



Sunrise Power Company, LLC

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661-615-4630

Kelly S. Lucas, Executive Director

May 22, 2013

SU-3458

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

RE: CPF 5-2013-0004M
Notice of Amendment – Sunrise Power Company, LLC

Dear Mr. Hoidal:

In response to your letter dated April 26, 2013, Sunrise Power Company (SPC) respectfully submits the following responses and O&M manual attachments for each inadequacy referenced in the Findings of Violation:

Item 1: §192.616 Public Awareness.

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program of procedural manual as to why compliance with all or certain provisions of the recommended practice is not practical and not necessary for safety.

“Edison Mission Operation and Maintenance lacks procedures to track the number of entities reached within each audience identified in the Public Awareness Program as required by API RP 1162 Section 8.4.1.”

Sunrise’s Response: See attached O&M Manual (July 9, 2012, Revision #6) Section 2.15 – Public Education; V.; F. “Program Evaluation.” This section was updated to better define our annual effort to continually track our outreach program. Attached you will find the following public awareness program information:

- **A list of the excavators and agencies who were present and received information regarding SPC’s program at the August 23, 2012 USA North Bakersfield S.A.F.E. event.**
- **The number of online visits we received through our internet ad placement with SPC’s local newspaper, The Midway Driller.**
- **Sign-in sheet listing public agencies present at SPC’s October 25, 2012 annual public awareness program tour and BBQ.**

Item 2: §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practical and not necessary for safety.

“Edison Mission did not specify the effectiveness evaluation frequency in their Public Awareness Program procedures. It was noted that Edison Mission conducted one review in September 2009.”

Sunrise’s Response: See attached O&M manual (July 9, 2012, Revision #6) Section 2.15 – Public Education; VIII, “Records,” Paragraph C, which states the Public Education Program will be evaluated, and updated if needed, on an annual basis, concurrent with the O&M Manual review. The last review was conducted on July 9, 2012.

After reviewing the attachments, if you have any questions, please contact me at (661) 615-4684.

Sincerely,



Kelly Lucas
Executive Director
Sunrise Power Company, LLC

Attachments

cc: David King Dave Leach
Paul Dumke Shelley Rosas
Yvonne Hoeke Ben Burns