

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-2016-0006
Requested By: Southern Natural Gas Company, LLC
Operator ID#: 18516
Original Date Requested: January 11, 2016
1st Renewal Issuance Date: March 17, 2023
Code Section(s): 49 CFR 192.611(a) and (d), 192.619(a), and 192.5

Purpose:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) provides this information to describe the facts of the subject special permit application submitted by Southern Natural Gas Company, LLC¹ (SNG), to discuss any relevant public comments received with respect to the application, to present the engineering/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. SNG requests that PHMSA waive compliance from 49 Code of Federal Regulations (CFR) 192.611(a) and (d), 192.619(a), and 192.5 for 16 *special permit segments* approximately 3.180 miles of natural gas transmission pipeline segments.

Pipeline System Affected:

This special permit request applies to 16 *special permit segments* and 3.180 miles of natural gas transmission pipeline operated by SNG and located in the states of Alabama, Georgia, and Louisiana where a change has occurred from an original Class 1 location to a Class 3 location.

¹ Southern Natural Gas Company, LLC is owned by Kinder Morgan, Inc.

This special permit allows SNG to continue to operate the 16 *special permit segments* at their current maximum allowable operating pressure (MAOP).

Special Permit Request:

SNG submitted an application to PHMSA on March 4, 2021, for a special permit renewal seeking relief from the Federal pipeline safety regulations in 49 CFR 192.611(a) and (d), 192.619(a), and 192.5 for 16 *special permit segments* and 3.180 miles of natural gas transmission pipeline. The *special permit segments* are located in the states of Alabama, Georgia, and Louisiana.

Special permit segments are divided into two (2) categories: *Type A special permit segments* and *Type B special permit segments*.

- *Type A special permit segments* include those *special permit segments* as described in **Table 1 – Type A Special Permit Segments**, where there is a cluster, as described in 49 CFR 192.5(c), of more than 10 buildings intended for human occupancy in a “class location unit” and for which the MAOP has not been confirmed in accordance with 49 CFR 192.611(a) or where the pipe installed has been identified to have a seam type or manufacturer type that is problematic for maintaining pipeline integrity. *Type A special permit segments* total approximately 1.080 miles (5,699.76 feet) of pipe in this special permit renewal. *Type A special permit segments* must meet **Condition 1(d)** and **Conditions 8(b)(i)** and (c) of the Special Permit Conditions.

Table 1 – Type A Special Permit Segments											
Special Permit Segment Number ²	Outside Diameter (inches)	Line Name	Segment Length (feet)	Start Survey Station (MP - SS)	End Survey Station (MP - SS)	County or Parish, State	No. Dwellings	Year Installed	Seam Type	External Coating	MAOP (psig)
4 (KM 5)	18	South Main Line	1,130.20	0211 – 5058	0212 – 0908	Autauga, AL	1	1951	FW	CTE	1,200
12 (KM 59)	16	South Main Line	199.57	0384 – 4241	0384 – 4441	Jones, GA	1	1953	FW	CTE	1,200
14 (KM 64)	20	South Main Loop Line	2,432.59	0313 – 1326	0313 – 3759	Harris, GA	10	1958	FW	CTE	1,200
18 (KM 93)	20	Duck Lake Franklinton Line	639.77	0047 – 264	0047 – 904	East Baton Rouge, LA	3	1953	FW	CTE	1,200
19 (KM 94)	20	Duck Lake Franklinton Line	1,297.63	0071 – 1203	0071 – 2501	Livingston, LA	2	1953	FW	CTE	1,200

² The initial special permit required the replacement of *special permit segments 16 (KM 91) and 20 (KM 97)*. In addition to the required replacements, SNG has not elected to request a renewal for *special permit segments 2 (KM 2), 11 (KM 56), 17 (KM 92), 21 (KM 98), 23 (KM 129), 24 (KM 352), and 25 (KM 353)*. These segments must now meet the requirements of 49 CFR 192.611(a).

Note: **FW** is an electric flash welded pipe longitudinal seam type manufactured by A.O. Smith.
CTE is coal tar enamel pipe coating type.

