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May 28, 2009

Mr. Dennis Hinnah
Deputy Director, Western Region PHMSA
222 W. 7th Ave. #200
PO Box 37
Anchorage, AK 99513

RE: CPF 5-2009-0015M

Dear Mr. Hinnah:

In response to your letter dated April 29, 2009, ENSTAR has revised its procedures as follows:

1. ENSTAR's standard completion report forms (see attached), have been revised to indicate who performed plastic pipe fusion and welding on the project. Employees have been trained in the use of this form.
2. Depth requirements for mains and service lines are identified in ENSTAR's "Pipe Installation Procedures", SOP 2120 (copy attached). The completion report forms in response 1 were also modified to include a section on installed depth.
3. ENSTAR's "Hot Tapping Procedure for Steel Mains", SOP 2205, was revised to require all personnel performing hot tapping to be qualified per ENSTAR's Operator Qualification requirements.
4. ENSTAR has revised its "Pipeline Surveillance and Patrol Procedure", SOP 1420, (copy attached). A review of the GPTC Guide for Gas Transmission and Distribution Piping Systems was conducted and the procedure was expanded per the recommendations of the Guide. Section V of the procedure was modified to require increased inspections if lines are identified that are subject to physical movement or external loading that could cause leakage or failure. The frequency of the increased inspections are also indicated in the revised procedure.

We believe these procedure revisions remedy all apparent inadequacies found in your November 17, 18, 2008 inspection. Should you have any questions, do not hesitate to call me at 264-3745.

Sincerely,
ENSTAR Natural Gas Company

A handwritten signature in black ink, appearing to read "David W. Bredin".

David W. Bredin
Director of Operations

Legal Address:
 Service Address:
 Cross Street:
 Addt'l Legal:



GRID:
 COMP#:
 AREA:
 DATE:

Name:
 Cust ID:
 HM Phone
 Structure Desc:
 Set Comments:

S/L Status:
 Type of Svc:
 Resident Type:
 Comm Type:
 # of meters:
 BTU Load:
 UNDR GR Wire:
 CESS/Septic:
 Furel Tank:
 Sewer

ST. PERMIT:
 CITY PERMIT:
 RR PERMIT:
 F & G:
 C of E:
 Easement:
 Mktg Rep:
 Lead#
 ER#
 PRINT DATE:

ITEM	MATERIAL INSTALLED		PIPE ABANDONED		TEST DATA		TIE-IN DATA	
	PRIMARY/SECONDARY		PRIMARY/SECONDARY		Test Pressure:		YR Installed	Size:
	SIZE	QUANTITY	SIZE	QUANTITY	Test Medium		Length Exposed:	
XTRUBE					Test Duration:		Coated With:	
COPPER					Results:		Pipe Condition:	
PLASTIC					Crew Leader		Depth of Tie-In:	
PIPE								
COUPLING					PIPE INFORMATION			
STUBS					Pipe Mfg:		Date Mfg: / /	
**YEAR ORIGINAL S/L PIPE INSTALLED:								



Installed/Abandon (Charge #)	Plastic Fusion Performed By:	Steel Welding Performed By:	Depth. Installed
BU			
OBJ			

COMMENTS:

Submitted By: _____ Approved By: _____ Completion Date: _____

COMPLETION REPORT INFORMATION

TO BE ATTACHED TO AS-BUILT COPY ONLY

GRID: _____

ER NO: _____

COMPLETION DATE: _____

Pipe Manufacturer	Date of Manufacture	Size	Type	Proposed Footage	Installed Footage	TEST DATA
						MEDIUM _____
						PRESSURE _____
						DURATION _____
						RESULTS _____
						(ATTACHED CHART) _____
						WITNESSED BY _____

