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RE: CPF-3-2021-012-NOA

Montana-Dakota Utilities Co. (MDU) electronically submits this 30-day response to the Notice of Amendment dated July 30, 2021 (inspection CPF-3-2021-012-NOA) identified by the Pipeline Hazardous Materials Safety Administration (PHMSA) during a virtual inspection conducted from March 17, 2020 through November 12, 2020.

NOTICE OF AMENDMENT

4. 192.805 – Qualification Program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks

Finding(s):

MDU's *Policy Statement, Operator Qualification Plan, OPS 800* (Revision Date: 5/31/2019) is inadequate because it did not contain covered tasks regarding launching and receiving pigs and ILI devices, tap and/or stopple of a transmission pipeline, pipefitting - screw thread fitting, and flange connections per ASME B31Q.

MDU's *Policy Statement, Operator Qualification Plan, OPS 800* must be amended to include the mentioned missing covered tasks.

MDU Response

MDU submits the following information to address the findings stated above:

- Launching and receiving pigs and ILI devices:
 - Tasks 192-1418.02 and 192-1418.03 have been added to the MDUG Covered Task List corresponding to tasks 1631 and 1641 in ASME B31Q.
 - Task 192-1418.02 - Launch or Receive Internal Devices (Pigs) With a Temporary Launcher or Receiver for Lines Not In Service
 - This task consists of inserting or removing internal devices (pigs) on pipeline systems not in service.
 - Task 192-1418.03 - Launch or Receive Internal Devices (Pigs) Using Traps
 - This task consists of isolating pipeline barrels, relieving pressure, inserting or removing internal devices, pressurizing barrel, and launching/receiving internal

devices (pigs). These devices may include, but are not limited to, inspection, cleaning, batching, or plugging.

- Tap and/or stopple of a transmission pipeline:
 - 192-1426.05 - Tapping a Pipeline (Tap Diameter Greater Than 2 Inch) is included in the MDUG Covered Task List.
 - This task includes performing tapping, including the installation of the isolation valve, and tapping equipment and removal of isolation valve, as specified.
 - 192-1426.04 – Tapping a Pipeline (Tap Diameter 2 inch and Less) is included in the MDUG Covered Task List.
 - This task includes performing tapping including the installation of the isolation valve, and tapping equipment and removal of isolation valve, as specified.
- Pipefitting – Screw thread fitting:
 - 192-1005.07 - Joining of Pipe: Threaded Joints is included in the MDUG Covered Task List.
 - This task includes the joining of threaded pipe with threaded fittings and the inspection of completed joints. The joining of components with threaded connections is addressed in the task specific to the component.
- Flange connections:
 - 192-1005.08 – Join Pipe Using Flange Assembly is included in the MDUG Covered Task List.
 - This task includes the assembly of flanges, bolting in sequence, and torquing, as specified.

Please contact Josh Sanders at 701-222-7773 with questions or comments.

Respectfully Submitted,



Pat Darras
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Montana-Dakota Utilities Co.