

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

Special Permit Analysis and Findings

Class 1 to 3 Location

Special Permit Information:

Docket Number:	PHMSA-2008-0066
Requested By:	Columbia Gulf Transmission, LLC
Operator ID#:	2620
Original Issuance Date:	March 2, 2010
1st Renewal Issuance Date:	October 9, 2015
1st Renewal Effective Dates:	March 2, 2015 to July 21, 2021
2nd Renewal Issuance Date:	July 21, 2021
Renewal Effective Dates:	July 21, 2021 to July 21, 2031
Code Section(s):	49 CFR 192.611

Purpose:

The Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS),¹ provides this information to describe the facts of the subject special permit application submitted by Columbia Gulf Transmission, LLC (CGT),² 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. CGT requested that PHMSA waive compliance from the 49 Code of Federal Regulations (CFR) 192.611 for natural gas transmission pipeline segments, where the class location has changed from Class 1 to a Class 3 locations and from Class 2 to Class 3 locations.

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 CGT is a wholly-owned subsidiary of TC Energy.

Pipeline System Affected:

This special permit application applies to the CGT request for a waiver of the class location change requirements in 49 CFR 192.611 for approximately 27.66 miles of gas transmission pipelines located in Williamson, Davidson, Trousdale, and Wilson Counties, Tennessee. The special permit will allow CGT to continue operating the 30-inch diameter Mainline 100 Pipeline, 30-inch diameter Mainline 200 Pipeline, and 36-inch diameter Mainline 300 Pipeline *special permit segments*, as defined below, at a maximum allowable operating pressure (MAOP) of 935 pounds per square inch gage (psig) for the Mainline 100 Pipeline, and 1,007 psig for the Mainline 200 and 300 Pipelines.

Special Permit Request:

On September 04, 2019, CGT applied to PHMSA for a renewal of an existing special permit seeking relief from 49 CFR 192.611 for the below-listed *special permit segments*, where a class location change occurred from the original Class 1 to a Class 3 location and from a Class 2 to Class 3 location on the 30-inch diameter Mainline 100 (Mainline 100), 30-inch diameter Mainline 200 (Mainline 200), and 36-inch diameter Mainline 300 (Mainline 300) Pipelines in Williamson, Davidson, Trousdale, and Wilson Counties, Tennessee.

This special permit includes the renewal of a previous special permit granted to CGT that covered many of the same *special permit segments* with updated conditions, extensions of *special permit segments* that were included in the previous special permit, and includes new *special permit segments* added to the renewed special permit.

This special permit applies to the *special permit segments* and *special permit inspection areas* described and defined as follows, using the CGT survey station references:

Special Permit Segments:

- *Special permit segment 1* – Active³ – 30-inch diameter Mainline 100 – 704⁴ feet, SS 1584+69 to SS 1591+59; Williamson County, Tennessee, Year Constructed: 1954;

³ “Active segments” are “currently managed” by a special permit and are to be renewed with the issuance of this special permit.

⁴ This footage does not match stationing due to a station equation within the *special permit segment*.

- ***Special permit segment 2*** – Active – 30-inch diameter Mainline 200 – 1,081 feet, SS 1584+58 to SS 1595+39; Williamson County, Tennessee, Year Constructed: 1958;
- ***Special permit segment 3*** – Active, Extended⁵ – 36-inch diameter Mainline 300 – 796 feet, SS 1584+74 to SS 1592+70 (extension of 262 feet, from SS 1590+08 to SS 1592+70); Williamson County, Tennessee, Year Constructed: 1969;
- ***Special permit segment 4*** – Active, Extended – 30-inch diameter Mainline 100 - 21,115 feet, SS 1783+03 to SS 1994+18 (extension of 10,318 feet, from SS 1891+00 to SS 1994+18); Williamson County, Tennessee, Year Constructed: 1954;
- ***Special permit segment 5*** – Active, Extended – 30-inch diameter Mainline 200 – 10,664 feet, SS 1785+75 to SS 1892+39 (extension of 139 feet, from SS 1891+00 to SS 1892+39); Williamson County, Tennessee, Year Constructed: 1954;
- ***Special permit segment 6*** – Active, Extended – 36-inch diameter Mainline 300 – 20,472 feet, SS 1790+85 to SS 1995+57 (extension of 199 feet, from SS 1790+85 to SS 1792+84, and extension of 10,457 feet from SS 1891+00 to SS 1995+57); Williamson County, Tennessee, Year Constructed: 1968/1969;
- ***Special permit segment 7*** – Active – 30-inch diameter Mainline 100 – 5,578⁶ feet, SS 2210+36 to SS 2266+03; Davidson County, Tennessee, Year Constructed: 1953/1954;
- ***Special permit segment 8*** – Active – 30-inch diameter Mainline 200 – 5,487 feet, SS 2212+41 to SS 2267+28; Davidson County, Tennessee, Year Constructed: 1962;
- ***Special permit segment 9*** – Active – 36-inch diameter Mainline 300 – 603 feet, SS 2208+45 to SS 2214+48; Davidson County, Tennessee, Year Constructed: 1968;
- ***Special permit segment 10*** – Active, Extended – 30-inch diameter Mainline 200 – 6,038 feet, SS 2986+05 to SS 3046+43 (extension of 4,438 feet, from SS 2986+05 to SS 3030+43); Wilson County, Tennessee, Year Constructed: 1963;
- ***Special permit segment 11*** – Active, Extended – 36-inch diameter Mainline 300 – 5,986 feet, SS 2981+69 to SS 3041+55 (extension of 4,386 feet, from SS 2981+69 to SS 3025+55); Wilson County, Tennessee, Year Constructed: 1968;

⁵ “Active, Extended” *special permit segments* are currently managed by a special permit that have some amount of footage added to an endpoint of the existing “active segment” through issuance of this special permit renewal.

⁶ This footage does not match stationing due to a station equation within the *special permit segment*.

- *Special permit segment 12* – New⁷ – 30-inch diameter Mainline 100 – 46 feet, SS 1570+84 to SS 1571+30; Williamson County, Tennessee, Year Constructed: 1954;
- *Special permit segment 13* – New – 30-inch diameter Mainline 100 – 2,323 feet, SS 2016+69 to SS 2039+92; Williamson County, Tennessee, Year Constructed: 1954;
- *Special permit segment 14* – New – 30-inch diameter Mainline 100 – 7,219 feet, SS 2305+73 to SS 2377+92; Davidson County, Tennessee, Year Constructed: 1953;
- *Special permit segment 15* – New – 30-inch diameter Mainline 100 – 1,982 feet, SS 2509+43 to SS 2529+25; Davidson County, Tennessee, Year Constructed: 1953;
- *Special permit segment 16* – New – 30-inch diameter Mainline 100 – 1,377 feet, SS 3142+96 to SS 3156+73; Wilson County, Tennessee, Year Constructed: 1953;
- *Special permit segment 17* – New – 30-inch diameter Mainline 100 – 922 feet, SS 3366+03 to SS 3375+25; Wilson County, Tennessee, Year Constructed: 1953;
- *Special permit segment 18* – New – 30-inch diameter Mainline 100 – 1,292 feet, SS 3376+55 to SS 3389+48; Wilson County, Tennessee, Year Constructed: 1953;
- *Special permit segment 19* – New – 30-inch diameter Mainline 100 – 5,894 feet, SS 3399+47 to SS 3458+42; Wilson County, Tennessee, Year Constructed: 1953;
- *Special permit segment 20* – New – 30-inch diameter Mainline 200 – 9,352 feet, SS 1902+21 to SS 1995+73; Williamson County, Tennessee, Years Constructed: 1958, 1962, and 1963;
- *Special permit segment 21* – New – 30-inch diameter Mainline 200 - 2,309 feet, SS 2018+69 to SS 2041+78; Williamson County, Tennessee, Year Constructed: 1962;
- *Special permit segment 22* – New – 30-inch diameter Mainline 200 – 7,237 feet, SS 2306+66 to SS 2379+03; Davidson County, Tennessee, Year Constructed: 1962;
- *Special permit segment 23* – New – 30-inch diameter Mainline 200 – 298 feet, SS 2654+25 to SS 2657+23; Davidson County, Tennessee, Year Constructed: 1963;
- *Special permit segment 24* – New – 30-inch diameter Mainline 200 – 743 feet, SS 2927+84 to SS 2935+27; Wilson County, Tennessee, Year Constructed: 1963;

⁷ “New” *special permit segments* are pipeline segments that are being added to the special permit through the renewal process which includes a Federal Register notice and the issuance of a Final Environmental Assessment and Finding of No Significant Impact.