INSTALLED AS-STAKED: YES ___ NO ___ DEPTH INSTALLED: _____ FT.
 REASON FOR DEVIATION FROM STAKE LINE _____

STREET CROSSINGS

OPEN CUT _____ FT.
 PUNCH _____ FT.
 BORE _____ FT.
 PAVEMENT REPAIRED BY: _____

AUTHORIZED BY: _____

INSTALLED BY CONTRACTOR: _____

COMPANY FORCES: _____

CONTRACTOR _____

CREW LEADER _____

INSPECTOR _____

LEADMAN _____

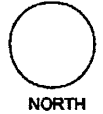
PLASTIC FUSION PERFORMED BY

STEEL WELDING PERFORMED BY

- 1.) _____
- 2.) _____
- 3.) _____
- 4.) _____

- 1.) _____
- 2.) _____
- 3.) _____
- 4.) _____

REMARKS AND SKETCHES:



ABANDONED PIPE	SIZE	TYPE	FOOTAGE	ER #
Yes _____ No _____				

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Ft Richardson Gas System	<input checked="" type="checkbox"/>
ENSTAR Natural Gas	<input checked="" type="checkbox"/>

Title: Hot Tapping Procedures for Steel Mains
No: 2305 Revision No.: 004 Effective Date: 05/29/2009 Page No. 1 of 1

Authorizing Signature: Dave Bredin Title: Director of Operations

Scope: This policy adopts the Mueller Operating Instructions for each of the steel hot tapping machines used by ENSTAR.

Policy: When hot tapping steel mains, all employees shall follow the manufacturer's "Operating Instructions" for the specific tapping equipment selected used to perform the hot tap.

Procedure:

I. Operating Instructions

ENSTAR utilizes various models of equipment for hot tapping steel mains. ENSTAR adopts the Operating Instructions for the following hot tapping equipment as an integral part of its Operations and Maintenance procedures;

- A. Mueller Line Stopper Unit No. 4SW
- B. Mueller Line Stopper Unit No. 3SW-500
- C. Mueller Line Stopper Unit No. 3SW
- D. Mueller E-5 and D-5 Drilling Machine
- E. Mueller No-Blo Operations Using the E5 or EH-1 Drilling Machine
- F. Mueller Low Pressure Line Stopper Fittings
- G. Mueller C1-36 Drilling Machine
- H. Mueller Line Stopper Unit No. 3
- I. Mueller Operating Instruction for Line Stopper Unit No. 2
- J. TD Williamson 660 a tapping machine

Printed copies of these manuals are available in each of ENSTAR's Distribution offices and can be printed from this procedure by clicking on the name of the machine.

II. Only trained and qualified employees and contractor employees shall perform hot tapping on steel mains. Training shall be documented in ENSTAR's Operator Qualification program.

STANDARD OPERATING PROCEDURES MANUAL



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Ft Richardson Gas System	<input checked="" type="checkbox"/>
ENSTAR Natural Gas	<input checked="" type="checkbox"/>

No: 2120	Title: Pipe Installation Procedures	Revision No.: 002	Effective Date: 04/17/09	Page No. 1 of 4
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Authorizing Signature: Dave Bredin Title: Director of Operations

Scope: This procedure outlines the procedures for installing steel and plastic pipe.

Policy: These procedures along with a special permit provisions shall be followed when installing steel or plastic pipe.

Procedure:

I. Installation of Mains and Service lines in an Open Trench

- A. Distribution mains and service lines may be installed in an open trench. Generally, a small excavator is used to make the trench. Most trenches are a bucket width with near vertical walls. Trenches can be wider when it is necessary to slope, shore or bench the trench for protection from collapse.
- B. All necessary permits shall be obtained and reviewed prior to installing pipe in a trench. Typically the Alaska Department of Transportation (ADOT) or City, Municipal or Borough Public Works Department will issue ROW permits for gas mains and service lines.
- C. The trench bottom shall be free of large rocks that could damage the pipe.
- D. Plastic pipe shall not be installed in tension, rather it will be laid such as to allow for some flexibility, i.e. snaked in the trench.
- E. The pipe will be covered with backfill material removed from the excavation. The pipe will be backfilled with material removed from the trench in such a way to prevent large rocks (fist size or larger) from impinging on the pipe.
- F. The locate wire shall be wrapped around plastic pipe per SOP 2205. It shall be inspected for continuity after installation.
- G. The trench line shall not deviate from the staked line without prior approval from the responsible surveyor, inspector or Supervisor.
- H. Steel gas mains or transmission lines shall be installed in such a manner to minimize stresses to the pipe and protect the pipe from coating damage.
- I. When backfilling steel pipe the pipe must be firmly supported in the ditch bottom or otherwise supported and the pipe and coating must be protected from equipment or damage from the backfill.

