbid.	Suitable habitat is not present in the Project area. In addition, there are no documented occurrences within the Project area.	<i>No effect</i>
Mollusks							
Inflated Heelsplitter	<i>Potamilus inflatus</i>	--	T	Ascension, Livingston	Found in slowly to moderately flowing rivers with soft and stable mud, sand, or silt bottoms. Individuals are usually found on the protected side of bars in shallow water; however, could occur in depths over 20 feet.	Suitable habitat is not present in the Project area. In addition, within Louisiana this species is only known to occur within the Amite River, which will not be impacted by the Project.	<i>No effect</i>
Sources: National Audubon Society, 2018; LDWF, 2018c, 2018d; USFWS, 1992 E = Endangered T = Threatened							

Any activities related to the new *special permit segments* would be conducted within the boundaries of the previously disturbed pipeline ROW. On an annual basis, GSPC submits a written request to the USFWS Daphne Field Office for categorical exclusion for activities to be undertaken within its existing, previously disturbed ROW to ensure compliance with Section 7 of the Endangered Species Act (ESA). The ESA requires federal agencies or their applicants to take into account the effects of their undertakings on historic structural and archaeological properties.

Climate Change: The scope and duration of any activities associated with the new *special permit segments* would have no impact on climate change. If the permit is not granted and GSPC elected to replace the pipe, this would necessitate blowing down the pipeline, thus releasing natural gas which is a known greenhouse gas. Pipeline replacement would also result in increased emissions from manufacture of new pipe, transportation of materials, and construction activities related to pipeline replacement.

Cultural Resources: Any activities associated with the new *special permit segments* would be conducted within the boundaries of the previously disturbed pipeline ROW. According to the Louisiana National Register there are no known historic properties near the special permit area.

Environmental Justice: This special permit will not have an adverse impact on the local population. Based on US Census data from 2011-2015 for Ascension and Livingston Parishes, the average residence has approximately 2.8 people per house (2.86 in Ascension Parish and 2.81 in Livingston Parish). With 1,141 residences, businesses, and other outside areas located along the pipeline in the 32.8-mile *special permit inspection area*, the increased safety measures associated with the special permit would benefit an estimated 4,441 people. With 390 residences, 5 businesses, and 2 other outside areas adjacent to the *special permit segments*, there are only an estimated 1,524 people who would benefit from increased safety associated with pipe replacement.

According to US Census data, Ascension and Livingston Parishes have 31% and 12% minority population, respectively. The special permit will not disproportionately impact any minority, low income, or non-English language populations.

Geology, Soils, and Mineral Resources: The *special permit inspection area* is located within the Mississippi Alluvial Plain section of the Coastal Plain Physiographic Province (U.S. Geological Survey [USGS], 2018a). The Mississippi Alluvial Plain section consists of a low floodplain and delta system, which were formed by the Mississippi River (USGS, 1998). Alluvial deposits contain layers of soil, gravel, and clay, while recent deposits consist of fertile material, especially silt. The section is characterized by level terrain and deep, fertile soils (Stroud, 2018). The topography across the *special permit inspection area* is generally flat to gently sloping. The elevation ranges from 3 to 29 feet above sea level.

The *special permit segments* are located within the Prairie Terraces and Alluvium geologic formations of the Coastal Plain Physiographic Province and date from the Pleistocene and Holocene epochs, respectively. The primary lithology of the region is clay or mud, and the secondary lithology consists of silt and sand. The Prairie Terraces formation is characterized by light gray to light brown clay, sandy clay, silt, sand, and some gravels (USGS, 2018b, 2018c). A portion of the *special permit segments* is overlain by 1 to 9 meters of loess in a subsection of

the formation (USGS, 2018b, 2018c). The Alluvium formation consists of gray to brownish gray clay, silty clay, sand, and gravel (USGS, 2018d).

Louisiana's primary non-fuel mineral resource is salt, accounting for approximately 59 percent of the total non-fuel mineral production value in 2013 (USGS, 2016a). Other mineral resources prevalent in Louisiana include construction and industrial sand and gravel (USGS, 2016a).

