

NOTICE OF AMENDMENT

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 19, 1994

Mr. Charles P. Lowry  
Vice President, Operations  
Northern Natural Gas Company  
1111 South 103rd Street  
Omaha, NE 68124-1000

Dear Mr. Lowry:

CPF No. 34111M

On August 17-19, 1993, representatives of the Minnesota Office of Pipeline Safety, acting as an agent for interstate pipelines for the Central Region, Office of Pipeline Safety, pursuant to Section 14(c) of the Natural Gas Pipeline Safety Act, 49 U.S.C. App. § 2001 et. seq. (NGPSA), conducted an onsite pipeline safety inspection of your pipeline facilities and records at Willmar, Minnesota.

As a result of the inspection, it appears that you have committed a probable violation as noted below of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 191 and Part 192. The item inspected and the probable violation is:

**1) § 192.615 Emergency plans.**

**§ 192.615(a) states that "Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:**

**(3) Prompt and effective response to a notice of each type of emergency, including the following:**

**(iv) Natural disaster."**

NNG procedures do not address any natural disaster other than tornados. These procedures should consider the

possibility of various types of natural disasters,  
including, but not limited to, tornados.

When it is found that an operator's procedures are inadequate, Title 49 CFR, § 190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures. This letter serves to provide you with notice of the inadequate procedures and the response options as prescribed under § 190.237, Title 49 CFR. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request an informal hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon  
Director, Central Region  
Office of Pipeline Safety