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-2019-0201
Requested By:	Columbia Gulf Transmission, LLC
Operator ID#:	2060
Original Date Requested:	October 15, 2019
Original Issuance Date:	March 31, 2022
Effective Dates:	March 31, 2022 to March 31, 2032
Code Section(s):	49 CFR 192.611, 192.505(c), and 192.619(a)(2)

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, 192.505(c), and 192.619(a)(2) for natural gas transmission pipeline segments, where the class location has changed from a Class 1 to a Class 3 location.[3]

[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.

[3] This special permit is for Class 1 or Class 2 locations that have changed to Class 3 locations due to population growth in accordance with 49 CFR 192.5. The existing pipe in the ***special permit segments*** is Class 1 design pipe.

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 88,768 feet (approximately 16.812 miles) of 24-inch, 30-inch, and 36-inch diameter gas transmission Mainline (ML) and East Lateral (EL) Pipelines located in Lafayette Parish, Louisiana; Alcorn and Union Counties, Mississippi; Macon County, Tennessee; and Carter, Menifee, Montgomery, and Rowan Counties, Kentucky. This special permit will allow CGT to continue operating the 30-inch diameter ML 100, 30-inch diameter ML 200, 36-inch diameter ML 300, 24-inch diameter EL 200, and 30-inch diameter EL 400 Pipeline ***special permit segments*** as defined below at a maximum allowable operating pressure (MAOP) of 935 pounds per square inch gage (psig) for the ML 100 Pipelines, 1,007 psig for the ML 200 and ML 300 Pipelines, and 973 psig for the EL 200 and EL 400 Pipelines.

Special Permit Request:

On October 15, 2019, CGT applied to PHMSA for a special permit seeking relief from 49 CFR 192.611, 192.505(c), and 192.619(a)(2) for the below-listed ***special permit segments***, where a class location change occurred from the original Class 1 to Class 3 location in Lafayette Parish, Louisiana; Alcorn and Union Counties, Mississippi; Macon County, Tennessee; and Carter, Menifee, Montgomery, and Rowan Counties, Kentucky.

This special permit was requested in lieu of pipe replacement, pressure reduction, or a new pressure test for Class 1 to 3 location changes (including where the existing pressure test is below an 8-hour duration or below either 1.25 times MAOP or 1.5 times MAOP) for 41 ***special permit segments*** totaling 88,768 feet (approximately 16.812 miles) in total length of pipeline.

Special Permit Segments:

This special permit applies to the ***special permit segments*** in **Table 1 – Special Permit Segments** and are identified using the CGT survey station (SS) references.

Table 1 – Special Permit Segments											
Special Permit Segment Number[4]	Outside Diameter (inches)	Line Name	Length (feet)	Start Survey Station (SS)	End Survey Station (SS)	County or Parish, State	Year Installed	Seam Type	MAOP (psig)	Pressure Test - Condition 1(b) Required (Yes)	Material - Condition 13(d) Required (Yes)
1	24	EL 200	1,453	479+60	494+13	Lafayette, LA	1954	DSAW	973	Yes[5]	Yes
2	24	EL 200	5,226	502+25	554+51	Lafayette, LA	1954	DSAW	973	Yes	Yes
3	24	EL 200	73	559+86	560+59	Lafayette, LA	1954	DSAW	973	Yes	Yes
4	24	EL 200	659	638+76	645+35	Lafayette, LA	1954	DSAW	973	Yes	Yes
5	24	EL 200	2,204	716+07	738+11	Lafayette, LA	1954	DSAW	973	Yes	Yes
7	30	EL 400	1,455	470+13	484+68	Lafayette, LA	1971	EFW / DSAW	1007		Yes
8	30	EL 400	2,882	489+52	518+34	Lafayette, LA	1971	EFW / DSAW	1007		Yes
10	30	ML 100	4,928	2006+68	2055+96	Union, MS	1954	DSAW	935		Yes
13	30	ML 100	70	4170+48	4171+18	Alcorn, MS	1954	DSAW	935		Yes
14	30	ML 100	3,119	4223+87	4255+06	Alcorn, MS	1954	DSAW	935		Yes
15	30	ML 100	1,873	4382+15	4400+88	Alcorn, MS	1954	DSAW	935		Yes
16	30	ML 100	1,259	338+43	351+02	Macon, TN	1954	DSAW	935		Yes
17	30	ML 100	2,637	395+56	421+93	Macon, TN	1954	DSAW	935		Yes
18	30	ML 100	1,008	335+67	345+75	Montgomery, KY	1954	DSAW	935		Yes
19	30	ML 100	62	397+23	397+85	Menifee, KY	1954	DSAW	935		Yes
20	30	ML 100	5,080	2737+94	2788+74	Carter, KY	1954	DSAW	935	Yes[6]	Yes
21	30	ML 100	2,363	3434+23	3457+86	Carter, KY	1954	DSAW	935	Yes	Yes
22	30	ML 100	418	3467+65	3471+83	Carter, KY	1954	DSAW	935	Yes	Yes
23	30	ML 100	535	3504+57	3509+92	Carter, KY	1954	DSAW	935	Yes	Yes
24	30	ML 100	1,501	3515+84	3530+85	Carter, KY	1954	DSAW	935	Yes	Yes
28	30	ML 200	4,638	2010+42	2056+80	Union, MS	1962	DSAW	1007		Yes
30	30	ML 200	80	4172+12	4172+92	Alcorn, MS	1965	EFW	1007		Yes
31	30	ML 200	3,179	4225+85	4257+64	Alcorn, MS	1965	EFW / DSAW	1007		Yes
32	30	ML 200	2,072	4384+22	4404+94	Alcorn, MS	1965	EFW	1007		Yes
41	30	ML 200	2,780	323+05	350+85	Macon, TN	1958	DSAW	1007		Yes
42	30	ML 200	2,609	396+05	422+14	Macon, TN	1958	DSAW	1007		Yes
43	30	ML 200	185	1682+05	1683+90	Rowan, KY	1958	DSAW	1007		Yes

[4] The ***special permit segments 6, 9, 11, 12, 25, 26, 27, 29, 33, 34, 35, 36, 37, 38, 39, 40, 48, 56, 58, and 59*** were removed from the special permit at the request of CGT. These ***special permit segments*** will require stronger pipe, a re-pressure test, or stronger pipe for the Class location change to meet 49 CFR 192.611 unless included in another ***special permit segment***.

[5] ***Special permit segments 1, 2, 3, 4, and 5***: The pressure test records provided did not meet TVC requirements as established in 49 CFR 192.517(a).

[6] ***Special permit segments 20, 21, 22, 23, and 24***: The pressure test records provided did not meet TVC requirements as established in 49 CFR 192.517(a).

Table 1 – Special Permit Segments											
Special Permit Segment Number[4]	Outside Diameter (inches)	Line Name	Length (feet)	Start Survey Station (SS)	End Survey Station (SS)	County or Parish, State	Year Installed	Seam Type	MAOP (psig)	Pressure Test - Condition 1(b) Required (Yes)	Material - Condition 13(d) Required (Yes)
44	30	ML 200	803	352+15	360+18	Montgomery, KY	1958	DSAW	1007		Yes
45	30	ML 200	199	410+91	412+90	Menifee, KY	1958	DSAW	1007		Yes
46	30	ML 200	2,771	2631+97	2659+68	Carter, KY	1963	DSAW	1007	Yes[7]	Yes
47	30	ML 200	4,104	2669+90	2710+94	Carter, KY	1963	DSAW	1007	Yes	Yes
49[8]	30	ML 200	6,564	2745+20	2810+84	Carter, KY	1963	DSAW	1007	Yes	Yes
50	30	ML 200	3,269	2937+69	2970+38	Carter, KY	1963	DSAW	1007	Yes	Yes
51[9]	30	ML 200	2,440	3441+88	3466+28	Carter, KY	1964	DSAW	1007	Yes	Yes
52	30	ML 200	439	3475+58	3479+97	Carter, KY	1964	DSAW	1007	Yes	Yes
53	30	ML 200	450	3512+64	3517+14	Carter, KY	1964	DSAW	1007	Yes	Yes
54	30	ML 200	1,439	3523+50	3537+89	Carter, KY	1964	DSAW	1007	Yes	Yes
55	36	ML 300	4,595	2006+61	2052+56	Union, MS	1969	DSAW	1007		Yes
57	36	ML 300	1,940	4379+19	4398+59	Alcorn, MS	1970	EFW	1007		Yes
60	36	ML 300	2,801	319+80	347+81	Macon, TN	1968	DSAW	1007	Yes[10]	Yes
61	36	ML 300	2,606	393+46	419+52	Macon, TN	1968	DSAW	1007	Yes	Yes

This special permit applies to the ***special permit segments*** located in Lafayette Parish, Louisiana, Alcorn and Union Counties, Mississippi, Macon County, Tennessee, and Carter, Menifee, Montgomery, and Rowan Counties, Kentucky as detailed in **Table 2 – Special Permit Segment Mileage by County.**

[7] **Segments 46 and 47**: The pressure test was not conducted to a minimum test factor of 1.25 times the MAOP.

[8] ***Segments 49 and 50***: The pressure test was conducted prior to July 1, 1965 (9/23/1963) and does not meet 49 CFR 192.619(a)(1) through (3). CGT did not furnish the five-year operating history between July 1, 1965 and July 1, 1970.

[9] ***Segments 51, 52, 53, and 54***: The pressure tests were conducted prior to July 1, 1965 (9/2-3/1964) and does not meet 49 CFR 192.619(a)(1) through (3). CGT did not furnish the five-year operating history between July 1, 1965 and July 1, 1970.

[10] **Segments 60 and 61**: The pressure test does not have the company representative identified that witnessed or conducted the test. This does not meet TVC requirements as established in 49 CFR 192.517(a)(1).

Table 2 – Special Permit Segment Mileage by County					
State	County or Parish	Outside Diameter (inches)	Line Name	Length (feet)	Total (Miles)
Louisiana	Lafayette Parish	24	EL 200	9,615	2.64
		30	EL 400	4,337	
Mississippi	Alcorn County	30	ML 100	5,062	2.34
		30	ML 200	5,331	
		36	ML 300	1,940	
	Union County	30	ML 100	4,928	2.68
		30	ML 200	4,638	
		36	ML 300	4,595	
Tennessee	Macon County	30	ML 100	3,896	2.78
		30	ML 200	5,389	
		36	ML 300	5,407	
Kentucky	Carter County	30	ML 100	9,897	5.94
		30	ML 200	21,476	
	Menifee County	30	ML 100	62	0.049
		30	ML 200	199	
	Montgomery County	30	ML 100	1,008	0.378
		30	ML 200	803	
	Rowan County	30	ML 200	185	0.035

Special Permit Inspection Areas:

The ***special permit inspection areas*** are defined as areas that extend that extends 220 yards on each side of the centerline along approximately 730.1 miles of pipeline as listed in **Table 3 – Special Permit Inspection Areas**.

