

U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
Special Permit Analysis and Findings – Conversion to Gas Service

Special Permit Information:

Docket Number:	PHMSA-2020-0040
Requested By:	Gulf South Pipeline Company, LP
Operator ID#:	31728
Original Date Requested:	March 17, 2020
Original Issuance Date:	July 24, 2020
Effective Date:	July 24, 2020
Code Section(s):	49 CFR 192.14(a)

Purpose:

The Pipeline and Hazardous Materials Safety Administration (PHMSA)¹ provides this information to describe the facts of the subject special permit application submitted by Gulf South Pipeline Company, LP² (GSPC), to discuss any relevant public comments received with respect to the application, to present the engineering and safety analysis of the special permit application, and to make findings regarding whether the requested special permit should be granted and if so under what conditions. GSPC requested that PHMSA waive compliance from the pressure test required in the 49 Code of Federal Regulations (CFR) 192.14(a) for approximately 57.7-miles of the 16-inch diameter Index 818-9 Pipeline that is being converted from carbon dioxide service pipeline (49 CFR Part 195) to a natural gas pipeline (49 CFR Part 192).

¹ Throughout this special permit the usage of “PHMSA” or “PHMSA OPS” means the U.S. Department of Transportation’s Pipeline and Hazardous Materials Safety Administration Office of Pipeline Safety.

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

Pipeline System Affected:

This special permit applies to the GSPC request for a waiver of the hydrostatic pressure test requirements in 49 CFR 192.14(a) for approximately 57.7 miles of 16-inch diameter Index 818-9 Pipeline (Index 818-9 Pipeline) located in Jasper, Clarke, Lauderdale, and Kemper Counties, Mississippi. This special permit allows GSPC to operate the Index 818-9 Pipeline ***special permit segment***, defined below, without re-hydrostatically pressure testing the Index 818-9 Pipeline. Without the special permit, 49 CFR 192.14(a) requires GSPC to retest the Index 818-9 Pipeline which was previously hydrostatically pressure tested to a minimum of 3,726 pounds per square inch gauge (psig) for eight (8) hours in 2013. The previous hydrostatic pressure test was at a minimum of 90 percent (%) of the pipeline specified minimum yield strength (SMYS). There were no hydrostatic test failures.

The Index 818-9 Pipeline will have a maximum allowable operating pressure (MAOP) of 1,480 psig and will operate at a maximum stress of 37 % of the pipeline SMYS. The Index 818-9 Pipeline was installed in 2013.

Special Permit Request:

GSPC applied to PHMSA on March 17, 2020, for a special permit seeking relief from the Federal pipeline safety regulations in 49 CFR 192.14(a) for approximately 57.7 miles of the Index 818-9 Pipeline, where a change has occurred from an original carbon dioxide service pipeline (49 CFR 195) to natural gas transmission pipeline (49 CFR 192) located in Jasper, Clarke, Lauderdale, and Kemper Counties, Mississippi.

The Index 818-9 Pipeline ***special permit segment*** is described below.

- This special permit applies to the ***special permit segment*** defined as follows using the GSPC Index 818-9 Pipeline survey station (SS) references:
 - ***Special permit segment*** – Index 818-9 Pipeline — approximately 57.7 miles, SS 0+00 to SS 3044+12 and is in Jasper, Clarke, Lauderdale, and Kemper Counties, Mississippi.

Attachment A is a route map of the Index 818-9 Pipeline ***special permit segment***.

Public Notice:

On June 2, 2020, PHMSA posted a notice of this special permit request in the Federal Register (85 FR 33790). The Federal Register notice period ended on July 2, 2020. The Special Permit Request letter, Final Environmental Assessment (FEA) and Finding of No Significant Impact (FONSI), Special Permit Analysis and Findings, and all other pertinent documents for this special permit are available in Docket No. PHMSA-2020-0040 in the Federal Docket Management System (FDMS) located on the internet at www.regulations.gov. PHMSA did not receive any comments in response to the notice.