According to the Louisiana Department of Natural Resources (LDNR) Strategic Online Natural Resources Information System, there are nine oil or gas wells located within 0.25-mile of the *special permit segments*. The data was obtained through publicly available state records, and locations presented may not be exact; therefore, the locations of oil and gas wells adjacent to the *special permit segments* will be field verified through civil surveys prior to the start of construction if the special permit is denied and pipe replacement is required.

The *special permit segments* are not in areas where karst terrain is present or where significant subsidence events are likely to occur (USGS, 2004a); therefore, it is not anticipated that karst terrain will adversely impact the special permit.

Seismic hazards include earthquakes, surface faulting, and soil liquefaction. According to the USGS Seismic Hazards maps, the Project is situated in areas of very low seismic probability. Based on historical seismic activity within Ascension and Livingston Parishes, the USGS estimates that the 500-year earthquake (an earthquake with a 10 percent probability of occurring within any 50-year interval) would result in peak ground accelerations of 1 to 2 percent gravity (g) (USGS, 2015a). Peak ground accelerations between 1 and 2 percent g are associated with the light ground motions and no potential damage (Wang, 2010); therefore, it is not anticipated that earthquakes will impact the *special permit segments*.

Indian Trust Assets: Any work associated with the *special permit segments* would have no impact on Native Americans or any land owned or otherwise administered by Native American tribes. The scope and duration of a pipe replacement project would have little to no effect or impact on the socioeconomics in the vicinity of this project. No tribal land exists along the *special permit segments*.

Land Use: All areas within the vicinity of the *special permit segments* are privately owned tracts of land. There are no known planned land expansions or developments in the vicinity of the pipeline. GSPC does not anticipate impacts to future land use planning.

Noise: The scope and duration of any activities associated with the *special permit segments* would have little to no impact on noise levels in the vicinity of the pipeline. A denial of the special permit or the “no action” alternative would result in temporary increases in noise should replacement of the existing pipe be chosen.

Recreation: The scope and duration of any activities associated with the *special permit segments* would have little to no impact on recreation in the vicinity of the pipeline. A denial of the special permit or the “no action” alternative could result in temporary impacts on recreation activities should replacement of the existing pipe be chosen.

Safety: The Federal Pipeline Safety Regulations require pressure reduction or replacement of Class 1 pipe in the event of certain population growth in order to better protect higher populations located along the pipeline. The special permit would waive the requirement to reduce pressure or replace the existing pipe with a stronger pipe. However, special permit conditions intended to improve safety and environmental protection to equal or exceed that provided by the measures required under 49 CFR 192.611 would be required. The special permit conditions include: pressure tests, remote controlled valves, coating surveys and remediation, corrosion surveys and remediation, damage prevention activities, line of sight ROW markers, inline-tool inspections for threats (corrosion, third-party damage, and cracking – pipe body, seam and girth welds), remediation of pipe threats based upon design factor for class location, reassessments based upon integrity management program, procedures, and documentation.

Monthly patrols, weather permitting, are used to observe surface conditions on and adjacent to the pipeline ROW for indications of leaks, third-party construction activity, exposed pipe, erosion or other factors that affect the safety and operation of the pipeline.

CIS and DCVG have been or will be performed on the *special permit segments* to ensure CP is acceptable. Areas of low CP potentials have been or will be remediated according to the special permit conditions, if the special permit is granted.

GSPC will continue to perform excavation damage prevention measures as described in the CGA Best Practices within the *special permit inspection area*.

ILI will be performed using high-resolution inspection tools at intervals as specified by 49 CFR Part 192, subpart O reassessment intervals.

Any ILI anomalies detected will be remediated in accordance with 49 CFR Part 192, subpart O and the special permit conditions. These activities will provide safety and environmental protection relative to the *special permit segments*.

The above-described special permit monitoring conditions would not be applicable if PHMSA denied the special permit request, because the safety requirements in 49 CFR Part 192, subpart O currently apply to only 1.58 miles of the 4.65 miles of the *special permit segments*. These monitoring conditions are intended to provide more information about the pipe so that any integrity issues can be remediated to avoid risk.