Table 3 – Special Permit Inspection Areas							
Special Permit Inspection Area Number	Special Permit Segment(s) Included	Outside Diameter (inches)	Line Name	Description	Start Survey Station (SS)	End Survey Station (SS)	Length[11] (miles)
1	1, 2, 3, 4, 5	24	EL 200	Rayne Compressor Station (CS) to Valve 1204	9+06	1339+26	25.2
2	7, 8	30	EL 400	Rayne CS to Valve 1203	0+00	751+22	14.2
4	10, 13, 14, 15	30	ML 100	Banner to Corinth	0+14	4506+36	85.3
5	16, 17	30	ML 100	Hartsville to Clementsville	0+02	4595+65	87.0
6	18, 19, 20, 21, 22, 23, 24	30	ML 100	Stanton to Leach	0+00	4547+33	86.1
8	28, 30, 31, 32	30	ML 200	Banner to Corinth	3+60	4510+80	85.4
9	41, 42	30	ML 200	Hartsville to Clementsville	0+00	4625+30	87.6
11	43, 44, 45, 46, 47, 49, 50, 51, 52, 53, 54	30	ML 200	Stanton to Leach	0+00	4565+02	86.5
12	55, 57	36	ML 300	Banner to Corinth	0+00	4505+01	85.3
13	60, 61	36	ML 300	Hartsville to Clementsville	0+13	4622+50	87.5

The ***special permit inspection areas*** are in:

- Acadia and Lafayette Parishes, Louisiana;
- Alcorn, Calhoun, Lafayette, Pontotoc, Prentiss, Tippah, and Union Counties, Mississippi;
- Macon and Trousdale Counties, Tennessee; and
- Adair, Allen, Bath, Boyd, Carter, Casey, Menifee, Metcalfe, Monroe, Montgomery, Powell, and Rowan Counties, Kentucky.[12]

Figures 1 through **16** are maps showing the 30-inch diameter ML 100, 30-inch diameter ML 200, 36-inch ML 300, 24-inch EL 200, and 30-inch EL 400 Pipelines ***special permit segments***, ***special permit inspection areas***, and class locations.

[11] If the ***special permit inspection area*** footage does not extent from launcher to receiver then the ***special permit inspection area*** would need to be extended.

[12] The ***special permit inspection areas*** include the ***special permit segments***.

Public Notice:

On October 24, 2020, PHMSA posted a notice of this special permit request in the Federal Register (85 FR 62798) with a closing date of November 23, 2020. PHMSA received no public comments concerning this special permit request.

PHMSA has reviewed this special permit application and will require CGT to comply with the special permit conditions to address pipeline safety and integrity threats to the pipeline in the ***special permit segments*** and ***special permit inspection areas***. The special permit will require CGT'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 these ***special permit segments*** for Class 1 to 3 location changes or Class 2 to 3 location changes.

The CGT Special Permit Request letter, Federal Register notice, Special Permit, Final Environmental Assessment and Finding of No Significant Impact, and all other pertinent documents are available for review in Docket No. PHMSA-2019-0201 in the Federal Docket Management System located on the internet 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 Federal Docket Management System, Docket No. PHMSA–RSPA-2004-17401. Third, special permits will only be granted when pipe conditions and active integrity management provides 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 for 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, 36-inch diameter Mainline 300, 24-inch diameter EL 200, and 30-inch diameter EL 400 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 not reported any coating issues such as disbonded coating.
    - CGT meets this requirement.
3) No pipe containing wrinkle bends will be considered.
    - There are no wrinkle bends in the ***special permit segments***.
    - CGT meets 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.
    - CGT meets this requirement.
5) Records must be produced that show a hydrostatic test to at least 1.25 x MAOP and 90% of SMYS.
    - CGT has special permit segments identified in **Table 1 – Special Permit Segments** that do not meet the requirements in **Condition 1(b)** in the Special Permit.
    - CGT will meet this requirement once it complies with the Special Permit conditions.
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 East Lateral 200 in 2009 and 2016, with a planned inspection in 2023, and conducted one (1) excavation and zero (0) repairs in the ***special permit inspection area***.

- CGT ran ILI tools on East Lateral 400 in 2008 and 2015, with a planned inspection in 2022, and conducted seven (7) excavations and zero (0) repairs in the ***special permit inspection area***.
- CGT ran ILI tools on Mainline 100 in 2007 and 2014, with a planned inspection in 2021, and conducted 14 excavations and 10 repairs in the ***Banner to Corinth special permit inspection area 8***.
- CGT ran ILI tools on Mainline 100 in 2004, 2010, and 2017, with a planned inspection in 2023, and conducted 10 excavations and eight (8) repairs in the ***Hartsville to Clementsville special permit inspection area***.
- CGT ran ILI tools on Mainline 100 in 2005, 2010 and 2016, with a planned inspection in 2023, and conducted 41 excavations and 22 repairs in the ***Stanton to Leach special permit inspection area***.
- CGT ran ILI tools on Mainline 200 in 2007 and 2014, with a planned inspection in 2021, and conducted five (5) excavations and two (2) repairs in the ***Banner to Corinth special permit inspection area***.
- CGT ran ILI tools on Mainline 200 in 2004, 2011, 2014, and 2019 with a planned inspection in 2022, and conducted 38 excavations and 15 repairs in the ***Hartsville to Clementsville special permit inspection area***.
- CGT ran ILI tools on Mainline 200 in 2005, 2012, 2014, and 2019 with a planned inspection in 2026, and conducted 35 excavations and 22 repairs in the ***Stanton to Leach special permit inspection area***.
- CGT ran ILI tools on Mainline 300 in 2007 and 2014, with a planned inspection in 2021, and conducted six (6) excavations and four (4) repairs in the ***Banner to Corinth special permit inspection area***.
- CGT ran ILI tools on Mainline 300 in 2004, 2011, and 2017, with a planned inspection in 2021, and conducted 32 excavations and 27 repairs in the ***Hartsville to Clementsville 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, both near-neutral and high-pH SCC.

- SCC is a significant safety threat; therefore, CGT will be required to conduct assessments 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 to assess and remediate threats to the ***special permit inspection areas***.

Criteria Matrix: The data submitted by CGT for the ***special permit segments*** has 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 acceptanc*e column of the criteria matrix for:
    - Design stress, depth of pipe cover, test pressure, test failures, local geology, type service, pressure fluctuations, safety related conditions, direct assessment, ILI type, ILI program, and damage prevention program.
- The ***special permit segments*** fall in the *possible acceptanc*e column of the criteria matrix for:
    - Class 1 to 3, pipe manufacturer, pipe material, pipe coating type (may shield cathodic protection (CP)), leaks and failures, CP, and HCA program.
- The ***special permit segments*** fall in the *requires substantial justification* column of the criteria matrix for:
    - Pipe girth weld records are not available to determine if the welds have been non-destructive tested;
    - The coating type may shield CP when disbonded causing SCC[13], and

[13] Two 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.

- Inspection findings (Enforcement History) – PHMSA enforcements are in the "Past Enforcement History – January 1, 2011 through January 28, 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 June 21, 2021:

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

From January 1, 2011, through June 21, 2021, PHMSA issued the enforcement cases outlined in **Tables 5 and 6** to the four (4) pipeline companies owned by TC Energy, the operator of CGT. TC Energy owns the Great Lakes Gas Transmission Company, ANR Pipeline Company, Columbia Gas Transmission, LLC, and Columbia Gulf Transmission, LLC pipeline systems (Operator identification #s (OPID#) 6660, 405, 2616, 2620). TC Energy acquired the CGT pipeline systems in 2016.

Table 5 - Enforcement Matters from January 1, 2011, through June 21, 2021[14]						
Status	Corrective Action Order	Notice of Amendment	Notice of Probable Violation	Safety Order	Warning Letter	**Total**
CLOSED	3	17	23	3	21	**67**
OPEN	0	0	3	0	0	**3**
Total	**3**	**17**	**26**	**3**	**21**	**70**

Table 6 - Enforcement Civil Penalty Status January 1, 2011 through June 21, 2021[15]				
Proposed	**Awaiting Order**	**Assessed**	**Withdrawn/Reduced**	**Collected**
$1,881,600	$0	$1,678,000	$203,600	$1,678,000

The type of 49 CFR Part 192 enforcement violations against TC Energy on these four (4) pipeline systems from January 1, 2011, through June 21, 2021, 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.

[14] **Table 5** summarizes PHMSA 49 CFR Part 192 enforcement actions against the Great Lakes Gas Transmission Company, ANR Pipeline Company, Columbia Gas Transmission, LLC, and Columbia Gulf Transmission, LLC pipeline systems.

[15] **Table 6** summarizes PHMSA 49 CFR Part 192 enforcement penalties against the Great Lakes Gas Transmission Company, ANR Pipeline Company, Columbia Gas Transmission, LLC, and Columbia Gulf Transmission, LLC pipeline systems.

Table 7 - Summary of Enforcement Findings from TC Energy January 1, 2011 to June 21, 2021					
Notice of Amendment					
Integrity Management	**7**	OME Procedural Manual	**4**		
				Notice of Amendment Total:	**11**
Notice of Probable Violation					
Corrosion Control	**2**	Operation and/or Maintenance	**1**	OME Procedural Manual	**2**
Integrity Management	**3**	Design	**2**		
				Notice of Probable Violation Total:	**10**
Warning Letter					
Design	**1**	Operation and/or Maintenance	**2**		
				Notice of Amendment Total:	**3**
				Grand Total:	**24**

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 ***special permit segments*** on the CGT 30-inch diameter ML 100, 30-inch diameter ML 200, 36-inch diameter ML 300, 24-inch diameter EL 200, and 30-inch diameter EL 400 Pipelines located in Lafayette Parish, Louisiana; Alcorn and Union Counties, Mississippi; Macon County, Tennessee; and Carter, Menifee, Montgomery, and Rowan Counties, Kentucky, is consistent with pipeline safety.

