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Via Electronic Mail to dustin.hubbard@dot.gov

April 28, 2022

Mr. Dustin Hubbard
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, Colorado 80228

RE: Response to PHMSA CPF 5-2022-001-NOA

Dear Mr. Hubbard,

Harvest Alaska, LLC (Harvest) has received the above referenced proposed Notice of Amendment (NOA), by which PHMSA identifies an apparent inadequacy within Harvest's Right-of-Way (ROW) inspection procedure. The NOA was generated from a records review as part of an integrated inspection of the Northstar Oil Pipeline in May of 2021.

The Harvest ROW procedure was found to be ambiguous regarding the requirements for patrolling the offshore portion of the pipeline during winter months when that portion of the ROW is completely ice-covered. The ROW procedure did not specify that the waiver issued by the Alaska Department of Environmental Conservation for patrolling the offshore portion of the ROW during ice covered periods of the year did not pertain to the ROW patrols required by § 195.412.

The Harvest ROW procedure has been amended to ensure that patrols extend to the offshore portion of the pipeline throughout the entire year regardless of ice cover and darkness.

Harvest does not contest this finding and has amended the Operation, Maintenance, and Emergency Response Manual (OMER), ROW inspection procedure, associated form, and immediately began inspections per federal requirements since the PHMSA inspection in May of 2021. The updated documents can be found attached to this letter.

Please feel free to contact me directly at (907) 777-8310, or at Harold.Colgrove@harvestmidstream.com with any other questions you may have regarding these matters.

Sincerely,

Harold Colgrove
(5055)

Digitally signed by Harold
Colgrove (5055)
DN: cn=Harold Colgrove (5055),
ou=Users
Date: 2022.04.28 15:34:41 -08'00'

Harold Colgrove, P.E.

Integrity and Regulatory Compliance Manager, Harvest Alaska

cc (by-email): David Hassell, Operations Supervisor (PHMSA)
 Christopher Lyon, Engineer / Inspector (PHMSA)
 Nancy Turner, (PHMSA)
 Andrew Limmer, Vice President (Harvest Alaska)
 Sean Kolassa, President (Harvest Midstream)
 Ben Hagedorn, Regulatory Compliance Specialist (Harvest Alaska)

Attachments Harvest ROW Surveillance Procedure
 Harvest ROW Surveillance Form
 Harvest NSI Oil OMER Excerpt