



PO BOX 196660

ANCHORAGE, ALASKA 99519-6660

TELEPHONE (907) 787-8700

February 28, 2008

Government Letter No.: 15159  
APSC File No. 2.11

Mr. Chris Hoidal, Western Region Director  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
12300 West Dakota Avenue, Suite 110  
Lakewood, CO 80228

RE: Notice of Probable Violation CPF No. 5-2008-0002

Dear Mr. Hoidal:

Attached please find Alyeska Pipeline Service Company's detailed response to the Pipeline and Hazardous Materials Safety Administration's Notice of Probable Violation CPF No. 5-2008-0002, dated January 28, 2008. Alyeska believes that this response will provide adequate clarification and additional information on the findings issued by PHMSA.

We hope you will find this material helpful. Should you have further questions, please do not hesitate to contact me at (907) 787-8061.

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. Robertson, P.E.", with a stylized flourish at the end.

Joseph P. Robertson, P.E.  
JPO/ DOT Liaison Director

JPR/leb

Attachment: Alyeska Pipeline Service Company's Response to NOPV CPF 5-2008-0002.

cc: Jon Strawn  
Jerry L. Brossia  
Dennis Hinnah  
Mike Thompson  
JPO Records Center

**PROBABLE VIOLATION 1.A:  
FGL Integrity Management Program**

**PHMSA POSITION**

**Pertinent Regulations:**

**49 CFR §192.911** What are the elements of an integrity management program?

An operator's initial integrity management program begins with a framework (*see* §192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (incorporated by reference, *see* §192.7) for more detailed information on the listed element.)

(p) A process for identification and assessment of newly-identified high consequence areas. (*See* §192.905 and §192.921.)

**49 CFR §192.905** How does an operator identify a high consequence area?

(a) *General.* To determine which segments of an operator's transmission pipeline system are covered by this subpart, an operator must identify the high consequence areas. An operator must use method (1) or (2) from the definition in §192.903 to identify a high consequence area. An operator may apply one method to its entire pipeline system, or an operator may apply one method to individual portions of the pipeline system. An operator must describe in its integrity management program which method it is applying to each portion of the operator's pipeline system. The description must include the potential impact radius when utilized to establish a high consequence area. (*See* appendix E.I. for guidance on identifying high consequence areas.)

(b) (1) *Identified sites.* An operator must identify an identified site, for purposes of this subpart, from information the operator has obtained from routine operation and maintenance activities and from public officials with safety or emergency response or planning responsibilities who indicate to the operator that they know of locations that meet the identified site criteria. These public officials could include officials on a local emergency planning commission or relevant Native American tribal officials.

(2) If a public official with safety or emergency response or planning responsibilities informs an operator that it does not have the information to identify an identified site, the operator must use one of the following sources, as appropriate, to identify these sites.

(i) Visible marking (*e.g.*, a sign); or

(ii) The site is licensed or registered by a Federal, State, or local government agency; or

(iii) The site is on a list (including a list on an internet web site) or map maintained by or available from a Federal, State, or local government agency and available to the general public.

**Findings:** APSC does not have an integrity management process for identifying high consequence areas (HCAs) associated with their Fuel Gas Line (FGL). A process for identifying HCAs is needed to ensure consistency during periodic checks by an operator for newly identified HCAs. This process must ensure that responsible personnel are informed of changes to the pipeline or the area surrounding the pipeline. The process will also ensure a timely HCA determination due to those changes.

**Proposed Compliance Order:**

In regard to Item Number 1.A of the Notice pertaining to a process for identifying HCAs:

Alyeska must develop and adopt a procedure for identifying HCAs during periodic checks by operator personnel. This process must ensure that responsible personnel are informed of changes to the pipeline or the area surrounding the pipeline. The process will also ensure a timely HCA determination due to those changes.

Provide the new procedure to the Director, Western Region within 30 days after receipt of the Final Order.

**ALYESKA PIPELINE SERVICE COMPANY'S RESPONSE**

**Summary:**

Alyeska Pipeline Service Company (Alyeska) does not contest PHMSA's finding that Alyeska did not have integrity management processes for the Fuel Gas Line. Alyeska now has written processes. Alyeska respectfully requests that PHMSA withdraw the proposed compliance order.

**Discussion:**

Section 5.2 outlines the process for Alyeska P&CM's to review any changes to pipeline facilities and personnel occupancy including building or area use changes which could affect the HCA determination. Section 5.3 describes the steps to be taken by the DOT Regulatory Specialist to incorporate any changes to or new HCA's identified during scheduled reviews.

With regard to Finding 1.A, Alyeska respectfully requests that the finding and proposed compliance order be withdrawn because Alyeska has written procedures to comply with §§192.911, 192.905(a) and 192.905(b).

NOPV CPF 5-2008-0002  
Finding No. 1.A: FGL Integrity Management Program  
2/28/08

**SUPPORTING DOCUMENTATION**

Exhibit 1 – MP-166-5.01, Identification of High Consequence Area on the Fuel Gas Line,  
Rev. 1



## Integrity Management Engineering

### Monitoring Program Procedures

---

Title: Identification of High Consequence Area on the Fuel Gas Line	Number: MP-166-5.01	Page: 1 of 6
	Revision: 1	Effective: 02/19/08

---

## 1.0 Purpose

The purpose of this procedure is to establish a standardized method for determining High Consequence Area (HCA) locations on the Alyeska Fuel Gas Line (FGL) meeting requirements of 49 CFR 192, Subpart O, Pipeline Integrity Management.

Implementation of this procedure ensures accurate and consistent assessment of which segments of the pipeline system could affect an HCA adjacent to the TAPS Fuel Gas Line (FGL).

Identification of HCA is part of an overall effort to ensure the safety of personnel living, working, or congregating near segments of the TAPS FGL. This procedure describes the steps used by responsible individuals for identifying which pipeline segments could affect HCA on the TAPS FGL. The steps are as follows:

- Identifying the current FGL location on a map.
- Determining population density and class location of the FGL
- Confirming maximum allowable FGL operating pressure and potential impact radius defined by regulation.
- Identifying buildings and areas where people live, work, and congregate near the FGL. Gathering data related to the occupancy of these identified sites.
- Determining in the presence of HCAs within the designated FGL potential impact radius.
- Reporting and documenting HCA decisions.

This procedure applies to collecting, processing, and evaluating HCA Could Affect Segments (CAS) data. This procedure applies to the following organizations: Integrity Management Engineering, Operations, Right-Of-Way (ROW) group, and APSC engineering contractor(s).

