

City of Susanville

PUBLIC WORKS DEPARTMENT



720 South St., Susanville, CA 96130 (530)257-1041 • www.susanvillepublicworks.org
Dan Newton, *Director* - Daniel Gibbs, *City Engineer*

19 June 2018

Alan K. Mayberry
Associate Administrator for Pipeline Safety
Office of Pipeline Safety, PIIMSA
1200 New Jersey Avenue, SE
East Building, 2nd Floor
Washington D.C. 20590

JUN 21 2018

RE: CPF No. 5-2016-0005M Petition For Reconsideration

Dear Mr. Mayberry:

The City is in receipt of your Final Order dated June 1, 2018. Per the last paragraph on Page 3, the City is submitting a Petition for Reconsideration of the order as allowed under 49 C.F.R. § 190.243. The following is the City's statement of the issue(s) regarding the content of this Final Order:

- i. Arguments provided by PIIMSA regarding anticipated Notice of Proposed Rulemaking (NPRM) are utilized in favor of the Office of Pipeline Safety only. The City is concerned that use of the NPRM should be considered and weighted equally when presented in support of the Respondent's arguments;
- ii. Definitions, subsequent analysis and arguments regarding the extent of the transmission main designation presented on Page 2 and 3 respectively of CPF No. 5-2016-0004 (ref. Section 192.4 on page 425 of 49 C.F.R.) ignores language within Item (1) of paragraph in Column 2 in that same order. Yet, this section specifically quotes large volume customer, which would reduce the limits of designation regarding transmission. Since the City does provide to large volume customers (as is strongly implied in your paragraph on Page 3) of that order and are served at an obvious point of connection or branch where downstream from a distribution center, it appears this potential reduction in the length of the transmission designation is worthy of revisiting.

Your opening statements regarding inadequacies regarding the City's Operations and Maintenance have been partially addressed. Specifically, items 3) and 4) on Page 8 of that Compliance Order have been completed but have not been formally submitted. These remain an integral part of our Operations and Maintenance (O&M) Plan and are available for review and confirmation upon request.

The City acknowledges the items in the compliance order and stipulates it will continue to pursue and make every attempt to comply within 90 and 180 days. However, some items will likely necessitate requesting grants for extension from the Director as allowed on Page 8 of your compliance order.

Sincerely,

Daniel Gibbs, PE
Acting Public Works Director