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**ILLINOIS COMMERCE COMMISSION**

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June 11, 2014

The Honorable Paul Tomazzoli  
Mayor of Cobden  
Cobden Municipal Gas System  
112 E. Maple St.  
P.O. Box 218  
Cobden, IL 62920

Re: Notice of Amendment (NOA # 2014-A001-00066)

Dear Mayor Tomazzoli:

Representatives of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a review of the Cobden Municipal Gas System ("Cobden") Distribution Integrity Management Plan ("DIMP") on June 4 and 5, 2014 (Inspection # 2014-P-00253). The audit has established that Cobden's DIMP is inadequate.

Below is the applicable section of the Code of Federal Regulations ("CFR") and the subsection language applicable to the violation. Following the CFR or subsection language is a description of the inadequacy.

**NOA # 2014-A001-00066**

**CFR §192.1007** titled: ***"What are the required elements of an integrity management plan?"*** states in paragraph (c), "Evaluate and rank risk. An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline. This evaluation must consider each applicable current and potential threat, the likelihood of failure associated with each threat, and the potential consequences of such a failure. An operator may subdivide its pipeline into regions with similar characteristics (e.g., contiguous areas within a distribution pipeline consisting of mains, services and other appurtenances; areas with common materials or environmental factors), and for which similar actions likely would be effective in reducing risk."

The threat of Material or Weld or Joint Failure was not ranked as a risk in the Distribution Integrity Management Program.

This letter serves as notice of an inadequate procedure. A written response to this notice is requested by July 11, 2014. If you are contesting this Notice, include a detailed written explanation and any necessary supporting documents with your response.

If you are not contesting this Notice, the written response must acknowledge that amended procedures will be provided to this office by September 9, 2014. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed. Any correspondence must include the Inspection Report Number as well as the corresponding NOA Number.

Failure to respond to this Notice and take corrective action will result in the issuance of a Notice of Probable Violation and initiation of a Citation Order that will subject the Cobden Municipal Gas System to a penalty assessment as allowed under Section 7 of the Illinois Gas Pipeline Safety Act (220 ILCS 20/7).

Please be advised that pursuant to IL Adm. Code Part 596 of the Commission's Rules, all information regarding this inspection in possession of the Commission, including communications regarding this inspection will be made available to the public and posted on the Commission's website. Confidential and/or personal information including, but not limited to social security numbers, drivers license numbers, credit card numbers, debit card numbers, and medical records, etc. should be included in neither inspection documents nor correspondence with the Commission. Any person, as set forth in Section 596.20, who believes that any inspection information is confidential or proprietary shall request that the Commission enter an order to protect the confidential or proprietary information pursuant to 83 Ill. Adm. Code 200.430.

If you have any questions concerning this matter, please contact Matt Smith at (217) 720-0291, or I may be contacted at (217) 785-1165.

Sincerely,



Darin R. Burk  
Manager - Pipeline Safety

DRB/mn