- **Type B special permit segments** include those *special permit segments* where there is a cluster, as described in 49 CFR 192.5(c), of 10 or fewer buildings intended for human occupancy in a “class location unit” and for which the MAOP has not been confirmed in accordance with 49 CFR 192.611. **Type B special permit segments** total approximately 2.101 miles (11,091.67 feet) of pipe as described in **Table 2 – Type B Special Permit Segments**.

Table 2 – Type B Special Permit Segments

Special Permit Segment Number ³	Outside Diameter (inches)	Line Name	Length (feet)	Start Survey Station (MP - SS)	End Survey Station (MP - SS)	County or Parish, State	No. Dwellings	Year Installed	Seam Type	External Coating	MAOP (psig)
1 (KM 1)	30	South Main 2nd Loop Line	1,847.74	0210 - 1896	0210 - 3744	Autauga, AL	2	1981	SAW	CTE	1,200
3 (KM 4)	30	South Main 2nd Loop Line	512	0296 - 1974	0296 - 2486	Lee, AL	1	1969	SAW	CTE	1,200
5 (KM 6)	24	South Main Loop Line	1,673.15	0210 - 1901	0210 - 3574	Autauga, AL	2	1958	SAW	CTE	1,200
7 (KM 9)	24	South Main Loop Line	662.0	0294 - 0	0294 - 616	Lee, AL	7	1958	SMLS	CTE	1,200
8 (KM 10)	24	South Main Loop Line	1,291.96	0296 - 2030	0296 - 3322	Lee, AL	1	1958	SMLS	CTE	1,200
9 (KM 54)	30	South Main 2nd Loop Line	796.04	0305 - 4848	0306 - 364	Harris, GA	2	1981	SAW	FBE	1,200
10 (KM 55)	26	South Main 2nd Loop Line	2,246.0	0313 - 1300	0313 - 3546	Harris, GA	10	1967	SAW	CTE	1,200
13 (KM 63)	24	South Main Loop Line	1,027.11	0305 - 4746	0306 - 494	Harris, GA	2	1958	SMLS	CTE	1,200
15 (KM 65)	20	Thomaston Griffin 2nd Loop Line	176.67	0027 - 4123	0027 - 4296	Spalding, GA	1	1981	ERW-HF	CTE	1,200
22 (KM 99)	24	White Castle Franklinton Loop Line	125.66	0047 - 768	0047 - 893	East Baton Rouge, LA	1	1968	SAW	CTE	1,200
26 (KM 355)	30	White Castle Franklinton Loop Line	733.34	0071 - 1221	0071 - 1954	Livingston, LA	1	1970	SAW	CTE	1,200

Note: **ERW-HF** is a high frequency electric resistance welded pipe longitudinal seam.

SAW is single submerged arc welded pipe longitudinal seam.

SMLS is seamless weld seam pipe.

FBE is fusion bonded epoxy coating type.

- **Special permit inspection areas** are defined as the one (1) mile continuous segment on both sides of the *special permit segment* plus the footage in the special permit segment. **Table 3 – Type A Special Permit Inspection Areas** and **Table 4 – Type B Special Permit Inspection**

³ **Type B special permit segment 6 (KM 7)** had been Federal Register noticed in the special permit renewal request. On December 16, 2022, SNG requested the removal of this *special permit segment* as it is no longer classified as a Class 3 location due to a decrease in dwellings for human occupancy.

Areas list the boundaries for the special permit inspection area associated with each special permit segment. The SNG special permit inspection areas totals 34.93 miles of pipe.

Table 3 – Type A Special Permit Inspection Areas					
Special Permit Segment Number	Outside Diameter (inches)	Line Name	Inspection Area Start (MP – SS)	Inspection Area End (MP – SS)	Inspection Area Length (Miles)
4 (KM 5)	18	South Main Line	0210 – 5058	0213 – 908	2.21
12 (KM 59)	16	South Main Line	0383 – 4241	0385 – 4431	2.04
14 (KM 64)	20	South Main Loop Line	0312 – 1634	0314 – 3759	2.40
18 (KM 93)	20	Duck Lake Franklinton Line	0046 – 264	0048 – 969	2.13
19 (KM 94)	20	Duck Lake Franklinton Line	0070 – 1491	0072 – 2447	2.18