## 2.0 References

- *CW-200, Records Retention Schedule*
- *MP-166-1.00, Integrity Management Programs Process*
- *FG-78, Operating, Maintenance, & Emergency Plans for the Fuel Gas Pipeline*
- D-31-CP1, PS # 1 Overall Plot Plan – FGL High Consequence Area Determination (see Attachment 1) (see TDDI for the most current Controlled copy)
- D-32-CP1, PS # 2 Overall Plot Plan – FGL High Consequence Area Determination (see Attachment 2) (see TDDI for the most current Controlled copy)



# Integrity Management Engineering

## Monitoring Program Procedures

---

Title: Identification of High Consequence Area on the Fuel Gas Line	Number: MP-166-5.01	Page: 2 of 6
	Revision: 1	Effective: 02/19/08

---

- D-33-CP1, PS # 3 Overall Plot Plan – FGL High Consequence Area Determination (see Attachment 3) (see TDDI for the most current Controlled copy)
- D-34-CP1, PS # 4 Overall Plot Plan – FGL High Consequence Area Determination (see Attachment 4) (see TDDI for the most current Controlled copy)
- 49 CFR 192, Subpart O, Gas Transmission Pipeline Integrity Management
  - 192.903, "What definitions apply to this subpart?"
  - 192.905, "How does an operator identify a high consequence area?"
  - 192.907, "What must an operator do to implement this subpart?"
- PHMSA Gas Integrity Management Inspection Protocols, January 1, 2007
  - With Results Forms
  - With Supplemental Guidance

### 3.0 Definitions

<b>PIR</b>	Potential impact radius as defined in 49 CFR 192.903 = $0.69 \times \text{square root}(p \times d^2)$ where:  p = FGL maximum allowable operating pressure (MAOP) = 1440 psi, and d = FGL diameter in inches = {10", 8", or 6"} depending on location. PIR = {262 ft, 209 ft or 157 ft} for {10", 8" or 6"} diameter FGL respectively.
<b>EDM</b>	Engineering Data Management System, Database repository of FGL integrity related data.
<b>HCA</b>	High Consequence Area defined by 49 CFR 192.903
<b>Identified Sites</b>	An outside area or building occupied by 20 or more people, or facility occupied by persons of limited mobility, as defined by 49 CFR 192.903.
<b>Buildings</b>	Buildings suitable for human habitation and defined by 49 CFR 192.903 (4b)
<b>FGL</b>	Fuel Gas Line, as defined by 49 CFR 192.3 under " <i>Pipeline</i> "
<b>Outside area</b>	Outside area or open structure occupied or congregated by 20 or more people, as defined by 49 CFR 192.903 (4a)
<b>Assessment</b>	Use of testing techniques as allowed by 49 CFR 192, Subpart O, to ascertain the condition of the covered pipeline segment.
<b>SME</b>	Subject Matter Expert



# Integrity Management Engineering Monitoring Program Procedures

---

Title: Identification of High Consequence Area on the Fuel Gas Line	Number: MP-166-5.01	Page: 3 of 6
	Revision: 1	Effective: 02/19/08

---

## 4.0 Accountable Resources

- DOTRS - DOT Regulatory Specialist
- IME Supervisor - Integrity Management Engineering Supervisor or assigned Engineering SME
- P&CM - Pipeline & Civil Maintenance Coordinator

## 5.0 Procedure

1. IME Supervisor – Maintains FGL data, photos and maps necessary to conduct this procedure.
  - Maintains maps and photos showing the location of the FGL, TAPS facilities, and any public facilities that could be considered an HCA. Assures that Pump Station drawings provided for use by this procedure (Attachment 1 through Attachment 4) are accurate and up to date.
  - Confirms aerial photography of the pipeline corridor is accurate and up to date.
  - Maintains integrity related data in EDM.
  - Maintains structure and occupancy data needed for the accurate evaluation and determination of class locations and HCA.
  - Show Class Determination and PIR boundary locations on Pump Station plot plan drawings (determined by step 5).
2. P&CM - Conducts HCA building and site survey of the FGL annually, and reports the following results:
  - Obtains and reviews current FGL plot plans showing Class Determination and PIR Boundary locations (attached).
  - Determines any changes within Pump Station facilities and along the Right-of-Way that may affect an HCA or Class Location.
  - Confirms which structures or areas within the PIR location limits are regularly occupied and determines the level of occupancy as described by step 5 of this procedure.
  - Identifies new structures or areas along the FGL which could affect the HCA determination as described by step 5 of this procedure.
  - Annually reviews/determines building or area use changes which could affect the HCA determination. Reports results as prescribed by Preventive Maintenance (PM) directive.
3. DOT RS - Reviews FGL and facility maps and results of HCA building and site determination survey to confirm population density and class location.



# Integrity Management Engineering Monitoring Program Procedures

---

Title: Identification of High Consequence Area on the Fuel Gas Line	Number: MP-166-5.01	Page: 4 of 6
	Revision: 1	Effective: 02/19/08

---

- Ensure that the population density of all Right-of-Way is determined annually using aerial photography and/or field collected information.
  - Request, when appropriate, additional air reconnaissance or land survey be conducted to establish the accuracy of the locations of buildings and outside areas.
4. DOT RS - Evaluates/reviews class locations annually and reports results.
5. DOT RS – Annually determines covered segments of FGL affecting an HCA and documents results as determined by the following steps:
- a. Determine the potential impact radius for all pipeline segments using the equation
- $$r = 0.69 * (\text{square root of } (p*d^2))$$
- The pressure (p) will be the MAOP.
- The diameter (d) will be 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.

- b. Identify each year, the locations of HCA's, and the boundaries of the covered pipe segments in the HCA's. Utilize both method 1 and method 2 as defined below, as appropriate. Report method selected in the determination of HCA as part of annual HCA determination report.
- c. When identifying an area using class location (method 1), an HCA will be defined as:
- Any area outside a class 3 or 4 location where the potential impact radius is greater than 660 feet (200 meters), and the area within a potential impact circle contains 20 or more buildings intended for human occupancy; or
  - The area in class 1 or 2 within a potential impact circle containing an identified site.
- When identifying an area using potential impact radius (method 2), an HCA will be defined as the area within a potential impact circle containing:
- 20 or more buildings intended for human occupancy
  - An identified site
- d. Determine identified sites meeting at least one of the following criteria:
- An outside area or open structure occupied by 20 or more people at least 50 days in any 12 month period (days need not be consecutive)
  - A building occupied by 20 or more people, 5 days a week, for 10 weeks a year (days and weeks need not be consecutive)
  - A facility occupied by persons who are confined, have impaired mobility, or would be



## Integrity Management Engineering Monitoring Program Procedures

---

Title: Identification of High Consequence Area  
on the Fuel Gas Line

Number: MP-166-5.01

Page: 5 of 6

Revision: 1

Effective: 02/19/08

---

difficult to evacuate

- e. Check for the occurrence of identified sites using the following sources of information and report results:
- Information from routine operation and maintenance activities
  - Input from public officials with safety or emergency response or planning. In the absence of public official input, one of the following should be used:
    - Visible markings such as signs, or
    - Facility licensing or regulation data on file with JPO, State DNR, DOT, NS Borough or other government agencies, or
    - Lists or maps maintained by or available from a Federal, State, or local government agency, and available to the general public.
- f. Submit the Gas Transmission Pipeline Integrity Management Program report semi-annually to USDOT/PHMSA (Pipeline and Hazardous Materials Safety Administration). Reports must be submitted to by Aug 30 and Feb 28 of each year.
- g. If any segment contains an HCA, Alyeska will prepare an Integrity Management Plan within 1 year of discovery, for that segment meeting regulatory requirements (49 CFR 192, Subpart O, Pipeline Integrity Management).
- h. If any of the following situations occur, the new information will be incorporated into the next annual process as defined in this segment:
- Changes in pipeline maximum allowable operating pressure (MAOP)
  - Pipeline modifications affecting FGL diameter
  - Changes in commodity transported in the FGL
  - Identification of new construction in the vicinity of the FGL that results in additional buildings intended for human occupancy or additional identified sites
  - Changes in the use of existing building (e.g., house or house converted to nursing home)
  - Installation of new pipe
  - Change in FGL class location (e.g., class 2 to 3) or class location boundary change
  - Pipeline reroutes
  - Corrections to erroneous FGL center line data
  - Field design changes (addition of taps, maintenance, pressure settings, etc.) affecting line pressure, diameter, or FGL location