II. Inspection

- A. All pipe and fittings shall be visually inspected as it is installed in the ditch. Any scrapes or gouges that would impair the serviceability of the pipe must be removed before being backfilled. Generally, on plastic pipe, scrapes and gouges exceeding 10% of the wall thickness shall be cut out and removed.
- B. The protective coating on steel pipe shall be inspected for holidays and repaired before backfilling. All steel fittings shall be wrapped or protected with an approved coating before backfilling.
- C. The pressure test may be done prior to backfilling or after backfilling. See SOP 2150 for pressure testing parameters.

STANDARD OPERATING PROCEDURES MANUAL



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Ft Richardson Gas System	<input checked="" type="checkbox"/>
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III. Burial Depth

A. The burial depth will be the more stringent of the DOT 192 code requirement or the State, Municipal or local ROW permit requirements. Generally pipe will be buried to the "ENSTAR Preferred Minimum Depth" in most applications. See Chart Below

Pipe Burial Depth Requirements

	Minimum Depth per DOT 192	Municipality of Anchorage ROW	ADOT ROW	Matanuska Susitna Borough ROW	City of Wasilla ROW	Kenai Peninsula Borough ROW	ENSTAR Preferred Minimum Depth
Distribution Mains	24"	42"	36"	36"	48"	48"	48"
Service lines	18" in ROW 12" private property	42"	36"	36"	48"	48"	48" in ROW 12" on Private Property
Transmission Lines	30" in Class 1 36" in Class 2 36" in road ditches and RR crossings	42"	36"	36"	48"	48"	48"
Road Crossings		42"	48"	48"	48"	48"	48"

B. Generally gas mains must be installed with at least 24 inches of cover. Where an underground structure prevents the installation of a transmission line or main with 24 inches of cover, it may be installed with less cover provided it is protected with additional protection to withstand anticipated external loads.

C. Gas mains may be installed with less than 24 inches of cover if the State or Municipal permit allows for less cover or if it requires the main to be installed in a common trench with other utility lines

D. All gas mains or transmission lines installed in a navigable river or stream must be installed with a minimum of 48 inches cover in soil or 24 inches in consolidated rock.

E. Service Lines shall generally be installed with at least 12 inches of cover on private property and at least 18 inches of cover in streets and roads. The ENSTAR preferred burial depth of service lines in state and local ROWs is 48". Where an underground structure prevents installation at those depths, the service line must be able to withstand any anticipated external loads



IV. Underground Clearances

- A. Steel transmission mains shall be installed with at least 12" of clearance from any other underground structure not associated with the pipeline. If this cannot be obtained the pipe must be protected from damage that might result from the proximity of the other structure.
- B. Each main must be installed with enough clearance from any other structure to allow for proper maintenance and to protect against damage that might result from being close to the other structure. Generally 12" separation from other utilities or structures is acceptable.
- C. Each plastic main shall be installed with sufficient clearance from any source of heat (i.e. steam lines, hot water lines, etc) so as to prevent heat from impairing the serviceability of the pipe.

V. Compaction

- A. All permit conditions specifying compaction shall be adhered to when installing mains and service lines across ROWs'.
- B. When not specified in a permit, road crossings and driveway crossings shall be compacted to 95% in 12" lifts.

VI. Plowing in Pipe

- A. Plastic service lines, 1" IPS and under, may be plowed in with a vibratory plow attached to a trencher or other piece of equipment. The tubing material shall be planted in such a manner that the pipe is not in tension. A #12 tracer wire shall be wrapped around the tubing per SOP 2205
- B. Static pull plows shall not be used to plow in mains or service lines.
- C. The pipe and tubing shall be visually inspected as it is installed.
- D. The service line shall be open trenched where depth requirements exceed those capable of achieving with the plow or where compaction is required.
- E. The plowed trench shall be "wheel compacted" using the trencher tires.

