Yankee Gas Services Company
47 Eagle Street
Waterbury, CT 06708

Yankeegas

February 9, 2004

RSPA-97-3001-19

Dockets Facility, U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-001

Re: Docket Number RSPA-97-3001, RIN 2137-AC54

Dear Sirs;

Yankee Gas has three pipeline crossings of navigable waterways that would be effected by the proposed rulemaking. Each of these crossings has different characteristics that illustrate our problems with the proposal.

The Connecticut River is still considered navigable at Windsor Locks, some ten miles above Hartford, Connecticut. Aids to navigation and charts end at Hartford, where the depth is listed as a maximum of 3-4 feet deep. Commercial navigation, or barge traffic, ends at Harford. The Connecticut River is generally stable except that localized erosion may take place when the river is in flood stage, generally in the spring. Although we have occasionally found our pipe exposed on the river banks during routine inspections after the river recedes, these exposed sections are out of the water after the flood stage. We re-bury the expose sections and they pose no threat to navigation.

Under the proposed regulations, we would be required to inspect the underwater portion to insure that the line is not damaged from vessels anchors since it is in less than fifteen feet of water. That section has never been exposed and is not a threat to the non-existent navigation.

The second crossing is in a recreational boating anchorage in Stamford harbor with a depth of about 8 feet at mean low water (MLW). It is too crowded for commercial traffic.

These two crossings were installed before the DOT code was in effect. If an inspection revealed no exposed piping, would a 35 year inspection cycle be unreasonable?

Our crossing of the Thames River, installed by a directional boring, is over ten feet below the channel depth of 25 feet. This section of the river has enough commercial traffic to be

maintained by dredging, marked with aids to navigation and covered on charts. However, the mud flats on either side of the channel would have to be scoured deeper than the channel before our pipe would be exposed. This channel is maintained only by dredging; scouring has not been a problem.

Yankee Gas is not qualified to suggest reasonable regulations for the Gulf of Mexico where the accidents mentioned took place. However, we are familiar with our local waters and know that scour, shifting channels and large commercial vessels in very shallow water are not a problem. If water over 15 feet deep at MLW is not a problem, then water of a minimum depth should also be safe from commercial traffic. The dredging and marking of channels and updating of depth surveys are based on commercial traffic. Perhaps the activities of the Coast and Geodetic Survey would be a better guide to commercial activity.

The means of determining the buried depth of a pipeline were not dealt with. The strength of the pipe and the coating in comparison with the typical marine traffic was not taken into consideration. The information referenced in the preamble was not mentioned in the rulemaking. In short, this proposed rulemaking need further refinement.

Sincerely,

R. S. Farnum / GB Flint

Robert S. Farnum
Operations Policy Administrator