- *Special permit segment 25* – New – 30-inch diameter Mainline 200 – 1,065 feet, SS 2943+83 to SS 2954+48; Wilson County, Tennessee, Year Constructed: 1963;
- *Special permit segment 26* – New – 30-inch diameter Mainline 200 – 1,404 feet, SS 3140+40 to SS 3154+44; Wilson County, Tennessee, Year Constructed: 1963;
- *Special permit segment 27* – New – 30-inch diameter Mainline 200 – 1,004 feet, SS 3361+66 to SS 3371+70; Wilson County, Tennessee, Year Constructed: 1963;
- *Special permit segment 28* – New – 30-inch diameter Mainline 200 – 1,280 feet, SS 3373+04 to SS 3385+85; Wilson County, Tennessee, Year Constructed: 1963;
- *Special permit segment 29* – New – 30-inch diameter Mainline 200 – 6,296 feet, SS 3395+18 to SS 3458+14; Wilson County, Tennessee, Year Constructed: 1963;
- *Special permit segment 30* – New – 30-inch diameter Mainline 200 – 7 feet, SS 4142+90 to SS 4142+97; Trousdale County, Tennessee, Year Constructed: 1965;
- *Special permit segment 31* – New – 36-inch diameter Mainline 300 – 621 feet, SS 1568+48 to SS 1574+69; Williamson County, Tennessee, Year Constructed: 1969;
- *Special permit segment 32* – New – 36-inch diameter Mainline 300 – 2,168 feet, SS 2017+32 to SS 2039+00; Williamson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 33* – New – 36-inch diameter Mainline 300 – 9 feet, SS 2197+72 to SS 2197+81; Williamson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 34* – New – 36-inch diameter Mainline 300 – 10 feet, SS 2205+72 to SS 2205+82; Davidson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 35* – New – 36-inch diameter Mainline 300 – 46 feet, SS 3057+71 to SS 3058+17; Wilson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 36* – New – 36-inch diameter Mainline 300 – 687 feet, SS 3062+97 to SS 3069+84; Wilson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 37* – New – 36-inch diameter Mainline 300 – 1,315 feet, SS 3136+89 to SS 3150+04; Wilson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 38* – New – 36-inch diameter Mainline 300 – 867 feet, SS 3358+02 to SS 3366+69; Wilson County, Tennessee, Year Constructed: 1968;
- *Special permit segment 39* – New – 36-inch diameter Mainline 300 – 1,326 feet, SS 3368+06 to SS 3381+32; Wilson County, Tennessee, Year Constructed: 1968;

- *Special permit segment 40* – New – 36-inch diameter Mainline 300 – 5,824 feet, SS 3391+59 to SS 3449+83; Wilson County, Tennessee, Year Constructed: 1968; and
- *Special permit segment 41* – New – 36-inch diameter Mainline 300 – 2,580 feet, SS 3647+69 to SS 3673+49; Wilson County, Tennessee, Year Constructed: 1970.

Special Permit Inspection Areas:

The *special permit inspection areas* are defined as the area that extends 220 yards on each side of the centerline along approximately 218.2 miles of Mainline 100, Mainline 200, and Mainline 300 Pipelines as follows:

- *Special Permit Inspection Area 1* – 30-inch diameter Mainline 100, SS 264+69 to SS 3586+03 (62.9 miles);
- *Special Permit Inspection Area 2* – 30-inch diameter Mainline 200, SS 264+58 to SS 4366+43 (77.7 miles); and
- *Special Permit Inspection Area 3* – 36-inch diameter Mainline 300, SS 264+74 to SS 4361+55 (77.6 miles).

The *special permit inspection areas* are in Maury, Williamson, Davidson, Sumner, Trousdale, and Wilson Counties, Tennessee.⁸ **Figures 1 through 11** are maps showing the 30-inch diameter Mainline 100, 30-inch diameter Mainline 200, and 36-inch diameter Mainline 300 Pipelines *special permit segments*, *special permit inspection areas*, and class locations.

Public Notice:

On October 30, 2020, PHMSA posted a notice of this special permit request in the Federal Register (85 FR 68953) with a closing date of November 29, 2020. PHMSA received one (1) public comment concerning this special permit request through November 30, 2020. The portion of the public comment related to the draft Environmental Assessment (EA) is addressed in the Final Environmental Assessment (FEA) and Finding of No Significant Impact (FONSI).

PHMSA received one (1) public comment (anonymous), which expressed opposition to the oil and gas industry and its political influence. The commenter also warned about the impacts of climate change and advocated for the utilization of renewable energy. In addressing this

⁸ The *special permit inspection areas* include the *special permit segments*.

comment, the special permit conditions are designed to protect the public and the environment on the *special permit segments* and *special permit inspection areas*.

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 segments* and *special permit inspection areas*. The special permit will require that CGT provide a systematic program to review and remediate the pipeline for safety concerns in its Operations and Maintenance (O&M) Manual and Procedures. Additional operational integrity reviews and remediation requirements will be required by this special permit for these *special permit segments* for Class 1 to 3 location changes or Class 2 to 3 location changes.

The CGT special permit application letter, Federal Register notice, FEA and FONSI, special permit with conditions, special permit analysis and findings document, and all other pertinent documents are available for review in Docket No. PHMSA-2008-0066 in the Federal Docket Management System (FDMS) located at www.Regulations.gov.

Analysis:

Background: On June 29, 2004, PHMSA published in the Federal Register (69 FR 38948) the criteria it uses for the consideration of applications for class location change waivers, now being granted or denied through a special permit. First, certain threshold requirements should be met on a pipeline *special permit segment* for a class location change special permit to be granted. 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 No. PHMSA-RSPA-2004-17401. Third, special permits will only 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. The operator's Federal pipeline safety regulation compliance history is also evaluated as part of the criteria matrix for acceptability prior to issuance of a special permit.

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 CGT special permit request.

- 1) No pipeline segments in a class location changing to Class 4 location will be considered.
 - This special permit request is for *special permit segments* on the CGT 30-inch diameter Mainline 100, 30-inch diameter Mainline 200, and 36-inch diameter Mainline 300 Pipelines, where a change has occurred from a Class 1 location to a Class 3 location or a Class 2 location to a Class 3 location.
 - CGT meets this requirement.
- 2) No bare pipe will be considered.
 - The CGT *special permit segments* are externally coated with asphalt enamel. CGT has met this requirement of no bare pipe.
 - CGT has not reported any coating issues such as disbonded coating.
- 3) No pipe containing wrinkle bends will be considered.
 - There are no wrinkle bends in the *special permit segments*.
 - CGT has met this requirement.
- 4) No pipe segments operating above 72% of the specified minimum yield strength (SMYS) will be considered for a Class 3 special permit.
 - The *special permit segments* operate at or below 72% SMYS.
 - The pipe for the *special permit segments* on the Mainline 100 Pipeline is 30-inch diameter, 0.375-inch wall thickness, and pipe yield strength of 52,000 psig. The pipe seam is a double submerged, arc-welded seam and was manufactured by National Tube in 1954.
 - The pipe for the *special permit segments* on the Mainline 200 Pipeline is primarily 30-inch diameter, 0.375-inch wall thickness, and pipe yield strength of 56,000 psig. The pipe seam is a double submerged, arc-welded seam and was manufactured by National Tube in 1958.
 - The pipe for the *special permit segments* on the Mainline 300 Pipeline is primarily 36-inch diameter, 0.388-inch wall thickness, and pipe yield strength of 65,000 psig. The pipe seam is a double submerged, arc-welded seam and was manufactured by National Tube in 1968.
 - CGT has met this requirement.

5) Records must be produced that show a hydrostatic test to at least 1.25 x MAOP. Table 1 provides the pressure test, year of each test, test duration, pipeline MAOP and pressure test percent of MAOP for each pipeline:

Table 1: Hydrostatic Testing Records for Special Permit Segments					
Pipeline Name	Pressure Test Year	Pressure (psig)	Test Duration (hours)	MAOP (psig)	Pressure Test Percent of MAOP
Mainline 100	1968	1,299	12	935	1.389
	1969	1,330	24		1.422
	1979	1,176	8		1.258
	1979	1,179	8		1.261
	1983	1,355	8		1.449
	2003	1,452	8		1.553
	2011	1,570	8		1.679
Mainline 200	1963	1,500	24	1,007	1.490
	1963	1,511	24		1.500
	1965	1,460	24		1.450
	1979	1,264	8		1.255
	1979	1,258	8		1.249
	2002	1,616	8		1.605
	2003	1,564	8		1.553
	2005	2,151	8		2.136
Mainline 300	1968	1,515	24	1,007	1.504
	1968	1,438	24		1.428
	1969	1,315	24		1.306
	1970	1,429	24		1.419

- CGT has met this requirement.
- 6) In-line inspection (ILI) must have been performed with no significant anomalies identified that indicate systemic problems such as stress corrosion cracking (SCC).
- CGT ran ILI tools on Mainline 100 Pipeline in 2015 and conducted fifteen (15) excavations and eight (8) repairs in the *special permit inspection area*.
 - CGT ran ILI tools on Mainline 200 in 2015 and conducted twenty-five (25) excavations and six (6) repairs in the *special permit inspection area*.
 - CGT ran ILI tools on Mainline 300 in 2015, 2016, and 2017 and conducted thirty-six (36) excavations and five (5) repairs in the *special permit inspection area*.