On the other hand, the “no action” alternative would require full compliance with 49 CFR 192.611. This would require the replacement of the existing pipeline with a thicker/stronger pipeline that meets the requirements of 49 CFR 192.611(a) for GSPC to uprate to the desired MAOP. However, the monitoring conditions associated with the special permit would not be applicable if the special permit were denied because those conditions are not mandated by the current 49 CFR Part 192. Accordingly, both alternatives are expected to lead to a similar safety result. The below questions are safety considerations of the possible effects of this special permit as follows: risk of a rupture or failure during operations, the consequences of a gas release, would a gas release affect more people, and the effect on pipeline longevity or reliability

- (a) **Would operation under the special permit change the risk of rupture or failure?** GSPC has a practice of implementing a number of pipeline safety measures that exceed the requirements of 49 CFR Part 192. These measures include conducting in-line inspections not required under existing regulations and conservatively repairing conditions that do not present near-term risk to pipeline integrity, in order to help ensure the integrity and safety of the pipeline. In addition, patrolling frequencies that exceed the requirements of 49 CFR Part 192, line-of-sight ROW signage where practical, and on-site monitoring of excavations

following CGA Best Practices enable GSPC to manage the risk of third-party damage to the pipeline. As a result of these measures, the Index 130 Pipeline is deemed to be in good condition and GSPC's safety record is good.

- (b) **If a failure occurred, would consequences and spill or release volumes be different if PHMSA granted the permit? Would granting this permit increase, decrease, or have no change on the risk of failure?** PHMSA believes that granting the special permit would not increase, and could arguably decrease the risk of failure with implementation of the special permit conditions. However, in the event that PHMSA denied the special permit and GSPC opted to reduce pressure instead of replace the pipe, a failure on a reduced-pressure pipeline could result in a smaller volume of natural gas released. GSPC contends that it would not opt to reduce pressure due to ongoing contractual obligations.
- (c) **Would the Potential Impact Radius (PIR) of a rupture change under the Special Permit? Please calculate and provide the PIR data, if applicable. Would more people be affected by a failure if PHMSA granted the permit?** The Index 130 Pipeline has a current MAOP of 780 psig and a PIR of approximately 578 feet. After GSPC uprates the Index 130 Pipeline to 936 psig, the new PIR will be approximately 633 feet. GSPC plans to uprate the Index 130 Pipeline *special permit inspection area* to 936 psig whether the special permit for a Class 1 to 3 location change is granted or denied. The number of people affected by a failure would not change if the special permit request is denied.
- (d) **Would operation under the Special Permit have any effect on pipeline longevity or reliability? Would there be any life cycle or maintenance issues?** Increased pipeline assessments required by the special permit conditions include defined reassessment intervals to ensure anomalies would be identified and remediated. Applying the special permit conditions over the 4.65-mile length of the *special permit segments* will improve reliability and safety. Pipe replacement for uprating under the no action alternative would also increase the longevity of the pipeline.

Socioeconomics: The scope and duration of any activities associated with the *special permit segments* will have no impact on the socioeconomics in the vicinity of the Index 130 Pipeline. According to US Census data, Ascension and Livingston Parishes have 22.2% of persons in

poverty. The special permit will not disproportionately impact any predominantly low income populations.

Topography: For the *special permit segments* the ROW is within an industrial area and is mowed and maintained as an empty field. There will likely be excavations conducted as calibration digs due to the special permit DCVG test requirement as well as anomaly investigation digs. These excavations would be conducted within the boundaries of the previously disturbed pipeline ROW. There would be no long term impact to ground topography.

Transportation: The scope and duration of any activities associated with the *special permit segments* or the no action alternative would have little to no impact on the local infrastructure or roads. The no action alternative could result in temporary impacts to traffic due to construction activities.

Water Resources: The Index 130 Pipeline *special permit segments* cross 51 wetlands, 18 of which are in Ascension Parish and 33 in Livingston Parish, Louisiana. No Wetlands Reserve Program easements are located within the *special permit segments* ROW.

