U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

AUG 27 2019

Mr. Jeffery Kittka
Vice President
National Fuel Gas Supply Corporation
1100 State Street
Erie, Pennsylvania 16501

Docket No. PHMSA-2017-0090

Dear Mr. Kittka:

On July 28, 2017, National Fuel Gas Supply Corporation (NFG) requested the Pipeline and Hazardous Materials Safety Administration (PHMSA) to issue a special permit to waive compliance with the pipeline safety regulations in 49 Code of Federal Regulations (CFR) §§ 192.53, 192.55, 192.105, 192.107, 192.109, 192.111, 192.113, 192.144, 192.149, 192.150, 192.327, 192.463, and 192.619 for usage of flexible steel line pipe. NFG has requested to insert 6-inch diameter FlexSteel pipe and components, in the NFG FM120 pipeline located in McKean and Elk Counties, Pennsylvania.

FlexSteel pipe has an inner and outer layer of high density polyethylene (PE4710) and a middle layer of steel. The NFG FM120 pipeline special permit segment involves 5.8 miles of 6-inch diameter FlexSteel pipeline located in a gas transmission class 1 and 2 locations. The maximum allowable operating pressure for the special permit segment will be 720 pounds per square inch gauge. The 6-inch diameter FlexSteel pipe will be installed by pulling it into an existing 12.75-inch existing bare steel pipeline.

PHMSA grants this special permit (enclosed), which will allow NFG to operate the FM120 pipeline special permit segment using FlexSteel pipe after implementing the special permit conditions. This special permit provides relief from certain requirements of the Federal Pipeline Safety Regulations for the NFG special permit segment and requires NFG to comply with certain conditions and limitations designed to maintain pipeline safety. The special permit conditions require NFG to conduct additional monitoring, maintenance, assessments, and any needed remediation to comply with the safety requirements for usage of this alternative line pipe and components.

PHMSA grants this special permit based on the findings set forth in the "Special Permit Analysis and Findings" and "Final Environmental Assessment and Finding of No Significant Impact" documents, which can be read in their entirety in Docket No. PHMSA-2017-0090 in the Federal Docket Management System (FDMS) located on the internet at www.regulations.gov.

My staff would be pleased to discuss this matter or any other regulatory matter with you. John Gale, Director of Standards and Rulemaking Division may be contacted at 202-366-0434, on regulatory matters, and Sentho White, Director of Engineering and Research Division, may be contacted at 202-366-2415, on technical matters specific to this special permit application.

Sincerely,

for

Alan K. Mayberry
Associate Administrator for Pipeline Safety

Enclosure: Special Permit – PHMSA-2017-0090

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