## Integrity Management Engineering Monitoring Program Procedures

Title: Identification of High Consequence Area on the Fuel Gas Line	Number: MP-166-5.01	Page: 6 of 6
	Revision: 1	Effective: 02/19/08

- i. Prepare an annual report documenting results of Class Location and HCA Determination in accordance with *MP-166-1.00, Integrity Management Programs Process*.

### End of Procedure

### 6.0 Records

Procedure for Identification of High Consequence Areas on the FGL (this procedure)	All records generated as a result of this document will be retained in accordance with <i>CW-200</i> , Records Retention Schedule.
Building and HCA site survey	
FGL Class and HCA Determination Report	
FGL Annual Report	

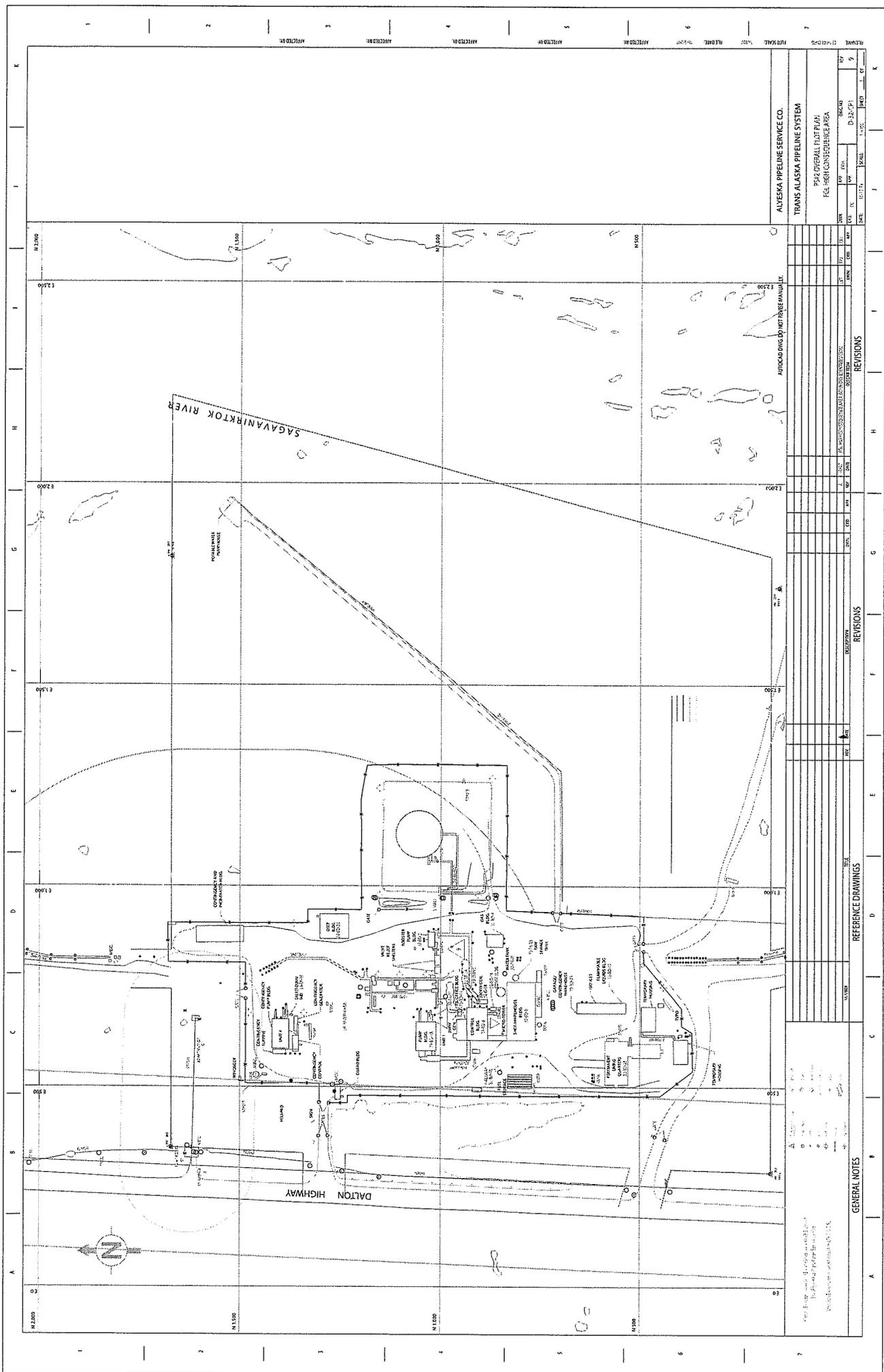
### 7.0 Revision History

Revision	Date	Revision Summary
<b>Approved by Tom Webb, Engineering Integrity Manager</b>		
1	02/19/08	Revised Attachment 1, D-31-CP1.
0	01/10/08	Initial issue of procedure.

### 8.0 Attachments

- Attachment 1. D-31-CP1, PS#1 Overall Plot Plan – FGL High Consequence Area Determination
- Attachment 2. D-32-CP1, PS#2 Overall Plot Plan – FGL High Consequence Area Determination
- Attachment 3. D-33-CP1, PS#3 Overall Plot Plan – FGL High Consequence Area Determination
- Attachment 4. D-34-CP1, PS#4 Overall Plot Plan – FGL High Consequence Area Determination





1. See drawing 5-2008-0001 for general notes.  
 2. See drawing 5-2008-0002 for general notes.  
 3. See drawing 5-2008-0003 for general notes.  
 4. See drawing 5-2008-0004 for general notes.  
 5. See drawing 5-2008-0005 for general notes.  
 6. See drawing 5-2008-0006 for general notes.  
 7. See drawing 5-2008-0007 for general notes.