CGT's enforcement record since 2016 does not reflect sustained and substantial noncompliance with 49 CFR Part 192. PHMSA has designed 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-destructive tested and for cracking type anomalies. 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 by CGT of a special permit that waives the

requirements of 49 CFR 192.611, 192.505(c), and 192.619(a)(2) for class location changes from a Class 1 to a Class 3 location. This permit requires CGT to implement the special permit conditions which 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: March 31, 2022

Prepared by: PHMSA - Engineering and Research Division

Figure 1 – Special Permit Segments and Inspection Area Route Maps

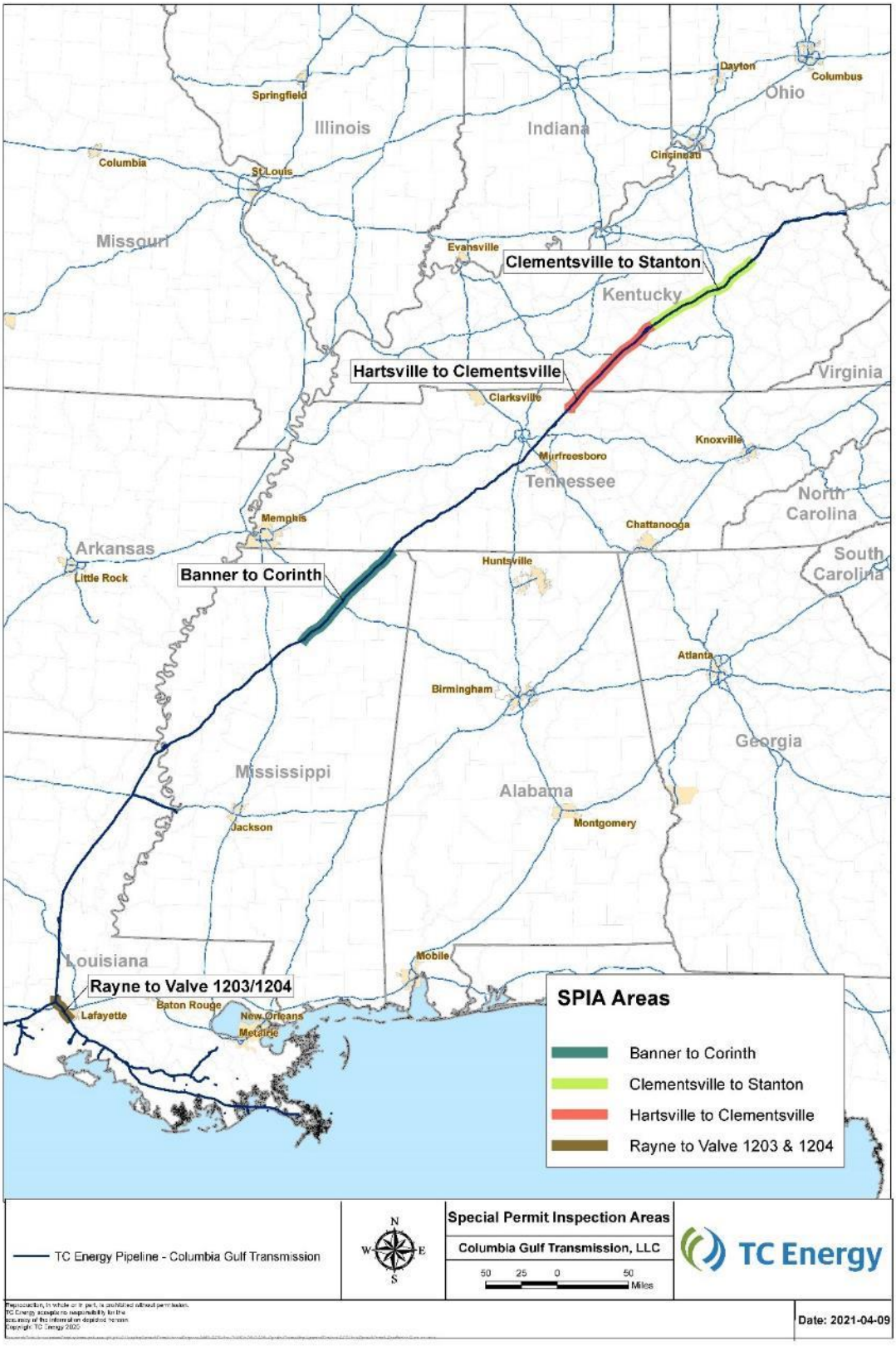


Figure 2 – Special Permit Segments and Inspection Area Route Maps 24-inch EL 200 and 30-inch EL 400 Pipelines

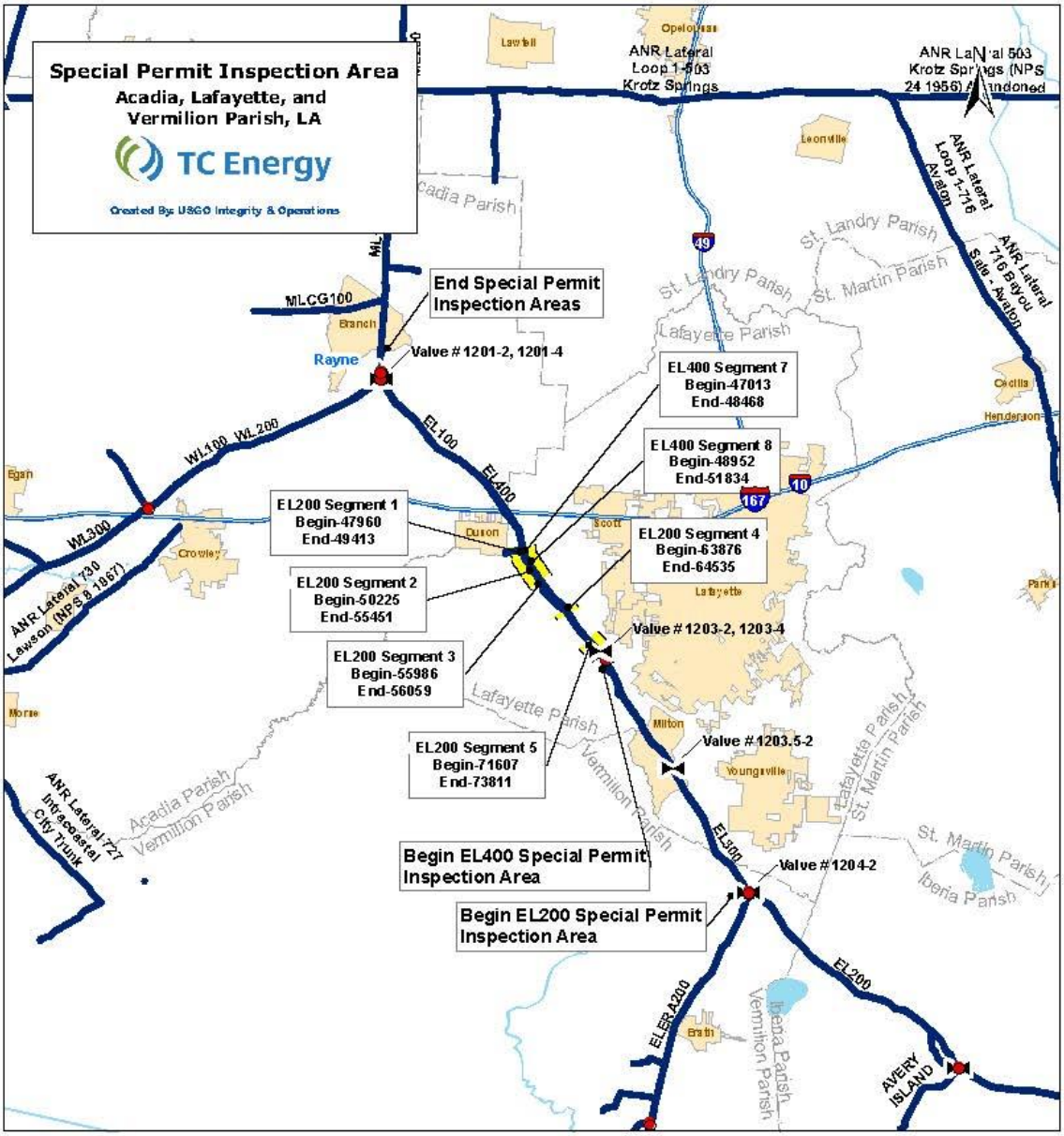


Figure 3 – Special Permit Segments and Inspection Area Route Maps
30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line

