



FAIRBANKS NATURAL GAS, LLC

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12-07-16 P12:03 RCVD

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

November 30, 2016

Attn. Mr. Hoidal

The Warning Letter, reference # CPF 5-2016-0023W, dated October 14, 2016, in response FNG would like to show changes to the Standard Operating procedures (SOP's), and update operating records.

PHMSA Comment:

1. At the time of the inspection, FNG personnel were not able to provide records of personnel qualifications for joining plastic pipe CFR 192.285 and records of personnel qualifications for inspection of plastic pipe joints CFR 192.287 for year 2013. FNG appears to be in violation of CFR 192.807(b) which requires records to be kept for 5 years 192.807 (b). FNG personnel were however, able to supply qualification records for individuals qualified in joining plastic pipe and inspection of pipe joints for the years 2014 and 2015.

FNG Response:

In response, FNG has included as an attachment the missing operating records for personnel qualifications for joining plastic pipe CFR 192.285 and records of personnel qualifications for inspection of plastic pipe joints CFR 192.287 for year 2013.

FNG revised its policy on filing, storage and maintaining training records. All records of Operator training activities shall be maintained for the duration of the operator company service and 5 years after operator service ends.

PHMSA Comment:

2. At the time of inspection, FNG personnel were not able to supply validation records of their "risk ranking" process of the FNG integrity management plan. FNG personnel were also unable to provide implementation records for all elements of the FNG integrity management plan. Records of validation of the risk ranking process and implementation records of an integrity management plan are required by CFR 192.1007 (f).

FNG Response:

At the time of inspection FNG was in the process of updating and finalizing the 2015 "DIMP" that is required. FNG revised its policy on maintaining "DIMP" records. All records



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required for the "DIMP" shall be updated and completed by the end of each fiscal qtr. for that reporting year.

Please review the attachment for validation of the "risk ranking" process of the FNG integrity management plan. The attached "DIMP" shall provide implementation records for all elements of the FNG integrity management plan

See Attachment A "Distribution Integrity Management Plan" for the required by CFR 192.1007 (f) code.

PHMSA Comment:

3. At time of inspection, FNG personnel were not able to provide pressure safety valve records required by CFR 192.739 for year 2013. FNG personnel were able to supply pressure safety valve records required by CFR 192.739 for 2014 and 2015.

FNG Response:

FNG has located the misplaced operating record, pressure safety valve records required by CFR 192.739 for year 2013. FNG revised its policy on filing, storage and maintaining operating records.

See Attachment B "pressure limiting, filter and major meter inspection / maintenance".

FNG appreciates the opportunity to take corrective action. If you have further questions or instructions on this matter, please call me at (907) 452-7111 or e-mail me at cgillespie@fngas.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Gillespie', with a long, sweeping horizontal line extending to the right.

Chris Gillespie