

Dominion Transmission, Inc.
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CERTIFIED MAIL

October 6, 2010

Ms. Dana L. Register
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Withdrawal of TL465 Special Permit Application – PHMSA-2010-0121

Dear Ms. Register:

On February 5, 2010, Dominion Transmission, Inc. (DTI) submitted a Petition for a Class Location Special Permit for a segment of its transmission pipeline TL465. In the eight months since the initial submission, DTI has responded to three separate data requests, and has noticed that the public comment period was extended from the original deadline of August 25, to October 14, 2010 (though no comments have been offered).

It is DTI's observation that recent pipeline safety incidents around the country may be placing PHMSA under a great deal of scrutiny in regard to its handling of such Petitions. While this is understandable, it is not the desire of DTI to place undue burden on PHMSA, or contend with operation of its pipeline under a much more restrictive set of Special Permit Conditions than originally required for its previously granted Special Permit on the same pipeline.

For these reasons, **DTI respectfully withdraws its Petition for Special Permit (PHMSA-2010-0121)**. DTI will proceed with replacement of the pipeline segment noted in the Petition; with completion planned before December 31, 2012. This action will relieve PHMSA of its obligation to issue a decision in regard to DTI's Petition, and will result in new, adequately designed pipe installed in the area of the Class Location Change.

To ensure the safe and reliable operation of the pipeline in the interim, DTI will continue to implement the activities detailed in the Petition, which include but are not limited to:

- *Inline Inspection (both high resolution geometry and MFL) in Spring 2011*
 - o *Baseline Assessment was conducted in 2004, and revealed no actionable anomalies or integrity concerns*
- *Monthly aerial patrols*

- *Quarterly surveillance of the HCA segments (Special Permit Segment included) which include observations in regard to the threats of third party as well as weather and outside force damage*
- *Line-of-sight pipeline markers within the segment*
- *Close Interval Survey in 2011 within the HCA segments (Special Permit Segment included)*

If you have any questions, or require additional information, please do not hesitate to contact me at (304)627-3404.

Respectfully,



Shawn A. Miller, PE
Compliance Engineer, Pipeline Integrity
Dominion Transmission, Inc.

cc: Mr. Byron Coy Jr.