PHMSA has reviewed this special permit application to ensure the special permit conditions address pipeline safety and integrity threats to the pipeline in the ***special permit segment***. The special permit will require GPSC's Operations and Maintenance (O&M) Manual and Procedures to provide a systematic program to review and remediate the pipeline for safety concerns. Additional operational integrity reviews and remediation requirements will be required by this special permit for the ***special permit segment*** as outlined in the Operational Integrity Compliance section of this document.

Analysis:

PHMSA is using the class location special permit criteria to evaluate and determine the type special permit conditions needed in-lieu of a new hydrostatic pressure test for the conversion of the Index 818-9 Pipeline from a carbon dioxide service pipeline (49 CFR Part 195) to a natural gas transmission pipeline (49 CFR Part 192).

Background: On June 29, 2004, PHMSA published in the Federal Register (69 FR 38948) the criteria it uses for the consideration of class location change waivers, now being granted through a special permit. First, certain threshold requirements must be met for a pipeline section to be further evaluated for a class location change special permit. Second, the age and manufacturing process of the pipe; system design and construction; environmental, operating and maintenance histories; and integrity management program elements are evaluated as significant criteria. These significant criteria are presented in matrix form and can be reviewed in the FDMS, Docket Number PHMSA-RSPA-2004-17401. Third, such special permits will only then be granted

when pipe conditions and active integrity management provide a level of safety greater than or equal to a pipe replacement or pressure reduction. For this special permit a 49 CFR 192.14(a) required hydrostatic pressure test is being replaced with special permit conditions that GSPC must implement to identify and remediate integrity threats to the ***special permit segment***.

Threshold Requirements: Each of the threshold requirements published by PHMSA in the June 29, 2004, Federal Register notice is discussed below in regards to the GSPC's special permit application.

- 1) No *pipeline* segments changing to Class 4 location will be considered.
 - The ***special permit segment*** is in predominately Class 1 locations with a few miles of Class 2 and 3 locations. GSPC has met this requirement.
- 2) No bare pipe will be considered.
 - The ***special permit segment*** is coated with fusion bonded epoxy coating. GSPC has met this requirement.
- 3) No pipe containing wrinkle bends will be considered.
 - There are no wrinkle bends in the ***special permit segment***. GSPC has met this requirement.
- 4) No pipe segments operating above 72% of SMYS will be considered for a Class 3 special permit.
 - The ***special permit segment*** operates at or below 72% SMYS. GSPC has met this requirement.
 - The 57.7 miles of ***special permit segment*** pipe is 16-inch diameter, 0.457-inch wall thickness, pipe strength of 70,000 psig and the pipe seams are a high frequency electric resistance welded (HR-ERW). The ***special permit segment*** pipe will operate at less than 37.012% SMYS at an MAOP of 1,480 psig.
 - **Attachment B – Index 818-9 Pipeline – Design, Construction, and O&M Parameters** gives an overview of the pipeline material, design, construction, and O&M parameters of the ***special permit segment***.
- 5) Records must be produced that show a hydrostatic test to at least 1.25 x MAOP and 90% of SMYS.

- Records submitted by GSPC show that the ***special permit segment*** was hydrostatically tested in 2013 to a minimum of 3,726 psig for eight (8) hours. GSPC has met this requirement.
- 6) In-line inspection (ILI) must have been performed with no significant anomalies identified that indicate systemic problems.
- The ***special permit segment*** will be required by the special permit to be inspected with a high resolution (HR) magnetic flux leakage and HR-Deformation ILI tools.
- 7) Additional information: The ***special permit segment*** is composed of pipe manufactured in 2012 and 2013 with HF-ERW seams at Corinth Pipeworks.

The ***special permit segment*** meets the threshold requirements; however, certain required ILI tool runs, anomaly remediation, and other integrity surveys are necessary to ensure safety, and therefore, will be required in the special permit conditions.