The *special permit inspection area* is underlain by one principal aquifer, the Coastal Lowlands aquifer system (USGS, 2003). The Coastal Lowlands aquifer system extends from Texas across Louisiana, Mississippi, and Alabama and into western Florida (USGS, 2003). Although several regional aquifers underlie the area, the aquifer system is characterized by an Oligocene to Holocene age heterogeneous, gulf-ward thickening, unconsolidated to poorly consolidated, discontinuous wedge of clay, sand, and silt (USGS, 2003).

The primary sources of groundwater in Livingston Parish, Louisiana are the Chicot aquifer, Evangeline aquifer, and Jasper aquifer. These aquifers are characterized by thickening, unconsolidated deposits of gravel, sand, and silt, which are separated by discontinuous layers of clay and sandy clay. The primary source of groundwater recharge is the infiltration of precipitation in the region (USGS, 2016b).

Depths of wells in Livingston Parish range from 11 to 928 feet below the surface of land and yield 2 to 1,934 gallons per minute, depending on the aquifer from which water is withdrawn. Approximately 13.6 million gallons per day (mgd) of water used in Livingston Parish is

withdrawn from groundwater resources, with the majority of water withdrawn for public supply, and to a lesser extent for industrial, rural domestic, livestock, general irrigation, and aquaculture purposes (USGS, 2016b).

Water in Ascension Parish, Louisiana is withdrawn from groundwater and surface water sources. The primary sources of groundwater in Ascension Parish include the Mississippi River alluvial, Norco, and Gonzales-New Orleans aquifers which consist of coarse sand and basal gravel, fine to coarse sand and some locally occurring gravel, and very fine to medium sand, respectively. The aquifers discharge by flowing into rivers, well water withdrawal, and leaking into underlying aquifers. Recharge into aquifers results from leakage from overlying aquifers, seasonal input from rivers, and rainfall infiltration (USGS, 2011).

Depths of wells in Ascension Parish range from 4 feet to 2,753 feet (Louisiana Department of Natural Resources [LDNR], 2018a). Wells yield 25 to 2,320 gallons per minute throughout the parish, although only 6 percent of water in Ascension Parish (12 mgd) is withdrawn from groundwater sources due to poor chemical quality and salt water encroachment (USGS, 2011; NRCS, 1976). Water is supplied by East Baton Rouge Parish to supplement the limited water supply in Ascension Parish (USGS, 2011). Water supplied by East Baton Rouge Parish primarily consists of groundwater withdrawn from the Chicot, Evangeline, and Jasper equivalent aquifers, totaling 150 million gallons per day (mgd) (USGS, 2015b). Groundwater withdrawn in Ascension Parish is utilized for rural domestic, industrial use, public supply, and aquaculture purposes (USGS, 2011).

Based on field surveys conducted in May and June 2018 and review of the USGS National Water Information System tool, there are no springs located within 1-mile of the *special permit segments* (USGS, 2017a). Therefore, no impacts on springs are anticipated.

In Livingston Parish, the Southern Hills Regional Aquifer System sole source aquifer underlies the *special permit segment* at Survey Station 4894+00 to 5046+25. The *special permit segments* in Ascension Parish are not underlain by any sole source aquifers (EPA, 2017).

No wellhead protection areas were identified in the vicinity of the *special permit segments* based on a review of data obtained from the Louisiana Department of Environmental Quality

(LDNR, 2018b; Molieri, 2018). There are 29 active wells in the vicinity of the *special permit segments*, used domestically, industrially, commercially, and for public supply.

The potential for groundwater impact resulting from the special permit is very low because existing groundwater flow paths are not expected to change. The special permit would not cause changes in overall groundwater quantity, which is determined by the quantity of recharge to the aquifer.

If the special permit is denied and pipe is replaced, the pipe replacement will result in a total of 8.32 acres of impacts on wetlands, of which 0.05 acre represents impacts associated with the operation of the permanent ROW. Pipe replacement will also require the use of horizontal directional drilling, which may increase the risk of surface water contamination, as drilling mud may migrate through a potential fracture in the underlying rock or substrate.

If the special permit is granted the primary risk to the surface water is if the pipe were to rupture during hydrostatic testing and spill the water used as the test medium.