- CGT has had no SCC findings or failures. Due to the coating type and operational and environmental conditions of the pipeline, CGT has evaluated the *special permit segments* and *special permit inspection areas* as being susceptible to SCC, for both near-neutral and high-pH SCC.
 - SCC is a significant safety threat; therefore, CGT will need to conduct assessments, described in the conditions to the special permit, to meet this requirement.
- 7) Criteria for consideration of a class location change waiver, being considered through the special permit, published by PHMSA in the Federal Register (69 FR 38948), define a *waiver inspection area (special permit inspection area)* as up to 25 miles of pipe on either side of the *waiver segment (special permit segment)*.
- A special permit would be contingent upon CGT's incorporation of the *special permit segments* in its written integrity management program as covered segments in a high consequence area in accordance with 49 CFR 192.903 and that CGT must assess and remediate threats to the *special permit inspection areas*.

Criteria Matrix: The data submitted by CGT for the *special permit segments* have been compared to the class location change special permit criteria matrix. The data fall within the *probable acceptance or the possible acceptance* column of the criteria matrix, except for PHMSA enforcement findings which fall under the *requires substantial justification*.

- The *special permit segments* fall in the *probable acceptance* column of the criteria matrix for:
 - Design stress, depth of pipe cover, test pressure, test failures, local geology, type of service, pressure fluctuations, safety related conditions, direct assessment, ILI type, and damage prevention program.
- The *special permit segments* fall in the *possible acceptance* column of the criteria matrix for:
 - Class 1 to 3 location, pipe manufacturer, pipe material, pipe coating type (may shield cathodic protection (CP)), leaks and failures, CP, HCA program, and ILI program.
- The *special permit segments* fall in the *requires substantial justification* column of the criteria matrix for:
 - Pipe girth welds have not been non-destructively tested;

- The coating type may shield CP when disbonded causing SCC⁹, and
- Inspection findings (Enforcement History) – PHMSA enforcements are in the “Past Enforcement History – January 1, 2010 through January 21, 2021” section below.

Operational Integrity Compliance:

To inform PHMSA’s decision about whether a special permit could provide a level of safety greater than or equal to a pipe replacement or pressure reduction and is consistent with pipeline safety, PHMSA reviewed this special permit request to understand the known type of integrity threats that are in the *special permit segments* and *special permit inspection areas*. This integrity information was used to design special permit conditions to provide a systematic program to review and remediate the pipeline for safety concerns. Additional operational integrity review and remediation requirements are required by this special permit 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, pipe depth of soil cover, weld seam and girth weld integrity, anomalies in the pipe steel and welds, and material and structures either along or near the pipeline that could cause the cathodic protection system to be ineffective. PHMSA has carefully designed a comprehensive set of conditions that CGT must implement to comply with this special permit.

Past Enforcement History – January 1, 2011 through January 21, 2021:

During January 1, 2011, through January 21, 2021, CGT was cited in five (5) enforcement actions with a total of \$33,100 in assessed civil penalties. PHMSA issued one (1) Corrective Action Order, one (1) Notice of Amendment, two (2) Notice of Probable Violation and one (1) Warning Letter to CGT. TC Energy acquired CGT in 2016 and the listed enforcement actions were previous to TC Energy owning and operating the CGT system.

From January 1, 2011, through January 21, 2021, TC Energy, the operator of CGT, was cited in 30 enforcement actions with a total of \$467,500 in assessed civil penalties on its ANR Pipeline

⁹ Two (2) types of SCC are found on pipelines: high pH (9 to 11) SCC and near-neutral pH (6 to 8) SCC. Coal tar and asphalt coatings that are disbonded are more prone to having SCC.

Company, Columbia Gas Transmission, LLC, and Columbia Gulf Transmission, LLC, pipeline systems. PHMSA issued eight (8) Notice of Amendments, nine (9) Notices of Probable Violations, eleven (11) Warning Letters, one (1) Safety Order, and one (1) Corrective Action Order to TC Energy. TC Energy acquired the Columbia Gas Transmission, LLC, and Columbia Gulf Transmission, LLC, pipeline systems in 2016 and these enforcement actions occurred when TC Energy was not the operator of the pipeline systems.

Tables 2 and 3 below show PHMSA’s enforcement actions and civil penalties for TC Energy on these systems (operator identification numbers (OPID#) 405, 2616, 2620):

Table 2: TC Energy Enforcement Matters from January 1, 2011, through January 21, 2021						
Status	Corrective Action Order	Notice of Amendment	Notice of Probable Violation	Safety Order	Warning Letter	Total
CLOSED	1	6	6	1	11	25
OPEN	0	2	3	0	0	5
Total	1	8	9	1	11	30

Table 3: TC Energy Enforcement Civil Penalty Status January 1, 2011 through January 21, 2021				
Proposed	Awaiting Order	Assessed	Withdrawn/Reduced	Collected
\$931,500	\$464,000	\$467,500	\$0	\$467,500

The type of 49 CFR Part 192 enforcement violations against TC Energy on these three (3) pipeline systems from 2010 through 2020 were as follows: 49 CFR 192.12, 192.161, 192.163, 192.225, 192.455, 192.465, 192.471, 192.479, 192.481, 192.491, 192.603, 192.605, 192.612, 192.616, 192.619, 192.625, 192.631, 192.705, 192.707, 192.709, 192.727, 192.735, 192.736, 192.805, 192.905, 192.907, 192.911, and 192.935.

Findings:

Based on the information submitted by CGT and PHMSA’s analysis of the technical, operational, and safety issues, PHMSA finds that granting this special permit to CGT to operate the *special permit segments* on the 30-inch diameter Mainline 100, 30-inch diameter Mainline 200, and 36-inch diameter Mainline 300 Pipelines located in Williamson, Davidson, Trousdale,

and Wilson Counties, Tennessee, for approximately 27.66 miles of Class 1 location pipe in a Class 3 location is consistent with pipeline safety.

CGT's enforcement record does not reflect sustained and substantial noncompliance with 49 CFR Part 192. PHMSA has designed the special permit conditions to effectively assess and remediate threats to the *special permit segments* and *special permit inspection areas*, including assessments to evaluate pipe girth welds that have not been non-destructively tested, any pipe with missing material records, and SCC. To ensure CGT properly implements the special permit conditions, CGT will be required to give PHMSA an annual review of their compliance with the special permit.

PHMSA finds that no significant negative impact to human safety and the environment will result from the issuance and full implementation of a special permit that waives the requirements of 49 CFR 192.611 for class location changes to a Class 3 location. This permit requires CGT to implement the special permit conditions that include safety requirements on the operations, maintenance, and integrity management of the *special permit segments* and the *special permit inspection areas*.

Completed in Washington DC on: July 21, 2021

Prepared by: PHMSA - Engineering and Research Division

**Figure 1 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments and Inspection Areas**

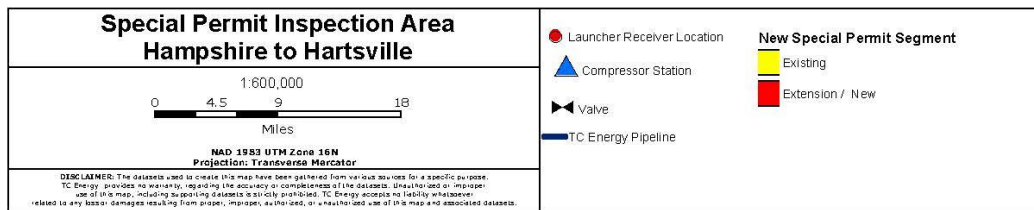
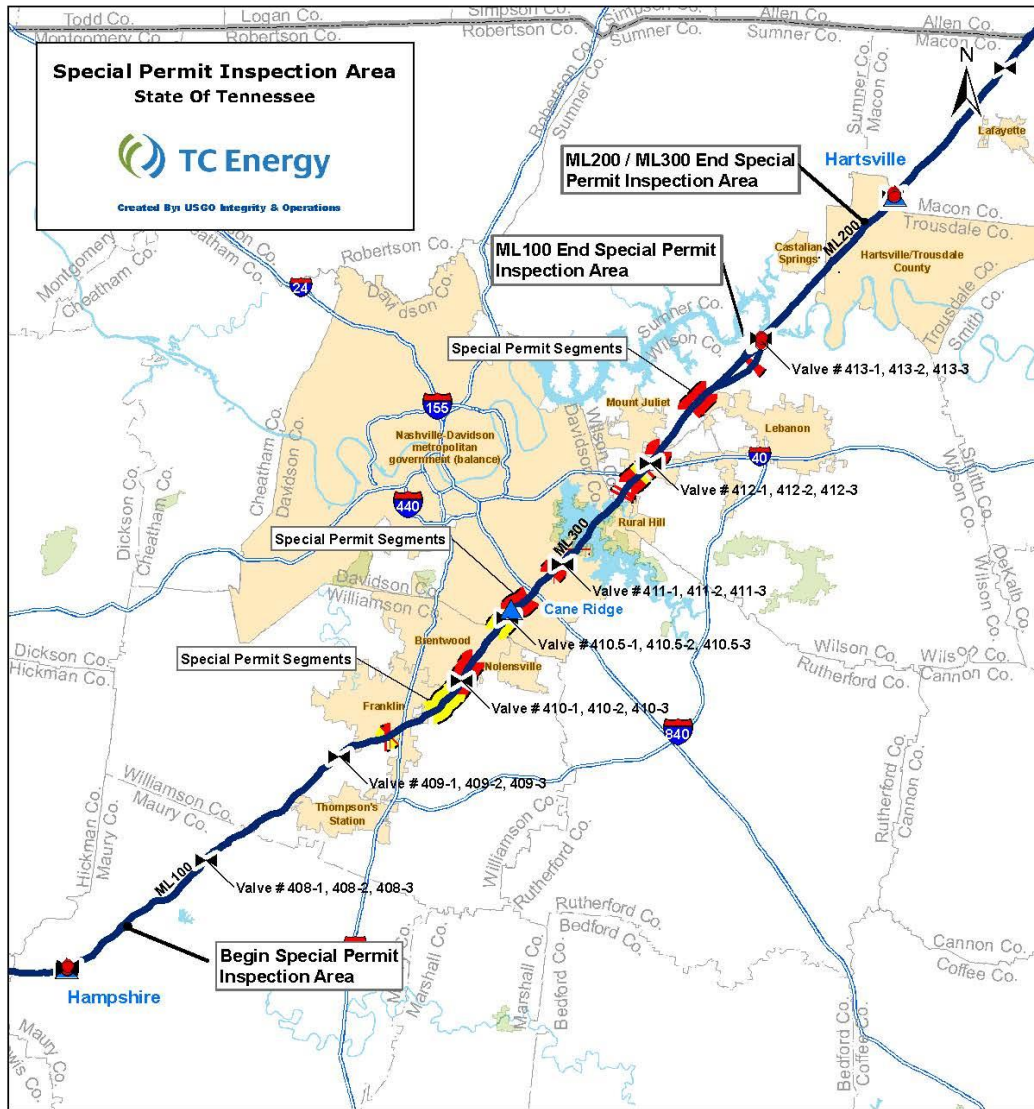


