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July 25, 2008

Mr. Alan Mayberry  
Director – Engineering and Emergency Support  
1200 New Jersey Ave SE  
Room E22-207  
Washington DC, 20590

**PHMSA Document Number: [PHMSA-2006-26611-1](#)  
Elan Subdivision Special Permit  
Near Lafayette, LA**

Dear Mr. Mayberry:


Texas Gas Transmission, LLC (Texas Gas or “we”), an interstate gas transmission company, submits this letter in response to your May 2nd 2008 request for information regarding the Special Permit that we submitted on June 1, 2006. Your request focused on evaluating the longitudinal seam integrity.

After conversations with PHMSA representatives Wayne Lemoi and Steve Nanney, it was agreed that Texas Gas should utilize the *TTO Number 5, Low Frequency ERW and Lap Welded Longitudinal Seam Evaluation*, Final Report by Michael Baker Jr., Inc., Revision 3, April 2004 (Baker Report) as a means of determining whether or not the seam of a particular pipeline in question was susceptible to failure.

Chapter 4, Section 4.3 *Determination of Susceptibility* and the flow chart in Figure 4.1 were utilized to complete the seam susceptibility analysis. Appendix A highlights the path through Figure 4.1. Appendix B presents the Figure 4.1 in a text format. In addition supporting documentation such as the pipe purchase orders and the hydrostatic test records are available upon request.

Should you have any questions or comments, please contact Frank Maraia at (985) 898-1004 or [Frank.Maraia@bwpmlp.com](mailto:Frank.Maraia@bwpmlp.com).

Sincerely,

  
David Goodwin  
Vice President

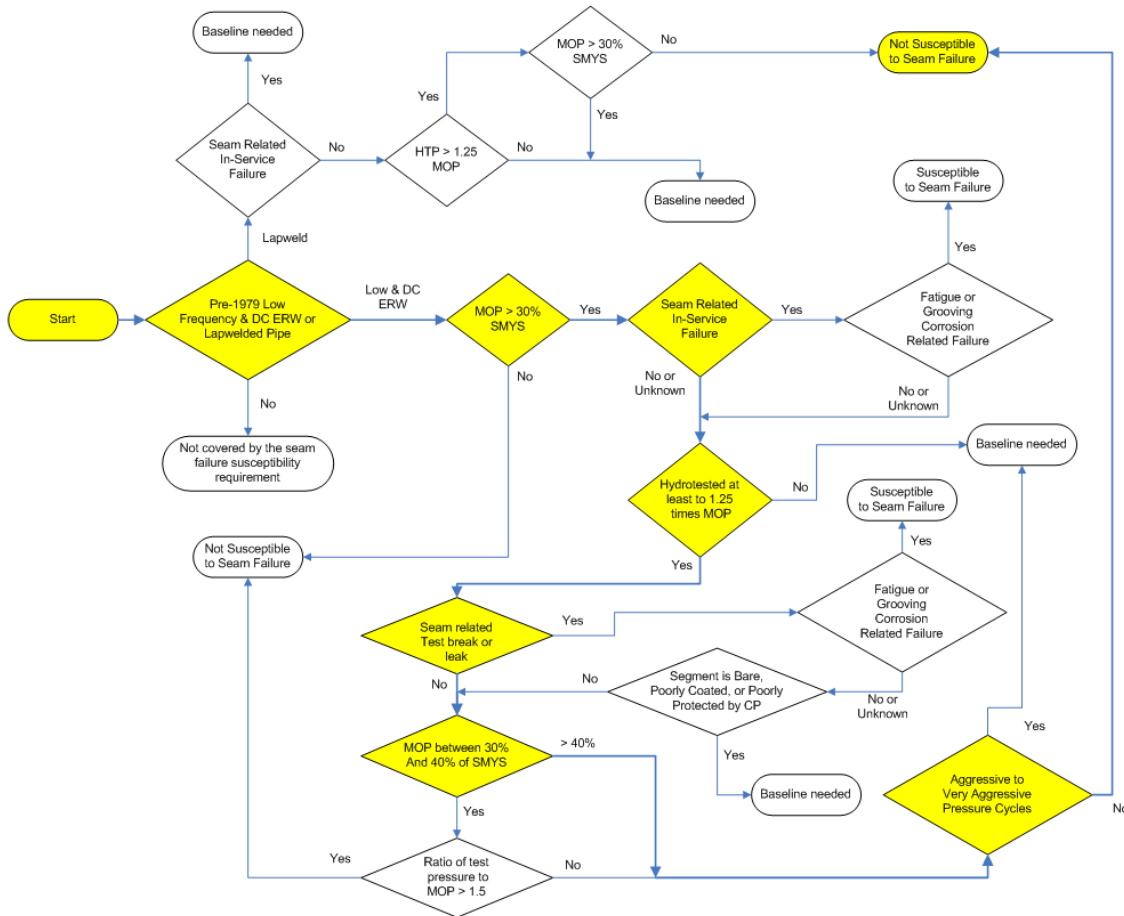
cc: Rodrick M. Seeley  
Wayne Lemoi  
Frank Maraia  
Jeff McMaine  
Walt Bennett



EUT 26-1 TT Elan Longitudinal Seam Susceptibility Analysis  
 Inspection Area from MP 11+2700 to MP 40+1600  
 Long Seam Susceptibility Criteria

The following is from *TTO5 – Low Frequency ERW and Lap Welded Longitudinal Seam Evaluation*, Section 4.3, Determination of Susceptibility. The path through the flow diagram has been highlighted.

