



NORGASCO, INC. 4341 B St., Suite 306 • Anchorage, Alaska 99503 • (907) 562-5520 FAX (907) 562-5530

April 3, 2017

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

RE: CPF 5-2017-0001M

Dear M Hoidal,

Enclosed are revised procedures in response to the Notice of Amendment dated February 10, 2017. I apologize for this correspondence being past the 45 day time period. I didn't realize a written response was required until Inspector Mike Chard called this morning.

Enclosed is Norgasco's updated P-7 Wax Tape Procedure that is now included as a covered task in Norgasco's Operator Qualification Program. Earlier this year, Norgasco started using the Midwest Energy Association, Energy U, Operator Qualification Program. Training course 192-0401.00 "Corrosion Monitoring – Atmospheric, External and Internal" and course 192-0402 "Coating Maintenance" are now required to be completed by all Norgasco Operators to be qualified to perform this task.

Also enclosed is an updated P-32 Key Operating Valve Inspection and Maintenance procedure and updated 2017 Operating Valve Survey Inspection Sheet. Starting with the 2017 valve survey we will follow this procedure and document the results for each valve inspected.

The two revised procedures should resolve the outstanding issues. If you have any questions, do not hesitate to contact me.

Respectfully,
Norgasco, Inc.

David W. Bredin
V.P. of Operations



P-7 Wax Tape Procedures

1 Wax Tape Application Procedures for underground pipe

Step 1. Use proper PPE for task. Wire brush and wipe the surface so that it is free from loose rust, scale and other foreign matter. Surface should be wiped as dry as possible.

Step 2. Apply Wax Tape primer to surface by brush or by hand. Only a thin film of primer is required.

Where moisture is present, rub and press primer onto surface, displacing moisture and insuring that the primer is adhering to the metal surface.

Step 3. Apply # 1 Wax Tape, allowing for at least a 1" overlap. The Wax Tape should overlap 3-6" over any existing coated or painted surface. While wrapping, apply slight tension and press the wax tape into place making sure that there are no air pockets and that it is in intimate contact with the pipe. Also, press and smooth out the lap seams to insure that the laps are sealed.

When applying Wax Tape to irregular surfaces, allow slack so it can be molded into conformity with the surface. This will prevent voids and insure intimate contact of the wax tape to the surface.

Where additional mechanical protection is required, due to severe back fill soil, over wrap # 1 Wax Tape with either Poly Ply, Guard Wrap or Glas-Wrap Wrappers.

Step 4. Backfill immediately after application of # 1 Wax Tape. No drying or curing time is required.



P-7 Wax Tape Application Procedures for above ground pipe.

Step 1. Use proper PPE for task. Wire Brush and wipe the surface so that it is free from loose rust, scale and other foreign matter. Surface should be wiped as dry as possible.

Step 2. Apply Wax Tape primer to the surface by brush or by hand. Only a thin film of primer is required.

Where moisture is present, rub and press primer onto the surface, displacing moisture and insuring that the primer is adhering to the metal surface.

Step 3. Apply #2 Wax Tape, allowing at least a 1" overlap. The Wax Tape should overlap 3-6" over any existing coated or painted surface. While wrapping the tape, apply slight tension and press the tape into place making sure that there are no air pockets under the tape and that the tape is in intimate contact with the pipe. Also, press and smooth out the lap seams to insure that the laps are sealed.

When applying tape to irregular surfaces, allow slack in the tape so that it can be molded into conformity with the surface. This will prevent voids under the tape and insure intimate contact of the tape to the surface.

Step 4. If required # 2 Wax Tape can be painted. Allow 2-14 days, depending on atmospheric conditions, for the Wax Tape to firm up before painting. An acrylic latex paint is recommended.

NOTE; Use wax tape primer BROWN for #2 Wax Tape
Wax Tape primer WHITE for # 2a or 2w Wax Tape



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Updated: 1-29-2017

P-32 Key Operating Valve Inspections and Maintenance

Purpose: This survey is conducted each calendar year at intervals not to exceed 15 months. Generally we do this work in June and July each year.

We inspect all valves which may be necessary for the safe operation of our distribution system. If we find any key valve inoperable we must take prompt remedial action to correct it, unless we can designate an alternative valve.

During this survey we must be able to recognize an Abnormal Operating Condition which is a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may indicate a condition exceeding design limits or result in a hazard to persons, property, or the environment.

Tools Needed: Valve Survey spreadsheet, snoop, grease, wrenches, pipe wrenches, rags, camera,

Safety Gear Needed: Safety glasses, safety vests, bug dope, badges, Harmony Radios,

We usually do this survey at the same time we do the above ground leak survey and the above ground corrosion survey. The valve survey and above ground leak survey spreadsheets are different and should be completed individually while at each site.

Each key operating valve must be checked as follows:

1. Observe surroundings, Note any abnormal conditions
2. Visually inspect valve for physical damage.
3. Using Snoop or Combustible Gas Indicator, check for external leaks at the body, bonnet, stem, flange, threads.
4. Note any right of way issues, damage prevention barriers or signs that need replacement.
5. Verify valve number, read data plate, type, model, size is correct. Note any variances.
6. Inspect for atmospheric corrosion.
7. Inspect wax tape coatings on risers
8. Lubricate valves that require it.
9. Check for correct NI valve tag.
10. Exercise the valve by turning the handle or wheel to open or close the valve. If closing or opening the valve handle all the way could cause problems, then exercise the handle to a safe limit, (generally ¼ open or close).
11. Take pictures where needed. Document your findings on the spreadsheet or other forms.

After each day of field work transfer the field data to the computer. Download the pictures to the correct folder and name and date each picture.



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If a leak is found the Operator must grade the leak and note it on the survey sheet. We use the grading system found in chapter 4 of the Guidance Manual for Operators of Small Natural Gas systems.

Grade 1: A leak that represents an existing or probable hazard to persons or property, and requires immediate repair or continuous action until the conditions are no longer hazardous. A Grade 1 Leak requires prompt action to protect life and property, and continuous action until the conditions are no longer hazardous.

Grade 2: A leak that is recognized as being non-hazardous at the time of detection, but justifies scheduled repair based on probable future hazard. Grade 2 leaks should be repaired or cleared within one calendar year, but no later than 15 months from the date the leak was reported. In determining the repair priority, criteria such as the following should be considered:

1. Amount and migration of gas.
2. Proximity of gas to buildings and subsurface structures.
3. Extent of pavement.
4. Soil type and soil conditions (such as frost cap, moisture and natural venting).

Grade 3: A leak that is non-hazardous at the time of detection and can be reasonably expected to remain non-hazardous. Grade 3 leaks should be re-evaluated during the next scheduled survey, or within 15 months of the date reported, whichever occurs first, until the leak is regraded or no longer results in a reading.