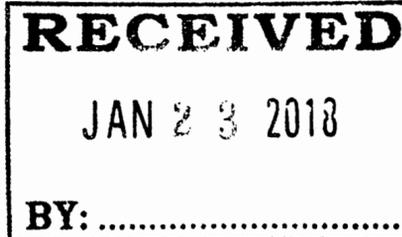




Michael W. Miller
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January 17, 2018



CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Kim West
Acting Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Re: Clear Creek Gas Storage Facility, Uinta County, Wyoming
Warning Letter – CPF 5-2017-1013W

Dear Ms. West:

An inspection of QEP Marketing Company's Clear Creek Gas storage facility occurred on August 21 through 25, 2017 by a PHMSA representative. As a result of the inspection, PHMSA identified three inadequacies detailed in a Warning Letter dated December 5, 2017.

QEP appreciates the opportunity to respond to the concerns raised in letter.

I. WARNING LETTER

1. §191.29 – National Pipeline Mapping System – It was noted during the records review of the Clear Creek Gas Storage facility that no notifications were sent to the National Pipeline Mapping System (NPMS) to comply with the annual requirements, or to document any changes from 2010 through 2016.

Response: No changes were made to the Clear Creek pipeline system between 2010 and 2016. An update to the system was made in 2017 for the 2016 calendar year was made but submitted after the March 15 deadline. QEP has put a future reminder into its report system to send a notification to NPMS annually regardless of whether no changes have been made to the system in accordance with §191.29.

2. §192.465 – External Corrosion Control: Monitoring – It was noted during the records review of the Clear Creek Storage facility that the annual Cathodic Protection (CP) surveys exceeded the once each calendar year, but not to exceed 15 months interval between the 2015 and 2016 annual surveys.



Kim West
Acting Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
June 22, 2017
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Response: As noted during the inspection QEP attempted to conduct the cathodic inspection in accordance with §192.465 requirements but halted the inspection due to a failed rectifier giving improper readings. A new rectifier was ordered and readings taken in November soon after it arrived which was outside of the compliance window. If this situation were to repeat, QEP would continue with the annual cathodic protection readings and note the issue with the rectifier in the report and then repeat the readings once a new rectifier was installed.

3. §192.807 – Recordkeeping – It was noted during the records review one of the Clear Creek Storage facility operators did not have a record of qualification on file for performing an OQ task. The OQ task performed was for taking and recording rectifier readings from January through August of 2016, in accordance with §192.465(b).

Response: The operator in question had received field training from the contractor who had previously performed those services but the training had not been documented properly in accordance with §192.807 or in accordance with the QEP Resources Operator Qualification Plan. This was corrected at the time of the inspection by the operator taking the online Rectifier Inspections course through EWebOQ, field retraining of the operator by our contract cathodic protection company and a demonstration of competency.

Should you require additional information, please do not hesitate to contact the undersigned at the contact information on the letterhead page of this letter.

Sincerely,



Michael W. Miller
Director of Health, Safety, and Environment