CITY OF COALINGA
The Sunny Side of the Valley

January 30, 2017

Chris Hoidal, Director
Director, Western Region
Pipeline and Hazardous Materials Safety Adm
12300 West Dakota Ave, Suite 110
Lakewood, CO 80228

Via Email w/Confirmation
chris.hoidal@dot.gov

Re: CPF 5-2016-0013M
CPF 5-2016-0014

Dear Mr. Hoidal:

This is in response to your letters dated August 31, 2016, regarding revisions to Coalinga's operations and maintenance (O&M) manual and monitoring requirements of Coalinga's cathodic protection system. The City of Coalinga has incorporated the changes requested in its O&M Plan, and is otherwise complying as follows.

Regarding CPF 5-2016-0013M, items in the O&M manual:

1. Plastic Pipe: Inspection of joints: See page 19 of the updated O&M manual. A new section has been added addressing inspection and certification of plastic pipe joints. As a matter of practice, it has been over a year since any type of fusion has been done in Coalinga. All pipe connections have been for service laterals and have been done using approved stab fittings. However, at least three of the gas field staff will soon be re-certified for butt-fusion and electro-fusion, to be in full compliance with safety and operating requirements.

2. Emergency Plans: Safely restoring any service outage. See page 13 of the updated O&M manual, specifically the section "Emergency Shutdown and Safe Restoration of Service." This section has been expanded to more clearly state the process of restoring service to customers following an outage.

3. Emergency Plans: Review employee plans following an emergency. See the new section on page 14, "Review Following an Emergency Shutdown." This section specifies that employee activities shall be reviewed following a gas emergency.

4. Emergency Plans: Liaison activities. See the new section added on page seven, "Liaison Activities." This section provides specifics for liaison activities associated with gas

emergencies. Further, a liaison meeting will be held and documented no later than February 28, 2017.

5. Public Awareness: Effectiveness of public awareness plan. A paragraph has been added on page 25 stating that the city's gas system is too small to practicably have a program to measure the effectiveness of its public awareness program.

Regarding CPF 5-2016-0014, applying to annual cathodic system testing:

Coalinga has added to its annual cathodic inspection procedure a secondary test consistent with the requirement of Appendix D to Part 192.463. See pages 17 and 18 of the O&M manual. This will be in addition to testing pipe-to-soil potentials around the system. Specifically, a voltage drop study will be conducted as stated in Appendix D (III), "Determination of polarization voltage shift." This will be done by April 30th, as the cathodic testing for 2017 will occur soon.

Mr. Dan Bergmann of IGService will follow up with Nicolas Cruz to assure we have responded satisfactorily, especially with regard to expansion of our cathodic system testing.

Thank you for supporting the City of Coalinga in safe operation of its gas distribution system. We appreciate your oversight.

Sincerely,

Pete Preciado, P.E.
Public Works and Utilities Director
City of Coalinga

cc: Nicolas Cruz, PHMSA, Nicolas.Cruz@dot.gov
Dan Bergmann, IGS, dan@igservice.com
Randy Arp, City of Coalinga, rarp@coalinga.com

Attached: Revised Operations and Maintenance Plan