



Questar Gas Management Company

Independence Plaza  
1050 17th Street, Suite 500  
Denver, CO 80265  
Tel 303 672 6900 • Fax 303 308 3610

December 5, 2007

SENT TO COMPLIANCE REGISTRY  
Hardcopy  Electronically   
# of Copies 1 / Date 12/17/07

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Ave. Suite 110  
Lakewood, CO 80228

Dear Mr. Hoidal:

Re: **CPF 5-2007-0025M**

Questar Gas Management has received your Notice of Amendment dated November 16, 2007 and respectfully issues this letter as our formal response.

QGM would like to thank you for the time and consideration that has been devoted to the above referenced inspection, and we appreciate the input and recommendations made by you and your staff. We are devoted to the safety and integrity of our pipeline systems and feel that any valid recommendations should be considered and addressed appropriately in our program.

For this reason, QGM would like to submit to you changes to our program as follows:

**Item 1A: §192.905(a) and §192.905(b)(1)&(2)**

The QGM HCA identification process does not clearly define in sufficient detail who is responsible for making decisions regarding the determination of HCAs and the qualifications of that individual as required by ASME B31.8S Section 12.2.4 and §192.915.

**Response:**

QGM has changed the written program to include these elements as described. Please reference the attached copy of the revised plan.

**Item 1B: §192.905(c)**

The HCA process used by QGM does not require the pipeline to be surveyed and evaluated for any other changes on an annual basis to determine if there are any HCAs along the pipeline.

**Pipeline and Hazardous Safety Administration**  
**CPF 5-2007-0025M**  
**December 3, 2007**  
**Page 2**

**Response:**

QGM has changed the written program to include these elements as described. Please reference the attached copy of the revised plan.

Again, QGM appreciates the time and consideration that you and your staff devoted to this inspection, and if there are any other changes that you feel are required or recommended to better our program, please feel free to notify me.

Sincerely,



Perry H. Richards  
Vice President  
Questar Gas Management  
1050 17<sup>th</sup> Street  
Denver, CO 80265  
(303) 672-6986

Cc: Kevin Peretti  
Doug Pehrson  
Jim Wakeley  
K.W. Pritchett

<b>PAGE NUMBER</b>	<b>Questar Gas Management</b>
1-1	<b>SECTION 1 INTRODUCTION</b>
<b>LAST REVISION DATE</b>	
December 1, 2007	

## Questar Gas Management – Gas Pipeline Integrity Management

Clear Creek LLC, a Utah limited liability company, is owned 100% by Questar Energy Trading Company ("QET"). QET contracts with its affiliate Questar Gas Management Company to act as the operator of record for its pipeline systems.

Questar Gas Management (QGM) is dedicated to the safety of the public and its employees. QGM strives to maintain safety through the integrity of its pipeline systems, and is committed to compliance with Federal regulations in regards to integrity management programs. QGM is required, according to 49 CFR 192 Subpart O, to conduct survey's and analysis on all pipeline systems and determine if a program of baseline or recurring integrity assessments/testing should be implemented. Currently, there are no QGM pipelines that meet the criteria outlined in Subpart O for High Concentration Areas (HCA) or Identified Sites (IS), however, QGM will continue to conduct supplemental survey's and evaluations on an annual basis to determine if any increase in population has or will create an HCA or IS along the pipeline.

Due to the commitment of QGM to ensure safety and regulatory compliance, QGM will only utilize companies/committees of persons who meet the following criteria when performing the required surveys/evaluations and HCA/IS determinations:

- At least 5 years of engineering or professional experience in DOT regulations and the interpretation of those regulations, or
- Completed training specific to HCA and IS recognition/determination by a person having the required engineering or professional experience, and documentation of that training.

QGM utilizes The Compliance Group to identify direct, indirect, transport and buffered HCA's that could be affected by the pipeline or pipeline facilities. The overall process for identification of line segments that could affect high consequence areas (HCA) begins with maintaining a current list of company operated pipelines that are subject to 49 CFR Part 192. These jurisdictional pipelines include both active and inactive or idle pipelines and are included below:

### Clear Creek (North)

Comes From	Goes To	Length	Class Loc.	Size	MAOP	Product	PIR
Clear Creek	Northwest / Overthrust	1 mile	1	6"	1440	Natural Gas	173 feet
Clear Creek	Northwest / Overthrust	5.4 mile	1	8"	1440	Natural Gas	226 feet
Clear Creek	Kern (leg 1)	1 mile	1	8"	1440	Natural Gas	226 feet

### Clear Creek (South)

Clear Creek	Kern (leg 2)	4.4 mile	1	8"	1440	Natural Gas	226 feet
Clear Creek	Kern (leg 3)	3.3 miles	1	6"	1440	Natural Gas	173 feet
Clear Creek	Kern (leg 4)	0.9 mile	1	8"	1440	Natural Gas	226 feet

<b>PAGE NUMBER</b>	<b>Questar Gas Management</b>
1-2	<b>SECTION 1 INTRODUCTION</b>
<b>LAST REVISION DATE</b>	
December 1, 2007	

The QGM Operations Manager is responsible to issue a new pipeline listing to The Compliance Group, Inc. within 6 months of a newly constructed or acquired pipeline system jurisdictional to 49 CFR 192. The Compliance Group is responsible for conducting the initial and subsequent annual surveys/evaluations for possible inclusion of the new pipeline systems into the integrity management plan/program. Each pipeline will be broken down into segments which include all portions of each pipeline system.