Figure 2 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments

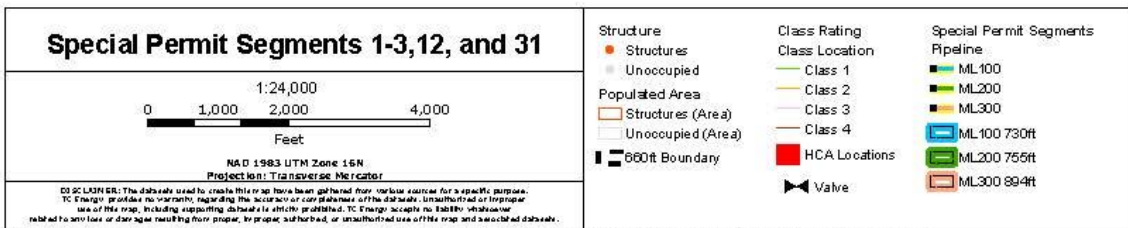
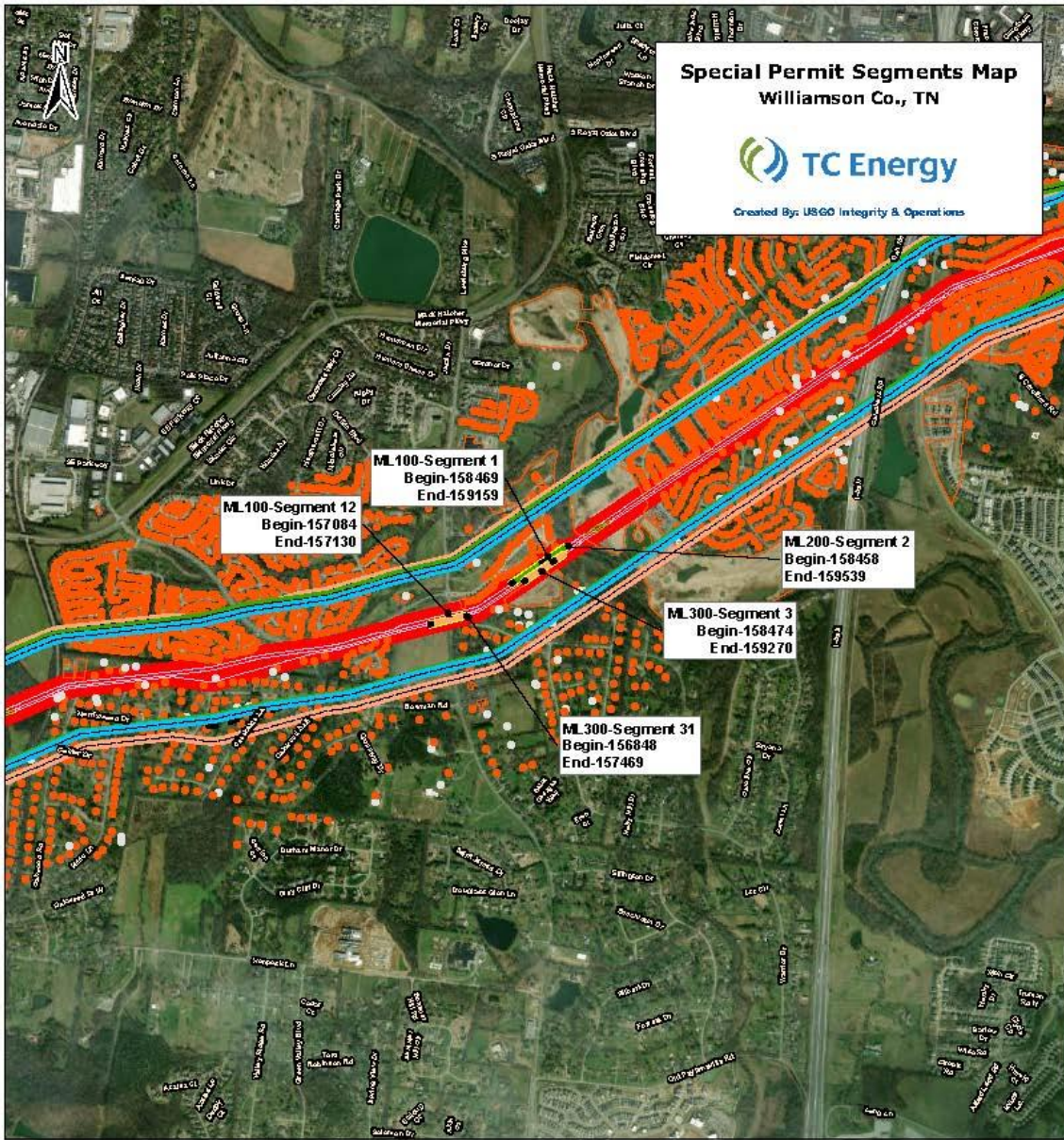