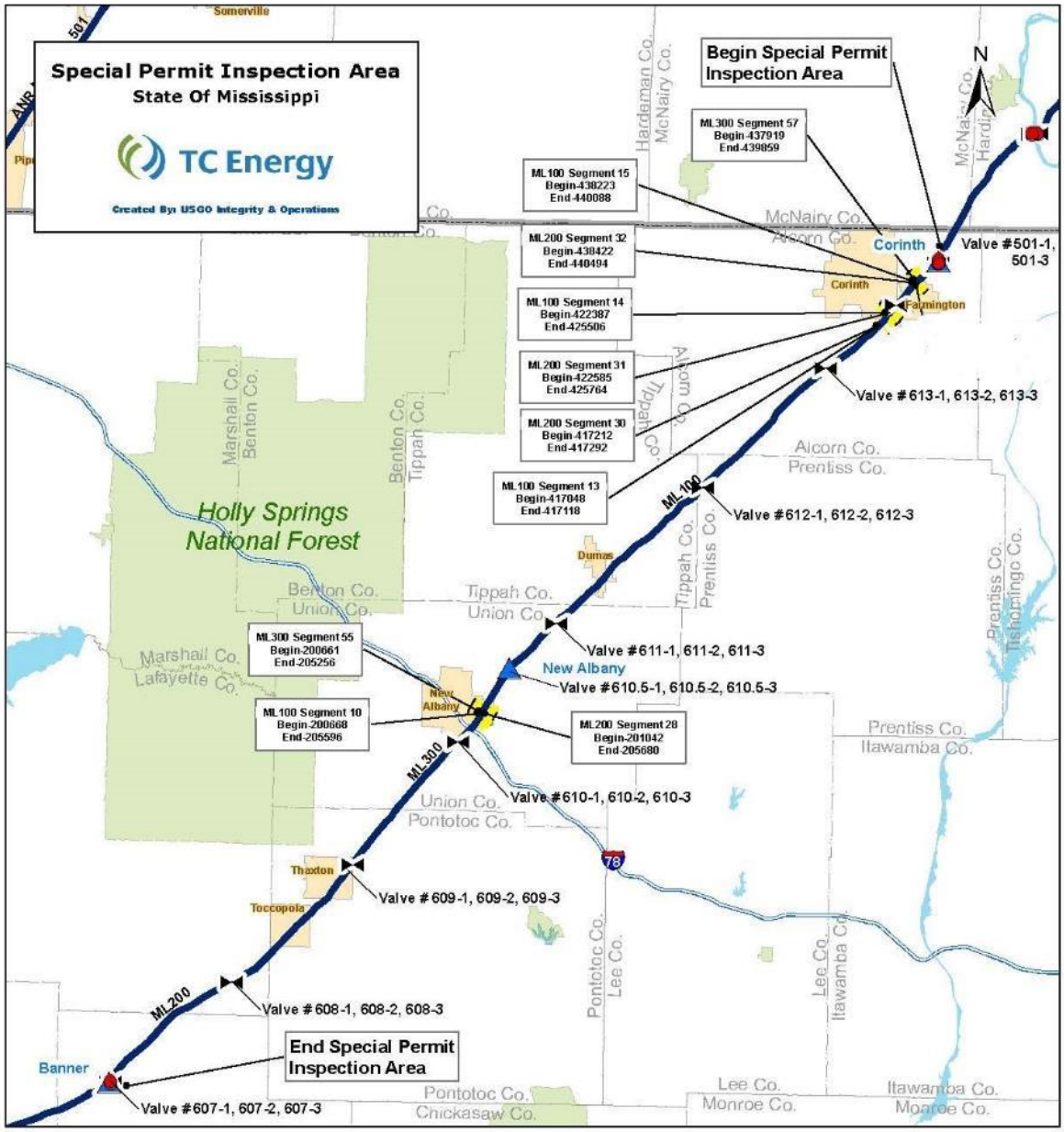


Figure 4 – Special Permit Segments and Inspection Area Route Maps
30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300

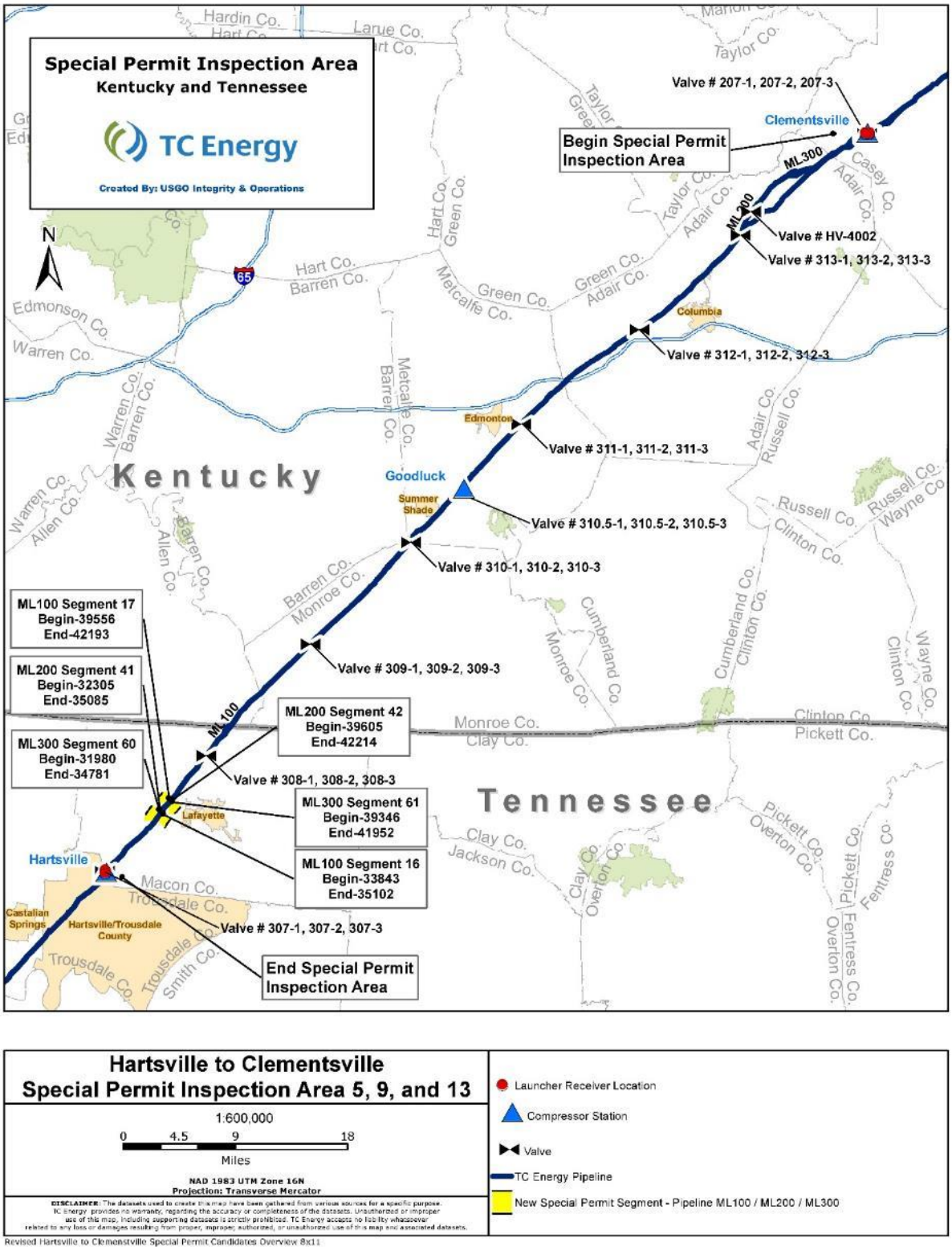
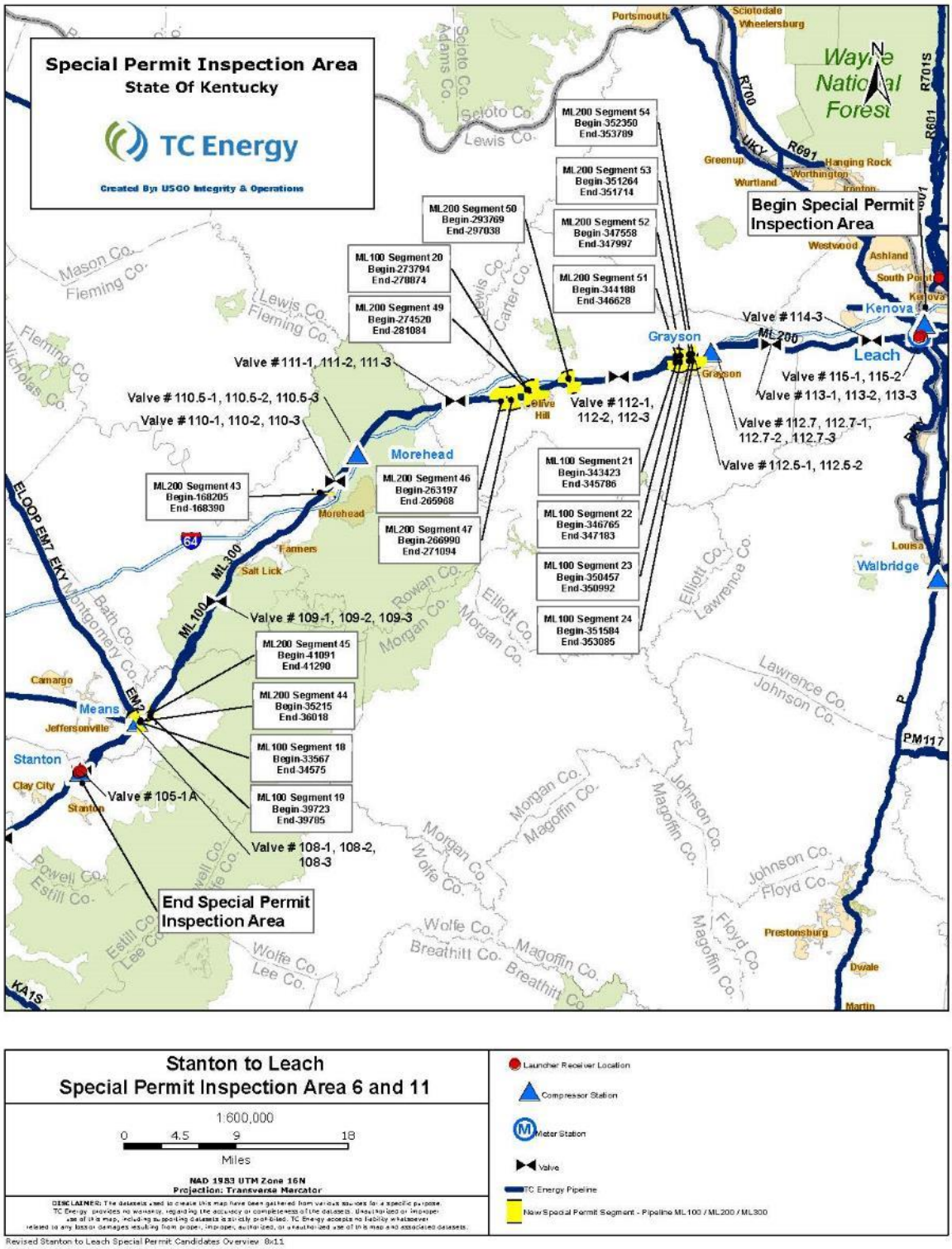


Figure 5 – Special Permit Segments and Inspection Area Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300



