GREAT PLAINS
NATURAL GAS CO.
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May 27, 2008

Ivan Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Re: Notice of Amendment CPF 3-2009-1007M

Dear Mr. Huntoon:

Great Plains Natural Gas (GPNG) has received the above mentioned letter and upon review, offers the following as a response.

GPNG will add detail to the identification of High Consequence Areas (HCAs) along its transmission lines. This detail will include defining both Method 1 and Method 2, and when each method is used. Details on building counts, occupancy of buildings, and how possible identified sites are evaluated will be addressed. Details regarding the use of the Potential Impact Circle including how it is calculated, used in conjunction with GIS and field verification of the impact area distances will be added. The process for documenting these activities will also be described including where the data will be stored and the retention period.

The process for monitoring the transmission line for changes in the current HCAs or changes to the transmission line or the use of the land adjacent to the pipeline that could impact the classification of a HCA, such as annual HCA evaluations, leak surveys, general O&M activities, etc. will be described. A process for verifying the quality or accuracy of the information collected will established. Information will be added that describes how any new information, including changes to current HCAs or discovery of new HCAs, obtained during the reviews of the transmission line is used and integrated into the IMP.

The risk assessment portion of the GPNG IMP plan will have additional detail added regarding the threats listed in ASME B31.8S. Procedures will be added to the plan addressing each of the nine threat groups. Information on how the threats are evaluated and eliminated, if possible, will also be added. Detail on how the threats are applied to newly identified HCAs will be added to the IMP as well as the assessment method that is appropriate for each of the threats listed. Documenting the evaluation of the threats as well as the results of the evaluation will also be added to the plan.

The analysis of manufacturing/construction threat will be clarified including the use of low frequency electric resistance welding (ERW) on the pipe longitudinal seam. A process for determination of the threat being stable will be detailed which will include the use of the 5 year history of the pipeline pressure. Continual evaluation of the manufacturing/ construction threat including criteria for determining the threat remains stable will also be addressed. The process for considering interactive threats as well as a process to address the accuracy and quality of the data collected will also be added. Documentation of the process will be added.

The procedure for handling anomalies discovered on the pipeline will be written in more detail. The section will have information added that covers the remediation either temporary pressure reductions calculated using "RSTRENG" and more permanent, scheduled repairs. Criteria for extension of evaluation of the pipeline to non-covered sections due to discovery of anomalies as well as justification of time extension for repair work or pressure reduction will be stated in the plan. How anomalies discovered during routine O&M or how anomalies, classified as monitor, that advance to a more serious issue are handled will be detailed. ASME B31.8S Section 7 Table 4 will be added to the plan for use with threats not meeting the classification criteria for §192.333(d).

The process for continual assessment of the covered segments will be re-written to include more detail. GPNG's IMP will have a process for both a low stress re-assessment as well as confirmatory direct assessment to be scheduled as needed to ensure the integrity of the pipeline in maintained. The time frame for re-assessment will be developed using the data integrated into the process and the risks associated with that data. The process will include a review of the threats to the covered section, the adequacy and effectiveness of any current or newly proposed preventative and mitigative measures as well as evaluating the assessment methods and schedules. The process for documentation of this data will be developed and added to the plan.

The Preventative and Mitigative Measure section of GPNG's IMP will be re-written to define its process in more detail. The selection of the PMM's, with the assistance from other departments in the organization, will include all the threats to the pipeline, and consider both the likelihood and consequences of a failure. The procedures for investigation of an unreported 3rd party excavation and for evaluation of the use of an automatic shut-off valve or remote control valve will be added to GPNG's plan. The process for documenting this portion of the IMP will be developed.

The management of change section of the IMP will be re-written to address the requirements of §192.911(k).

The process followed to ensure quality control of the IMP will be more clearly defined. The plan will describe the knowledgeable/experience possessed by the people responsible for the IMP and how they are kept up to date on the IMP and the issues related to the IMP. The plan will also describe the qualification of the people that are responsible for completing the assessment of the pipeline and evaluating the results of the IMP. The documentation of this process will be developed and written into the plan.

Compliance with "should" statements relative to documents incorporated by reference will be addressed in the plan.

The processes for documenting data, results and evaluations of the IMP will be added to the plan. Provisions for tracking the performance measures for reporting to PHMSA as well as the individual performance measures for the threats identified on the pipeline segments will be detailed in GPNG's plan. What information is to be collected, the length of time it is kept, where and by who will be detailed in the plan.

Some of the deficiencies have been addressed as we worked to complete baseline assessment to ensure compliance with the code. An example of this is the direct assessment plan for the one HCA that needed to be completed by December 31, 2007. The other deficiencies will be our primary priority.

With the extensive amount of clarification and additional procedures and processes that need to be developed and added to the IMP, we are requesting an extension to the 30 day response time frame. We are requesting an additional 9 months to give GPNG time ensure we complete the update to the IMP to the satisfaction of both PHMSA and the State Regulators. The additional time will be used to write the procedure and give ample time for review of those procedures by office and field staff as well as for review time for management. Montana Dakota Utilities (MDU)/Great Plains Natural Gas (GPNG) is in the process of integrating two additional utility companies recently acquired by MDU/GPNG. We will take this opportunity to ensure the IMPs for the companies are updated using the requested changes of this letter, improving not just GPNG's IMP but three others as well. Doing this also increases the time needed for review.

Thank you for your consideration in this request and for supplying us with the report of the audit. GPNG strives to transport and supply natural gas to our customer as safely and efficiently as possible. Having an IMP plan that meets the requirements of 49 CFR 192 is a major step in continuing to do just that.

If you have any questions feel free to contact me at (701) 222-7741.

Sincerely,

Danny L. Hood, P.E.
Staff Engineer

cc: Jay Skabo – Executive
Pat Darras – GPNG Region Manager
Daryl Anderson – Manager Distribution Engineering
Ron Blum – Gas Superintendent
Duane Mahlum – District Manager
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