



ENSTAR Natural Gas Company
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January 23, 2012

01-26-12P12:28 RCVD

Mr. Dennis Hinnah,
Deputy Director, Western Region
US Department of Transportation
Pipeline & Hazardous Materials Safety Administration
188 W. Northern Lights Blvd.
Suite 520
Anchorage, AK 99503

RE: CPF 5-2011-0023M
Distribution Integrity Management Program Inspection

Dear Dennis,

In response to your letters dated October 25, 2011, and extension letter dated January 6, 2012 ENSTAR respectfully submits the enclosed Revision 1 of its Distribution Integrity Management Program, Standard Operating Procedure 2102.

The plan has been revised to address the specific concerns identified in the Notice of Amendment letter. Specifically:

Item 1: ENSTAR has modified its Standard Operating Procedure (SOP) 2102 to add details on the data sources used and the procedures followed to develop their Distribution Integrity Management Program (DIMP). All data sources used to develop and demonstrate system knowledge are described, as well as the systematic review of all Leak Investigation Reports (LIRs) utilized to develop the DIMP leak database. Please refer to SOP 2102: *Procedure I. Develop & Demonstrate System Knowledge* (page 4).

Item 2: Additional detail has been added to describe the procedures used to identify existing and potential threats to the distribution system, using all available data sources. Methods used by the Subject Matter Experts (SMEs) to gather, identify and categorize threats and more specific sub-threats are described. Please refer to SOP 2102: *Procedure II. Identify Threats to the System* (page 4).

Item 3: ENSTAR has expanded the DIMP SOP to fully describe the procedure used to develop the program baseline, which will be used to measure the performance of

the DIMP program. Please refer to SOP 2102: *Procedure V. Measure Performance & Monitor Results* (page 6).

Item 4: The DIMP SOP has been further modified to describe in detail the procedures ENSTAR will follow when conducting a periodic evaluation. Please refer to SOP 2102: *Procedure VI. Periodically Evaluate & Improve the Program* (page 6-7).

We believe we have addressed all of your concerns with these changes to the Distribution Integrity Management Program. I have submitted an electronic copy of this letter and the plan to Mr. Jon Strawn should you wish to view the plan electronically. Should you have any questions, do not hesitate to call me at 907-264-3745.

Respectfully,
ENSTAR Natural Gas Company



David W. Bredin
Director of Operations

Cc: Jon Strawn, electronic copy