Criteria Matrix: The original and supplemental data submitted by GSPC for the ***special permit segment*** have been compared to the class location change special permit criteria matrix, described above. The data falls within the *probable acceptance* column of the criteria matrix for a class location change in the areas of pipe manufacture, pipe material, design stress level, non-destructive examination of all girth welds, fusion bonded epoxy pipe external coating, hydrostatic test pressure used for the 2013 test, no hydrostatic test failures, depth of cover meets both 49 CFR 192 and 195 requirements, local geology, no operational leaks or failures, cathodic protection, no safety related condition reports, integrity management program will be required, future ILI time frame, coating assessments, damage prevention program, and no PHMSA enforcement actions on the Index 818-9 Pipeline.

PHMSA has determined that imposing the special permit conditions will address any concerns from not conducting a new pressure test prior to placing the special permit segment into a gas transmission service and will provide an equivalent level of safety for the public and will protect the environment.

Operational Integrity Compliance:

PHMSA reviewed this special permit request to ensure that integrity threats to the pipeline in the

special permit segment are in the Operator's O&M Procedures to provide a systematic program to review and remediate the pipeline for safety concerns. Additional operational integrity review and remediation requirements have been required by this special permit. The pipeline operational integrity requirements are to ensure that the operator has an ongoing program to locate and remediate safety threats. These threats to integrity and safety include any issues with the pipe coating quality, cathodic protection effectiveness, operations damage prevention program for third-party damage, weld seam and girth weld integrity, anomalies in the pipe steel, and material and structures either along or near the pipeline that could cause the cathodic protection system to be ineffective. PHMSA carefully designed a comprehensive set of conditions that GSPC will be required to implement when the special permit is granted. Special Permit **Conditions 1 through 13** are summarized below:

1. **General Conditions and Maximum Allowable Operating Pressure:**

- a) The special permit conditions must be included into GSPC O&M Procedures in accordance with 49 CFR 192.603 and 192.605.
- b) GSPC must operate the ***special permit segment*** at or below an MAOP of 1,480 psig.
- c) The ***special permit segment*** must be capable of ILI in accordance with 49 CFR 192.150.

2. **Integrity Management Program:** GSPC must incorporate the requirements of this special permit into its written integrity management program and standard operating procedures (SOPs).

- a) GSPC must conduct a baseline assessments of the special permit segment using high resolution magnetic flux leakage (HR-MFL) and high resolution (HR) Deformation ILI tools within twelve (12) months of the grant of this special permit.
- b) GSPC must conduct integrity re-assessments in accordance with 49 CFR 192.939(a) assessment intervals using in-line inspections along the special permit segment and in compliance with 49 CFR Part 192, Subpart O integrity management regulations.
- c) GSPC must treat the ***special permit segment*** as a "covered segment" in a "high consequence area (HCA)" in accordance with 49 CFR Part 192, Subpart O.
Reassessments of the ***special permit segment*** using HR-MFL and HR Deformation

ILI must be conducted at the frequency specified for HCAs in 49 CFR 192, Subpart O.

- d) If GSPC identifies threats within the ***special permit segment*** that require running additional ILI tools, pursuant to 49 CFR Part 192, Subpart O, such as for crack detection³ or pipe movement from soil or geologic stresses, GSPC must use the appropriate ILI tools or other evaluation methods for pipeline assessments.

