



Questar Gas Management Company

Independence Plaza

1050 17th Street, Suite 500

Denver, CO 80265

Tel 303 672 6900 • Fax 303 308 3610

July 16, 2008

SENT TO COMPLIANCE REGISTRY

Hardcopy \_\_\_ Electronically # of Copies 1 / Date 7-18-08

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 5-2008-5019**

Questar Gas Management Company ("QGM") has received your Notice of Probable Violation and Proposed Compliance Order dated June 19, 2008 and respectfully issues this letter as its 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. QGM is devoted to the safety and integrity of its pipeline systems and believes that any valid recommendations should be considered and addressed appropriately in its program.

For this reason, QGM submits to you changes to its program as follows:

**1. §195.452 Pipeline integrity management in high consequence areas.**

*Questar Gas Management Company(QGM) completed a pressure test of its propane line as a baseline assessment in July of 2005. The pressure record provided to QGM's inspector indicated that the test was not conducted in accordance with 49 CFR Part 195, Subpart E. The test pressure was only maintained for four hours on a pipeline that could not be visually inspected. Buried lines must be tested for at least eight hours. In addition, nitrogen was inappropriately used as the test medium.*

**Response:**

QGM acknowledges that the pressure test conducted previously was only maintained for four hours. As a result, QGM will perform a pressure test no later than November 15, 2008, according to 49 CFR 195. The pressure during the test will be held at 150% for four continuous hours and then at least 110% for an additional four hours, making the pressure test a total of eight hours.

**Pipeline and Hazardous Safety Administration**  
**CPF 5-2008-5019**  
**July 16, 2008**  
**Page 2**

Regarding the comment that nitrogen was inappropriately used as the test medium, QGM respectfully contests your statement that nitrogen is not allowed to be used as a test medium for this line under 49 CFR 195.306(4)(d). This propane pipeline is operated in its entirety at a stress level of 20 percent or less of the specified minimum yield strength of the line pipe, classifying it as a low-stress pipeline. Attached for your review is the formula and calculation showing the current operating parameters and pipe data. As such, QGM proposes to again utilize nitrogen as the test medium for the pressure test to be conducted by November 15, 2008. Should you have a different opinion about using nitrogen as the test medium, please advise.

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 QGM's program, please feel free to notify me.

Sincerely,



Perry H. Richards  
Vice President of Operations  
Questar Gas Management  
1050 17<sup>th</sup> Street  
Denver, CO 80265

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

Attachment

## 49 CFR Part 195 SMYS Calc.

**Engineer:** Kasey Werkele

**Location:** Blacks Fork Liquid Line to Rail Loading

		INPUT	
P	700	psi	Operating Pressure
D <sub>N</sub>	Φ 4.000	in	Nominal Pipe O.D.
D	4.500	in	Actual Pipe O.D.
t	0.188	in	Pipe Wall Thickness Chosen
Material	API 5L X42	UL	Material Spec. & Grade
SMYS	42000	psi	Specified Minimum Yield Strength

### Pressure Ratings

P <sub>SMYS</sub>	3509	psig	Pressure Rating at 100% SMYS
P <sub>20%</sub>	702	psig	Pressure Rating at 20% SMYS

$$P = \frac{\sigma_h * t}{r}$$

### Operating Pressure % of SMYS

A	19.9%	%	% of SMYS at Operating Pressure
---	-------	---	---------------------------------