### **Potential Impact Radius**

Potential Impact Radius (PIR) means the radius of a circle within which the potential failure of a pipeline could have significant impact on people or property. PIR is determined by the formula  $r=0.69 \cdot (\text{square root of } p \cdot d^2)$ , where 'r' is the radius of a circular area in feet surrounding the point of failure, 'p' is the maximum allowable operating pressure (MAOP) in the pipeline segment in pounds per square inch and 'd' is the nominal diameter of the pipeline in inches.

**Note:** 0.69 is the factor for natural gas. This number will vary for other gases depending upon their heat of combustion. An operator transporting gas other than natural gas must use section 3.2 of ASME/ANSI B31.8S-2001.

The Compliance Group, Inc. is responsible for conducting the calculations in accordance with the procedure listed above and providing it to the Operations Manager to determine the pipelines jurisdiction to gas integrity management rules and regulations.

### **Determining High Consequence Areas**

QGM (specifically the Operations Manager or his designee) will utilize method one (1) from the definition in 49 CFR 192.903 to identify a high consequence area. Method (1) is included below:

A High Consequence Area (for purposes of gas integrity management) means an area established by one of the methods described in paragraphs (1) or (2) as follows:

- 1) An area defined as- (i) A Class 3 location under 49 CFR 192.5; or (ii) A Class 4 location under 192.5; or (iii) Any area in a class 1 or class 2 location where the potential impact radius is greater than 660 feet and the area within a potential impact circle contains 20 or more buildings intended for human occupancy; or (iv) Any area in a class 1 or class 2 location where the potential impact circle contains an identified site.

An "identified site" means each of the following areas:

(a) an outside area or open structure that is occupied by twenty (20) or more persons on at least 50 days in any twelve (12) month period. (The days need not be consecutive.) Examples include but are not limited to, beaches, playgrounds, recreational facilities,

<b>PAGE NUMBER</b> 1-3	<b>Questar Gas Management</b>
<b>LAST REVISION DATE</b> December 1, 2007	<b>SECTION 1 INTRODUCTION</b>

camping grounds, outdoor theaters, stadiums, recreational areas near a body of water, or areas outside a rural building such as a religious facility; or

(b) a building that is occupied by twenty (20) or more persons on at least five (5) days a week for ten (10) weeks in any twelve (12) month period. (The days and weeks need not be consecutive). Examples include, but are not limited to, religious facilities, office buildings, community centers, general stores, 4-H facilities, or roller skating rinks; or

(c) a facility occupied by persons who are confined, are of impaired mobility, or would be difficult to evacuate. Examples include but are not limited to hospitals, prisons, schools, day-care facilities, retirement facilities or assisted-living facilities.

**NOTE:** Where a potential impact circle is calculated, the length of the high consequence area extends axially along the length of the pipeline from the outermost edge of the first potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy to the outermost edge of the last contiguous potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy.

QGM only requires physical pipeline mapping once an onsite determination has been made that the pipeline is in close proximity to a Class 3 or 4 location or an identified site. If the pipeline is located in a rural area and the initial on-site review illustrates the pipeline to be in a class 1 location, no additional pipeline mapping or surveying is required. The initial onsite survey will be conducted by the Operations Manager (or his designee). The initial onsite survey will be conducted utilizing a range finder, GPS or other means of determining distances from the pipeline right of way to buildings or identified sites. If the pipeline is confirmed in class 1 location and there are no identified sites observed, no additional mapping is required. The PIR Calculation and the confirmation of the class location are all that are required by QGM.

When QGM has information that the area around a pipeline segment not previously identified as a high consequence area could satisfy any of the definitions in 49 CFR 192.903, QGM must complete the evaluation as listed in this document. If the segment is determined to meet the definition of a "High Consequence Area", a Gas Pipeline Integrity Management Plan will be developed (within 6 months of the newly acquired / constructed / newly identified pipeline) by the Operations Manager (or his designee).

If any items listed in the PIR Calculation change (i.e. – MAOP, pipeline diameter, product transported), within 30 days the Operations Manager must revise the PIR calculation to determine if the pipeline now falls under gas IMP. If a different pipeline diameter is used, that pipeline segment should be broken down into its own PIR calculation.