Revised Stanton to Leach Special Permit Candidates Overview 8x11

Figure 6 – Route Maps

24-inch East Lateral 200 and 30-inch East Lateral 400 Special Permit Segments

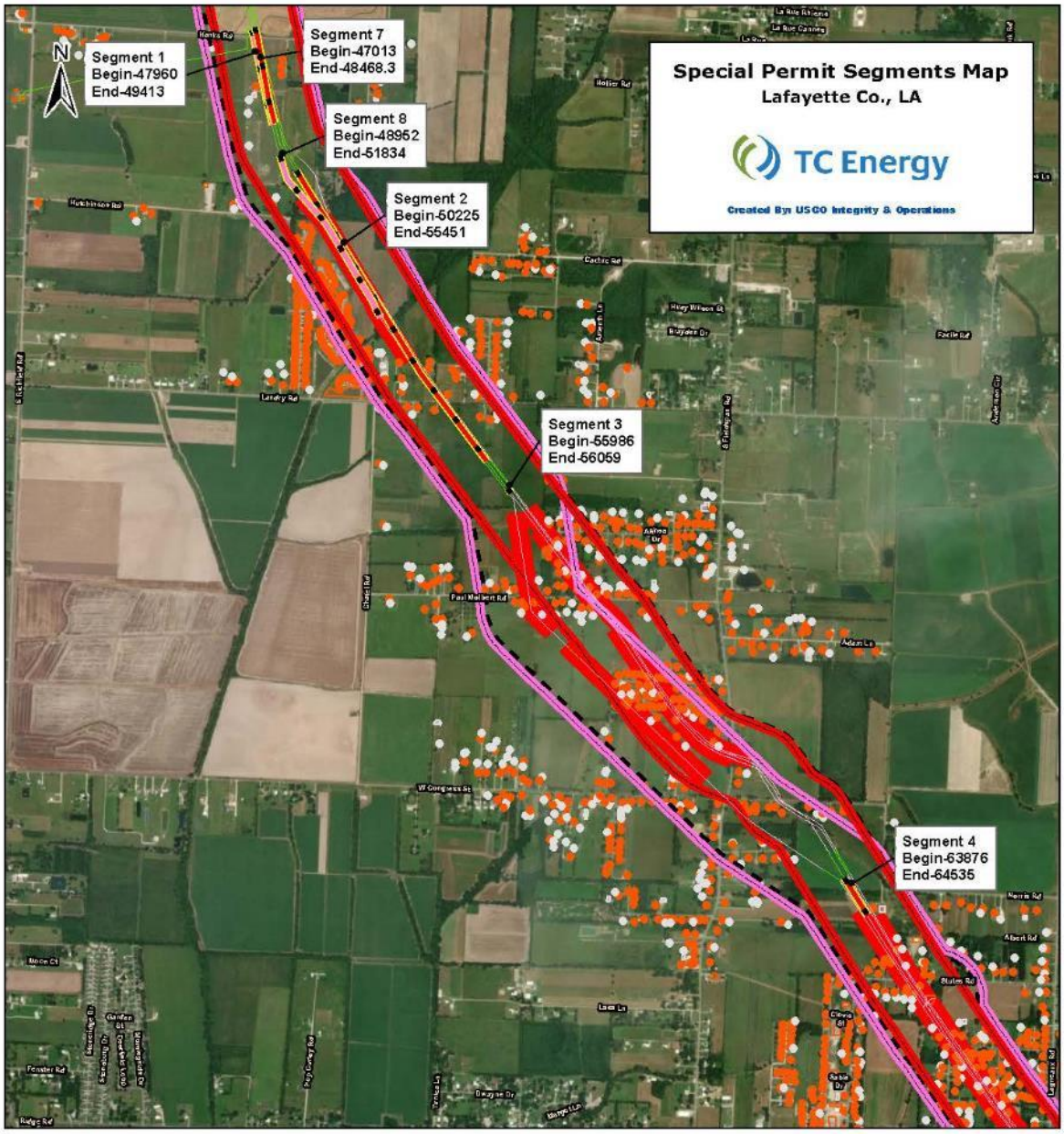


Figure 7 – Route Maps

24-inch East Lateral 200 and 30-inch East Lateral 400 Special Permit Segments

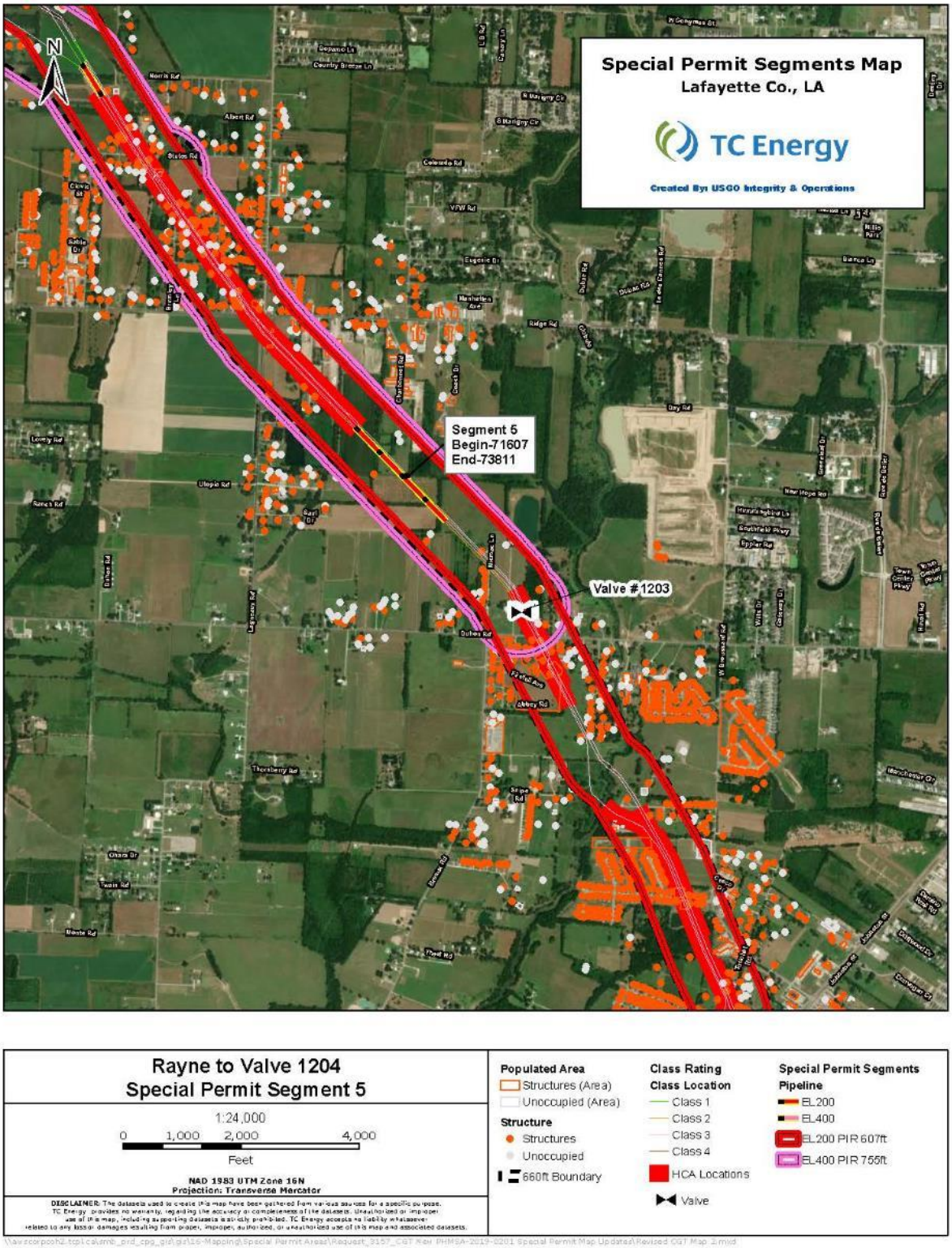


