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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 5-2022-002-NOPV, Compliance Order; Submittal and Request for Plan Approval

Dear Mr. Hubbard,

Harvest Alaska, LLC (Harvest) has received the above referenced Proposed Compliance Order by which PHMSA alleges that Harvest committed probable violations of Title 49, Code of Federal Regulations. The Proposed Compliance Order was generated from a records review as part of an integrated inspection of the Northstar Oil Pipeline and claims that Harvest failed to conduct tests to determine the adequacy of cathodic protection on the subsea portion of the Northstar Oil Pipeline at least once each calendar year, but with intervals not to exceed 15 months as required by § 195.573. The compliance order addressed cathodic protection records generated during calendar years 2018, 2019, and 2020.

The Proposed Compliance Order directs Harvest to develop a plan and schedule for determining the adequacy of cathodic protection for the subsea section of the Northstar Oil Pipeline.

Harvest conducted CP testing during 2018, 2019, and 2020 that provided information regarding the health of the CP system along the Northstar pipeline. However, these tests leave a margin of indeterminacy regarding the effectiveness of the entire subsea portion of the pipeline because the test locations did not adequately represent the entire pipeline route. Harvest is addressing this issue and has scheduled plans for additional measures summarized below.

1. July 2021 – Harvest permanently expanded the cathodic protection survey scope to include readings to ten feet beyond Northstar Island and 50 feet beyond the Point Storkersen shoreline. [ACTION COMPLETED]
2. April 2022 – The Harvest Alaska Cathodic Protection (CP) Manual was updated to include the definition and requirements of shore-based readings, consistent with the 2021 scope. [ACTION COMPLETED]
3. June/July 2022 – A full subsea close-interval survey (CIS) is planned and will be completed by boat. This data will be reviewed during the annual Northstar CP closeout report.
4. November 2022 – Harvest will review offshore CIS data in conjunction with in-line inspection data during the next Northstar Oil Comprehensive Risk Assessment (CRA) currently scheduled for November of this year. Harvest will determine the offshore CIS interval during the CRA. Future CIS intervals and frequencies will be directly driven by the results of the survey as well as the recommendations in the annual CP report.

Harvest requests PHMSA's review and approval of the plan and schedule identified above, and proposes that upon completion of these items a Final Order can be issued, and the Proposed Compliance Order can be resolved.

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)
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ou=Users
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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)
Ben Hagedorn, Regulatory Compliance Specialist (Harvest Alaska)
Andrew Limmer, Vice President (Harvest Alaska)
Sean Kolassa, President (Harvest Midstream)

Attachments: 2021 Northstar Island Annual CP Report
Harvest Alaska Cathodic Protection Manual