

COMMONWEALTH OF VIRGINIA

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STATE CORPORATION COMMISSION DIVISION OF UTILITY AND RAILROAD SAFETY

September 13, 2012

Mr. Jeffrey D. Wiese
Associate Administrator for Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Mr. Wiese,

By letter dated April 11, 2011, we provided PHMSA with a brief progress report relative to addressing the risks associated with the aging pipeline infrastructure in Virginia. In response to your June 13, 2012, letter to the Commission and the July 23, 2012, letter from the Administrator to our Governor, I am providing an update to our previous report.

With respect to cast iron pipelines in Virginia, investor-owned operators have reduced their total miles by another 37 miles since last year, with 106 miles remaining. The three municipal gas systems have reduced their cast iron pipelines from 544 miles in 2011 to 485 miles this year. The remaining cast iron pipelines are to be replaced based on each operator's DIMP program.

We also reported on the significant reduction in the number of miles of bare steel pipelines since the early 1990s. Currently, we have about 660 miles of bare steel with plans by each operator to replace these facilities over time, again based on their DIMP plans.

Further, we will complete all our DIMP inspections in 2012 and continue to perform inspections on every IMP dig. We completed the review of records for determination of the MAOP to ensure compliance with Part 192, and with two exceptions, the records were adequate. For the two pipelines in question, plans are underway to address the issues discovered.

We appreciate working with PHMSA on pipeline safety matters and are ready to provide additional details if necessary.

Should you have questions, please let me know.

Sincerely,



Massoud Tahamtani