Table 4 – Type B Special Permit Inspection Areas					
Special Permit Segment Number	Outside Diameter (inches)	Line Name	Inspection Area Start (MP – SS)	Inspection Area End (MP – SS)	Inspection Area Length (Miles)
1 (KM 1)	30	South Main 2nd Loop Line	0209 – 1712	0211 – 3568	2.32
3 (KM 4)	30	South Main 2nd Loop Line	0295 – 2051	0297 – 2715	2.10
5 (KM 6)	24	South Main Loop Line	0209 – 2141	0211 – 3574	2.32
7 (KM 9)	24	South Main Loop Line	0293 – 96	0295 – 816	2.13
8 (KM 10)	24	South Main Loop Line	0295 – 2315	0297 – 3402	2.24
9 (KM 54)	30	South Main 2nd Loop Line	0304 – 4833	0307 – 365	2.15
10 (KM 55)	26	South Main 2nd Loop Line	0312 – 1543	0314 – 3546	2.38
13 (KM 63)	24	South Main Loop Line	0304 – 4756	0307 – 19	2.13
15 (KM 65)	20	Thomaston Griffin 2nd Loop Line	0026 – 4069	0028 – 4393	2.03
22 (KM 99)	24	White Castle Franklinton Loop Line	0046 – 768	0048 – 907	2.03
26 (KM 355)	30	White Castle Franklinton Loop Line	0070 – 1259	0072 – 1954	2.14

After the issuance of this special permit, those *special permit segments* that have been pressure tested or replaced such that the MAOP has been made commensurate with the present class location as defined in 49 CFR 192.611 would no longer be included in this special permit.

This special permit allows SNG to continue to operate the pipeline segments at their current maximum allowable operating pressure (MAOP) until either replaced, hydrostatically tested, or operated in accordance with the special permit conditions. The Federal pipeline safety regulations in 49 CFR 192.611(a) require natural gas pipeline operators to confirm or revise the MAOP of a pipeline segment after a change in class location. A special permit would allow

SNG to continue to operate each of the 16 *special permit segments* at their existing MAOP's despite a change in class location for the special permit specified time interval.

Public Notice:

On May 27, 2022, PHMSA posted a notice of this special permit request in the Federal Register (87 FR 32232) with a closing date of June 27, 2022. PHMSA has reviewed all public comments received for Docket Number PHMSA-2016-0006. PHMSA received public comments concerning this special permit request that have been addressed in the Final Environmental Assessment and Finding of No Significant Impact (FEA and FONSI).

The SNG special permit application letter, Federal Register notice, Final Environmental Assessment, Finding of No Significant Impact, and all other pertinent documents are available for review in Docket No. PHMSA-2016-0006 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 class location change waivers, now being granted through special permits. 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 the operator's integrity management program provides a level of safety equal to a pipe replacement or pressure reduction.

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 SNG special permit petition.

- 1) No pipeline segments in a class location changing to Class 4 location will be considered.

This special permit request is for 16 *special permit segments* on the SNG pipeline system

where a class location change has occurred from Class 1 to Class 3 locations as defined in § 192.5(c) for cluster locations and segments outside the cluster (and inside the sliding mile for the class location) where an additional dwelling(s) have been identified. SNG has met this requirement.

- 2) No bare pipe will be considered. These SNG *special permit segments* are coated with an external protective coating. SNG has met this requirement.
- 3) No pipe containing wrinkle bends will be considered. There are no wrinkle bends in the *special permit segments*. SNG 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. SNG has met this requirement.
- 5) Records must be produced that show a hydrostatic test to at least 1.25 x maximum allowable operating pressure (MAOP). SNG will pressure test any segments that do not meet this requirement through the special permit conditions.
- 6) In-line inspection (ILI) must have been performed with no significant anomalies identified that indicate systemic problems. SNG will meet this requirement through the special permit conditions.
- 7) Criteria for consideration of class location change waiver, now being granted through special permits, 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 either side of the *waiver segment (special permit segment)*. The *special permit inspection area* must be inspected according to SNG's integrity management program and periodically inspected with an in-line inspection technique. The *special permit inspection area* extends one-mile out from either side of the special permit segments and the Class location 3 sliding mile. This additional length was used since the Type B areas that are not being replaced are locations with 10 or fewer buildings intended for human occupancy in a "class location unit" and are outside the original "cluster area." This special permit is contingent upon SNG's incorporation of each of the *special permit segments* in its written integrity management program as a "covered segment" in a "high consequence area" (HCA) per 49 CFR 192.903.

