



March 25, 2008

Mr. Larry Borum, Chief  
Gas Pipeline Safety Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

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2008 MAR 28 PM 13:58  
T.R.A. DOCKET ROOM

Re: Docket 07-00251, Petition of Atmos Energy Corporation  
for a Waiver to Permit the Limited Use of Polyethylene Piping

Dear Mr. Borum:

In response to your questions regarding our petition, I offer the following responses:

Question 1. *Definite locations for installations may not have been finalized at this time. However, what operating pressures are anticipated for pipe installations under this special permit?*

The intended design pressures for the anticipated pipe installations under this special permit will be at values determined using a 0.40 design factor in Section 192.121 using a HDB rating for the given material and geometric characteristics. The operating pressures may be slightly less than the calculated maximum design pressure using a 0.40 design factor but greater than that resulting from the use of a 0.32 design factor. Utilizing our normal SDR 11 pipe, this design equates to a maximum pressure of 100 psig for MDPE.

Question 2. *Will any segment(s) of pipe operate at an internal pressure exceeding the maximum design pressure calculated for the segment(s) when using a design factor equal to 0.32 in the equation in 192.121? The response to this question is needed prior to the evaluation of the request under Item 10 of the petition relative to "continued satisfactory operation of these systems at the installed pressures until such time, if any, that PHMSA adopts an increased design factor."*

Only the newly installed systems under this special permit will operate at pressures resulting from the use of a 0.40 design factor to ensure a good test and evaluation.

Question 3. *Relative to the request in Item 10 (see above), what additional operations and maintenance steps will Atmos take to insure the safe continued operation of these systems at the installed pressure?*

- Atmos proposes to install additional line markers
- Atmos proposes to perform additional leak surveys during the first year (2 times per year) and then on an annual basis thereafter.

Question 4. *The table included under Item 12 indicates that the minimum wall thickness and maximum Standard Dimension Ratio (SDR) for 2-inch diameter pipe will be 0.216 inches and 11 respectively. However, the first sentence after the table references 2-inch diameter IPS SDR 13.5. What is the SDR limit?*

Under this special permit, the SDR for the 2-inch pipe size is SDR 11.

Question 5. *After the initial Item 12, item numbering is incorrect.*

This has been re-submitted and re-numbered.

Question 6. *Can a trench detail for a typical installation be supplied to the GPSD staff?*

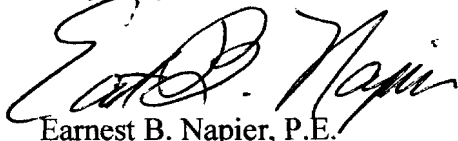
A typical trench detail is attached.

Question 7. *What criteria will Atmos use to measure the success of the in-service operating experience?*

The single biggest criterion to measure the success of the in-service operating experience is the leak survey information. Atmos intends to use PE materials with which the industry has a long and safe track record. Moreover, the industry has numerous data which indicates the material's ageing characteristics. There is no technical reason to believe that there will be any issues with the material performance. Atmos will comply with any reasonable request by the IDF steering committee and the proposed testing.

I hope this letter will answer your questions adequately. If you need any further information, please do not hesitate to let me know.

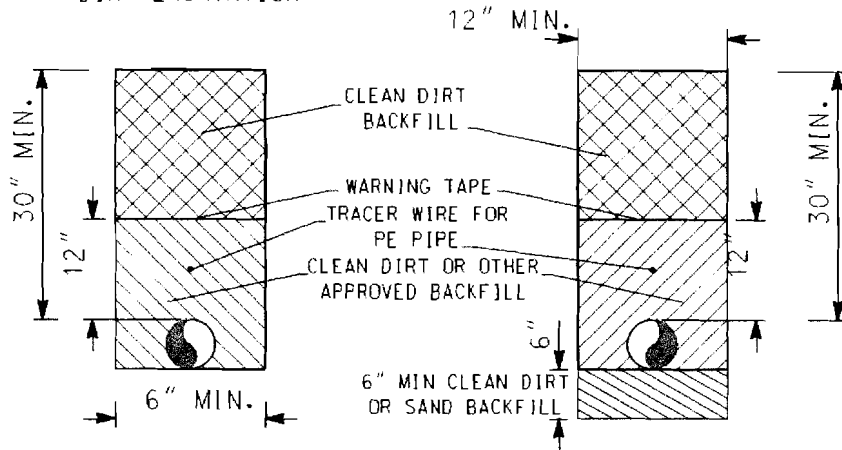
Very truly yours,



Earnest B. Napier, P.E.  
Vice President – Technical Services

Enclosure

# DIRT EXCAVATION



# ROCK EXCAVATION

## STANDARD TRENCH - 2" MAINS & UNDER

NOTE: EXCAVATIONS IN ASPHALT OR CONCRETE REQUIRE 100 % STONE BACKFILL TO WITHIN 4 INCHES OF GRADE. CONCRETE AND ASPHALT CAN THEN BE RESTORED.