

North Slope Borough

Department of Public Works

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Scott Danner, Director of Public Works

November 9, 2018

Mr. Chris Hoidal

Director, PHMSA Western Division

12300 W. Dakota Avenue, Suite 110

Lakewood, CO 80228

720-963-3160

720-963-3161 (Fax)

Re: Notice of Amendment Letter CPF 5-2016-0019M Dated October 6, 2016

Dear Mr. Hoidal:

The North Slope Borough Public Works Department has prepared a written response to the Notice of Amendment Letter CPF 5-2016-0019M. Below are the responses to the findings in the letter.

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.
 - The NSB has amended the procedures to specify how the periodic odorant sampling will be implemented. Please see the attached Pipeline Specific Operations Manual (PSOM) Section 8: Odorant Injection.

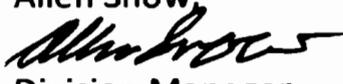
2. §192.605 Procedural manual for operations, maintenance, and emergencies... (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
 - (1) Operating, Maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.
 - The NSB has amended the procedures to specify how a fire on a pipeline facility will be addressed. Please see the attached Pipeline Specific Operations Manual (PSOM) Section 13: Emergency Response Procedures.

3. **§192.615 Emergency Plans (a)** Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following: ... (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.
 - The NSB has amended the procedures to specify how communications will be addressed during an emergency. Please see the attached Pipeline Specific Operations Manual (PSOM) Section 13: Emergency Response Procedures.

4. **§192.615 Emergency Plans (a)** Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following: ... (10) Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.
 - The NSB has amended the procedures to specify how investigations will be addressed following an emergency. Please see the attached Pipeline Specific Operations Manual (PSOM) Section 13.5: Emergency Response Procedures.

5. **§192.617 Investigation of failures.** Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.
 - The NSB has amended the procedures to specify how investigations will be addressed following an emergency. Please see the attached Pipeline Specific Operations Manual (PSOM) Section 13.5: Emergency Response Procedures and O&M Procedure P-192.617.

Sincerely,

Allen Snow

Division Manager
North Slope Borough
Department of Public Works
Fuels and Natural Gas