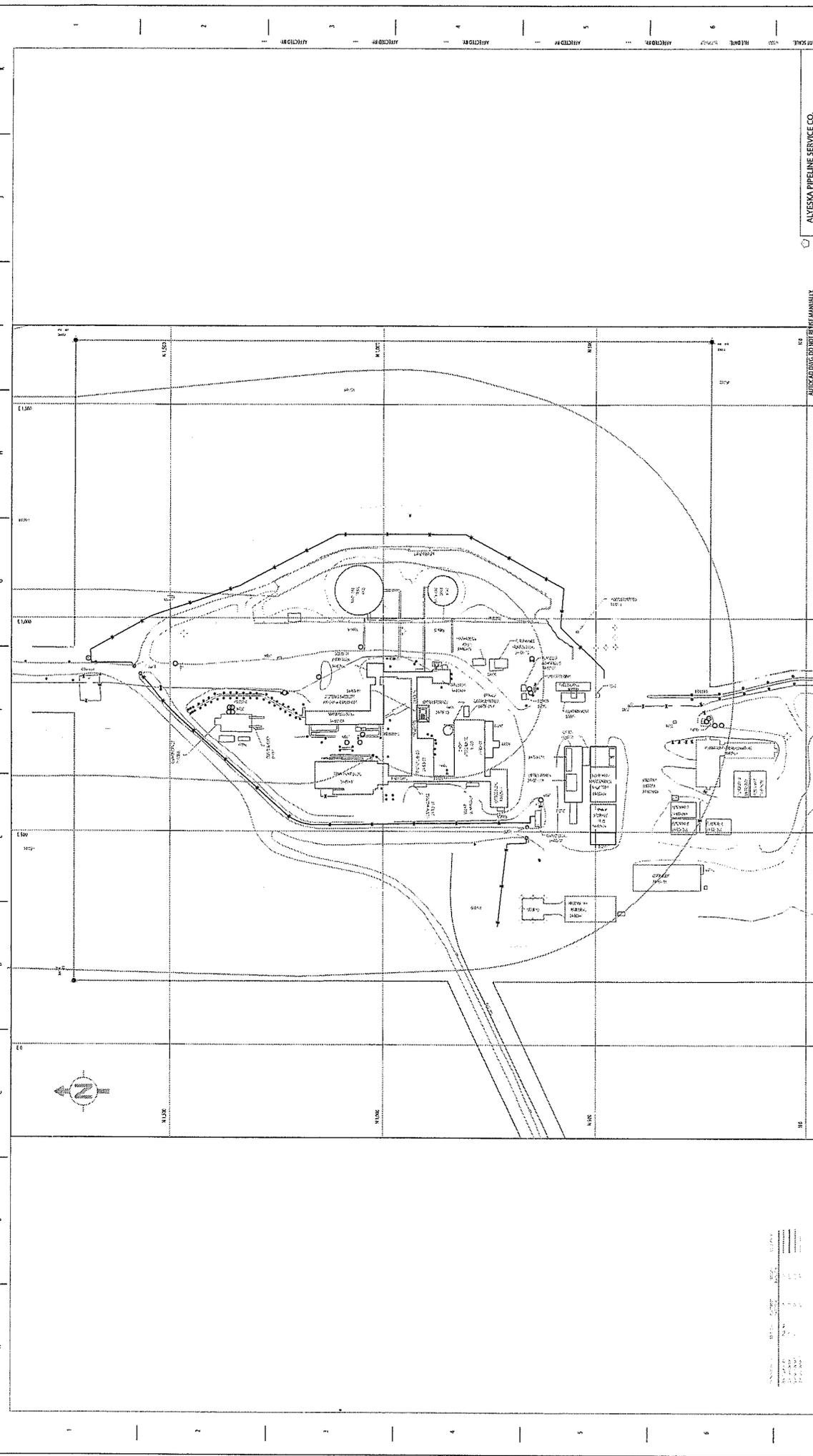
GENERAL NOTES

REFERENCE DRAWINGS

REVISIONS

NO.	DATE	BY	CHKD.	APP.	DESCRIPTION
1	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION
2	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION
3	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION
4	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION
5	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION
6	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION
7	01/15/08	J. J. ...	J. J. ...	J. J. ...	ISSUED FOR CONSTRUCTION





NO.	DATE	BY	CHKD.	DESCRIPTION
1	08-28-08	...	...	...
2	...	...	...	...
3	...	...	...	...
4	...	...	...	...
5	...	...	...	...
6	...	...	...	...
7	...	...	...	...

ALYESKA PIPELINE SERVICE CO.  
 TRANS ALASKA PIPELINE SYSTEM  
 FINAL OVERALL MASTER PLAN  
 REGULATORY CONFORMANCE AREA

PROJECT NO. 08-001  
 DATE: 08-28-08  
 SCALE: AS SHOWN

**GENERAL NOTES**  
 1. SEE THE PROJECT MANUAL FOR ALL SPECIFICATIONS.  
 2. ALL CONSTRUCTION SHALL BE IN ACCORDANCE WITH THE LATEST EDITIONS OF THE STANDARD SPECIFICATIONS FOR HIGHWAY CONSTRUCTION, SEVENTH EDITION, 2003, PUBLISHED BY THE ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC SAFETY.  
 3. ALL UTILITIES SHALL BE PROTECTED AND DEEPENED TO A MINIMUM OF 48 INCHES BELOW FINISHED GRADE.  
 4. ALL UTILITIES SHALL BE MARKED AND DEEPLY REVEALED PRIOR TO CONSTRUCTION.  
 5. ALL UTILITIES SHALL BE PROTECTED AND DEEPLY REVEALED PRIOR TO CONSTRUCTION.  
 6. ALL UTILITIES SHALL BE PROTECTED AND DEEPLY REVEALED PRIOR TO CONSTRUCTION.  
 7. ALL UTILITIES SHALL BE PROTECTED AND DEEPLY REVEALED PRIOR TO CONSTRUCTION.

**REFERENCE DRAWINGS**  
 1. SITE PLAN  
 2. ...  
 3. ...  
 4. ...  
 5. ...  
 6. ...  
 7. ...

**REVISIONS**  
 1. ...  
 2. ...  
 3. ...  
 4. ...  
 5. ...  
 6. ...  
 7. ...

**PROBABLE VIOLATION 1.B:  
FGL Integrity Management Program**

**PHMSA POSITION**

**Pertinent Regulation:**

**49 CFR §192.911** What are the elements of an integrity management program?

An operator's initial integrity management program begins with a framework (*see* §192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (incorporated by reference, *see* §192.7) for more detailed information on the listed element.)

- (p) A process for identification and assessment of newly-identified high consequence areas. (*See* §192.905 and §192.921.)

**49 CFR §192.903** What definitions apply to this subpart?

The following definitions apply to this subpart:

*Assessment* is the use of testing techniques as allowed in this subpart to ascertain the condition of a covered pipeline segment.

*Confirmatory direct assessment* is an integrity assessment method using more focused application of the principles and techniques of direct assessment to identify internal and external corrosion in a covered transmission pipeline segment.

*Covered segment or covered pipeline segment* means a segment of gas transmission pipeline located in a high consequence area. The terms gas and transmission line are defined in §192.3.

*Direct assessment* is an integrity assessment method that utilizes a process to evaluate certain threats (*i.e.*, external corrosion, internal corrosion and stress corrosion cracking) to a covered pipeline segment's integrity. The process includes the gathering and integration of risk factor data, indirect examination or analysis to identify areas of suspected corrosion, direct examination of the pipeline in these areas, and post assessment evaluation.