VII Installation of Pipe in bores

- A. Installation of pipe in Uncased Bores
 - 1. Generally uncased bores will be done with piercing tools (Hole Haws, Moles, etc) or by Horizontal Directional Drilling (HDD).
 - 2. When using piercing tools, the gas pipe may be used to supply compressed air to the piercing tool. A piercing tool one size larger than the diameter of the pipe shall be used.
 - 3. One or more tracer wires shall be pulled with the pipe. A high tensile stranded or stainless steel tracer wire shall be used on uncased bores.
 - 4. The installation of locate marker balls at either end of the bore may be required.
 - 5. All permit conditions shall be strictly adhered to when installing road bores.
 - 6. When installing an uncased bore by HDD, a pull head one size larger than the carrier pipe shall be used to ream out the hole prior to pulling back.
 - 7. In all uncased bores, the carrier pipe shall be inspected for signs of excessive tension which may occur during the pullback. Such bores shall be rejected and not used.
- B. Installation of Pipe in Casings
 - 1. Casings may be installed in an open trench, auger bored or jacked into location.



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ENSTAR Natural Gas

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2. Casing material shall be specified by the engineer.
3. Pipe shall be protected from damage, i.e. scrapes or gouges to plastic pipe or coating damage to steel pipe, when inserted into a casing. The leading edge of plastic carrier pipe shall be closed before insertion.
4. Steel pipe shall be separated from the casing pipe by the installation of casing spacers. The carrier pipe shall be inspected to insure it is not in contact or shorted to the casing pipe.
5. Casings under railroads and highways must be able to withstand the superimposed loads. If there is a possibility that water could enter railroad or highway casings, the ends must be sealed.
6. Vents may be required on some casings. If so they will be specified on the drawings by the engineer.

VIII. Installation of Pipe Above Ground

- A. Installation of plastic pipe above ground is generally temporary in nature such as for temporary distribution feeds or temporary service lines.
- B. Uncased plastic pipe in above ground applications may not be subjected to ultra violet radiation from more than what the manufacturer recommends or two years, whichever is greater. Generally ENSTAR uses plastic temporary service line tubing for one construction season and then either buries the pipe as the permanent service line or discards the pipe.
- C. Plastic pipe installed temporarily above ground must be protected from damage such as vehicular traffic and other external forces.
- D. Steel pipe installation above ground is usually limited to regulator stations, meter sets, block valves, etc.

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No: 1420 **Revision No.: 011** **Title: Pipeline Surveillance and Patrol** **Effective Date: 5/29/2009** **Page No. 1 of 6**

Authorizing Signature: Dave Bredin **Title: Director of Operations**

Scope: This procedure contains the requirements for continuing surveillance of ENSTAR's facilities and the requirements and methods of conducting transmission and distribution pipeline surveillance patrols.

Policy: All employees shall be observant of conditions that might adversely affect the Company's facilities and follow this procedure to correct them. Regular Distribution and Transmission pipeline patrols shall be conducted according to the frequency and conditions of this procedure.

Procedure:

I. Definitions

For the purposes of this procedure, the following definitions apply:

- A. **Transmission Lines.** All natural gas transmission facilities belonging to Alaska Pipeline Company or ENSTAR Natural Gas Company, that regularly operate at more than 60 pounds per square inch gauge (PSIG).
- B. **Distribution Lines.** All natural gas facilities belonging to ENSTAR Natural Gas Company those regularly operate at 60 PSIG or less.

