



06-05-13PUT:23 RCVD

May 29, 2013

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

Re: CPF 5-2013-0007M

Dear Mr. Hoidal:

This is to acknowledge that your **NOTICE OF AMENDMENT** dated May 21, 2013 has been received and that Island Energy does not contest the notice. As detailed below, Island Energy recognized the deficiencies of its Anti-Drug and Alcohol Misuse Plan during the November inspection. A new plan that addresses the inadequacies was adopted by the end of January 2013 and communicated to covered employees shortly thereafter.

The new Island Energy Anti-Drug and Alcohol Misuse Plan was created using a template provide by the American Public Gas Association (APGA) Security and Integrity Foundation (SIF). A copy of the plan has been enclosed. The new plan addresses the identified inadequacies as follows:

Inadequacy 1.

The new anti-drug plan is specifically for "covered" employees as defined by PHMSA regulations and the template on which it is based is designed by APGA SIF to comply with all of the requirements of 49 CFR Part 199. The final Island Energy plan was reviewed by staff to insure compliance prior to adoption.

Inadequacy 2.

The new anti-drug plan defines a "covered employee" and "accident" in terms of PHMSA regulations.

Inadequacy 3.

The new anti-drug plan defines "accident" in terms of PHMSA regulations. Post accident drug testing procedures are specified and include a definition

of which employees must be drug tested following an accident. The plan also identifies individuals and service providers involved in post-accident drug testing and their respective roles.

Inadequacy 4.

The new alcohol misuse plan is specifically for "covered" employees as defined by PHMSA regulations and the template on which it is based is designed by APGA SIF to comply with all of the requirements of 49 CFR Part 199. The final Island Energy plan was reviewed by staff to insure compliance prior to adoption.

Inadequacy 5.

The new alcohol misuse plan defines a "covered employee" and "accident" in terms of PHMSA regulations.

Inadequacy 6.

The new alcohol misuse plan defines "accident" in terms of PHMSA regulations. Post accident alcohol testing procedures are specified and include a definition of which employees must be alcohol tested following an accident. The plan also identifies individuals and service providers involved in post-accident alcohol testing and their respective roles.

In conclusion, Island Energy is confident our new plan adequately addresses the inadequacies identified during the inspection. Please let me know if you have any questions.

Sincerely,



Peter Guadagni
General Manager
Island Energy