*High consequence area* 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 §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 (200 meters), 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.

- (2) The area within a potential impact circle containing-
- (i) 20 or more buildings intended for human occupancy, unless the exception in paragraph (4) applies; or
  - (ii) An identified site.
- (3) Where a potential impact circle is calculated under either method (1) or (2) to establish a high consequence area, 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. (See figure E.I.A. in appendix E.)
- (4) If in identifying a high consequence area under paragraph (1)(iii) of this definition or paragraph (2)(i) of this definition, the radius of the potential impact circle is greater than 660 feet (200 meters), the operator may identify a high consequence area based on a prorated number of buildings intended for human occupancy with a distance of 660 feet (200 meters) from the centerline of the pipeline until December 17, 2006. If an operator chooses this approach, the operator must prorate the number of buildings intended for human occupancy based on the ratio of an area with a radius of 660 feet (200 meters) to the area of the potential impact circle (i.e., the prorated number of buildings intended for human occupancy is equal to  $20 \times (660 \text{ feet})$  [or 200 meters]/potential impact radius in feet [or meters]<sup>2</sup>).

*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, 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.

*Potential impact circle* is a circle of radius equal to the potential impact radius (PIR).

*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  $r = 0.69 * (\text{square root of } (p * d^2))$ , 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 (Supplement to ASME B31.8; incorporated by reference, see §192.7) to calculate the impact radius formula.

*Remediation* is a repair or mitigation activity an operator takes on a covered segment to limit or reduce the probability of an undesired event occurring or the expected consequences from the event.

**Findings:** APSC's procedures for their FGL does not contain a process detailing how the Potential Impact Radius (PIR) is to be applied to the FGL to determine if the FGL has an HCA. A written process for determining the PIR of a pipeline is required to ensure consistency in the application of the PIR to an operator's pipeline throughout the life of the pipeline.

**Proposed Compliance Order:**

In regard to Item Number 1.B of the Notice pertaining to procedure that details how the Potential Impact Radius (PIR) is to be applied to the FGL:

APSC must develop and adopt a procedure that details how the Potential Impact Radius (PIR) is to be applied to the FGL to determine if the FGL has an HCA.

Provide the new procedure to the Director, Western Region within 30 days after receipt of the Final Order.

**ALYESKA PIPELINE SERVICE COMPANY'S RESPONSE**

**Summary:**

Alyeska Pipeline Service Company (Alyeska) does not contest PHMSA's finding that Alyeska did not have a process to apply Potential Impact Radius (PIR) to the Fuel Gas Line. Alyeska now has written processes. Alyeska respectfully requests that PHMSA withdraw the proposed compliance order.

**Discussion:**

Section 5.5 (a) through (e) describe how the PIR is to be applied to the fuel gas line to determine if new HCA's are identified or any changes to existing HCA's.

With regard to Finding 1.B, Alyeska respectfully requests that the finding and proposed compliance order be withdrawn because Alyeska has written procedures to comply with §192.903.

**SUPPORTING DOCUMENTATION**

Exhibit 1 – MP-166-5.01, Identification of High Consequence Area on the Fuel Gas Line,  
Rev. 1

**PROBABLE VIOLATION 1.C:  
FGL Integrity Management Program**

**PHMSA POSITION**

**Pertinent Regulation:**

**49 CFR §192.911** What are the elements of an integrity management program?

An operator's initial integrity management program begins with a framework (*see* §192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (incorporated by reference, *see* §192.7) for more detailed information on the listed element.)

- (p) A process for identification and assessment of newly-identified high consequence areas. (*See* §192.905 and §192.921.)

**49 CFR §192.905(c)**

*Newly identified areas.* When an operator has information that the area around a pipeline segment not previously identified as a high consequence area could satisfy any of the definitions in §192.903, the operator must complete the evaluation using method (1) or (2). If the segment is determined to meet the definition as a high consequence area, it must be incorporated into the operator's baseline assessment plan as a high consequence area within one year from the date the area is identified.

**Findings:** APSC does not have a process or procedure for their FGL that contains a description and timeline for actions to be taken as soon as an HCA is identified. A process or procedure describing action to be taken when an HCA is identified and timeline for completing those actions is required to ensure an operator takes consistent, appropriate and timely actions once an HCA is identified.

**Proposed Compliance Order:**

In regard to Item Number 1.C of the Notice pertaining to a process or procedure describing actions to be taken when an HCA is identified;

APSC must develop and adopt a procedure that describes actions to be taken when an HCA is identified which includes the timeline for completing those actions once an HCA is identified.

Provide the new procedure to the Director, Western Region within 30 days after receipt of the Final Order.

## **ALYESKA PIPELINE SERVICE COMPANY'S RESPONSE**

### **Summary:**

Alyeska Pipeline Service Company (Alyeska) does not contest PHMSA's finding that Alyeska does not have a process for actions after identifications of HCAs. Alyeska now has written processes. Alyeska respectfully requests that PHMSA withdraw the proposed compliance order.

### **Discussion:**

Section 5.5 (f) (g) & (h) describe the process to be implemented when an HCA is identified, or changes to an existing HCA are identified.

With regard to Finding 1.A, Alyeska respectfully requests that the finding and proposed compliance order be withdrawn because Alyeska has written procedures to comply with §§192.905(c).

## **SUPPORTING DOCUMENTATION**

Exhibit 1 – MP-166-5.01, Identification of High Consequence Area on the Fuel Gas Line,  
Rev. 1

**PROBABLE VIOLATION 2:  
FGL Integrity Management Program**

**PHMSA POSITION**

**Pertinent Regulations:**

**49 CFR §192.911** What are the elements of an integrity management program?

An operator's initial integrity management program begins with a framework (*see* §192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (incorporated by reference, *see* §192.7) for more detailed information on the listed element.)

(i) A performance plan as outlined in ASME/ANSI B31.8S, section 9 that includes performance measures meeting the requirements of §192.945.

**Findings:** APSC has no integrity management procedure for submitting semi-annual reviews to reflect that no new HCAs have been created along their FGL. Additionally, APSC has no process for submitting the four overall performance measures for HCAs specified in ASME/ANSI B31.8S; section 9.4, and the specific measures for each identified threat specified in ASME/ANSI B31.8S, Appendix A, should an HCA be created along any FGL segment. An operator is required to submit semi-annual reviews of their pipelines' integrity management activities, which includes reporting that there are no newly-created HCAs. A procedure that requires semi-annual reporting is required to ensure that an operator makes these reports consistently and on time. Additionally this process must include enough detail to permit operator personnel to adequately report performance measures semi-annually if or when an HCA is determined.

**Proposed Compliance Order:**

In regard to Item Number 2 of the Notice pertaining to a procedure for review of integrity management performance measures and the semi-annual reporting of performance measures:

APSC must develop a procedure with provisions for reporting that no HCAs have been identified. The procedure must include provisions that direct personnel to review the FGL integrity management performance measures effectiveness, once HCAs have been determined. This procedure must require that these reports be submitted on a semi-annual basis for time periods January 1 through June 30, and July 1 through December 31 of each year. These semi-annual reports must be submitted within two (2) months after those dates.

