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By [U.S. Postal Service Certified Mail]

April 4<sup>th</sup>, 2016

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

**RE: Notice of Amendment  
CPF No. 5-2016-0002M**

Dear Mr. Hoidal,

On March 17, 2016, Alaska Pipeline Company (APC) received the above-referenced Notice of Amendment (NOA), dated March 16, 2016 from the Pipeline and Hazardous Materials Safety Administration (PHMSA). APC takes seriously the concerns articulated by PHMSA in the NOA. By way of this letter and pursuant to 49 C.F.R. § 190.206, APC respectfully submits its response to the NOA. APC has made a number of changes to its Standard Operating Procedures (SOP) in response to the NOA. For each of the 3 items in the NOA, APC has set out the relevant regulatory text, PHMSA's allegation, followed by the company's response. APC's amended procedures are enclosed with this letter within the proposed 30 day amendment period described in the NOA letter.

**Item 1**

*§ 192.605 Procedural manual for operations, maintenance, and emergencies.  
(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.*

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## **PHMSA Allegations**

*At the time of the inspection, APC did not provide a procedure for determining the maximum allowable operating pressure in accordance with § 192.619 Maximum allowable operating pressure: Steel or plastic pipelines. A procedure for determining the maximum allowable operating pressure in accordance with 49 C.F.R. Part 192, subpart L, § 192.619 is required by § 192.605(b) (1).*

## **Alaska Pipeline Company Actions Taken**

Standard Operating Procedure 1325 titled Pipeline Design and MAOP Validation was established to address the issue in 2015.

### **Item 2**

*§ 192.605 Procedural manual for operations, maintenance, and emergencies. (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.*

## **PHMSA Allegations**

*At the time of the inspection, APC did not provide a procedure for starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.*

## **Alaska Pipeline Company Actions Taken**

Standard Operating Procedure 1902 titled: Transmission Shutdown Procedures states that any procedure to start up or shut down a pipeline must take into consideration the MAOP. APC's shut down/start up procedure template includes a portion titled: Pressure Monitoring Required for Start Up. This portion of the procedure takes MAOP into consideration. SOP 1902 may also be used in conjunction with SOP 1325 to ensure MAOP limits are not surpassed.

### **Item 3**

*§ 192.605 Procedural manual for operations, maintenance, and emergencies. (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*

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(8) Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.

### **PHMSA Allegations**

*Alaska Pipeline Company did not modify its procedure manual of operations, maintenance, and emergencies as recommended by its investigation of a near miss occurrence. An APC letter dated May 10, 2011, Subject: "Recommended modifications to ENSTAR/APC procedures to enhance Contractor Safety working around Transmission Lines" contained several recommendations for modifications to company protocols and Standard Operating Procedures. These recommendations were a result of an APC investigation regarding a near miss which was discovered by APC on April 28, 2011. At the time of the PHMSA's inspection the Standard Operating Procedures had not been modified as recommended.*

### **Alaska Pipeline Company Actions Taken**

1. The Safety Requirements for Excavation letter is now available to customers at ENSTAR's Spenard office.
2. Standard Operating Procedure 1405, titled Line Locating Policy and Procedures, addresses the concerns of the vicinity of transmission pipelines during design related locates.
3. The Safety Requirements for Excavation letter is now distributed to design firms by ENSTAR's engineering department during the design phase.
4. Standard Operating Procedure 1405, titled Line Locating Policy and Procedures, requires the Locator to notify the locate requestor of the existence of transmission pipelines in the vicinity. If the locate requestor is not present at the time of the locate, the Locate Coordinator will contact the requestor to notify them of the existence of transmission pipelines in the vicinity.

Should you have any questions regarding our response, please feel free to call me at 907-334-7736.

Sincerely



John Lau

Vice President of Operations

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ENSTAR Natural Gas Company

Cc: Jared Green  
John Lau  
Moiria Smith  
Steve Cooper

Enclosures:

Relevant Sections of ENSTAR's Revised Standard Operating Procedures

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