Figure 3 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments

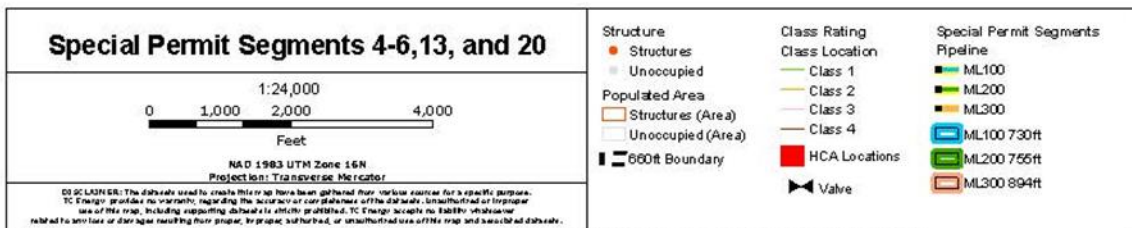
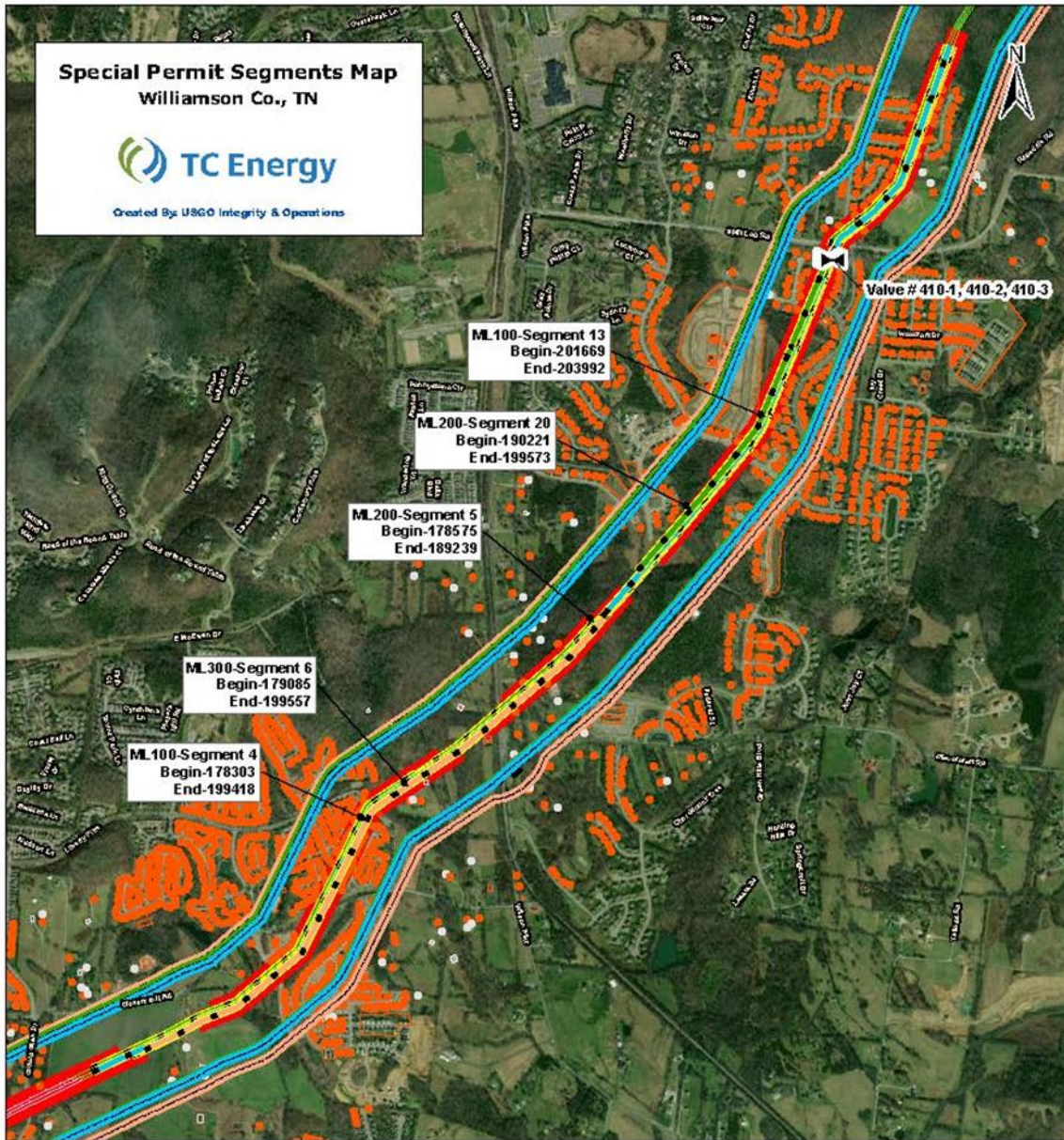