Provide the new procedure to the Director, Western Region within 30 days after receipt of the Final Order.

## **ALYESKA PIPELINE SERVICE COMPANY'S RESPONSE**

### **Summary:**

Alyeska Pipeline Service Company (Alyeska) does not contest PHMSA's finding that Alyeska does not have a procedure for semi-annual reviews of HCAs. . Alyeska now has written processes. Alyeska respectfully requests that PHMSA withdraw the proposed compliance order.

### **Discussion:**

Section 5.5(f) directs the DOT RS to submit the semi-annual reports to USDOT/PHMSA by August 20 and February 28 of each year indicating whether or not HCA's for the fuel gas line have been identified or modified, including integrity management performance measures effectiveness.

Section 5.5(g) requires that the DOT RS prepare an Integrity Management Plan within 1 year of discovery, for that segment meeting regulatory requirements.

With regard to Finding 2, Alyeska respectfully requests that the finding and proposed compliance order be withdrawn because Alyeska has written procedures to comply with §192.911.

## **SUPPORTING DOCUMENTATION**

Exhibit 1 – MP-166-5.01, Identification of High Consequence Area on the Fuel Gas Line, Rev. 1

**PROBABLE VIOLATION 3:  
FGL Integrity Management Program**

**PHMSA POSITION**

**Pertinent Regulations:**

**49 CFR §192.945 What methods must an operator use to measure program effectiveness?**

(a) *General.* An operator must include in its integrity management program methods to measure, on a semi-annual basis, whether the program is effective in assessing and evaluating the integrity of each covered pipeline segment and in protecting the high consequence areas. These measures must include the four overall performance measures specified in ASME/ANSI B31.8S (incorporated by reference, *see* §192.7), section 9.4, and the specific measures for each identified threat specified in ASME/ANSI B31.8S, Appendix A. An operator must submit the four overall performance measures, by electronic or other means, on a semi-annual frequency to OPS in accordance with §192.951. An operator must submit its first report on overall performance measures by August 31, 2004. Thereafter, the performance measures must be complete through June 30 and December 31 of each year and must be submitted within 2 months after those dates.

(b) *External Corrosion Direct assessment.* In addition to the general requirements for performance measures in paragraph (a) of this section, an operator using direct assessment to assess the external corrosion threat must define and monitor measures to determine the effectiveness of the ECDA process. These measures must meet the requirements of §192.925.

**Findings:** APSC failed to submit their initial semi-annual performance measures report to PHMSA beginning August 31, 2004. Additionally APSC filed their next five semi-annual performance measures reports in late March 2007. The result was that APSC's March 1, 2005 report was 25 months late; the August 30, 2005 report was 19 months late; the March 2006 report was 13 months late; the August 2006 report was seven months late; and the March 1, 2007 reports was late by ½ month. Though an operator may have no HCAs, they are still required to report on a semi-annual basis that they do not have HCAs to which performance measures can be applied.

**Warning:** With respect to Item Number 3, DOT reviewed the circumstances and supporting documents involved and decided not to conduct additional enforcement action or penalty assessment proceedings at this time. DOT advises APSC to promptly correct this item and advises APSC that failure to do so may result in APSC being subject to additional enforcement action.

## **ALYESKA PIPELINE SERVICE COMPANY'S RESPONSE**

### **Summary:**

Alyeska Pipeline Service Company (Alyeska) respectfully disagrees with PHMSA's finding that Alyeska did not submit its semi-annual performance measures report in a timely manner. Alyeska requests that PHMSA withdraw this finding.

### **Discussion:**

Alyeska has submitted the required reports for the Fuel Gas Line since August 31, 2004 as required by §192.945. Even prior to the reporting requirements of §192.945, Alyeska reported to the Office of Pipeline Safety, Research & Special Programs Administration's database in 2002. (See Exhibit 2). In advance of the reporting deadline of August 31, 2004, Alyeska filed information in the database for 2003 and 2004 on March 11, 2004. (See Exhibits 3 and 4).

Alyeska continued to file timely reports in the OPS database. As an example, Alyeska reported to the OPS Gas Integrity Management Program Reporting database for the period ending June 30, 2005 on September 27, 2005. (See Exhibit 5). In the spring of 2007, Alyeska received notification from PHMSA that the agency did not have Alyeska's reports. Ensuing conversation with Roger Little, PHMSA's Director of Information and Analysis revealed that the OPS database had suffered a significant failure, and all of Alyeska's reporting records had been lost. Per PHMSA's request, Alyeska resubmitted reports for 2004, 2005, and 2006 on March 28, 2007. (See Exhibits 6-9).

Therefore, with regard to Finding 3, Alyeska respectfully requests that the finding be withdrawn as Alyeska has submitted its semi-annual performance measure report in a timely manner.

## **SUPPORTING DOCUMENTATION**

- Exhibit 2 – Office of Pipeline Safety, Research & Special Programs Administration, OPS Online Data Entry and Operator Registration System, dated March 11, 2002
- Exhibit 3 – Office of Pipeline Safety Pipeline and Hazardous Materials Safety Administration, OPS Online Data Entry and Operator Registration System, for Calendar Year 2002, dated March 11, 2004.
- Exhibit 4 – Office of Pipeline Safety Pipeline and Hazardous Materials Safety Administration, OPS Online Data Entry and Operator Registration System, for Calendar Year 2003, dated March 11, 2004.
- Exhibit 5 – Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, Gas Integrity Management Program Reporting, dated September 27, 2005.
- Exhibit 6 – email from Office of Pipeline Safety re: Gas IMP report receipt, reporting period 12/31/04, dated March 28, 2007
- Exhibit 7 – email from Office of Pipeline Safety re: Gas IMP report receipt, reporting period 6/30/05, dated March 28, 2007

NOPV CPF 5-2008-0002  
Finding No. 3: FGL Integrity Management Program  
2/28/08

Exhibit 8 – email from Office of Pipeline Safety re: Gas IMP report receipt, reporting period 12/31/05, dated March 28, 2007

Exhibit 9 – email from Office of Pipeline Safety re: Gas IMP report receipt, reporting period 6/30/06, dated March 28, 2007

# Office of Pipeline Safety

## Research & Special Programs Administration

### OPS Online Data Entry and Operator Registration System

[OPS Home](#) | [Main](#) | [Operators](#) | [Request PIN](#) | [Update PIN](#) | [Pipeline Data](#) | [Contact Information](#) | [Log Out](#)

Confirmation Page	
The information was successfully saved in our database. We strongly recommend that this page be printed/saved for reference when entering supplementals or when calling the Office of Pipeline Safety.	
<b>Type of Report :</b>	Gas Transmission & Gathering Systems Annual report for Calendar Year 2001
<b>Report ID:</b>	20020061
<b>Company Name:</b>	ALYESKA PIPELINE SERVICE CO
<b>Operator ID:</b>	26149
<b>Date of Entry:</b>	03/11/2002 20:06:30
<b>Prepare's Name:</b>	Lee Schoen
<b>Prepare's Telephone Number:</b>	(907)450-5776
<b>Prepare's Email Address:</b>	schoenlj@alyeska-pipeline.com
<a href="#">Back to summary</a> <a href="#">Print this page</a>	