EUT 26-1TT Elan Longitudinal Seam Analysis



TTO Number 5, Low Frequency ERW and Lap Welded Longitudinal Seam Evaluation, Final Report by Michael Baker Jr., Inc., Revision 3, April 2004 (Baker Report), Figure 4.1		
E'Lan Subdivision EUT 20-1 TT		
Start	Inspection Area from MP 11+2700 to MP 40+1600	Documentation
Pre-1979 Low Frequency & DC ERW or Lapwelded Pipe	AQ Smith EFW	Appendix C - Pipe PC
MOP>30% SMYS	Yes; 100% SMYS = 1461, MAOP = 1052, 72% SMYS Stress Level	
Seam Related In-Service Failure	No	
Hydro Tested at Least to 1.25 x MAOP	Yes 1320, 1956 Test, 1052 MAOP; 1320/1052 = 1.25 1461, 1989 Test, 1052 MAOP; 1461/1052 = 1.39 2175, 1989 Test, 1052 MAOP; 2175/1052 = 2.07 1890, 1981 Test, 1052 MAOP; 1890/1052 = 1.80 2175, 1980 Test, 1052 MAOP; 2175/1052 = 2.07 1461, 1959 Test, 1052 MAOP; 1461/1052 = 1.39 2175, 1994 Test, 1052 MAOP; 2175/1052 = 2.07 1461, 1989 Test, 1052 MAOP; 1461/1052 = 1.39 2175, 1999 Test, 1052 MAOP; 2175/1052 = 2.07 2175, 1993 Test, 1052 MAOP; 2175/1052 = 2.07 2175, 1989 Test, 1052 MAOP; 2175/1052 = 2.07 2175, 1976 Test, 1052 MAOP; 2175/1052 = 2.07 1315, 1984 Test, 1052 MAOP; 1315/1052 = 1.25	Appendix D - Hydro Records and Charts
Seam Related Test Break or Leak	Yes	Appendix D - Hydro Records and Charts
Fatigue or Grooving Corrosion Related Failure	No	
Segment is Bare, Poorly Coated, or Poorly Protected by CP	No	
MOP Between 30% and 40% of SMYS	>40%; 72%	
Aggressive to Very Aggressive Pressure Cycles	No	
<b>Not Susceptible to Seam Failures</b>		

TTO Number 5, Low Frequency ERW and Lap Welded Longitudinal Seam Evaluation, Final Report by Michael Baker Jr., Inc., Revision 3, April 2004 (Baker Report), Figure 4.1		
E'Lan Subdivision EUT 26-1 TT		
Start	Inspection Area from MP 11+2700 to MP 40+1600	Documentation
Pre-1979 Low Frequency & DC ERW or Lapwelded Pipe	AQ Smith EFW	Appendix C - Pipe PC
MOP>30% SMYS	Yes; 100% SMYS = 1500, MAOP = 1080, 72% SMYS Stress Level	
Seam Related In-Service Failure	No	
Hydro Tested at Least to 1.25 x MAOP	Yes 1350, 1961 test, 1080 MAOP; 1350/1080 = 1.25 1500, 1963 test, 1080 MAOP; 1362/1080 = 1.26 1730, 1975 test, 1080 MAOP; 1730/1080 = 1.60 2175, 1989 test, 1080 MAOP; 2175/1080 = 2.01 1500, 1989 test, 1080 MAOP; 1500/1080 = 1.39 2077, 1981 test, 1080 MAOP; 2077/1080 = 1.92 1620, 1976 test, 1080 MAOP; 1620/1080 = 1.50 1500, 1989 test, 1080 MAOP; 1500/1080 = 1.39 2175, 1994 test, 1080 MAOP; 2175/1080 = 2.01 2175, 1999 test, 1080 MAOP; 2175/1080 = 2.01 2175, 1993 test, 1080 MAOP; 2175/1080 = 2.01 1952, 1976 test, 1080 MAOP; 1952/1080 = 1.81 1500, 1964 test, 1080 MAOP; 1500/1080 = 1.39 1362, 1984 test, 1080 MAOP; 1362/1080 = 1.26 1350, 1984 test, 1080 MAOP; 1350/1080 = 1.25 2175, 2002 test, 1080 MAOP; 2175/1080 = 2.01 2164, 2002 test, 1080 MAOP; 2164/1080 = 2.00 2164, 2003 test, 1080 MAOP; 2164/1080 = 2.00	Appendix D - Hydro Records and Charts
Seam Related Test Break or Leak	No	Appendix D - Hydro Records and Charts
MOP Between 30% and 40% of SMYS	>40%; 72%	
Aggressive to Very Aggressive Pressure Cycles	No	
<b>Not Susceptible to Seam Failures</b>		