II. Continuing Surveillance

- A. During the normal course of work, ENSTAR field employees shall note conditions around Company facilities that could affect their integrity. Examples of conditions which could affect ENSTAR facilities include, but are not limited to:
 - 1. Road or street improvement projects or general construction projects.
 - 2. Changes in topography, which may have an affect on pipeline facilities.
 - 3. Conditions caused by severe weather such as flooding, heavy snows, high winds, ice storms, etc.
 - 4. Evidence of tampering, vandalism or damage.
 - 5. Encroachments on pipeline facilities.
 - 6. Changes in population density.
- B. Employees that become aware of conditions, which could adversely impact ENSTAR facilities, shall document the conditions on a Distribution Field Order and give it their Supervisor for action. The Supervisor shall investigate and act on the condition as appropriate.
- C. Supervisors responsible for the following activities shall review and analyze records of such activities to determine if conditions are present that will adversely impact Company facilities:

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Ft Richardson Gas System
ENSTAR Natural Gas

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- 1. Leakage Surveys
- 2. Aerial Pipeline Surveys
- 3. Valve Inspections
- 4. Regulator Station Inspections
- 5. Corrosion Control Inspections
- 6. Accident and Material Failure Investigations

- D. If a segment of pipeline is determined to be in unsatisfactory condition, the Director of Transmission Operations or his/her designee shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.
- E. If a segment of pipeline is determined to be in satisfactory condition but no immediate hazard exists, the Director of Transmission Operations or his/her designee shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure.

III. Transmission Line Patrols

- A. Company Transmission Lines shall be patrolled according to the following schedule:

Maximum Interval Between Patrols

Class Location of Line	At Highway and Railroad Crossings	All Other Places
Class 1 and 2	7-1/2 months; but at least twice each calendar year	15 months; but at least once each calendar year
Class 3	4-1/2 months; but at least four times each calendar year	7-1/2 months; but at least twice each calendar year

- B. Transmission Line patrols may be performed in conjunction with Transmission Line leak surveys and/or corrosion surveys. Patrols shall be documented on a "Pipeline Patrol Report" (See Attachment 1).
- C. Patrolling involves observing conditions along the Right-of-Way limits of the Transmission Line to determine if any potential danger or safety hazard exists or may exist. Such hazards may include erosion and pipeline exposure or decrease in cover. Locations where Transmission Line(s) cross streams or rivers or where storms or seasonal flooding may erode banks, shall be observed carefully. Patrols shall be timed to observe these areas when seasonal flooding is occurring or soon thereafter.
- D. Transmission Line patrol can be performed either from the air or on the ground by walking, by wheeled vehicle or by snow machine. Observations shall be recorded by geographic location, milepost, or prominent feature along the Right-of-Way.

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IV. Transmission Line Daily Air Patrols

- A. Beginning about May 1 and ending approximately November 1, daily aerial patrols of the Company's Transmission Lines in the Anchorage area shall be performed. The Engineering Services Supervisor is responsible for contacting and scheduling these patrols. Aerial patrols of the remaining Transmission Lines shall be conducted on a weekly basis, weather permitting, from approximately May 1 to November 1. They are scheduled to coincide with the summer construction season.
- B. Generally, daily aerial patrols are conducted each morning six days a week, Monday through Saturday, weather permitting. The patrol pilot notes activity on Transmission Line right-of-ways. The pilot or observer's notes are documented on an "Aerial Pipeline Patrol Report", (See Attachment 2) and transmitted immediately upon landing to the Engineering Coordinator. This ROW activity is compared to scheduled locates (or locate requests). Where activity is noted from the patrol, yet no locate request can be identified, the Engineering Coordinator shall resolve the questionable activity, dispatching a line locator to the location for inspection if necessary. Other reportable items noted by the patrol pilot shall be reported to the Coordinator, such as surface water running across the Right-of-Way, soil erosion, changes in vegetation color, etc.
- C. The Engineering Services Supervisor shall be responsible for maintaining copies of all Aerial Pipeline Patrol Reports.
- D. ENSTAR personnel may ride with the patrol pilot from time to time to familiarize themselves with the ROW conditions and observe the effectiveness of the patrol pilot's inspection and reporting accuracy.