Figure 8 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

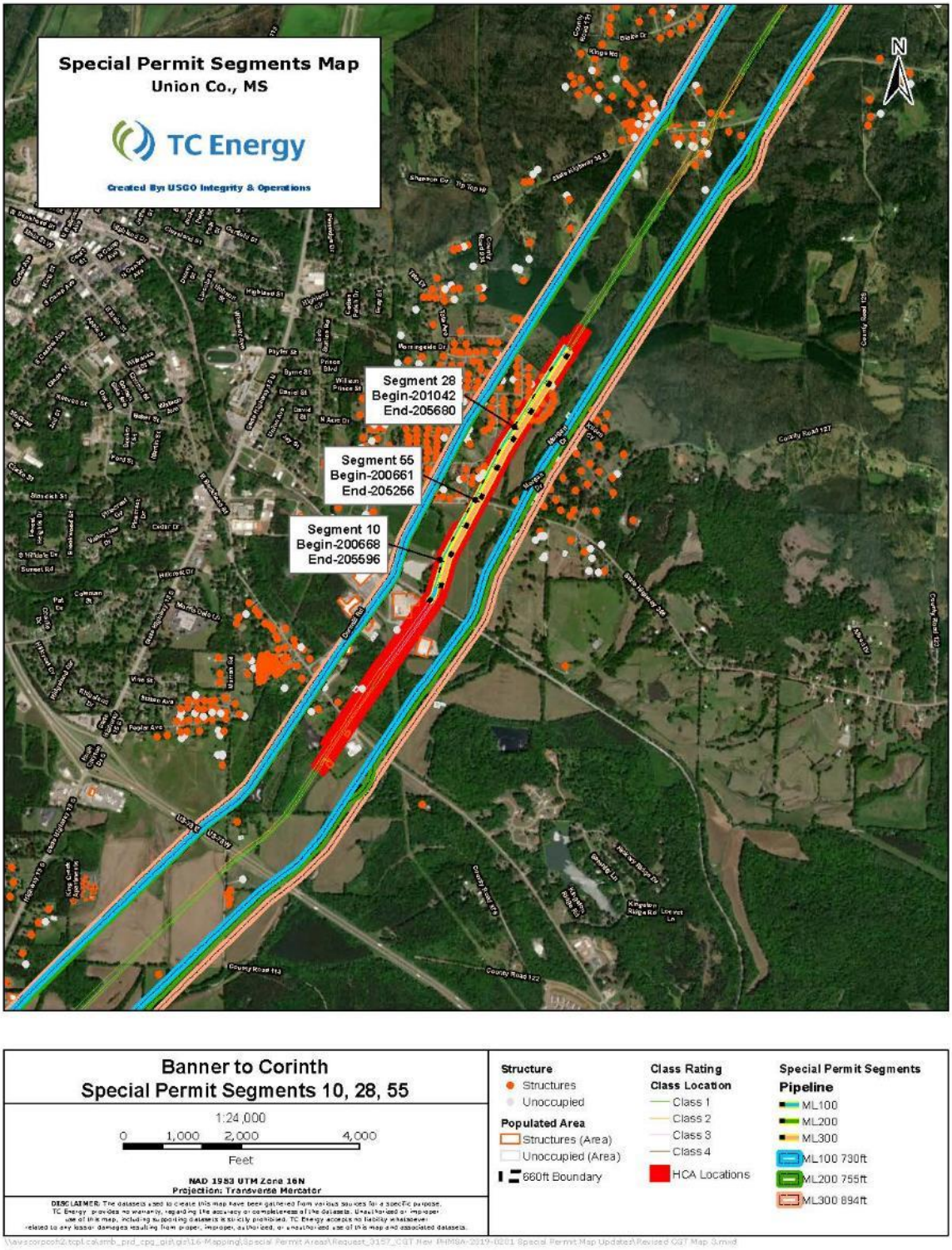


Figure 9 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

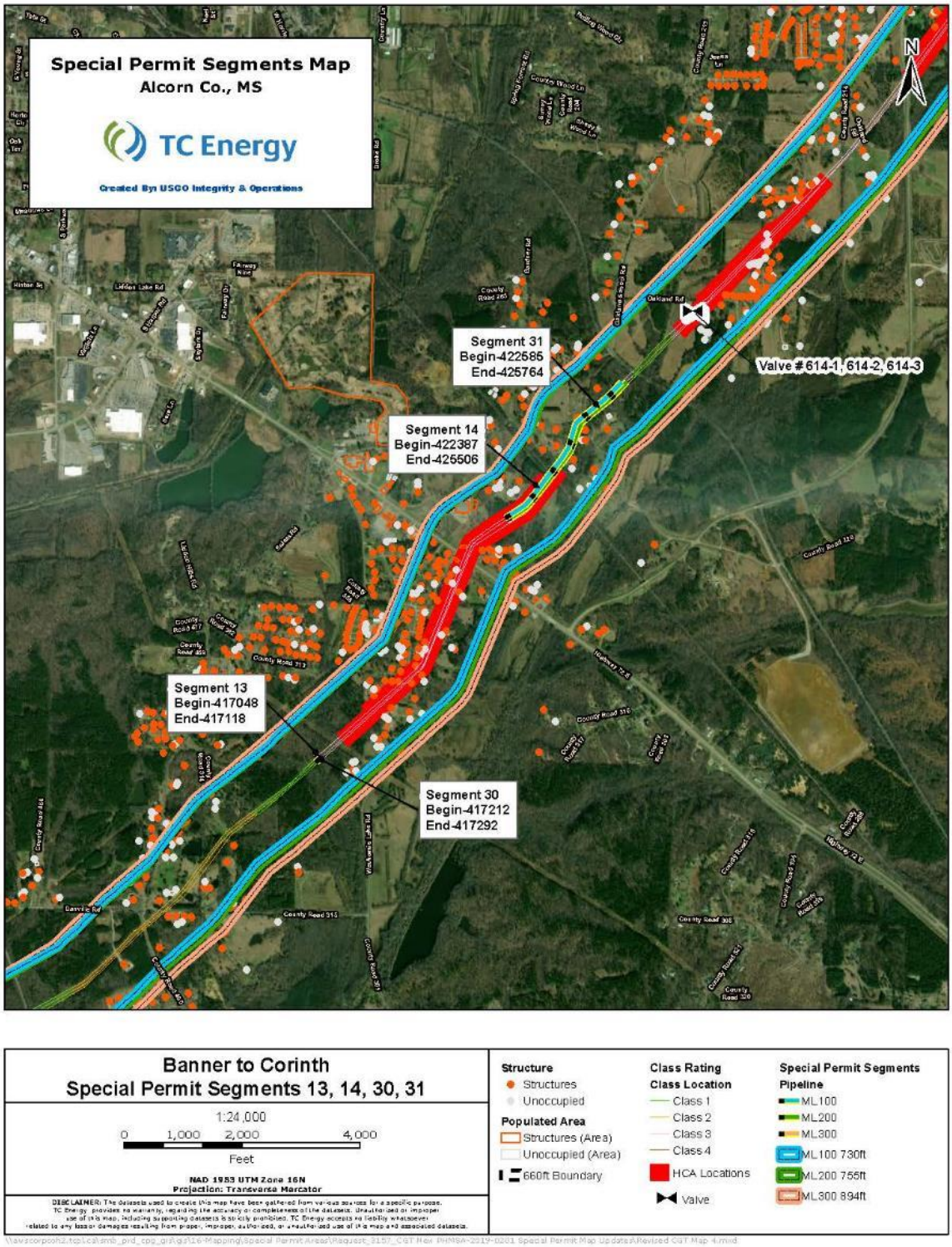


Figure 10 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

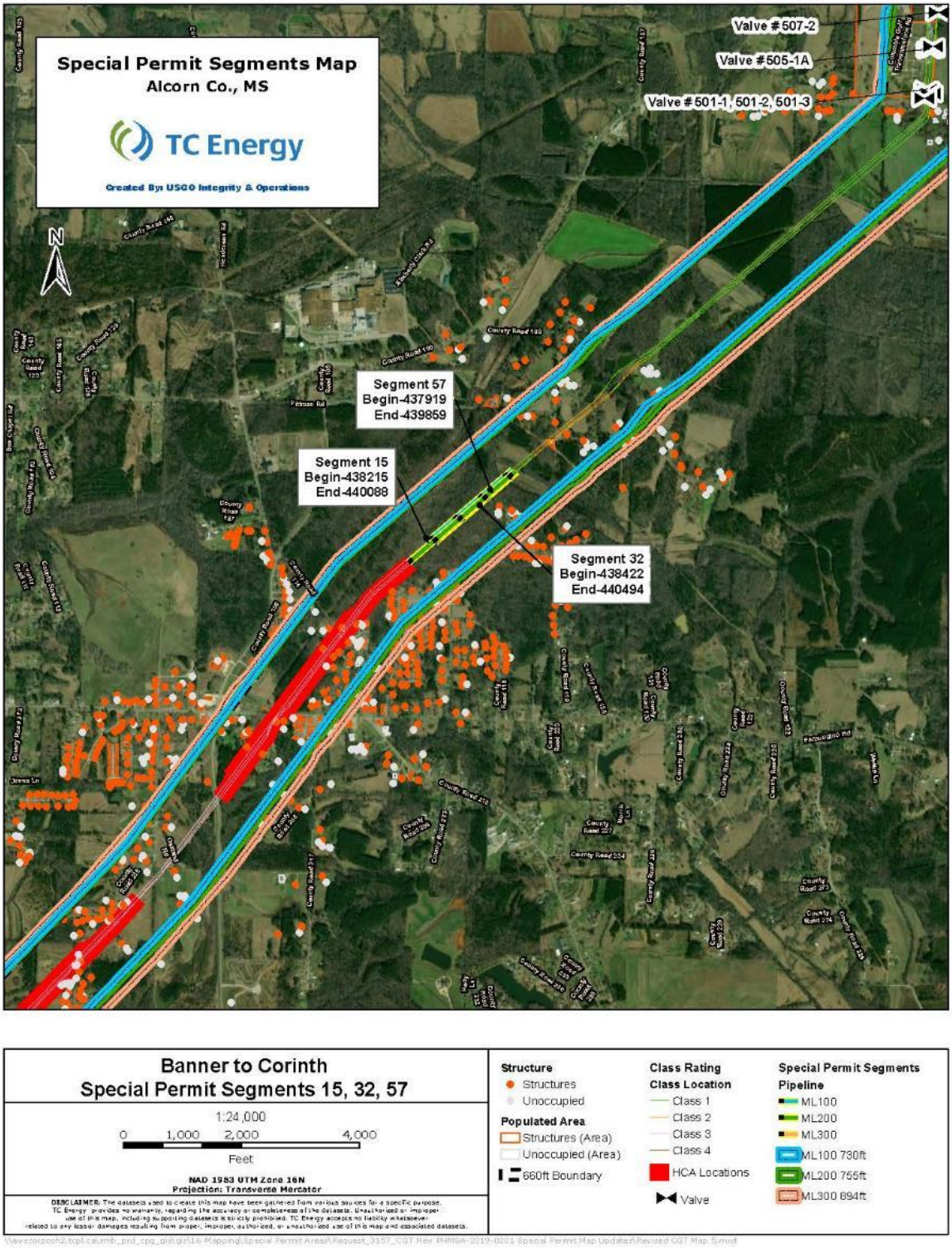


Figure 11 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

