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Quest Pipelines (KPC)  
210 Park Avenue  
Suite # 2750  
Oklahoma City, OK 73102

August 19, 2010

**VIA FEDERAL EXPRESS**

Mr. David Barrett  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Room 462  
Kansas City, MO 64106

**Re: CPF 3-2010-1003M**

Dear Mr. Barrett:

Subsequent to an inspection conducted on Quest Pipelines (KPC) plans and procedures on Dec 12-14, 2009 and January 25-26, 2010. Quest has received a Notice of Amendment dated July 23, 2010. Quest appreciates the opportunity to respond to this evaluation and trusts that this input may assist in resolving any outstanding issues.

Quest respectfully requests an extension of 60 days to comply with the thirty-one required items of the PHMSA NOA. Quest is taking all necessary steps to comply with the PHMSA NOA but an extension of time will be necessary to allow the new procedures to be properly managed and approved.

For ease of response, below is a summary of the PHMSA NOA items in italics followed by Quest's response.

**NOA Item 1:** *Quest did not reference the correct section of API 1104 when addressing that welding procedures must be qualified under Section 5 of API 1104.*

**Response**

Quest Operations and Maintenance Manual, Section 17 and Welding Plan, are being revised and will be submitted to PHMSA.

**NOA Item 2:** *Quest did not reference the correct section of API 1104 when addressing that a welder qualified under § 192.227(a) may only weld on pipe at pressure that produces a hoop stress of 20 percent or more SMYS within the preceding 6 calendar months if he has one weld tested and found acceptable under sections 6 or 9 of API 1104. Quest must reference Section 6 or 9 of 1104 when addressing the limitations on welders.*

**Response**

Quest Operations and Maintenance Manual, Section 17 and Welding Plan, are being revised and will be submitted to PHMSA.

**NOA Item 3:** *Quest did not reference section 9 of API 1104 when addressing the inspection and testing of welds per API 1104. Quest only reference API 1104. Quest must reference Section 9 of 1104 when addressing the inspection and test of welds nondestructively.*

**Response**

Quest Operations and Maintenance Manual, Section 17 and Welding Plan, are being revised and will be submitted to PHMSA.

**NOA Item 4:** *Quest did not address the use of the ultrasonic testing (UT) procedure for nondestructive testing of welds nor the specific requirements associated with the procedure, including the proper interpretation of each UT test of a weld. Quest must provide a procedure that addresses the use of UT for testing of welds and the specific requirements associated with the procedure, including the proper interpretation of each UT test of a weld.*

**Response**

Quest Operations and Maintenance Manual, Section 17 and Welding Plan, are being revised and will be submitted to PHMSA.

**NOA Item 5:** *Quest did not correctly address the requirement to nondestructively test samples of each welder's work for each day. Quest must address that a sample of each welders work each day shall be nondestructively tested.*

**Response**

Quest Operations and Maintenance Manual, Section 17 and Welding Plan, are being revised and will be submitted to PHMSA.

**NOA Item 6:** *Quest did not correctly address the repair procedure of a previously repaired weld. Quest has conflicting procedures concerning repairs. One procedure states "After repair, the welded area must be inspected to ensure its acceptability. If the initial repair attempt is not acceptable, the weld must be removed (cut out)." The procedure states "Cracks, repairs, or defect repairs in previously repaired areas, must be done in accordance with the qualified written procedures outlined in the Quest Welding Manual". Quest shall develop one procedure addressing repair and a previously repaired weld that does not conflict with another procedure.*

**Response**

Quest Operations and Maintenance Manual, Section 17 and Welding Plan, are being revised and will be submitted to PHMSA.

**NOA Item 7:** *Quest did not address periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures. Quest had addressed review of the procedures only. Quest must address periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures.*

**Response**

Quest Operations and Maintenance Manual, Section 2, is being revised and will be submitted to PHMSA.

**NOA Item 8:** *Quest combined the purging of air and gas procedures into one procedure that creates confusion of which medium should be used at a particular time. The procedure did not clearly address the purging of pipelines, whether with gas or air. Quest must develop one procedure that addresses the purging of air and one procedure that addresses the purging of gas, and ensure that the two procedures do not conflict with each other.*

**Response**

Quest Operations and Maintenance Manual, Section 3, is being revised and will be submitted to PHMSA

**NOA Item 9:** *Quest did not adequately address the use of temporary and permanent repairs and the differences in the two types of repair as it relates to their pipeline system. Quest must develop one or more procedures that address the use of temporary and permanent repairs as it relates to their pipeline system.*

**Response**

Quest Operations and Maintenance Manual, Section 16 and Welding Plan are being revised and will be submitted to PHMSA.

