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SENT TO COMPLIANCE REGISTRY
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Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, Colorado 80228

Re: CPF 5-2012-1005M

Dear Mr. Hoidal:

Kern River Gas Transmission Company (KRGT) is submitting its Operator Qualification Plan that has been modified to address the concern of the Pipeline and Hazardous Materials Safety Administration (PHMSA) as expressed in the referenced Notice of Amendment (NOA). The changes made are summarized in the item as follows:

1. §192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(b) Ensure through evaluation that individual performing covered tasks are qualified;

Section 8.0 thru 8.2.5 of KRGT's Operator Qualification Plan has been modified to elaborate on and clearly state the process in which contracted staff will be trained on applicable KRGT procedures and/or standards. Additionally, the affected portion of KRGT's written Operator Qualification Plan written to satisfy the aforementioned NOA will become effective August 15, 2012. This will allow time to post procedures and standards to the Veriforce system, develop and post training materials, notify contractors of the new requirements, and give contractors time for their employees to complete evaluations under the new requirements.

Kern River is strongly committed to maintaining and following an effective Operator Qualification Plan to ensure safe operations of its employees and contracted staff. We are confident that the corrections made to the enclosed Kern River Operator Qualification Plan will be to PHMSA's satisfaction. Please contact Von McAllister at 801-937-6333 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Checketts", with a long horizontal flourish extending to the right.

Robert Checketts

cc: John Haddow, PHMSA
Von McAllister, Kern River Gas Transmission

Enclosure: Applicable portion of Kern River's Operator Qualification Plan

8.0 Contractors and Contracted Service Providers

8.1 Contractors may be used to perform covered tasks and shall be qualified in accordance with this plan and meet the requirements of Veriforce's policies and procedures.

8.2 Contractor's operator qualified employees, as part of the qualification process, are required to acknowledge that they are knowledgeable of specific Kern River documents which are accessed by logging into VeriSource, Veriforce's on-line database. The following describes the process.

8.2.1 Applicable KRGT procedures, standards and/or training materials are placed on the Veriforce site.

8.2.2 Veriforce (on KRGT's behalf) will notify all KRGT contractors of the requirement to review the material and acknowledge that they are aware of the requirement/s.

8.2.3 The contractor's employee, upon completion of the of the procedure review will acknowledge they have reviewed the applicable document/s and are knowledgeable of the content.

8.2.4 Once the contractor's employee has completed the review and acknowledged their understanding, the contractor will be able to access and print a Field Verification Report (FVR) for that employee. In the event the contractor employee is not qualified or has not reviewed the appropriate document/s, a FVR will not be available for printing thus prohibiting the contractor from obtaining the necessary documentation to perform the covered task/s for Kern River.

8.2.5 No contractor employee will be able to perform covered tasks without sufficient documentation demonstrating qualification and understanding of Kern River documents, i.e., a field verification report unless working under Span-of-Control.

8.3 Veriforce will manage all contractor qualification and knowledge records. Refer to the latest revision of Veriforce's procedures for details regarding the management of contractor qualifications and data backup. Veriforce will make all necessary documents available to Kern River employees and contractors and will manage all associated contractor qualification and knowledge data.

8.4 The contractor is responsible for ensuring qualification of its employees and its sub-contractors for the covered task(s) to be performed for Kern River per O&M procedure 10.22.02, Operator Qualification Requirements and this plan.