



ROBERT DOWELL
DIRECTOR

2400 EAST SPRING STREET • LONG BEACH, CA 90806
(562) 570-2000 • www.lbgo.org

DEPARTMENT

October 18, 2017

VIA UPS

Mr. Huy Nguyen
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Re: CPF 5-2017-0019

Dear Mr. Nguyen:

Long Beach Gas & Oil (LBGO) received your September 22, 2017 letter regarding a Notice of Probable Violation and Proposed Compliance Order resulting from the September 14-18, 2015 and March 13-22, 2017 Pipeline and Hazardous Materials Safety Administration (PHMSA) inspection of the LBGO records and gas distribution system. In accordance with Title 49 Code of Federal Regulations (CFR) 190.208, LBGO is providing the following response:

Item 1a - §192.1007(e) ["measure performance, monitor results and evaluate effectiveness"]:

"Specifically, LBGO failed to implement Section 8 of its Distribution Integrity Management Plan (DIMP) that covered the required elements of §192.1007(e) and (f)."

"...LBGO failed to show records that LBGO uses the DIMP attribute data to measure performance, monitor results and evaluate effectiveness of its IM program."

LBGO Response:

Pursuant to the Proposed Compliance Order, LBGO will submit the required documentation in support of Section 8 of its DIMP within 180 days of the final order.

Item 1b - §192.1007(f) ["Periodic Evaluation and Improvement"]:

"LBGO exceeded the regulatory deadline for re-evaluation of five years, which should have occurred on or about November 16, 2016."

LBGO Response:

Pursuant to the Proposed Compliance Order, LBGO will submit the documentation evidencing the 5-year review that took place in July 2015, pursuant to a Notice of Amendment received by LBGO, CPF 5-2015-009M, dated July 1, 2015.

October 18, 2017
Page 2

In addition, two items were noted in the September 22 letter as warnings. LBGO has initiated corrective actions to remedy the PHMSA findings.

Should you have any questions on this matter, please do not hesitate to contact me at (562) 570-2001.

Sincerely,

A handwritten signature in black ink that reads "R M Dowell". The signature is written in a cursive style with a large, stylized "R" and "D".

Robert M. Dowell
Director

c: Stephen C. Bateman, Manager, Engineering & Construction - Long Beach Gas & Oil
Phillip M. Carroll, Pipeline Compliance Officer – Long Beach Gas & Oil