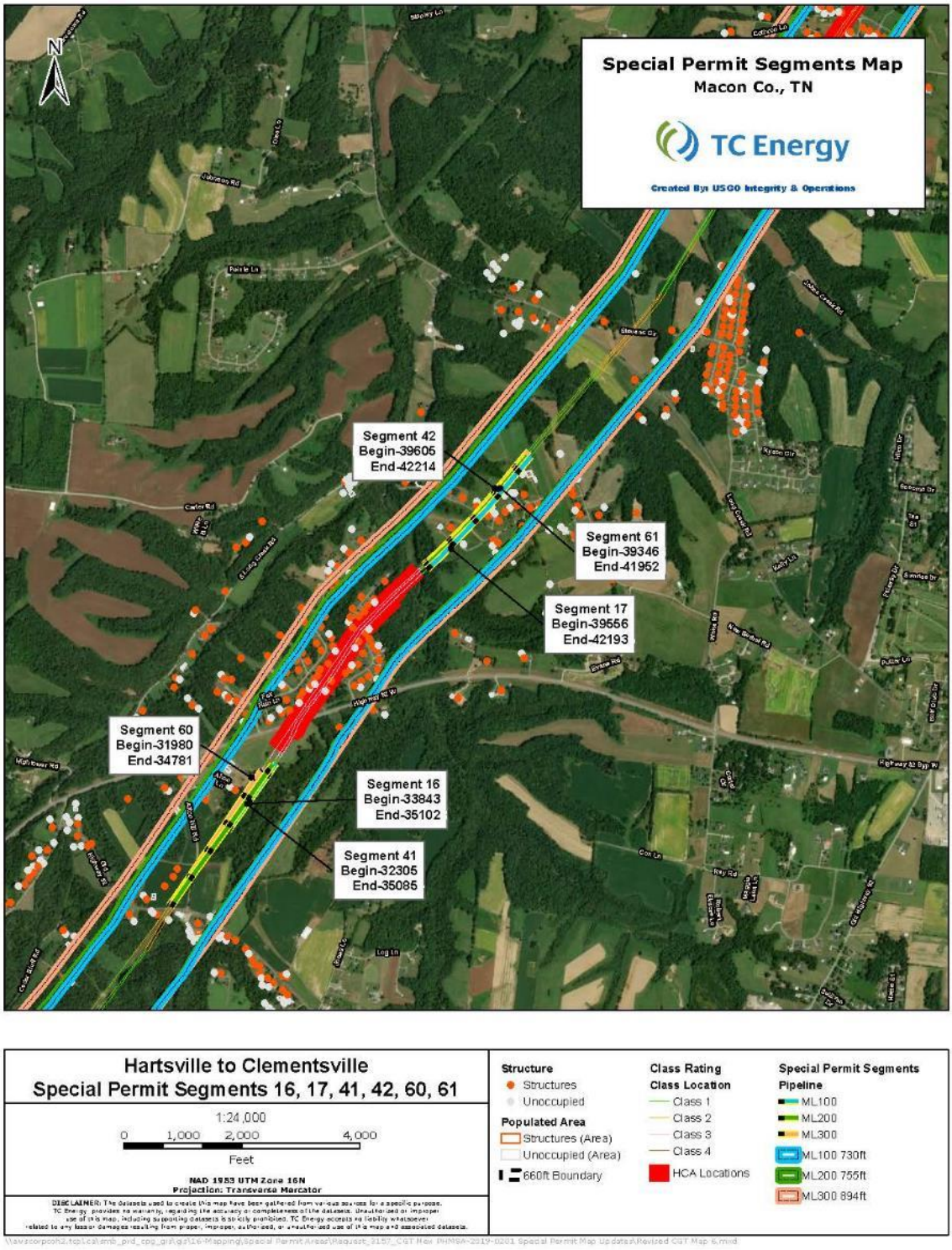


Figure 12 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

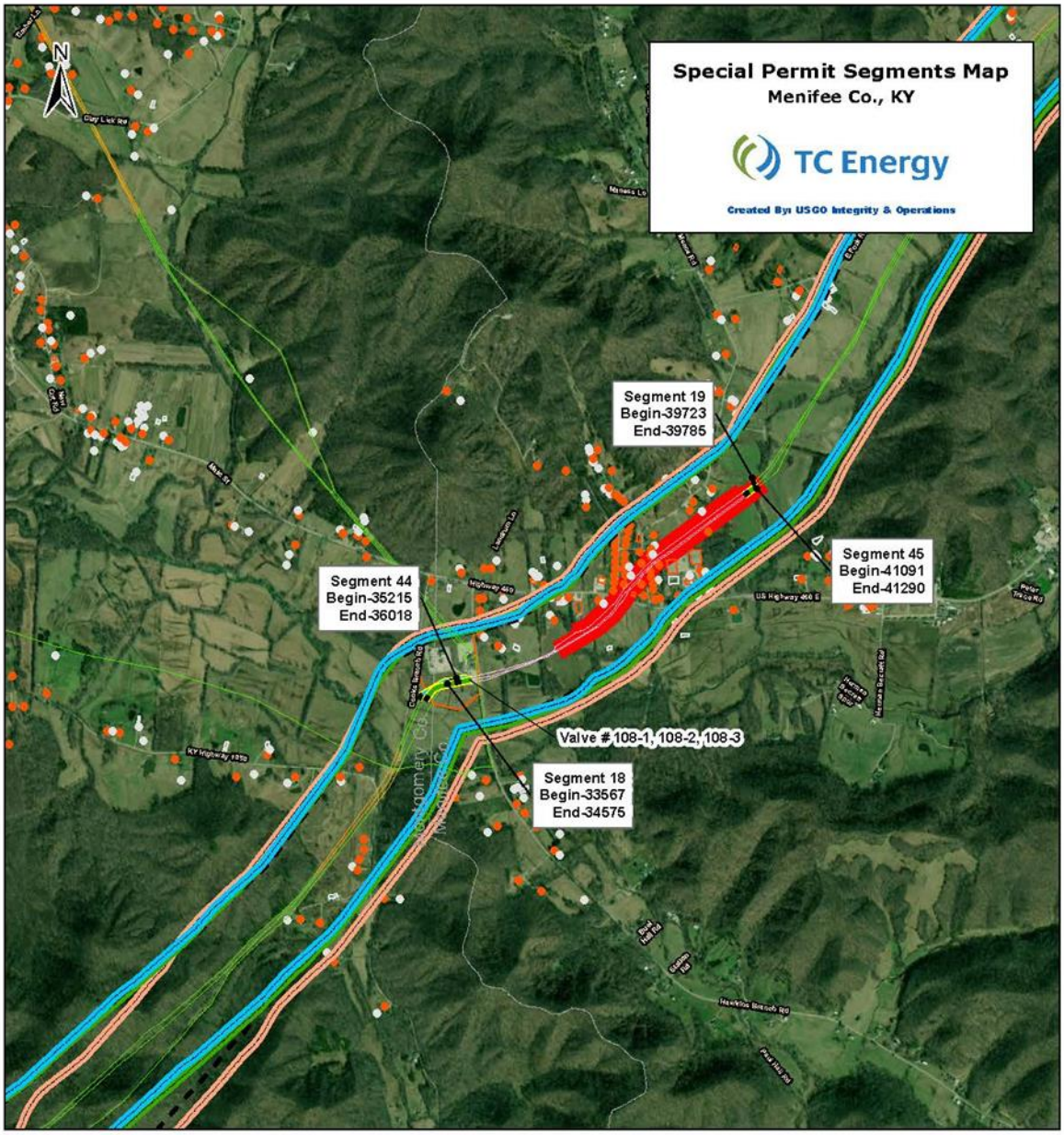


Figure 13 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

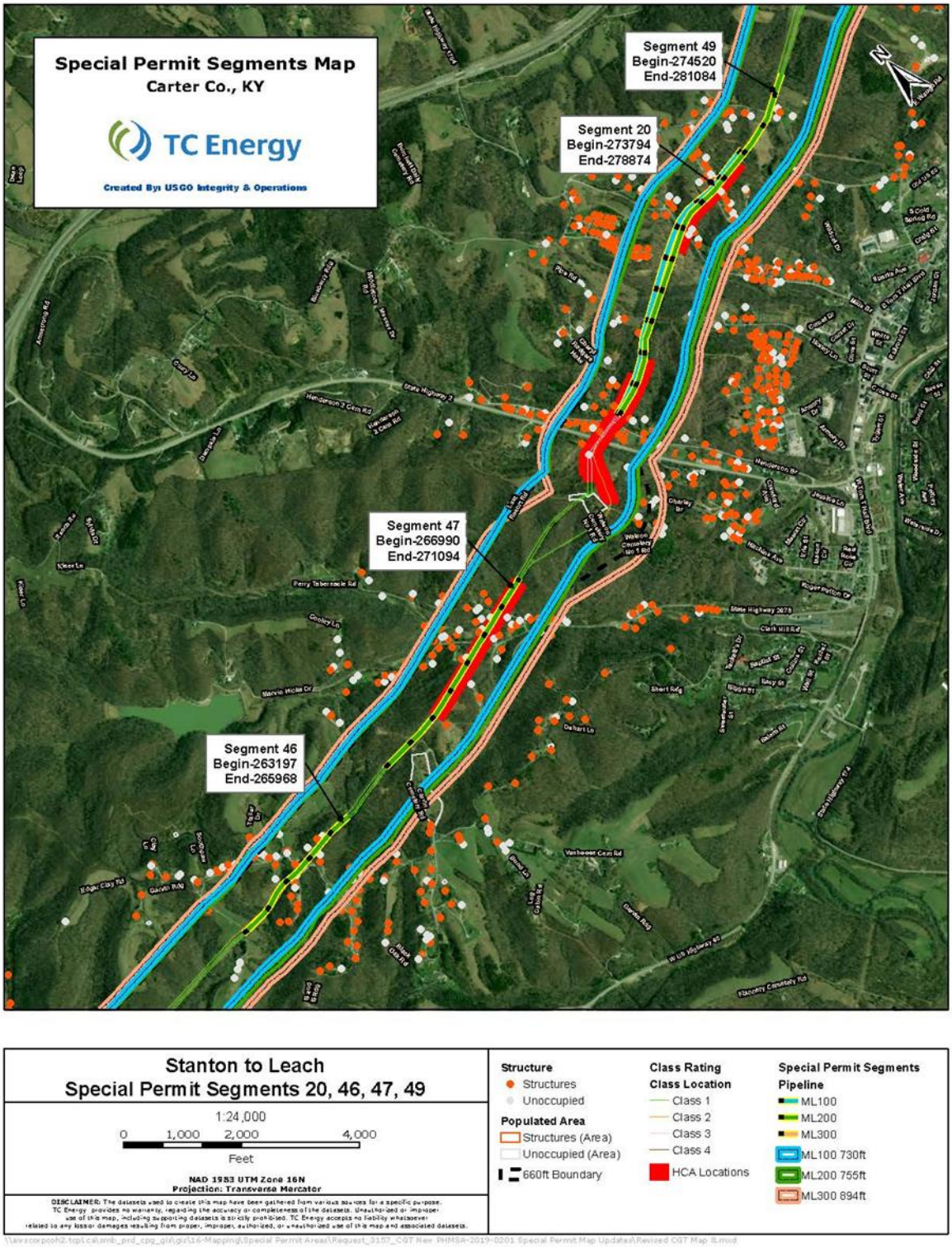


Figure 14 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments

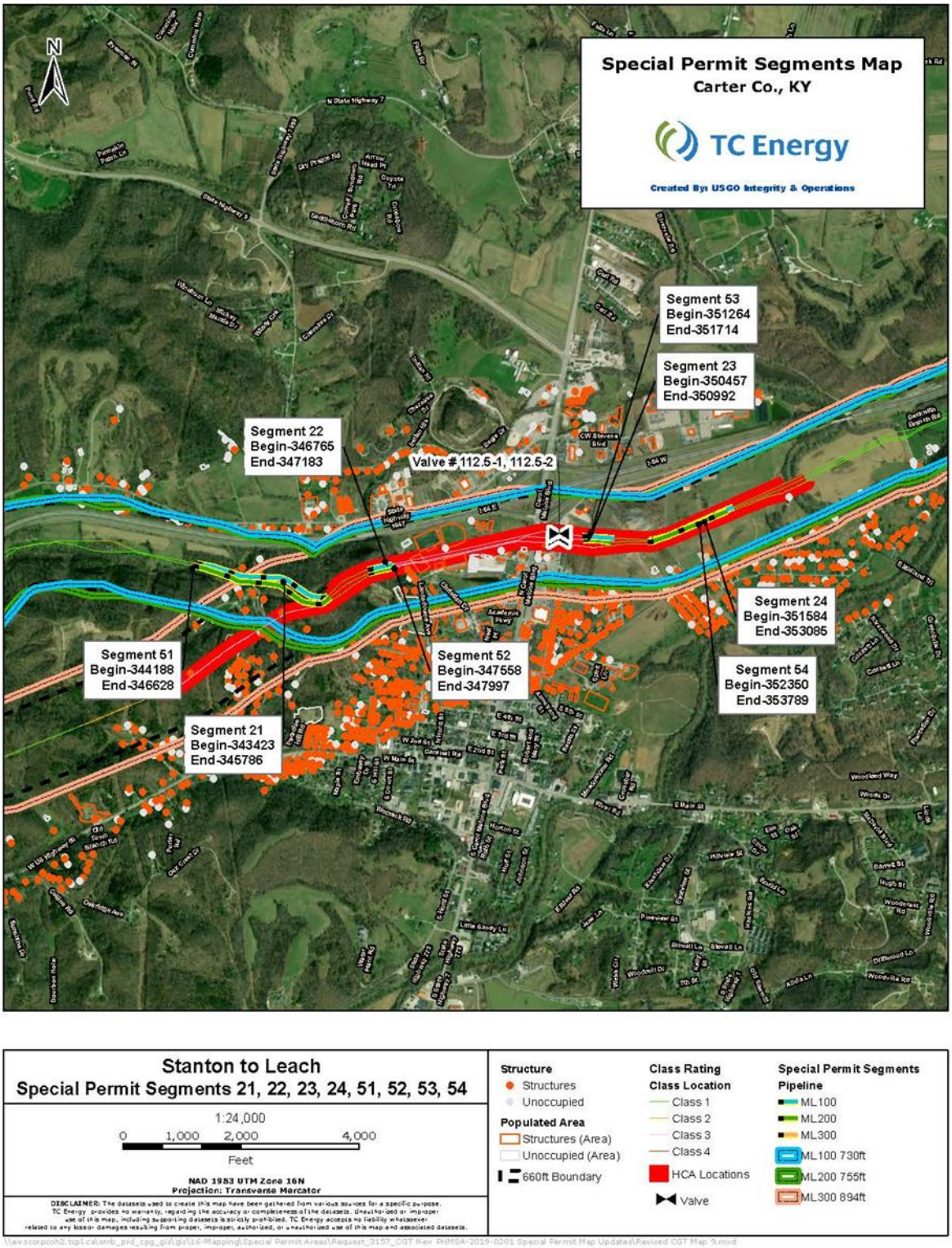