[OPS Home](#) | [Main](#) | [Operators](#) | [Update PIN](#) | [Pipeline Data](#) | [Contact Information](#)

**From:** Schoen, Lee J.  
**Sent:** Thursday, March 11, 2004 10:43 AM  
**To:** Schoen, Lee J.  
**Subject:** 2002 Gas Annual Report

# Office of Pipeline Safety

Pipeline and Hazardous Materials Safety Administration

## OPS Online Data Entry and Operator Registration System

[OPS Home](#) | [Main](#) | [Operators](#) | [Request PIN](#) | [Update PIN](#) | [Pipeline Data](#) | [Contact Information](#) | [Log Out](#)

### ANNUAL REPORT FOR GAS TRANSMISSION & GATHERING SYSTEMS

**Report No:** 20031310

#### INSTRUCTIONS

*Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide you do not have a copy of the instructions, you can obtain one from the Office Of Pipeline Safety Web Page at <http://ops.dot.gov>. To view the general instructions, click here.*

*To view the instructions for this electronic format here*

\* Indicates Required Fields

Calendar Year : *	2002	Type of Report :
		Initial <input type="checkbox"/> Supplemental <input checked="" type="checkbox"/>

#### PART A - OPERATOR INFORMATION

1. Name and company or establishment \*

ALYESKA PIPELINE SERVICE CO

2. Location of office where additional information may be obtained

Select an Address  or enter a new one

Number & Street : \* 615 BIDWILL AVE

City : \* FAIRBANKS County : \* ANCHORAGE

State : \* AK ZIP : \* 99701

3. State in which system operates: \* AK (provide a separate report for each state in which system operates)

4. Operator's 5 digit identification number : \* 26149

5. Headquarters name & address, if different

Select an Address  or enter a new one

Number & Street : P/O BOX 196660

City : ANCHORAGE County : ANCHORAGE

State : AK ZIP : 99519

PART B- SYSTEM DESCRIPTION

1. General - miles of pipeline in the system at the end of year that are jurisdictional to OPS

TRANSMISSION	STEEL				CAST IRON Wrought iron pipe	PLASTIC PIPE	OTHER PIPE	TOTAL
	Cathodically Protected		Unprotected					
	Bare	Coated	Bare	Coated				
Onshore	0	114	0	34	0	0	0	148

	Offshore	0	0	0	0	0	0	0	0	0	0	0
<b>GATHERING</b>												
Onshore	0	0	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0	0	0
<b>System Totals</b>	0	114	0	34	0	0	0	0	0	0	0	148

Add / Check B1

**2. Miles of pipe by nominal size**

	UNKNOWN	4" OR LESS	OVER 4" THRU 10"	OVER 10" THRU 20"	OVER 20" THRU 28"	OVER 28"	TOTAL
<b>TRANSMISSION</b>							
Onshore	0	0	114	34	0	0	148
Offshore	0	0	0	0	0	0	0
<b>GATHERING</b>							
Onshore	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0
<b>System Totals</b>	0	0	114	34	0	0	148

Add / Check B2

**3. Miles of pipe by decade of installation**

	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	20
<b>TRANSMISSION</b>									
Onshore	0	0	0	0	0	148	0	0	
Offshore	0	0	0	0	0	0	0	0	
<b>GATHERING</b>									
Onshore	0	0	0	0	0	0	0	0	
Offshore	0	0	0	0	0	0	0	0	

System Totals	0	0	0	0	0	148	0	0
Add / Check B:								

**4. Miles of pipe by class location**

	CLASS 1	CLASS 2	CLASS 3	CLASS 4	TOTAL
TRANSMISSION					
Onshore	147	1	0	0	148
Offshore	0	N/A	N/A	N/A	0
GATHERING					
Onshore	0	0	0	0	0
Offshore	0	N/A	N/A	N/A	0
System Totals	147	1	0	0	148

Add / Check B4

**PART C - TOTAL LEAKS ELIMINATED/REPAIRED DURING YEAR**

CAUSE OF LEAK	TRANSMISSION		GATHERING	
	Onshore	Offshore	Onshore	Offshore
Corrosion	0	0	0	0
Natural Forces	0	0	0	0
Excavation	0	0	0	0
Other Outside Force Damage	0	0	0	0
Materials and Welds	0	0	0	0
Equipment and Operations	0	0	0	0
Other	0	0	0	0

Check Values

**PART D - TOTAL NUMBER OF LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR**

**1. Transmission**

Onshore 0

Offshore 0

Outer continental shelf 0

**2. Gathering**

Onshore 0

Offshore 0

Outer continental shelf 0

**PART E - NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR**

1. Transmission 0

2. Gathering 0

**PART F - ADDITIONAL COMMENTS / DETAILS**

Empty text area for additional comments.

**PART G - PREPARER AND AUTHORIZED SIGNATURE**

Preparer's Name \* : LEE SCHOEN

Telephone Number \* : 9074505776

E-mail Address : SCHOENLJ@ALYESKA-PIPE

Facsimile Number : 9074507800

[OPS Home](#) | [Main](#) | [Operators](#) | [Update PIN](#) | [Pipeline Data](#) | [Contact Information](#) | [Privacy](#)

**From:** Schoen, Lee J.  
**Sent:** Thursday, March 11, 2004 10:42 AM  
**To:** Schoen, Lee J.  
**Subject:** 2003 Gas Annual Report

# Office of Pipeline Safety

Pipeline and Hazardous Materials Safety Administration

## OPS Online Data Entry and Operator Registration System

[OPS Home](#) | [Main](#) | [Operators](#) | [Request PIN](#) | [Update PIN](#) | [Pipeline Data](#) | [Contact Information](#) | [Log Out](#)

### ANNUAL REPORT FOR GAS TRANSMISSION & GATHERING SYSTEMS

**Report No:** N/A

#### INSTRUCTIONS

*Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide you do not have a copy of the instructions, you can obtain one from the Office Of Pipeline Safety Web Page at <http://ops.dot.gov>. To view the general instructions, click [here](#).*

*To view the instructions for this electronic format [here](#)*

\* Indicates Required Fields

Calendar Year : * <input type="text" value="2003"/>	Type of Report : <input checked="" type="radio"/> Initial <input type="radio"/> Supplemental
---	---