3. **Anomaly Response and Repair:**

- a) **General:** GSPC must account for ILI tool tolerance and corrosion growth rates within the scheduled response times and repairs, and must document and justify the values used.
 - i) GSPC must demonstrate ILI tool tolerance accuracy for each ILI tool run by usage of calibration excavations and unity plots that demonstrate ILI tool accuracy to meet the tool accuracy specification provided by the vendor (typical for depth within +/- 10% accuracy for 80% of the time). GSPC must incorporate ILI tool accuracy by ensuring that each ILI tool service provider determines the tolerance of each tool and includes that tolerance in determining the size of each anomaly feature reported to GSPC. GSPC must compare previous indications to current indications that are significantly different. If a trend is identified where the tool has been consistently overcalling or under-calling, the remaining ILI features must be re-graded accordingly.
 - ii) The unity plots must show actual anomaly depth versus predicted depth.
 - iii) ILI tool evaluations for metal loss must use “6t x 6t”⁴ interaction criteria for determining anomaly failure pressures and response timing.
 - iv) Discovery date must be within 150 days of any ILI tool run for each type of ILI tool (e.g. HR-geometry, HR-deformation or HR-MFL tools).
- b) **Dents:** GSPC must repair dents in the ***special permit segment*** in accordance with the 49 CFR 192.933 repair criteria. The ***special permit segment*** must have a HR

³ “Pipe Crack” activity shall be defined as over both 20% wall thickness depth.

⁴ “6t” means pipe wall thickness times six.

deformation tool inspection as part of the initial ILI. The HR deformation tool can be from past ILI inspections. The timing for these dent repairs should follow the GSPC O&M Manual but must be no longer than one (1) year after discovery or the timing intervals in 49 CFR 192.933(d), whichever is shorter.

- c) **Repair Criteria and Response Time for ILI Results:** The following is the required timing for excavation and investigation of anomalies based on ILI results. GSPC must evaluate ILI data by using either the ASME Standard B31G, “Manual for Determining the Remaining Strength of Corroded Pipelines,” the modified B31G (0.85dL) or R-STRENG for calculating the predicted failure pressure ratio (FPR) to determine corrosion anomaly responses.

The ***special permit segment*** baseline assessment and first reassessment anomaly findings must be remediated in accordance with the below criteria and thereafter must be remediated in accordance with 49 CFR Part 192 criteria for either HCAs or moderate consequence areas. The below remediation criterion applies to anomalies located within the ***special permit segment*** when they have been ILI assessed, excavated and investigated, or the timing intervals in 49 CFR 192.933(d), whichever is shorter as follows:

- i) **Immediate response:** Any anomaly within the ***special permit segment*** that meets either: (1) a FPR equal to or less than 1.25; or (2) an anomaly depth equal to or greater than 70% wall thickness loss.
- ii) **One-year response:** Repair any anomaly in the ***special permit segment*** that meets either: (1) a FPR less than or equal to 1.39 in a Class 1 location; (2) a FPR less than or equal to 1.67 in a Class 2 location; (3) a FPR less than or equal to 2.00 in a Class 3 or 4 location; or (4) an anomaly depth greater than 40% of pipe wall thickness.
- iii) **Monitored response:** Any anomaly within the ***special permit segment*** that meets both: (1) a FPR greater than 1.39 in a Class 1 location; (2) a FPR greater than 1.67 in a Class 2 location; (3) a FPR greater than 2.00 in a Class 3 or 4 location; or (2) an anomaly depth less than or equal to 40% wall thickness loss. The schedule for the response must take tool

tolerance⁵ and corrosion growth rates into account.

- iv) **Special permit segment – Crack Type Anomalies** - All cracking exceeding 30% of the pipe wall thickness or having a FPR below 1.39 or meeting 49 CFR Part 192 requirements must be remediated within 180 days of discovery.^{6, 7}

- 4. **Close Interval Surveys**: GSPC must perform a close-interval survey (CIS) and remediate any areas of inadequate cathodic protection in the ***special permit segment*** within one (1) year after the grant of this special permit. If environmental permitting or right-of-way factors beyond GSPC's control should prevent the completion of the CIS within one (1) year from the grant of this special permit, **(1)** GSPC must complete a CIS and perform subsequent remediation including coating repair as soon as practicable, **(2)** GSPC must submit a letter justifying the delay and providing the anticipated date of completion to the Director, PHMSA Central Region, no later than one (1) month prior to the end of one (1) year after the grant of this special permit, and **(3)** must receive a letter of "no objection" from the Director, PHMSA Central Region, for a delay.⁸ CIS remediation activities must be completed within one (1) year of the finding. GSPC must submit a written request to the Director, PHMSA Central Region, for any extended evaluation and remediation schedules. GSPC must receive a letter of "no objection" from PHMSA prior to implementing an extended CIS and remediation interval.