Figure 4 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments

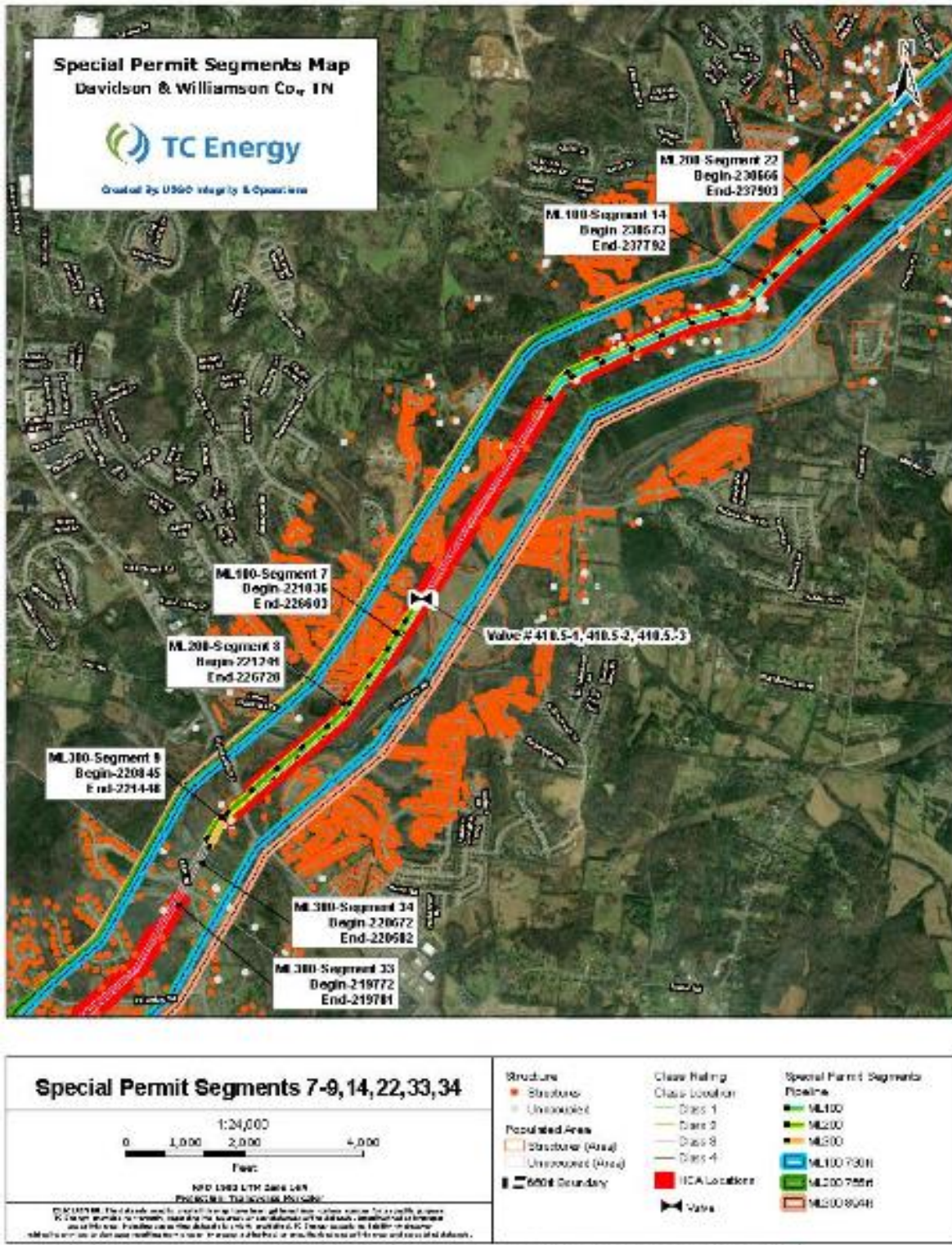
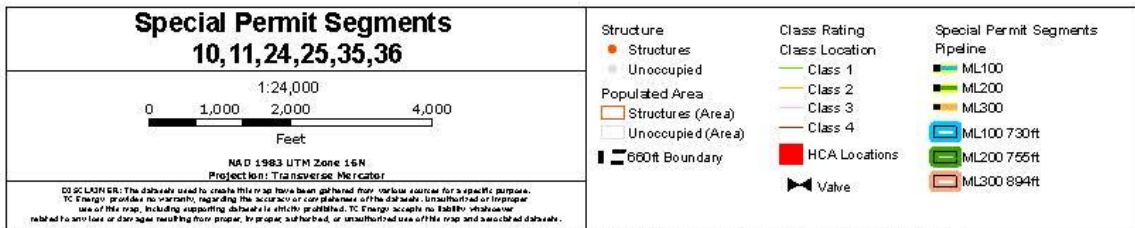
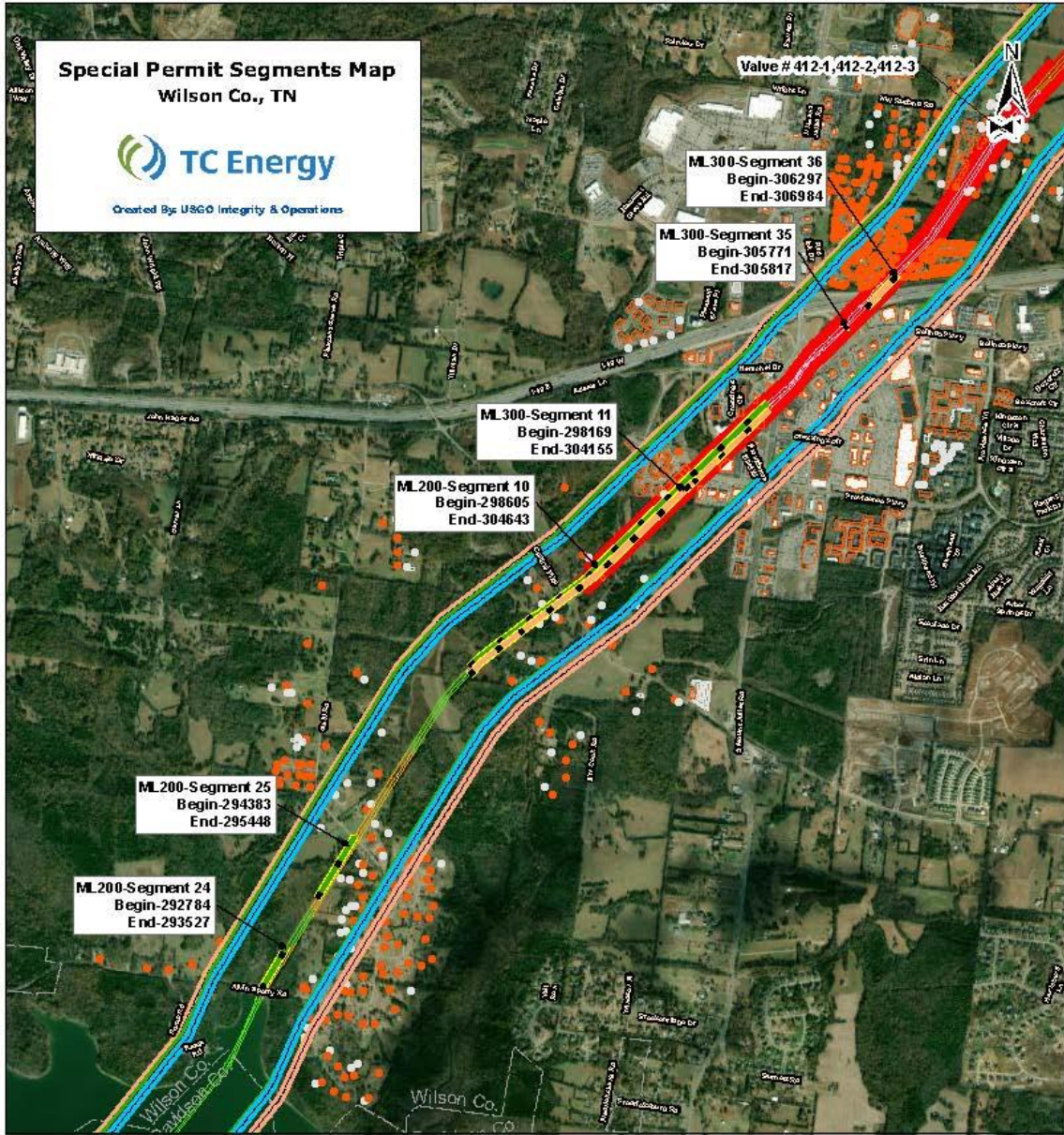
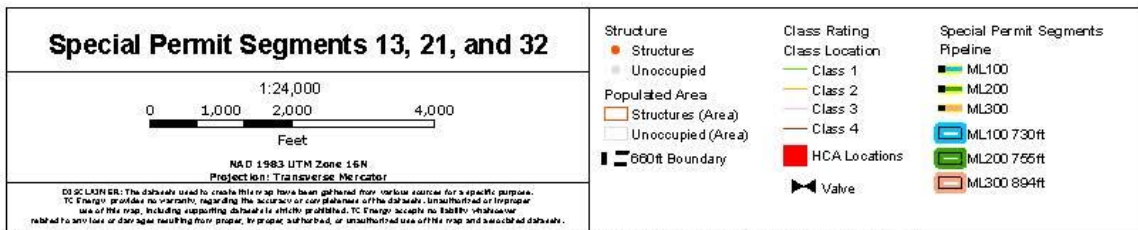
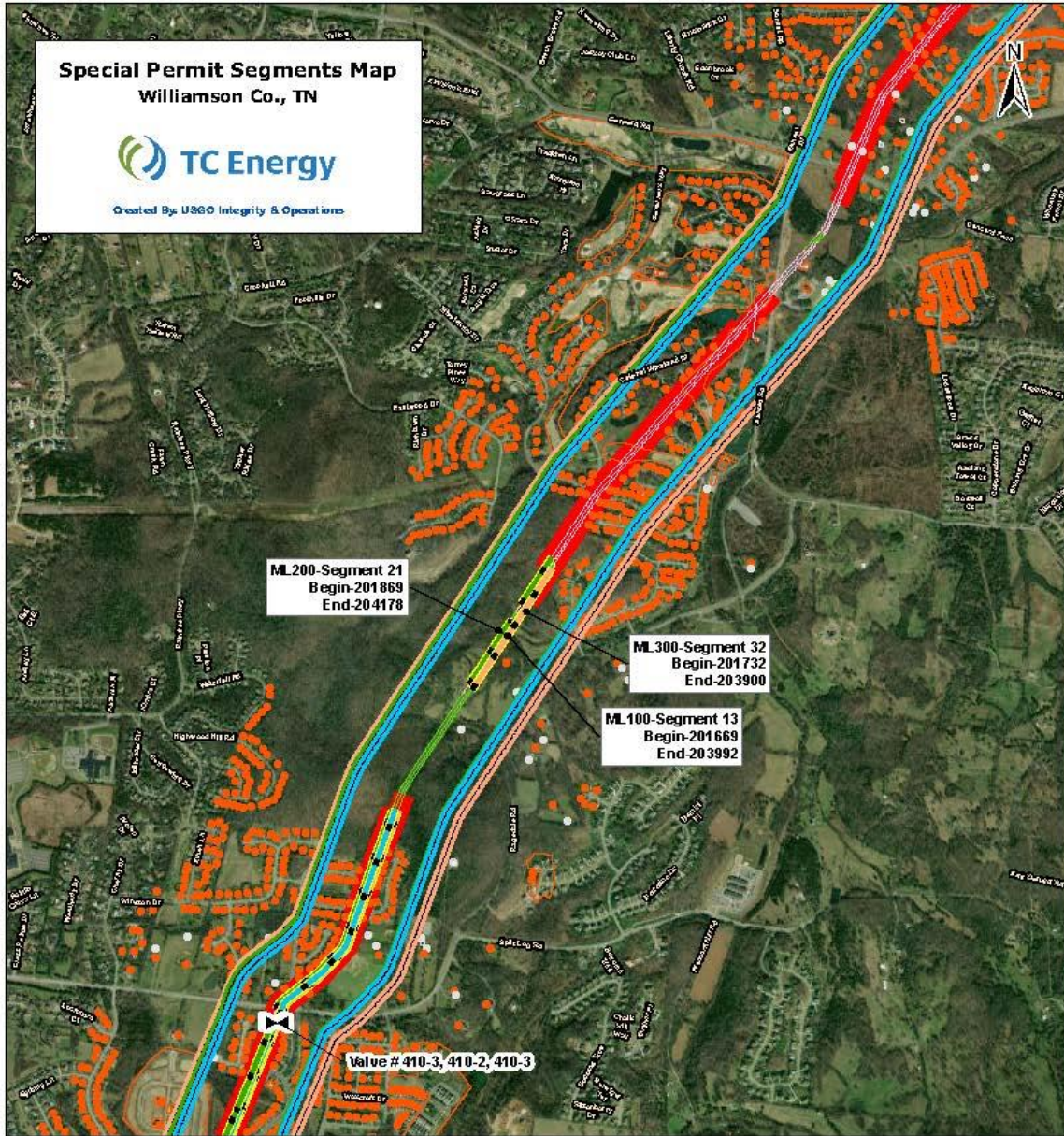