#### PART A - OPERATOR INFORMATION

1. Name and company or establishment \*

ALYESKA PIPELINE SERVICE CO

2. Location of office where additional information may be obtained

Select an Address  or enter a new one

Number & Street : \* 615 BIDWILL AVE

City : \* FAIRBANKS County : \* ANCHORAGE

State : \* AK ZIP : \* 99701

3. State in which system operates: \* AK (provide a separate report for each state in which system operates)

4. Operator's 5 digit identification number : \* 26149

5. Headquarters name & address, if different

Select an Address  or enter a new one

Number & Street : P/O BOX 196660

City : ANCHORAGE County : ANCHORAGE

State : AK ZIP : 99519

PART B- SYSTEM DESCRIPTION							
TRANSMISSION	1. General - miles of pipeline in the system at the end of year that are jurisdictional to OPS						
	STEEL			CAST IRON Wrought iron pipe	PLASTIC PIPE	OTHER PIPE	TOTAL
	Cathodically Protected	Unprotected					
Bare	Coated	Bare	Coated				
Onshore	0	114	0	34	0	0	148



System Totals	0	0	0	0	0	148	0	0
Add / Check B:								

**4. Miles of pipe by class location**

	CLASS 1	CLASS 2	CLASS 3	CLASS 4	TOTAL
TRANSMISSION					
Onshore	147	1	0	0	148
Offshore	0	N/A	N/A	N/A	0
GATHERING					
Onshore	0	0	0	0	0
Offshore	0	N/A	N/A	N/A	0
System Totals	147	1	0	0	148

Add / Check B4

**PART C - TOTAL LEAKS ELIMINATED/REPAIRED DURING YEAR**

CAUSE OF LEAK	TRANSMISSION		GATHERING	
	Onshore	Offshore	Onshore	Offshore
Corrosion	0	0	0	0
Natural Forces	0	0	0	0
Excavation	0	0	0	0
Other Outside Force Damage	0	0	0	0
Materials and Welds	0	0	0	0
Equipment and Operations	0	0	0	0
Other	0	0	0	0

Check Values

**PART D - TOTAL NUMBER OF LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR**

**1. Transmission**

Onshore 0

Offshore 0

Outer continental shelf 0

**2. Gathering**

Onshore 0

Offshore 0

Outer continental shelf 0

**PART E - NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR**

1. Transmission 0

2. Gathering 0

**PART F - ADDITIONAL COMMENTS / DETAILS**

Empty text area for additional comments.

**PART G - PREPARER AND AUTHORIZED SIGNATURE**

Preparer's Name \* : LEE SCHOEN

Telephone Number \* : 9074505776

E-mail Address : SCHOENLJ@ALYESKA-PIPE

Facsimile Number : 9074507800

Submit Form

Reset

[OPS Home](#) | [Main](#) | [Operators](#) | [Update PIN](#) | [Pipeline Data](#) | [Contact Information](#) | [Privacy](#)

**From:** Schoen, Lee J.  
**Sent:** Tuesday, September 27, 2005 10:20 AM  
**To:** Schoen, Lee J.  
**Subject:** Gas IMP Annual Performance Report

# Office of Pipeline Safety

Pipeline and Hazardous Materials Safety Administration

## GAS INTEGRITY MANAGEMENT PROGRAM REPORTING

[OPS HOME](#) | [ODES HOME](#) | [GAS IMP MAIN](#) | [HELP/INSTRUCTIONS](#)

Your report has been submitted to the Office of Pipeline Safety.  
Please print this page for your records.

[View/Edit previously submitted reports](#)

Report ID: 1650  
Date: 9/27/2005  
Period Ending: 6/30/2005

### Operator Information

Operator ID: 26149  
Operator name: ALYESKA PIPELINE SERVICE CO

### Contact Information

Contact: Lee Schoen  
Phone: 907 450 5776  
E-mail: schoenlj@alyeska-pipeline.com

Related operators included in the Operator 26149 plan  
none

### Gas IMP for Operator 26149

I have identified HCAs.

Number of total miles (system), should match miles on annual report:	148
Number of total miles of pipelines inspected:	148
Number of High Consequence Area (HCA) miles in the IMP program:	0
Number of HCA miles inspected via IMP assessments (physical pipe miles):	0
Number of immediate repairs completed in HCA as a result of IMP :	0
Number of scheduled repairs completed in HCA as a result of IMP:	0

Number of leaks in HCA classified by cause:

Total 0

Alyeska Pipeline Service Company  
CPF No. 5-2008-0002  
Exhibit 5  
Page 1 of 2

Number of failures in HCA classified by cause:

Total 0

Number of Incidents in HCA classified by cause:

Total 0

**From:** Office of Pipeline Safety [noreply@dot.gov]

**Sent:** Wednesday, March 28, 2007 2:44 PM

**To:** Schoen, Lee J.

**Subject:** Gas IMP report receipt

Report ID: 3871

Date: 3/28/2007

Period Ending: 12/31/2004

**Operator Information**

Operator ID: 26149

Operator name: ALYESKA PIPELINE SERVICE CO

**Contact Information**

Contact: Lee Schoen

Phone: 907 450 5776

E-mail: schoenlj@alyeska-pipeline.com

**Related Operators in the Operator 26149 Plan**

none

**Gas IMP for Operator 26149**

I have not identified any HCAs.

Please do not reply to this e-mail.

**From:** Office of Pipeline Safety [noreply@dot.gov]

**Sent:** Wednesday, March 28, 2007 2:43 PM

**To:** Schoen, Lee J.

**Subject:** Gas IMP report receipt

Report ID: 3870

Date: 3/28/2007

Period Ending: 6/30/2005

**Operator Information**

Operator ID: 26149

Operator name: ALYESKA PIPELINE SERVICE CO

**Contact Information**

Contact: Lee Schoen

Phone: 907 450 5776

E-mail: schoenlj@alyeska-pipeline.com

**Related Operators in the Operator 26149 Plan**

none

**Gas IMP for Operator 26149**

I have not identified any HCAs.

Please do not reply to this e-mail.

**From:** Office of Pipeline Safety [noreply@dot.gov]

**Sent:** Wednesday, March 28, 2007 2:41 PM

**To:** Schoen, Lee J.

**Subject:** Gas IMP report receipt

Report ID: 3868

Date: 3/28/2007

Period Ending: 12/31/2005

**Operator Information**

Operator ID: 26149

Operator name: ALYESKA PIPELINE SERVICE CO

**Contact Information**

Contact: Lee Schoen

Phone: 907 450 5776

E-mail: schoenlj@alyeska-pipeline.com

**Related Operators in the Operator 26149 Plan**

none

**Gas IMP for Operator 26149**

I have not identified any HCAs.

Please do not reply to this e-mail.

**From:** Office of Pipeline Safety [noreply@dot.gov]

**Sent:** Wednesday, March 28, 2007 2:40 PM

**To:** Schoen, Lee J.

**Subject:** Gas IMP report receipt

Report ID: 3867

Date: 3/28/2007

Period Ending: 6/30/2006

**Operator Information**

Operator ID: 26149

Operator name: ALYESKA PIPELINE SERVICE CO

**Contact Information**

Contact: Lee Schoen

Phone: 907 450 5776

E-mail: schoenlj@alyeska-pipeline.com

**Related Operators in the Operator 26149 Plan**

none

**Gas IMP for Operator 26149**

I have not identified any HCAs.

Please do not reply to this e-mail.

**Alyeska Pipeline Service Company**

**CPF No. 5-2008-0002**

**Exhibit 9**

**Page 1 of 1**