- 5. **Close Interval Surveys – Reassessment Interval**:

- a) GSPC must perform periodic CIS of the ***special permit segment*** at the applicable

⁵ Tool tolerance shall be applied only to FPR calculations, not to the anomaly depth criteria.

⁶ Should any cracking anomalies above 30% of the pipe wall thickness be found in the ***special permit segment***, GSPC must remediate the cracks or have a crack anomaly evaluation procedure submitted to the Director, PHMSA Central Region with a "no objection" reply prior to using the crack evaluation procedure for cracking anomalies left in the pipeline above 30% of the pipe wall thickness without remediation. If GSPC does not receive a "no objection" letter or request for additional review time from PHMSA within 90 days of the notification, GSPC may proceed.

⁷ A fracture mechanics and pressure cycling evaluation is required where an un-remediated crack of 10% or more (of wall thickness) is detected by ILI or direct inspection tools. The pipe must have toughness tests (Charpy V-notch impact values) of the pipe body, seam, or girth weld so that fracture mechanics modeling can be used, if needed.

⁸ PHMSA has assigned this special permit to the Director, PHMSA Central Region, but upon notice to GSPC could assign this special permit to a different PHMSA Region.

reassessment interval(s) for a “covered segment” determined in concert and integrated with ILI in accordance with 49 CFR Part 192 Subpart O reassessment intervals as required in 49 CFR 192.937 (a) and (b) and 192.939, not to exceed the 7-calendar year reassessment interval in 49 CFR 192.939(a). CIS assessments within the reassessment interval are not required to be performed in the same year as ILI reassessments.

- b) CIS data must be integrated with ILI data. **Condition 10 (Data Integration)** – gives a complete description of data integration information that an operator must maintain for *special permit segment*, including CIS and ILI data.

6. **Right-of-Way Patrols and Leakage Surveys:** In addition to the requirements of 49 CFR 192.705, GSPC must perform right-of-way patrols as follows:

- a) Aerial flyover patrols or ground patrols by walking or driving of the *special permit segment* right-of-way once each month, not to exceed 45 days, contingent on weather conditions. Should mechanical availability of the patrol aircraft or weather conditions become an extended issue, the *special permit segment* pipeline aerial flyover patrol must be completed within 60 days of the last patrol by other methods such as walking or driving the pipeline route, as feasible.
- b) If the schedule for either ground patrols or aerial flyover patrols cannot be met due to circumstances beyond GSPC’s control, GSPC must notify the Director, PHMSA Central Region, in writing of the reasons the schedule cannot be met and obtain a letter of “no objection” within three (3) business days of the exceedance.
- c) GSPC must conduct a leakage survey, referenced in 49 CFR 192.706, within 45 days of placing the *special permit segment* into gas service and thereafter in accordance with 49 CFR 192.706 leakage survey intervals.

7. **Line-of-Sight Markers:** GSPC must install and maintain line-of-sight markers within the *special permit segment* in accordance with 49 CFR 192.620(d)(4)(iv) to the extent practicable. Any removed or missing line-of-sight markers must be replaced within 60 days of discovering the marker is removed or missing.

8. **Mainline Valve – Monitoring and Remote Control for Leaks or Ruptures:** Mainline valves at Mile Post 0, 17.7, 23.2, 44.9, and 56.7 in the *special permit segment* must be

controlled by a supervisory control and data acquisition (SCADA) system and must be equipped for remote monitoring and control, or remote monitoring and automatic control and the following requirements:

- a) If any crossover or lateral pipe for gas receipts or deliveries connects to the isolated segment between the upstream and downstream mainline valves, the nearest valve on the crossover connection(s) or lateral(s) must be isolated, such that, when all valves are closed, there is no flow path for gas to flow to the leak or rupture site (except for residual gas already in the shut-off segment);
 - b) Mainline valves must be continuously monitored for valve status (open, closed, or partial closed/open), upstream pressure, and downstream pressure;
 - c) GSPC must conduct a point-to-point verification between SCADA displays and the mainline valve, sensors, and communications equipment in accordance with 49 CFR 192.631(c) and (e), or an equivalent verification; and
 - d) All valves used to isolate a leak or rupture must be maintained in accordance with this special permit and 49 CFR 192.745.
9. **Interference Currents Control**: Within one (1) year of the grant of this permit, GSPC must perform surveys and remediation, with corrosion control implemented, for induced currents from electric transmission lines and other known sources of potential interference that may affect the ***special permit segment***. An induced alternating current (AC) or direct current (DC) program and remediation plan to protect the pipeline from corrosion caused by stray currents must be written and implemented within one (1) year of the grant date of this special permit.
10. **Data Integration**: GSPC must maintain data integration of special permit condition findings and remediation in the ***special permit segment***. Data integration must include the following information: pipe diameter, wall thickness, grade, and seam type; pipe coating; MAOP; class location (including boundaries on aerial photography); HCAs (including boundaries on aerial photography); hydrostatic test pressure including any known test failures; casings; any in-service ruptures or leaks; ILI survey results including HR-MFL, HR-Deformation tools; most recent CIS; rectifier readings; cathodic protection test point

survey readings; AC/DC interference surveys; pipe coating surveys; pipe coating and anomaly evaluations from pipe excavations; stress corrosion cracking (SCC) excavations and findings; and pipe exposures from encroachments. Structures must be validated every three (3) years by obtaining new aerial imagery or by ground patrol.

- a) Data integration documentation and drawings, with four (4) years of prior data, must be maintained and must be submitted, if requested by PHMSA, beginning with the 2nd annual report of this special permit.
- b) Data integration must be updated on an annual basis. GSPC must conduct, at least, an annual review of integrity issues to be remediated.
- c) GSPC must maintain data integration as a composite of all applicable data elements in a data viewer.

11. **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 segment*** prior to the disturbance. GSPC must obtain all applicable (Federal, state, and local) environmental permits and adhere to all applicable (Federal, state, and local) environmental permit requirements when conducting the special permit conditions activity.
12. **Documentation:** GSPC must maintain documentation for **Conditions 1 through 11 and 13** for the ***special permit segment*** for the life of this special permit.
13. **Certification:** A GSPC senior executive officer, vice president or higher, must certify in writing the following:
 - a) The ***special permit segment*** meets the conditions described in this special permit;
 - b) The written manual of O&M procedures required by 49 CFR 192.603 and 192.605 for the ***special permit segment*** has been updated to include all additional operating and maintenance requirements of this special permit; and
 - c) GSPC has implemented all conditions as required by this special permit.

Within 12 months after the grant of this special permit, GSPC must send the certifications required in **Condition 13(a) through (c)** with special permit condition status and procedure completion date, compliance documentation summary, and the required senior executive

signature and date of the signature to the PHMSA Associate Administrator for Pipeline Safety, with copies to Director, PHMSA Central Region; and to the Federal Register Docket (PHMSA-2020-0040) at www.Regulations.gov.

The Special Permit with conditions and the “Final Environmental Assessment and Finding of No Significant Impact” document can be read in their entirety in Docket No. PHMSA-2020-0040 in the Federal Docket Management System located on the internet at www.regulations.gov.

PHMSA has determined that imposing these conditions will ensure that granting the special permit will not be inconsistent with safety.

Past Enforcement History – January 1, 2010 through June 30, 2020:

From January 1, 2010 through June 30, 2020, Boardwalk and GSPC were cited in 30 enforcement cases with a total of \$706,700 in assessed civil penalties. PHMSA initiated four (4) Notice of Amendments, ten (10) Notices of Probable Violations, fourteen (14) Warning Letters, one (1) Safety Order and one (1) Corrective Action Orders against Boardwalk Pipeline Partners and GSPC.

