



October 28, 2020

Via Email

Mr. Gregory Ochs.
Director, Central Region
Office of Pipeline Safety
Pipeline Hazardous Material Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Notice of Amendment - Viking Gas Transmission - CPF 3-2020-1004M

Dear Mr. Ochs:

Pursuant to the Notice of Amendment (NOA) CPF 3-2020-1004M dated September 30, 2020, Viking Gas Transmission (Viking) respectfully submits the following response to the issues brought forth from the inspection of the Viking facilities which occurred from August 13 -17, 2018.

NOA Item 1

PHMSA observation:

Viking's Procedure NGPsaf3.340 "Flammable and Combustible Material" (rev 6-13-13) is inadequate because it does not describe common materials that could be flammable or combustible (such as cardboard boxes, wooden pallets, paper products) in quantities beyond those required for everyday use to ensure that those materials are stored a safe distance from the compressor building, and not inside the compressor building. The procedure mentions "Class A combustibles," but does not define what Class A combustible materials are. The procedure also discusses limiting flammable and combustible materials storage in the compressor buildings, and warehousing flammable and combustible materials a safe distance from compressor buildings, however, there is not enough information for a person on staff to know what quantities are required for everyday use, or materials or quantities normally used in the compressor buildings. Therefore, Viking must amend its procedures to define what Class A combustible materials are, and address the quantities of flammable or combustible materials beyond what is required for everyday use.

Viking's response:

Viking has completed the revisions to our Procedure NGPsaf3.340 (attached) amending this procedure to address flammable and combustible materials at compressor stations. In Section 4.1.6, Viking has added a combustible material definition for Class A materials and updated Section 4.5.1 to address flammable and combustible material daily use.

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Viking Gas Transmission hopes that you will find the information provided adequate to address the NOPV. If you require any additional information or clarification to this response, please contact Gary Numedahl, Director, DOT Compliance at 918-595-1546 or gary.numedahl@oneok.com.

Sincerely,

DocuSigned by:

Kevin Burdick

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Kevin Burdick

Executive Vice President and Chief Operating Officer