Criteria Matrix: The original and supplemental data submitted by SNG for the *special permit segment* have been compared to the class location change special permit criteria matrix. The *special permit segments* fall in the probable acceptance column of the criteria matrix for all criteria except for:

- Possible acceptance – pipe manufacture, pipe material, pipe coating, and several leaks within 20-miles of the *special permit segment*.

The data findings below fall within the “probable and possible acceptance” columns of the criteria matrix:

1) Pipe design and construction, including pipe manufacture, material and design stress:

- SNG pipeline special permit segments have:
 - Pipe manufactured with the following pipe seams: high-frequency electric resistance welded, flash welded, double submerged arc welded, seamless, and submerged arc weld.
 - Pipe coatings included: coal tar enamel and fusion bonded epoxy.
 - Pipe design stress was 72% specified minimum yield strength or lower.
 - Several leaks within 20-miles of the *special permit segment*: SNG will be required to conduct a stress corrosion cracking assessment (SCCDA) of the *special permit segments* to evaluate where the risk of stress corrosion cracking (SCC) is present. SNG will be required to implement a plan to improve cathodic protection reliability and perform inspections for SCC during excavations.
- To further address pipe manufacturing, material, construction, pipe coating, SCCDA, and possible pipe leak issues, this special permit will include conditions requiring SNG to treat all *special permit segments* as “covered segments” in an HCA per 49 CFR 192.903.
- SNG will also be required to perform ILI assessments, anomaly repairs, close interval surveys, identify any pipeline segment that may be susceptible to pipe seam issues because of the vintage of the pipe, the manufacturing process of the pipe, or other issues and stress corrosion cracking direct assessment (SCCDA) along the entire length of the *special permit inspection areas* and *special permit segments* according to the requirements of 49 CFR 192.929 after the grant of this special permit.

- This special permit will include a condition that SNG must continue to operate each *special permit segment* at or below its existing MAOP.

PHMSA has determined that imposing the special permit conditions will address these concerns and provide equivalent safety for these areas.

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 consider 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 SNG must implement to comply with this special permit.

Past Enforcement History – January 1, 2011 through July 31, 2022:

During January 1, 2011 through July 31, 2022, SNG was cited in five (5) enforcement actions with a total of \$72,900 in assessed civil penalties. PHMSA issued one (1) Corrective Action Order, one (1) Notice of Amendments, one (1) Notice of Probable Violations, and two (2) Warning Letters to SNG. **Tables 5 and 6** below shows PHMSA's enforcement actions and civil penalties for SNG:

Table 5: SNG Enforcement Matters from January 1, 2011 through July 31, 2022						
Status	Corrective Action Order	Notice of Amendment	Notice of Probable Violation	Safety Order	Warning Letter	Total
CLOSED	0	1	1	0	2	4
OPEN	1	0	0	0	0	1
Total	1	1	1	0	2	5

Table 6: SNG Enforcement Civil Penalty Status January 1, 2011 through July 31, 2022				
Proposed	Awaiting Order	Assessed	Withdrawn/Reduced	Collected
\$72,900		\$72,900	\$0	\$72,900

Summary of Enforcement Findings for SNG includes:

- **Design:** Compressor Station Design and Construction, Pressure Relieving and Limiting Stations, and Supports and Anchors; **External Corrosion Control:** Monitoring; **Internal Corrosion Control:** General; **Integrity Management:** Baseline Assessment, Direct Assessment Plan, Program Elements, and Remediation; **OME Procedural Manual:** General, and Maintenance and Normal Operations; **Maintenance:** Compressor Stations-Storage of Combustible Materials, Patrolling, and Record Keeping;
- 49 CFR 192.3, 192.163, 192.199, 192.465, 192.475, 192.605, 192.705, 192.709, 192.735, and 192.911.