The area is in a 1 percent annual chance Flood Hazard Area according to the National Flood Insurance Program's Flood Insurance Rate Map.

If the special permit is denied and pipe replacement is required, installation of 30-inch pipe will not affect the floodplains crossed by the *special permit segments*, as pipe will be installed subsurface and all contours will be restored following the completion of construction activities.

The installation of impervious surfaces will total approximately 0.1 acre, an insignificant amount compared to the floodplains as a whole, and pipe replacement is therefore not anticipated to impact the function of the floodplains.

B. Comparative Environmental Impacts of Alternatives

As PHMSA recognized in its June 29, 2004, Federal Register Notice (69 FR 38948), implementing additional preventative and mitigative measures enables a pipeline operator to improve its knowledge and understanding of the pipeline's integrity, accelerate the identification and repair of actionable anomalies, and better manage and mitigate threats to the public and environment. Implementing enhanced inspection and assessment practices throughout the

special permit segments and *special permit inspection area*, in lieu of replacing small segments of pipe experiencing the class location change, extends pipeline safety benefits to a much greater area along the pipeline. In addition, avoiding pipe excavation and replacement would minimize costs to the operator, would avoid delivery interruptions and supply shortages, and avert environmental disturbance. All of these benefits will be realized under GSPC's special permit.

If the special permit is not granted, 49 CFR 192.611(a) would require pipe replacement for GSPC to uprate the *special permit segments* to the desired MAOP. The GSPC contractual obligations require the operating pressure of the pipe to be uprated to 936 psig. However, the monitoring conditions associated with the special permit would not be applicable if the special permit were denied because those conditions are not mandated. Accordingly, both alternatives are expected to lead to a similar safety result.

The mode of pipeline failure would be the same whether the pipe operates under a special permit or is replaced. Likewise, human safety should not be affected.

The natural environment would be temporarily disturbed if the pipe is replaced; a special permit would have little to no impact on the environment.

X. Consultation and Coordination

GSPC and PHMSA personnel involved in preparation of this document include:

- **Personnel from parent owner and operator of GSPC**
Darral Ward, Manager Pipeline Safety, Boardwalk Pipeline Partners, MLP
Tina Baker, Manager Compliance Services, Boardwalk Pipeline Partners, MLP
Sam Swift, Integrity Engineer, Boardwalk Pipeline Partners, ML
Marc Hess, Environmental Specialist, Boardwalk Pipeline Partners, MLP

- **PHMSA**
Amelia Samaras, PHMSA, US DOT
Steve Nanney, PHMSA, US DOT

XI. Response to Public Comments Placed on Docket PHMSA-2018-0099

PHMSA published the special permit request in the Federal Register (83 FR 62952) on December 6, 2018, and the public notice comment period ended on January 4, 2019, with all comments received through February 1, 2019, being reviewed and considered. The special permit application from GSPC, environmental assessment, and special permit conditions are available in Docket No. PHMSA-2018-0099 at: www.regulations.gov. PHMSA did not receive any public comments concerning the special permit request, including the environmental assessment and special permit conditions.

XII. Finding of No Significant Impact

In consideration of the safety conditions explained above, PHMSA finds that no significant negative impact will result from the issuance and full implementation of the above-described special permit to waive the requirements of 49 CFR 192.611 for *special permit segments 1, 2, 3, and 4*, which consists of approximately 4.65 miles of 30-inch diameter Index 130 Pipeline located in Ascension and Livingston Parishes, Louisiana. This permit requires GSPC to implement additional conditions on the operations, maintenance, and integrity management of the approximately 4.65-miles (*special permit segments*) and approximately 32.8 miles (*special permit inspection area*) of the 30-inch-diameter natural gas transmission pipeline (Index 130 Pipeline) located in Ascension, Livingston, and St. Helena Parishes, Louisiana.

PHMSA believes that implementation of this special permit is not inconsistent with safety and will not result in a significant impact to the human environment.

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**Attachment B – 30-inch Index 130 Pipeline Route Map
Special Permit Segments and Inspection Areas with Automated Mainline Valves**