Below is a table of PHMSA enforcement matters of all types in all PHMSA Regions for Boardwalk/GSPC (Operator identification # (OPID#) 19270, 31554, 31728, 32299) from January 1, 2010, through June 30, 2020:

- Texas Gas Transmission, LLC (OPID# 19270)
- Boardwalk Petrochemical Pipeline, LLC (OPID# 31554)
- Gulf South Pipeline Company, L.P. (OPID# 31728)
- Gulf Crossing Pipeline Company, LLC (OPID# 32299)

Status	Corrective Action Order	Notice of Amendment	Notice of Probable Violation	Safety Order	Warning Letter	Total
CLOSED	1	4	10	0	14	29
OPEN	0	0	0	1	0	1
Total	1	4	10	1	14	30

The limitations section of the special permit requires a reapplication and review of the GSPC

special permit on a periodic basis. PHMSA may revoke, suspend or modify the GSPC special permit based on any finding listed in 49 CFR 190.341(j)(1) and require GSPC to comply with the regulatory requirements in 49 CFR 192.14(a). 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 the special permit. Any work plans and associated schedules must be automatically incorporated into the GSPC special permit and are enforceable in the same manner.

PHMSA has determined that imposing the conditions and limitations summarized in this document will ensure that granting the special permit for not re-hydrostatic pressure testing the *special permit segment* will be consistent with safety.

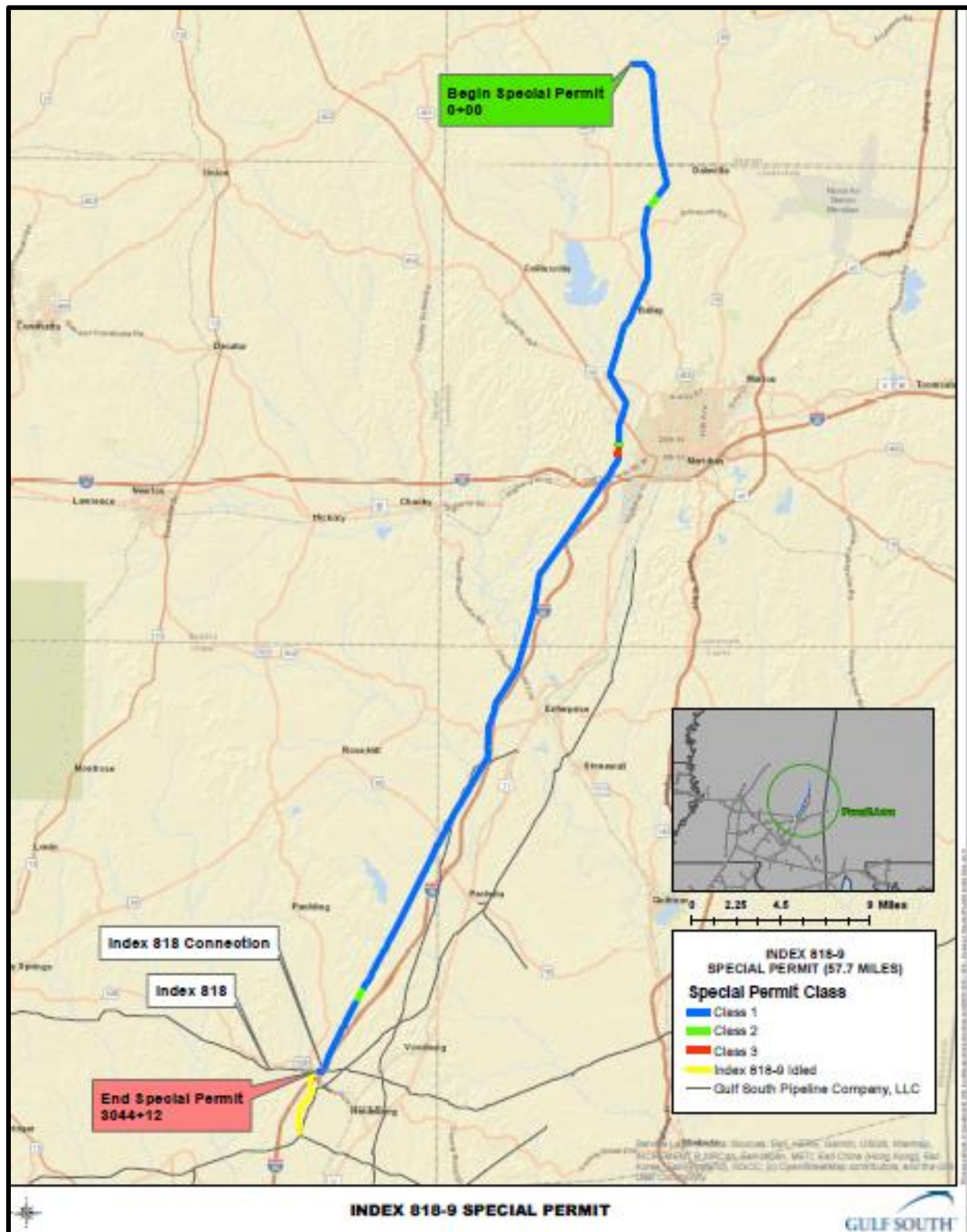
Findings:

Based on the information submitted by GSPC and PHMSA's analysis of the technical, operational, and safety issues, and given the conditions that will be imposed in the special permit, PHMSA finds that granting this special permit to GSPC to operate the 16-inch diameter Index 818-9 Pipeline *special permit segment* located in Jasper, Clarke, Lauderdale, and Kemper Counties, Mississippi, without a new hydrostatic pressure test would not be inconsistent with pipeline safety.

Completed in Washington DC on: July 24, 2020

Prepared by: PHMSA OPS - Engineering and Research Division

Attachment A – 16-inch Index 818-9 Route Map with Class Locations



Attachment B – Index 818-9 Pipeline – Design, Construction, and O&M Parameters	
<i>Special Permit Segment</i> (Index 818-9 Pipeline)	Survey Station (SS) 0+00 to 3044+12 (approximately 57.7 miles)
Limits of HCAs	One (1) HCA is anticipated at SS 1115+43 to 1179+69
Original Installation of Pipeline	2013
Primary Pipe manufacturer	Corinth Pipeworks
Diameter	16 inch
Primary Wall Thickness	0.457 inch
Primary Grade	X70, 70,000 psi
Seam Type	High Frequency Electric Resistance Weld
Coating Type	Fusion Bonded Epoxy
Depth of Cover	Buried in accordance with § 192.327 and § 195.248
Geology, Terrain and associated risks	Flat, stable soils, with no known instability.
Original CO2 service MOP	2,875 psig (72% SMYS)
Proposed Gas Service MAOP	1,480 psig (37% SMYS)
Maximum and Minimum Operating Pressure over last 5 years	Maximum 2,054 psig, Minimum 0 psig
Hydrostatic Pressure Tests	3,753 psig, 8 hours, 1-28-2013 (Southern segment) 3,726 psig, 8 hours, 1-27-2013 (Northern segment)
Pressure Test Failures	None
Girth Weld Radiography	All girth welds x-rayed. Records available.
In-Line Inspection Summary	2013 Caliper ILI run found no anomalies
Cathodic Protection	No known deficiencies. 124 test stations installed.
Stress Corrosion Cracking (SCC) Direct Assessment	There are no known SCC threats on this pipeline.
Incident History	None
Leak History	None
Repairs	None
Damage Prevention Initiatives	O&M Sections 11020 and 4000 Quarterly Patrols Line of sight signage where practical Public Awareness and Education Programs Common Ground Alliance Best Practices.
Safety Related Condition Reports	None
Scheduled ILI Inspection	HR-MFL and HR-Deformation ILI tools scheduled for 2020.