Table 7 below shows PHMSA's enforcement actions and civil penalties for SNG and the specific 49 CFR Parts 191 and 192 violations:

Table 7: Summary of Enforcement Findings from SNG January 1, 2011 to July 31, 2022					
Notice of Amendment					
Integrity Management	7	OME Procedural Manual	4		
Notice of Amendment Total:					11
Notice of Probable Violation					
Corrosion Control	1	Integrity Management	1	OME Procedural Manual	1
Notice of Probable Violation Total:					3
Warning Letter					
Corrosion Control	1	Design	3	Integrity Management	2
OME Procedural Manual	1	Operation and/or Maintenance	3		
Warning Letter Total:					10
Grand Total:					24

Summary of Enforcement Findings for the Kinder Morgan Gas Pipelines Companies - CIG, EPNG, NGPL, SNG, Tejas, and TGP:

From January 1, 2011, through July 31, 2022, Kinder Morgan, the operator of SNG, was cited in 64 enforcement actions with a total of \$1,077,800 in assessed civil penalties on its Colorado Interstate Gas Company (CIG), El Paso Natural Gas Company (EPNG), Natural Gas Pipeline of America (NGPL), Southern Natural Gas Company (SNG), Tejas Pipeline (Tejas), and Tennessee Gas Pipeline Company (TGP) pipeline systems. PHMSA issued seventeen (17) Notice of Amendments, twenty-two (22) Notices of Probable Violations, twenty-two (22) Warning Letters, one (1) Safety Order, and nine (9) Corrective Action Orders to Kinder Morgan.

Tables 8 and 9 below show PHMSA's enforcement actions and civil penalties for Kinder Morgan on these pipeline systems – CIG, EPNG, NGPL, SNG, Tejas, and TGP - with operator identification numbers (OPID#) 2564, 4280, 13120, 18516, 4900, and 19160.

Table 8: Kinder Morgan Enforcement Matters from January 1, 2011 through July 31, 2022						
Status	Corrective Action Order	Notice of Amendment	Notice of Probable Violation	Safety Order	Warning Letter	Total
CLOSED	5	17	22	1	22	67
OPEN	4	0	0	0	0	4
Total	9	17	22	1	22	71

Table 9: Kinder Morgan Enforcement Civil Penalty Status January 1, 2011 through July 31, 2022				
Proposed	Awaiting Order	Assessed	Withdrawn/Reduced	Collected
\$1,461,500	\$0	\$1,077,800	\$383,700	\$1,077,800

The type of 49 CFR Part 192 enforcement violations against Kinder Morgan on these six (6) pipeline systems from January 1, 2011 through July 31, 2022 were as follows:

Summary of Enforcement Findings for CIG, EPNG, NGPL, SNG, Tejas, and TGP includes:

- **Atmospheric Corrosion Control:** General and Monitoring; **Construction:** Compliance with Standards; **Control Room Management:** Alarm Management, Fatigue Mitigation, and Roles and Responsibilities; **Design:** Compressor Station Design and Construction, Pressure

Relieving and Limiting Stations, and Supports and Anchors; **External Corrosion Control:** Cathodic Protection, Examination of Buried Pipe, Maintenance and Normal Operations, Monitoring, Protective Coating, and Test Stations; **Gas Transportation:** Conversion of Service, and Underground Natural Gas Storage; **Internal Corrosion Control:** General, Inspection Internal Surface, and Records; **Integrity Management:** Addressing Integrity Issues, Continual Process Evaluation and Assessment, High Consequence Area Identification, Preventative and Mitigative Measures, Program Elements, and Threat Identification; **Maintenance:** Compressor Stations-Gas Detection, Compressor Stations-Inspection and Testing of Relief Devices, Compressor Stations-Storage of Combustible Materials, Leak Surveys, Line Markers, Permanent Field Repair of Damage, Pressure Limiting and Regulating Stations Inspection and Testing, Relief Devices, Patrolling, Record Keeping, and Valve Maintenance; **OME Procedural Manual:** Emergency Plans, General, Maintenance and Normal Operations, Safety Related Conditions Reporting (SRCR); **Operations:** Change in Class Location, Continual Surveillance, Emergency Plans, General, MAOP, Odorization of Gas, and Overpressure Safety Devices; **Operator Qualification:** Qualification Program and Recordkeeping; **Public Awareness:** Develop and Implement Public Awareness and Documentation; **Reporting:** Incident Reports, Immediate Reporting Incident, Filing SRCR, Offshore Pipeline Condition Report; **Welding:** Limitations on Welders, Procedures, and Qualifications.

