



August 13, 2015

SENT VIA EMAIL

Mr. Matt Smith
Manager, Gas Pipeline Safety
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

Dear Matt:

This letter is in response to the Notice of Probable Violations (NOPV 2015-V001-00005 and 2015-V001-00006) issued on July 14, 2015, following an ICC Comprehensive Field audit (Inspection # 2015-P-00222) conducted on May 20 – 21, 2015 at the Ameren Illinois (AIC) Canton Operating Center.

Staff requested that AIC submit evidence refuting the probable violations or if such evidence can not be provided, a written plan outlining actions to be taken to correct the violation including a schedule and the date when compliance is anticipated and steps that AIC has taken or expects to take to prevent a recurrence by August 13, 2015.

During the audit, Staff observed a casing at the railroad crossing on Route 78 north of Dunfermline missing a pipeline marker. Staff referenced CFR192§192.707, that a line marker must be placed and maintained as close as practical over each buried main and transmission line at each crossing of a public road and railroad; issuing NOPV number 2015-V001-00005. Staff noted that a pipeline marker must be installed and maintained for the south casing. Staff also recommended that this area be cleared to assure that the location of the pipeline crossing under the railroad tracks is abundantly clear or a pipeline marker added that is easily visible.

While the pipeline crossing this railroad had a line marker on the north side of the crossing, a marker was not present at the casing vent on the south side of the crossing at the time of the Field Audit. The location of the north pipeline marker was not visible from the south side of the crossing due to vegetation overgrowth. Since the time of the audit, AIC has installed a pipeline marker adjacent to the casing vent on the south side of the crossing and has cleared the vegetation to provide visibility to the north pipeline marker. See Attachment "A" showing a picture of the updated right of way as of June 22, 2015.

AIC routinely reviews pipeline crossings for the presence of markers during patrols, and to prevent a reoccurrence of this situation, AIC will publish a compliance alert bulletin highlighting the requirements of looking for pipeline markers during a patrol. The bulletin will

also reiterate how to report deficiencies related to pipeline markers. This compliance alert bulletin will be shared with all Gas Field Personnel including Leak Survey technicians in the 3rd quarter of 2015 and will also be incorporated into the annual leak surveyor training.

Staff also observed a customer meter and regulator located under a carport on Locust St in Canton. Staff referenced CFR§192.355, that the service regulator vent must terminate outdoors with the outdoor terminal located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; issuing NOPV number 2015-V001-00006. Staff requested that the meter regulator at this location must either be relocated or modified to allow gas to vent freely into the atmosphere and away from any opening into the building.

Since the time of the audit, AIC has relocated the gas regulator and meterset to a location outside of the carport. See Attachment "B" showing the original and modified location of this meterset.

To prevent a recurrence of this situation, AIC will publish a compliance alert bulletin to be shared with all Gas Field Personnel including Leak Survey technicians in the 3rd quarter of 2015 highlighting the importance of identifying metersets locations to determine if gas can vent freely into the atmosphere and away from any opening into a building, and how to document locations that need remediated. While the carport where this meterset was installed was open to atmosphere on two sides, AIC will review definitions and procedures relevant to the location of metersets and make any updates to the O&M Plan that are required . Any updates will be shared with Staff.

Please feel free to contact me if you have any questions.

Sincerely,



John W. Bozarth
Manager, Gas Compliance & Training

JWB/mf

cc: RDPate
SAGlaeser
SRColyer
BASheriff