Figure 5 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments



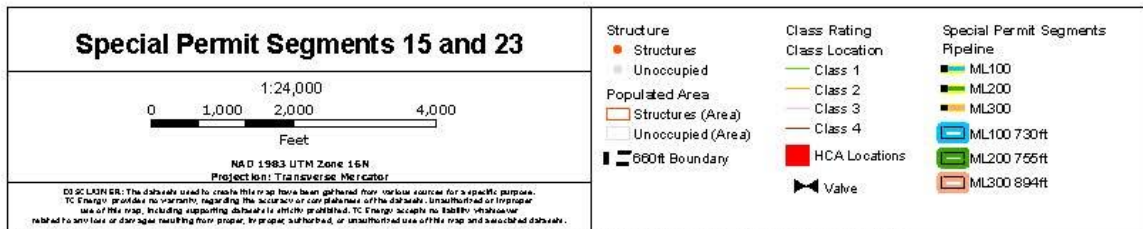
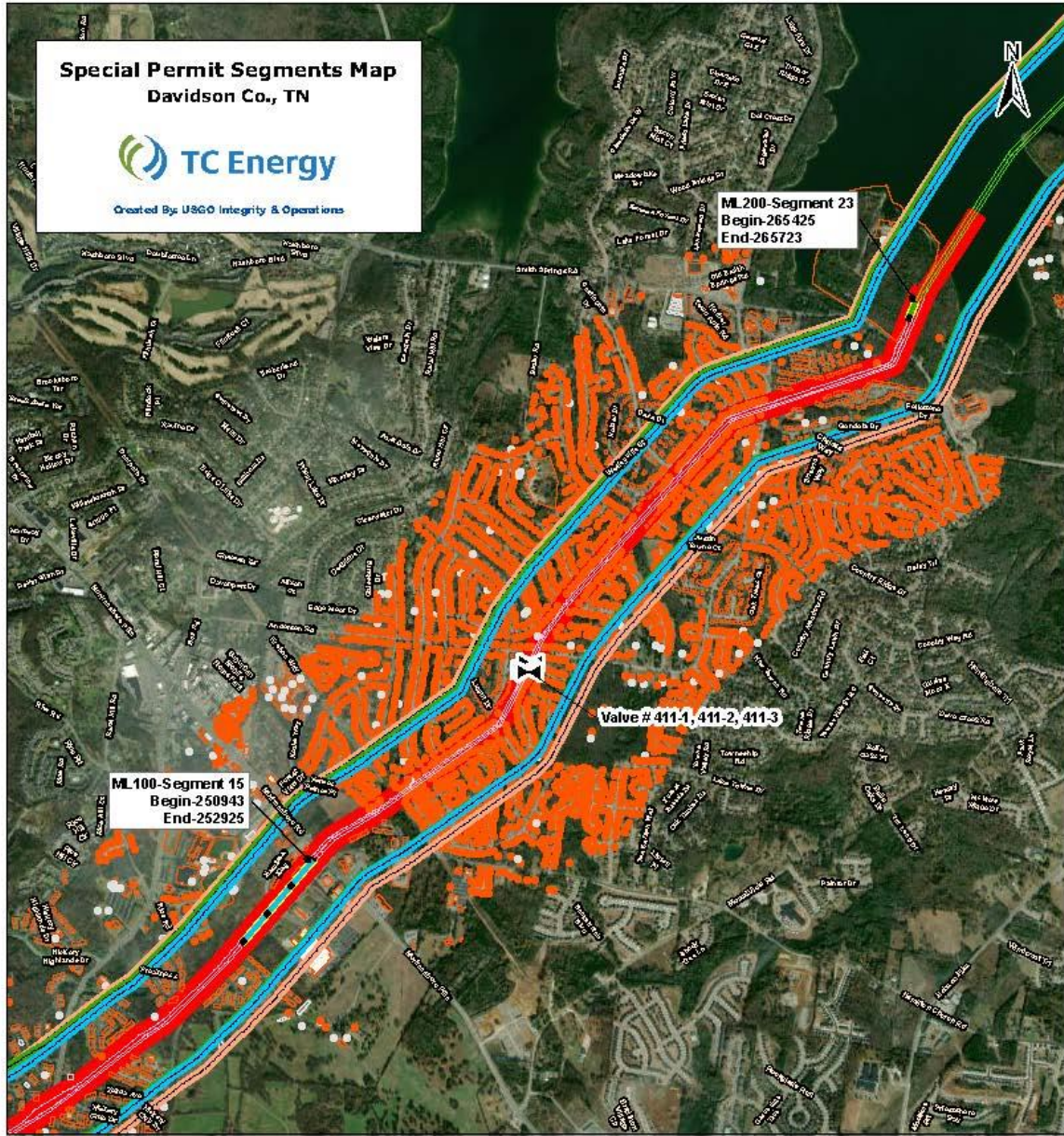
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**Figure 6 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments**



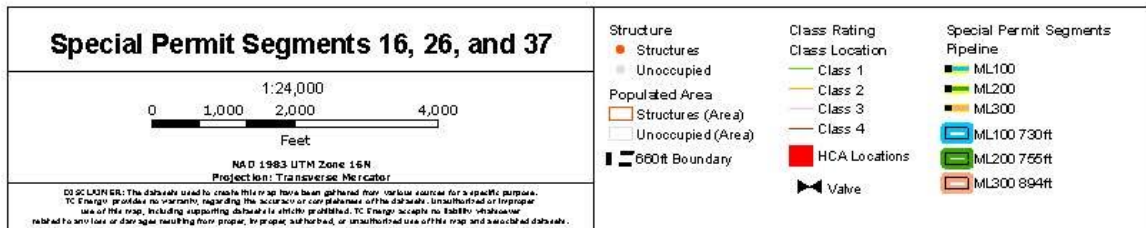
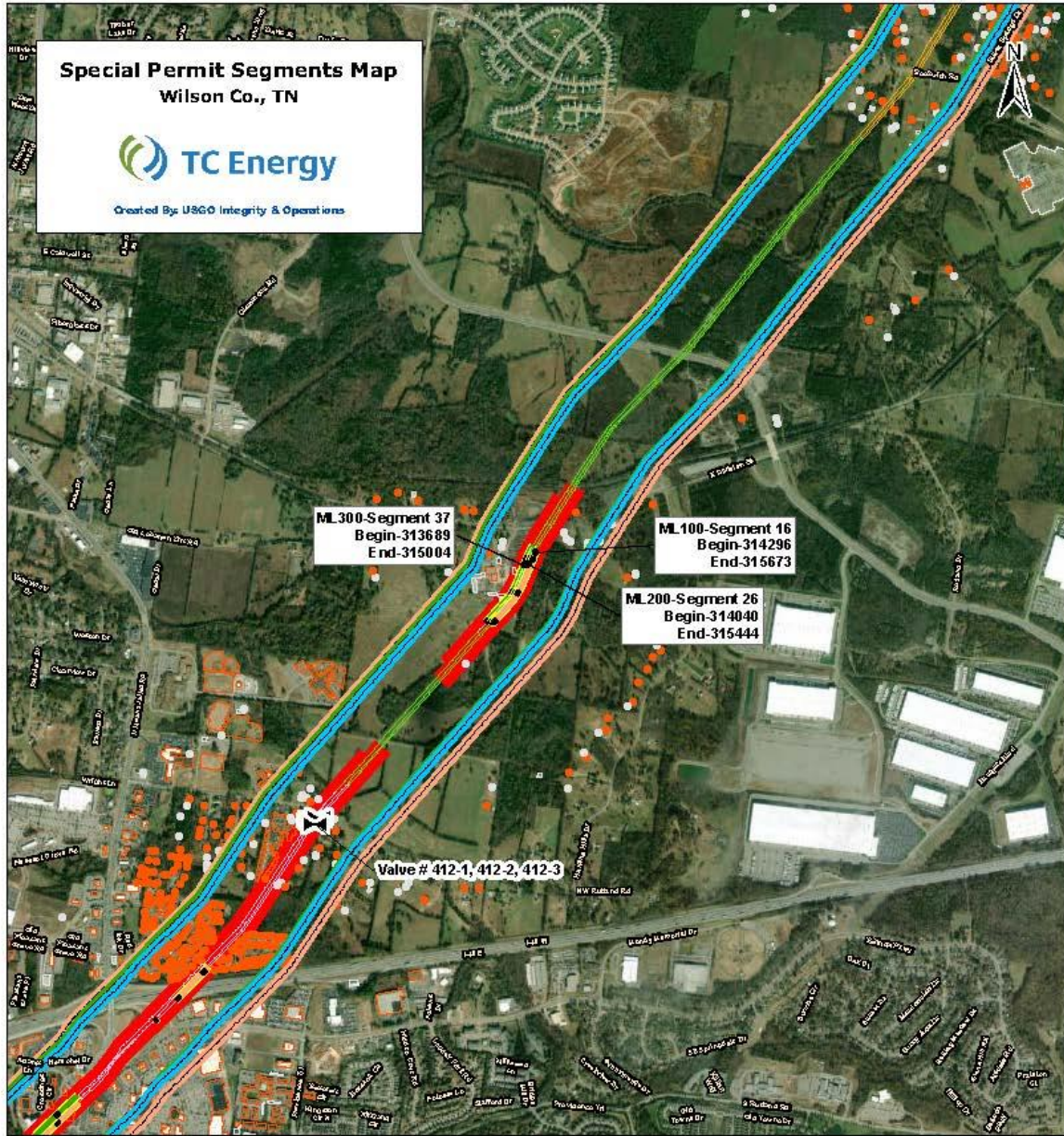
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Figure 7 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments



G:\16-Mainline\Special Permit Areas\CGT_TCD New Special Permit Inspection Area Mainline\CGT_TCD Renewal Segments\cb\CGT_Map_Segments_Returns\CGT1_Segments_15_23.mxd

**Figure 8 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments**



G:\16-Mainline\Special Permits\Area\CGT_TCO\New\Special Permits\Inspection Area\Map\CGT_TCO_Renewal_Segments\Map\CGT_Map_Segments_Returns\Area\CGT_Segments_16_26_37.mxd

