



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 2019

Mr. Scott Pfoff
President and CEO
Aurora Exploration LLC
4645 Sweetwater Blvd., Suite 200
Sugarland, Texas 77479

CPF 5-2019-0011M

Dear Mr. Pfoff:

On August 20 through 22, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Aurora Exploration LLC's (Aurora) procedures for Operations and Maintenance and Emergency Response in Anchorage, Alaska.

On the basis of the inspection, PHMSA identified the apparent inadequacies within Aurora's plans or procedures, as described below:

1. **§ 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:**
 - (1) **Receiving, identifying, and classifying notices of events which require immediate response by the operator.**

The Operator's Emergency Response Plan (AG-71-EP-REV1, "ERP") lacks an adequate process for receiving, identifying, and classifying notices. The ERP designates who will receive, identify, and classify notices of events which require immediate response by Aurora. It states that the first notification of events which need immediate response is "typically the on-duty Production Supervisor with the Manager of Production Operations and Engineering as the secondary contact". However, based on conversations with the operator, these positions no longer exist within Aurora. The operator failed to update the ERP with the current position(s) for receiving, identifying, and classifying notices of event which require immediate response by the operator. The procedure cannot be implemented as written in the ERP.

2. **§ 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:

(1)

(4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

The operator's Emergency Response Plans (AG-71-EP-REV1, "ERP") lacks an inventory or fails to otherwise identify what equipment, tools, and materials would be needed at the scene of an emergency. The ERP states that "[t]he ERP will present an overview of the personnel and equipment typically available for immediate callout in the event or (*sic*) an emergency. This will include company personnel and equipment, as well as other service providers and contractors active in the area of operations." However, the ERP does not present an overview of personnel and equipment available for callout.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Aurora maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Chris Hoidal, Acting Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2019-0011M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Chris Hoidal
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

cc: George Pollock, Senior Operations Consultant, gpollock@aurorapower.com
PHP-60 Compliance Registry
PHP-500 J. Gano (#160487)