**NOA Item 10:** *Quest did not adequately address the use of IR drop in determining the cathodic protection of their pipelines. Although the procedure mentions IR drop, the procedure is not clear about its use in determining adequate cathodic protection on their pipelines. Quest must amend its procedure to address what IR drop is and how Quest considers IR drop in determining adequate cathodic protection on their pipelines.*

**Response**

Quest Operations and Maintenance Manual, Section 9, is being revised and will be submitted to PHMSA

**NOA Item 11:** *Quest did not adequately address the timeliness of a prompt remedial action to correct deficiencies indicated by monitoring. Quest must amend its procedure to address the timeliness of prompt remedial action to correct deficiencies indicated by monitoring.*

**Response**

Quest Operations and Maintenance Manual, Section 9, is being revised and will be submitted to PHMSA

**NOA Item 12:** *Quest did not have adequate procedures to address the transportation of corrosive gas. Quest did not have a procedure stating the use of gas sampling to monitor and minimize internal corrosion. Quest must amend its procedure to address the use of gas sampling to monitor and minimize internal corrosion.*

**Response**

Quest Operations and Maintenance Manual, Section 9, is being revised and will be submitted to PHMSA

**NOA Item 13:** *Quest did not establish criteria to initiate remedial action after determining the corrosiveness of the gas taken by gas sampling. Quest did not address locations on the pipeline to be utilized for gas sampling. Quest must amend its procedures to state the criteria that Quest has set to initiate remedial action after determining the corrosiveness of the gas sampled.*

**Response**

Quest Operations and Maintenance Manual, Section 9, is being revised and will be submitted to PHMSA

**NOA Item 14:** *Quest did not address the suitability of coating to prevent atmospheric corrosion. Although Quest had procedures for coating, they did not refer to the suitability of the coating. Quest must amend its procedure to refer to the suitability of the coating.*

**Response**

Quest Operations and Maintenance Manual, Section 9, is being revised and will be submitted to PHMSA

**NOA Item 15:** *Quest did not adequately address the requirement to maintain the corrosion control maps showing the location of cathodically protected piping, cathodic protection facilities, and neighboring structures bonded to the cathodic protection system. Although Quest had procedures addressing corrosion control requirements in general, there was no specific language addressing what portion of corrosion control and cathodic protection must be maintained. Quest must amend its procedure to address the portions of corrosion control and cathodic protection it will maintain as records.*

**Response**

Quest Operations and Maintenance Manual, Section 9, is being revised and will be submitted to PHMSA

**NOA Item 16:** *Quest did not adequately address the use of reliable engineering tests and analyses for permanently field repairing imperfection and damages to pipelines operating at or above 40 percent SMYS. Quest must address the applicable reliable engineering test and analyses used for permanently field repairing imperfection and damages to pipelines operating at or above 40 percent SMYS.*

**Response**

Quest Operations and Maintenance Manual, Section 16, is being revised and will be submitted to PHMSA

**NOA Item 17:** *Quest did not address the requirement that the operating pressure must be at a safe level during repair operations in their permanent field repair of imperfections and damages procedures. Quest must address in its procedure that the operating pressure must be at a safe level during repair operations in their permanent field repair of imperfections and damages procedures.*

**Response**

Quest Operations and Maintenance Manual, Section 16, is being revised and will be submitted to PHMSA

**NOA Item 18:** *Quest did not address the requirements if repairing a weld if the line is in service. The procedure did not address that the weld must not be leaking, the pressure in the segment has been reduced so that it does not produce more than 20 percent of the SMYS of the pipe, and grinding of the defective area can be limited so at least 1/8-inch thickness in the pipe weld remains. Quest must amend the procedure to address that the weld must not be leaking, the pressure in the segment must be reduced so that it does not produce more than 20 percent of the SMYS of the pipe, and grinding of the defective area must be limited so at least 1/8-inch thickness in the pipe weld remains.*

**Response**

Quest Operations and Maintenance Manual, Section 17, is being revised and will be submitted to PHMSA

**NOA Item 19:** *Quest did not adequately address the use of reliable engineering tests and analyses to show the repair method can permanently restore the serviceability of the pipe. Quest must address the applicable reliable engineering test and analyses used for permanently field repairing leaks that can show permanently restoring the serviceability of the pipe.*

**Response**

Quest Operations and Maintenance Manual, Section 17, is being revised and will be submitted to PHMSA

**NOA Item 20:** *Quest did not require-the posting of warnings signs, stating the signs "should be placed" rather than "shall be placed". Also, the procedure did not address the appropriate locations for placement of the signs.*

**Response**

Quest Operations and Maintenance Manual, Section 12, is being revised and will be submitted to PHMSA

**NOA Item 21:** *Quest did not address the availability of personnel, equipment, tools and materials that were available if needed at the scene of an emergency. Quest must amend their procedure to address the availability of personnel, equipment, tools and materials that were available if needed at the scene of an emergency.*

**Response**

Quest Emergency Response Plan, Section 8, is being revised and will be submitted to PHMSA