- 49 CFR 191.3, 191.5, 191.15, 191.22, 191.23, 191.25, 191.27, 191.605, 192.3, 192.12, 192.14, 192.161, 192.163, 192.199, 192.201, 192.225, 192.227, 192.229, 192.303, 192.436, 192.459, 192.461, 192.463, 192.465, 192.469, 192.475, 192.479, 192.481, 192.491, 192.603, 192.605, 192.611, 192.613, 192.615, 192.616, 192.619, 192.625, 192.631, 192.705, 192.706, 192.707, 192.709, 192.713, 192.731, 192.735, 192.736, 192.739, 192.743, 192.745, 192.805, 192.807, 192.905, 192.911, 192.917, 192.921, 192.933, 192.935, and 192.937.

Table 10 below gives a complete summary of the findings and the specific 49 CFR Parts 191 and 192 violations:

Table 10: Summary of Enforcement Findings for CIG, EPNG, NGPL, SNG, Tejas, and TGP January 1, 2011 through July 31, 2022					
Notice of Amendment					
Construction	1	Control Room Management	4	Integrity Management	10
OME Procedural Manual	11	Operation and/or Maintenance	2	Operator Qualification	3
Public Awareness	8	Reporting	3	Transportation of Gas	5
Welding of Steel in Pipelines	3				
Notice of Amendment Total:					50
Notice of Probable Violation					
Control Room Management	1	Corrosion Control	13	Design	2
Integrity Management	10	OME Procedural Manual	14	Operation and/or Maintenance	26
Operator Qualification	7	Public Awareness	2	Reporting	5
Welding of Steel in Pipelines	1				
Notice of Probable Violation Total:					81
Warning Letter					
Corrosion Control	11	Design	1	Integrity Management	1
OME Procedural Manual	10	Operation and/or Maintenance	31	Operator Qualification	2
Public Awareness	4	Reporting	1	Transportation of Gas	1
Warning Letter Total:					62
Grand Total:					193

Findings:

Based on the information submitted by SNG and PHMSA's analysis of the technical, operational, and safety issues, PHMSA finds that granting this special permit with conditions that requires SNG to operate the 16 *special permit segments* on the 16-inch diameter, 18-inch diameter, 20-inch diameter, 24-inch diameter, 26-inch diameter, and 30-inch diameter pipelines located in Autauga and Lee Counties, Alabama; Harris, Jones, and Spalding Counties, Georgia; and East Baton Rouge and Livingston Parishes, Louisiana at their current MAOP for a Class 1 to Class 3 location change segment is consistent with pipeline safety.

PHMSA has designed the special permit conditions to effectively assess and remediate threats to the *special permit segments* and *special permit inspection areas*, including pressure testing, obtaining pipe material records, and conducting assessments to evaluate pipe girth welds that have not been non-destructively tested, any pipe with missing material records, and SCC. To ensure SNG properly implements the special permit conditions, SNG will be required to give PHMSA an annual review of their compliance with the special permit.

PHMSA finds the issuance and full implementation of this special permit that waives the requirements of 49 CFR 192.611(a) and (d) and 192.619(a) for a class location change to a Class 3 location is not inconsistent with pipeline safety. This special permit requires SNG 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*. SNG will be required to implement the special permit conditions along the *special permit segments* and *special permit inspection areas* in pipeline segments that are not high consequence areas and would not normally be required by 49 CFR Part 192 to be assessed on a periodic interval for threats.

Completed in Washington DC on: March 17, 2023

Prepared By: PHMSA – Engineering and Research Division