V. Special Location Distribution Line Patrols

- A. The Director of Engineering or his/her designee shall be responsible for evaluating Distribution Lines that are subject to physical movement or external loading that could cause leakage or failure. Areas that should be considered for increased patrol activity include but are not limited to:
 - 1. Bridge crossings
 - 2. Aerial crossings
 - 3. Unstable River or creek banks
 - 4. Exposed water crossings
 - 5. Areas susceptible to washout
 - 6. Landslide areas
 - 7. Areas susceptible to earth subsidence such as mines or landfills
 - 8. Tunnels
 - 9. Railroad crossings
 - 10. Attachments to buildings or other structures
 - 11. Facilities or support structures which require maintenance until repaired

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Ft Richardson Gas System	<input checked="" type="checkbox"/>
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- B. If any Distribution Lines are identified in places or on structures where physical movement or external loading can cause leakage they shall be patrolled at a minimum a follows:
1. In Business Districts, they shall be patrolled at intervals not exceeding 4-1/2 months, but at least four times each calendar year.
 2. Outside Business Districts, they shall be patrolled at intervals not exceeding 7-1/2 months but at least twice each calendar year.
 3. The frequency of patrols may increase depending on the severity of the condition which could cause failure or leakage and the consequent hazards to public safety.
- C. Where a main or its support structure is constructed and maintained to resist movement and external loading, special location patrols are not required.
- D. Maintaining records special location patrols shall be the responsibility of the Engineering Services Supervisor.

**ATTACHMENT 1
SOP 1420**



**ALASKA PIPELINE COMPANY
PIPELINE PATROL REPORT**

Date: ___/___/___ Operator: _____ Emp #: _____ Unit Serial #: _____
 Survey Time: _____ hrs Calibration Date: ___/___/___
 Weather (circle one) Clear Cloudy P. Cloudy Temp: _____° Leaks Found: (circle one) YES NO
 Snow Rain

Color, Date & Initial Lines Surveyed In APC Transmission Schematic (circle one) Day MON TUES WED THURS FRI SAT
 Color RED BLUE BROWN GREEN YELLOW PINK

TRANSMISSION PIPELINE PATROL / LEAK SURVEY		MILES	
DESCRIPTION	FROM / TO	VEH	FOOT

Leak Description: _____

CONDITIONS FOUND

AREA REQUIRING SIGNS: _____

AREAS REQUIRING BRUSHING: _____

CONSTRUCTION ACTIVITY BY OTHERS: _____

NEEDED REPAIRS TO COMPANY FACILITIES: _____

COMMENTS: _____

File: MENSRY-cms-pipeline Patrol Report

Revised 7/10/07

**ATTACHMENT 2
SOP 1420**



ALASKA PIPELINE COMPANY
ENSTAR NATURAL GAS COMPANY

AERIAL PIPELINE PATROL REPORT

Date:	Flight Company:	
Pilot:	Observer:	Weather:
<input type="checkbox"/> Anchorage/ER	<input type="checkbox"/> Mat-Valley	<input type="checkbox"/> Beluga <input type="checkbox"/> Soldotna/Kenai <input type="checkbox"/> Turnagain Arm
POINTS TO SERVE:		
<ol style="list-style-type: none"> 1. <i>Construction equipment parked or working near the pipeline right of way.</i> 2. <i>New buildings on, or within 50 feet of the pipeline right of way.</i> 3. <i>Erosion by Streams, wave action or flooding that could expose pipeline.</i> 4. <i>Land subsidence or slides that could affect pipeline integrity.</i> 5. <i>Exposed Pipeline</i> 		
CONDITIONS FOUND:		
<input type="checkbox"/> No unusual activity along pipeline right of way <input type="checkbox"/> Brief description and location of activity along pipeline below:		
PIPELINES PATROLLED:		
<i>Report conditions found & location to the ENSTAR Engineering Department at 264-3740 upon landing. If no answer, call Dispatch, 264-3788.</i>		
Complete this report for every flight and send to:	ENSTAR Natural Gas Company Attn: Engineering Dept. P.O. Box 190288 Anchorage, AK 99519-0288	