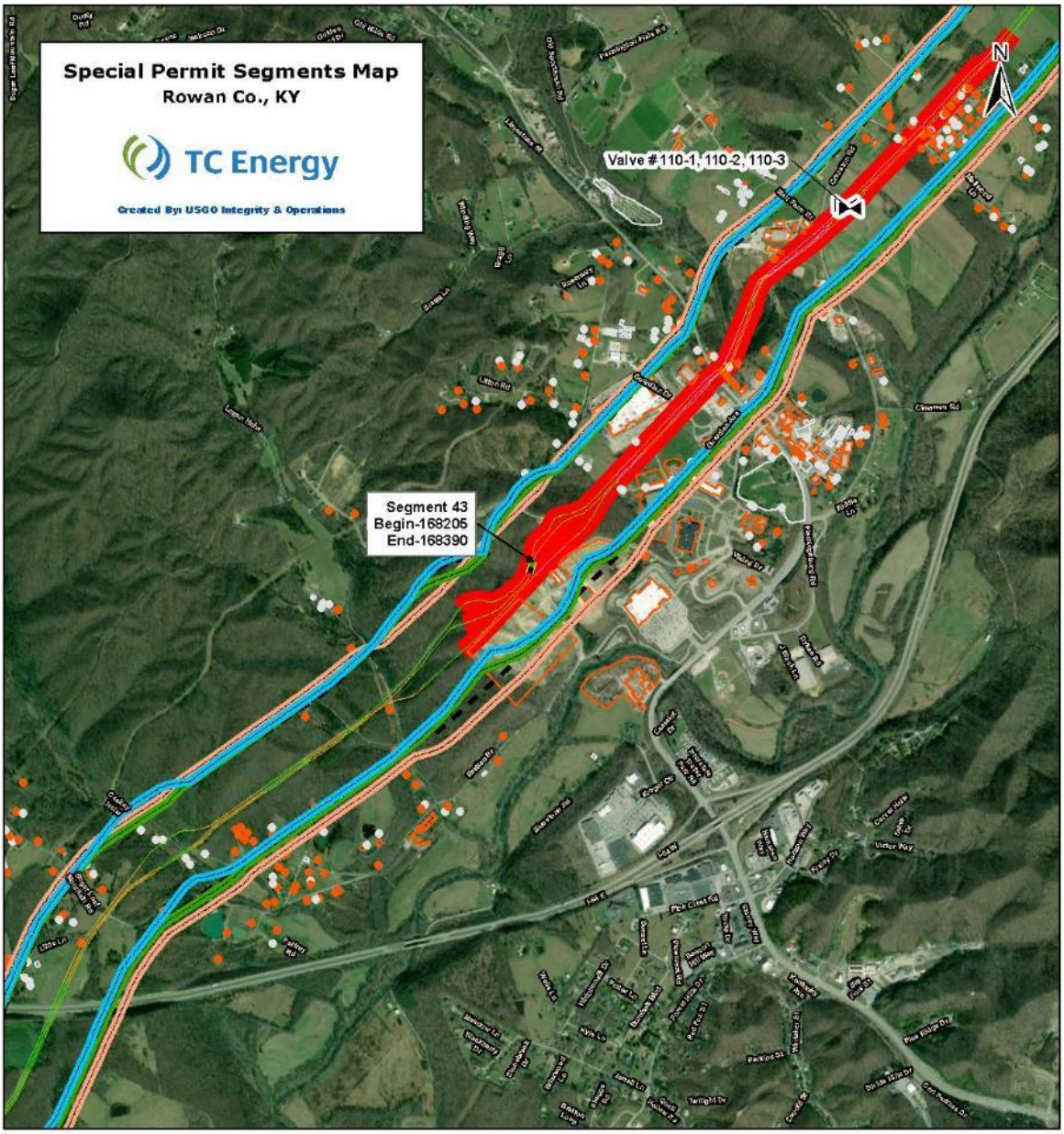


Figure 15 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments



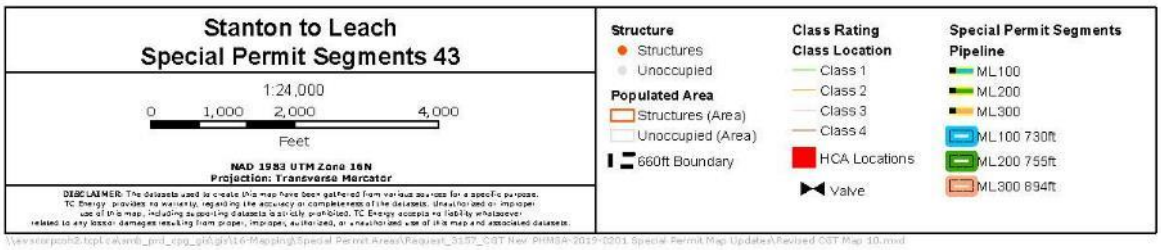
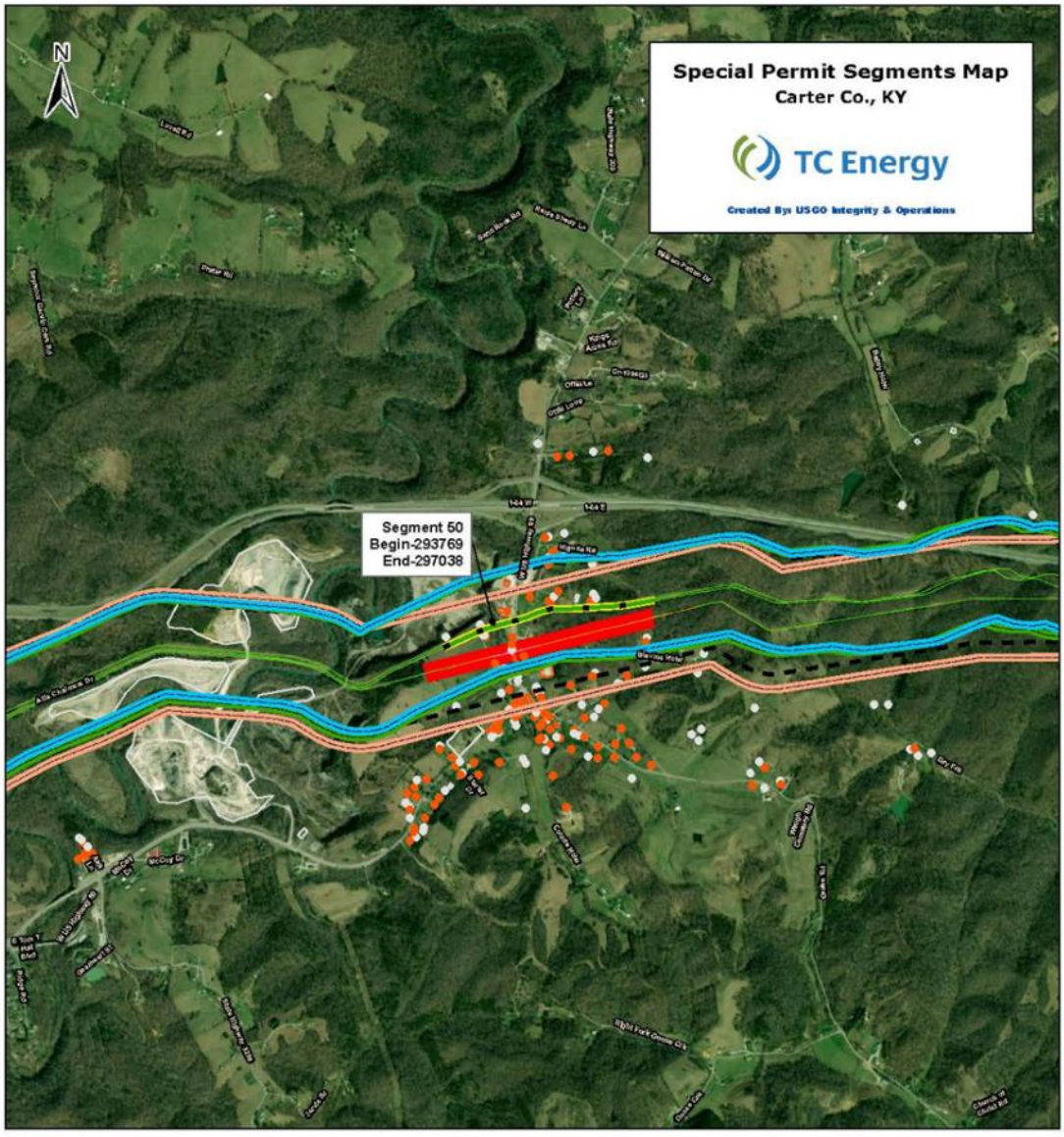


Figure 16 – Route Maps

30-inch Main Line 100, 30-inch Main Line 200, & 36-inch Main Line 300
Special Permit Segments



Final Page of the Special Permit Analysis and Findings