



Rcv'd 11/23/12 via USPS

November 16, 2012

Mr. Dennis Hinnah
Deputy Director, PHMSA Western Region
188 W. Northern Lights Blvd., Suite 520
Anchorage, Alaska 99503

RE: CPF 5-2012-6016M

Dear Mr. Hinnah:

As a result of the October 1, 2012 PHMSA inspection of the XTO Public Awareness Program and Procedures via teleconference, there were several alleged inadequacies identified. XTO will address each one individually as described below:

1. §195.440 Public Awareness

(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

XTO's Public Awareness Program has been modified to include a programming note due to Alaska's unique attributes. The program does not include the size and number of tanks because those assets are not DOT regulated and therefore, they are not required to be included in the Public Awareness Program description. However, the tanks are included in the OPA 90 Plan and annual drills with emergency responders are inclusive of the totality of the pipeline and facilities.

A program update will include the non-odorized gas to be addressed with affected stakeholders. This attribute will be added to the annual drill scenario where applicable and any messaging directed to commercial fishermen.

2. §195.440 Public Awareness

(d) The operator's program must specifically include provisions to educate public, appropriate government organizations, and persons engaged in excavation related activities on:

- (1) Use of one call notification system prior to excavation and other damage prevention activities;**
- (2) Possible hazards associated with unintended releases from a hazardous liquid or carbon dioxide pipeline facility;**
- (3) Physical indications that such a release may have occurred;**
- (4) Steps that should be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and**
- (5) Procedures to report such an event.**



The XTO mailing and handouts do state the following information:

- Hazards of an unintended release of natural gas or crude oil;
- The physical indications of a release
- Steps that need to be taken for public safety; and
- Procedures to report a release.

We believe the contents of the attached brochure will confirm the adequacy of the message.

If I can provide any additional information, please do not hesitate to contact me, richard_golemon@xtoenergy.com or 817-885-2966.

Sincerely,

A handwritten signature in blue ink that reads 'Dale Golemon'.

Dale Golemon
DOT Compliance Coordinator
XTO Energy