

Attachment 7 – 5/25/01 letter from El Paso to NTSB

25 May 2001

**Mr. Cliff Zimmerman
Investigator-In-Charge
National Transportation Safety Board
Office of Pipeline and Hazardous Materials Safety, PH-1
490 L'Enfant Plaza East, S. W.
Washington D. C. 20594**

Subject: Document Request, 12 October 2000

Dear Mr. Zimmerman:

On October 31, 2000, we provided documents in response to your request for information about clean pigging on the 1103 line.

Recently, in connection with reviewing some of this information, we realized that we had provided summary charts to you and to the OPS that were different in certain respects. We are attaching a letter we provided to OPS, dated April 24, 2001, that discusses the issue.

Please let me know if you have any questions at 719-520-4530.

Sincerely Yours,


Thomas P. Morgan

Cc: N. Dunn

April 24, 2001

Mr. Richard Lopez
U.S. Department of Transportation
Research and Special Programs Administration
Office of Pipeline Safety
2320 La Branch St., Suite 2100
Houston, TX 77004

Dear Richard:

We are writing to clarify the information provided to you on September 26, 2000, which I mentioned to you when we met on April 3.

Question #7, addressed to us on September 21, 2000, called for information on pigging runs that had been performed between 1990 and 2000 on the 1103 Line. In response, we furnished all available records reflecting such pigging runs. In addition to the underlying records, we presented a chart summarizing the data from the underlying records.

In reviewing this chart and the underlying records, we recently noticed inconsistencies between the chart and the underlying data. First, the pigging entry on the chart for January 1999 reflects that 20 lbs. of solids were removed from the line as the result of the pigging run; however, the underlying records indicate that 2100 lbs. were removed from the line. Although after further review we believe that the 20 lbs. figure is most likely the accurate amount, the discrepancy between that estimate and the underlying records should have been explicitly noted by describing the process by which the figure was revised downwards. Similar data was presented to the NTSB, with a similar chart. However, the chart submitted to the NTSB used the 2100 lbs. figure rather than 20 lbs., because of the uncertainty concerning the January 1999 entry, with a notation that the amounts were estimates. The chart submitted to the NTSB was prepared by people who were unaware that a similar chart had been submitted to OPS.

Second, in the chart submitted to OPS, an absence of data about the solids and liquids removed from the lines was generally noted as "no data." However, for April 21, 1998, and May 22, 2000, the chart shows figures of zero. The underlying records reflect the absence of data for solids and liquids rather than specific information (i.e., "zero") suggesting that no solids or liquids were removed from the line. Accordingly, the correct entry should have been "no data."

We regret any inconvenience caused by our need to provide this supplementary information at this time. Please let us know if you have any questions regarding these matters.

Sincerely,



Donald R. Payne, P.E.
Manager, Compliance Services

cc: T. P. Morgan
M. Ferguson

Michael Bromwich
Fried Frank Harris Shriver & Jacobson
1001 Pennsylvania Ave., N.W., 9th Floor
Washington, DC 20004