**NOA Item 22:** *Quest did not adequately address the communication necessary between a first responder and Gas Control to ensure an emergency shutdown and pressure reduction to minimize hazards to life or property had been performed. Quest must amend their procedure to address the communication necessary between a first responder and Gas Control to ensure*

**Response**

Quest Emergency Response Plan, Section 11, is being revised and will be submitted to PHMSA

**NOA Item 23:** *Quest procedures did not address making safe any actual or potential hazard to life or property. Although procedures addressed safety in general, specific language addressing safety and potential hazards to life or property was not stated. Quest must address making safe any actual or potential hazard to life or property in their emergency procedures.*

**Response**

Quest Emergency Response Plan, Section 11, is being revised and will be submitted to PHMSA

**NOA Item 24:** *Quest did not address providing supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures. Although each supervisor did have an emergency manual, there was no procedure addressing that each supervisor gets the applicable portions of the latest edition of the emergency procedures. Quest must amend their procedures to ensure that supervisors who are responsible for emergency action have a copy of that portion of the latest edition of the emergency procedures.*

**Response**

Quest Emergency Response Plan, Section 2, is being revised and will be submitted to PHMSA

**NOA Item 25:** *Quest did not address the use of metallurgical laboratories, where appropriate, for examination of failed facility or equipment or the use of a chain of custody form for each specimen taken from the operator. Quest must amend their procedure to address the use of metallurgical laboratories, where appropriate, for examination of failed facility or equipment or the use of a chain of custody form for each specimen taken from the operator.*

**Response**

Quest Emergency Response Plan, Section 19, is being revised and will be submitted to PHMSA

**NOA Item 26:** *Quest's OQ Plan did not identify "nondestructive testing" (NDT) related to maintenance activities as a covered task. Although individuals performing the NDT were qualified, the written plan did not identify NDT as a covered task. Quest must amend their OQ Plan to identify "nondestructive testing" (NDT) related to maintenance activities as a covered task.*

**Response**

Quest Operator Qualification Plan, Section 8, is being revised and will be submitted to PHMSA

**NOA Item 27:** *Quest did not have procedures stating what methods of evaluation would be used to evaluate their company employees. Although all employees had been evaluated and were qualified (verified by review of documentation), the written program did not state the type of evaluation methods that Quest utilizes for the covered tasks. Quest must amend their procedure to address the methods of evaluation that will be used to evaluate company employees.*

**Response**

Quest Operator Qualification Plan, Section 8, is being revised and will be submitted to PHMSA

**NOA Item 28:** *Quest did not have procedures established to address the use of other entities that perform covered tasks on their facilities. Quest stated that one individual performs one covered task on their pipeline facility who is not a company or contract employee. Quest must develop procedures to address the use of other entities who perform covered tasks on their facilities or ensure that other entities do not perform covered tasks on Quest facilities.*

**Response**

Quest Operator Qualification Plan, Section 7, is being revised and will be submitted to PHMSA

**NOA Item 29:** *Quest did not establish the criteria to determine evaluation intervals related to the DIF analysis (difficulty, importance, frequency) that was listed in the written program. Quest had evaluation intervals assigned to each covered task, but those intervals did not necessarily correspond to the DIF analysis findings. Quest must establish criteria to ensure the evaluation intervals correspond to the criteria related to the DIF analysis.*

**Response**

Quest Operator Qualification Plan, Section 11, is being revised and will be submitted to PHMSA

**NOA Item 30:** *Quest did not have a specific procedure to address how their company evaluations for individuals were to be documented. An inconsistency of evaluation requirements for covered tasks was witnessed between company and contractor evaluation records. Quest must develop a specific procedure to address how evaluations for their company individuals are to be documented.*

**Response**

Quest Operator Qualification Plan, Section 14, is being revised and will be submitted to PHMSA

**NOA Item 31:** *Quest did not have adequate procedures to address the completion of evaluation forms. Specifically, there were certain covered tasks that did not require each step of the evaluation check sheet to be completed, providing an inconsistent completion pattern. Quest must amend procedures to ensure the correct completion of evaluation forms.*

**Response**

Quest Operator Qualification Plan, Section 3, is being revised and will be submitted to PHMSA

Quest is committed to regulatory compliance and will continue to designate the resources necessary to assure system wide compliance. This request of time is not being made for the purpose of obstruction or delay, but instead a good-faith request in order to permit Quest to access and finalize all plans and procedures such that our responses may be as thorough and accurate as possible.

Thank you for your consideration. If you have any questions about this request or about this matter generally, please do not hesitate to contact either myself at 913-764-6015 or Tom Saunders at 405-702-7424

Sincerely,

A handwritten signature in black ink, appearing to read "Juan Millan". The signature is fluid and cursive, with the first name "Juan" being more prominent than the last name "Millan".

Juan Millan  
Operations Manager

Cc: Tom Saunders, Executive Vice President.