Figure 9 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments

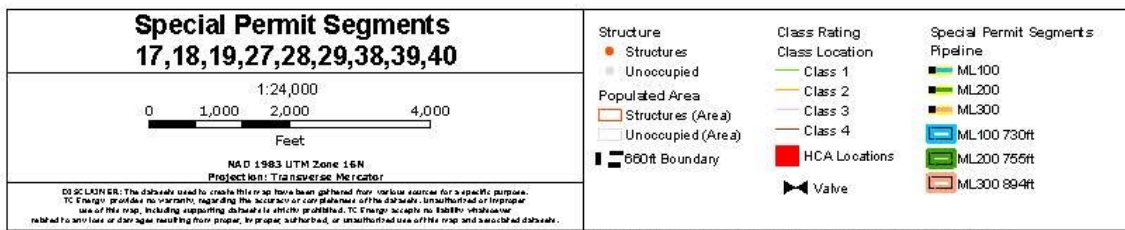
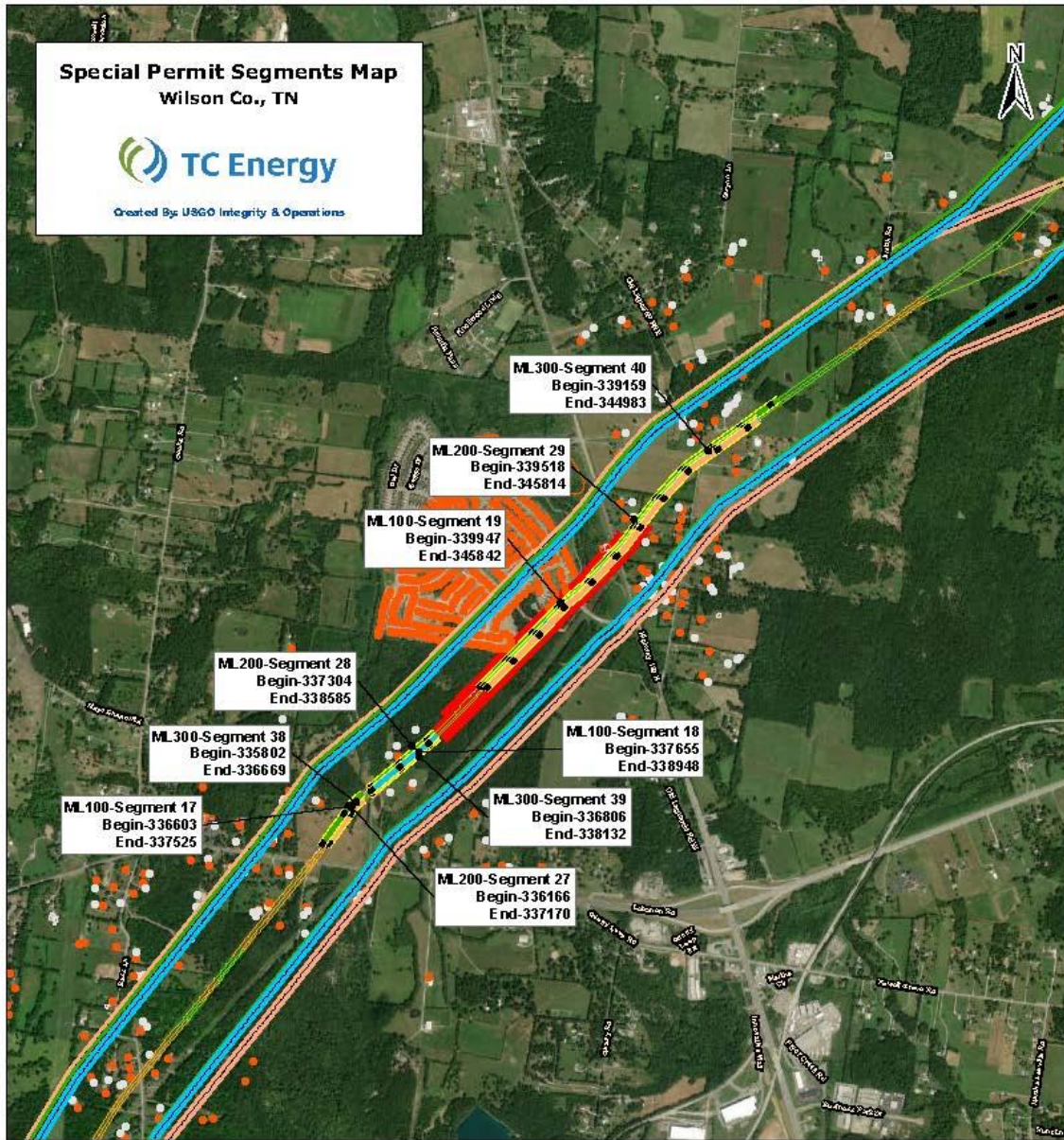


Figure 10 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments

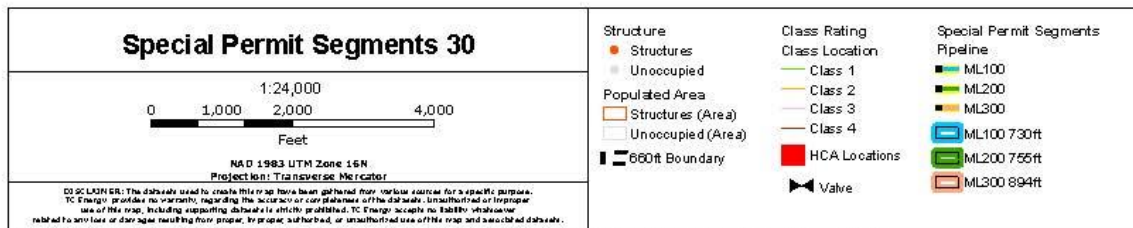
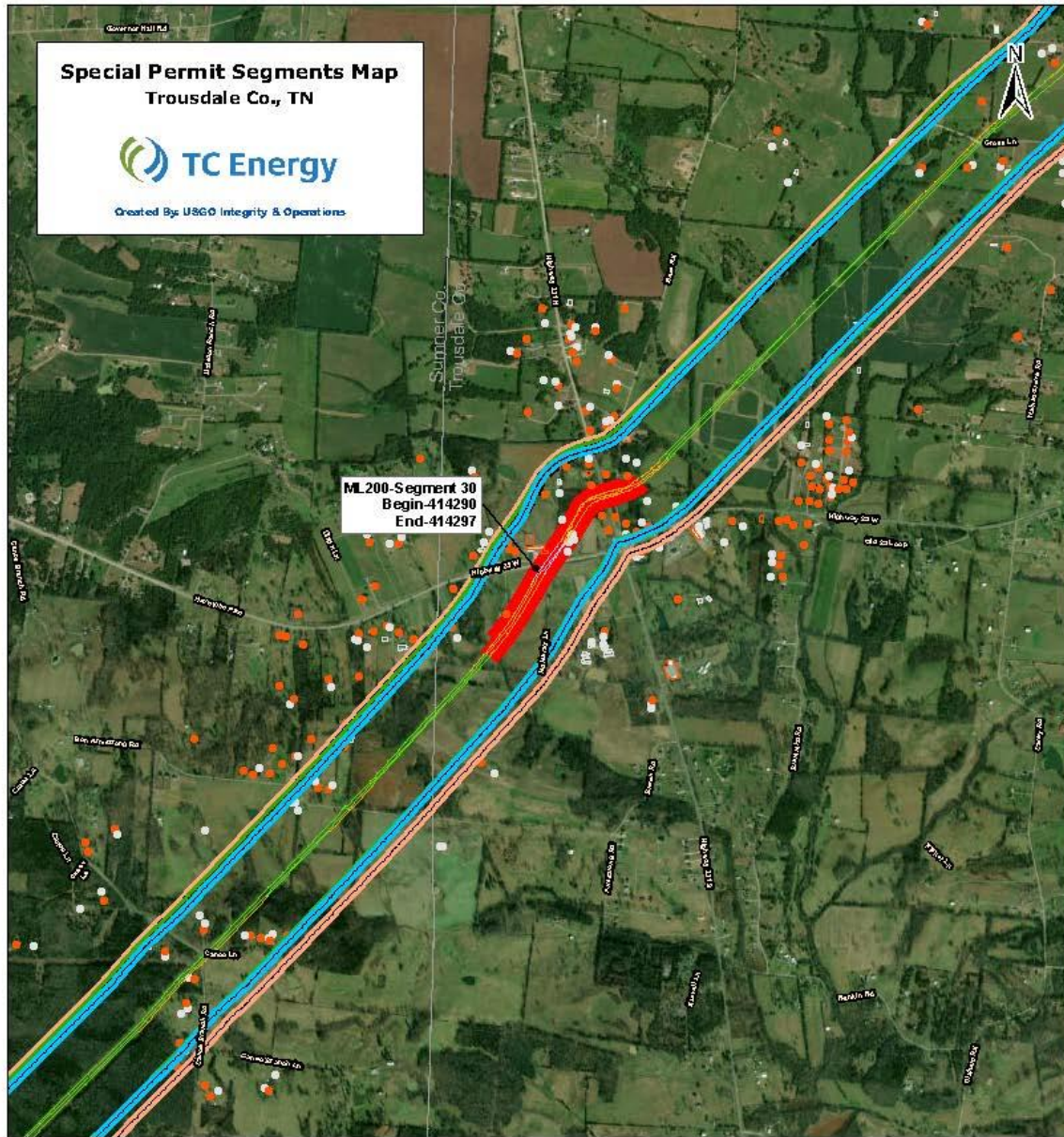


Figure 11 – CGT 30-inch Line 100, 30-inch Line 200 and 36-inch Line 300 Route Map
Special Permit Segments

