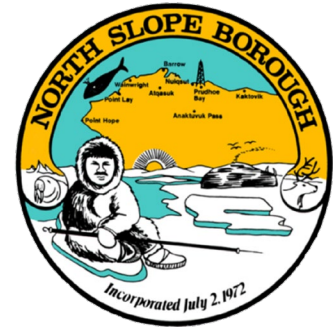


NORTH SLOPE BOROUGH

DEPARTMENT OF PUBLIC WORKS
P.O. Box 350
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Scott K. Danner, Director

VIA ELECTRONIC MAIL TO: dustin.hubbard@dot.gov

November 30, 2023

Dustin Hubbard
Director, Western Region
US Department of Transportation
Office of Pipeline and Hazardous Material Safety Administration
12300 W. Dakota Ave. Suite 110
Lakewood, CO 80228

Re: CPF 5-2023-039-NOPV

Dear Mr. Hubbard,

On November 2, 2023, the North Slope Borough ("the Borough") received the initial notice for CPF No. 5-2023-039-NOPV. We are working diligently to address each issue identified in the Notice, to provide clarification where warranted, and to ensure that any steps necessary are taken to ensure that the Nuiqsut Natural Gas Distribution System is in compliance.

This letter is intended to communicate the Borough's understanding of PHMSA's notice, define the status of each finding, and lay out the Borough's plan for corrective action.

Regarding NOPV Item # 1, *Procedural Manual for Operations Maintenance and Emergencies (192.605) – Management of Change* - Within 30-days of receipt of the Final Order, the Borough will complete a Management of Change (MOC) assessment on the monitoring systems at the Nuiqsut gas distribution office and the Controller Display Panel (at the Nuiqsut PRV Station). Pursuant to that assessment, the Borough will meet with past and current system operators to conduct a detailed review of the system O&M manual, ensure that there is a clear understanding of the past procedures and finalize a clear definition of how operation and control of the system is intended to function. Once that initial assessment is completed, formal Management of Change documentation will be developed and distributed. Formal notice of the MOC will be forwarded to the Director of the Western Region within 10 business days of completion.

Regarding NOPV Item # 2, *Procedural Manual for Operations Maintenance and Emergencies (192.605) – Manual Updates* - Within 90-days of receipt of the Final Order, the Borough will complete a review and update of both the Operations and Maintenance (O&M) Manual and Pipeline Specific Operations and Maintenance (PSOM) manual for the Nuiqsut natural gas distribution system. Updated O&M and PSOM manuals with accurate revision histories will be provided to the field personnel. Formal notice of the review and update will be forwarded to the Director of the Western Region within 10 business days of completion.

Regarding NOPV Item # 3, *Procedural Manual for Operations Maintenance and Emergencies (192.605) – O&M & PSOM manual effectiveness* - Within 180-days of receipt of the Final Order, the Borough will complete effectiveness reviews of the Operations and Maintenance (O&M) manual and Pipeline-Specific

Operations and Maintenance (PSOM) manual. Past effectiveness review documents will be compiled and included in this assessment. The manuals will be updated to reflect the findings of these reviews. Revised manuals with an accurate revision history will be provided to the field personnel. Formal notice of the effectiveness reviews and updates will be forwarded to the Director of the Western Region within 10 business days of completion.

Regarding NOPV Item # 4, *Emergency Plans (192.615) – Availability of Emergency Personnel, Equipment, Tools & Materials* - Within 90-days of receipt of the Final Order, the Borough will complete a comprehensive inventory of the emergency equipment, tools and materials that are in place. The Borough will also conduct an evaluation of the personnel emergency qualifications and training. The Borough will develop a detailed list of equipment, tools, and materials that are required but not in place and execute the procurement of missing items. The materials and equipment will be stored and locations catalogued for ready access. Written documentation of equipment availability and access will be forwarded to the Director of the Western Region within 90-days of the final order.

Regarding NOPV Item # 5, *Odorization of gas (192.625) – Periodic Sampling of Combustible Gas Odorant* – Within 270-days of the final order, the Borough will ensure that odorant testing equipment is calibrated, and that the equipment is scheduled for regular bi-annual calibration. During this period the Borough will also revamp data sheets to reflect proper unitization and collection of monthly data. Formal written notice and documentation of the odorization monitoring system will be provided to the Director of the Western Region within 10 business days of completion.

Regarding NOPV Item # 6, *Pressure limiting and regulating stations: Inspection and testing (192.739) – Pressure Relief Device Inspections* – With 90-days of the final order, the Borough will inspect the system pressure relief devices and the associated records to ensure consistency and compliance with part 192. Any discrepancies in the records will be corrected and documented. The O&M manual will be reviewed to ensure that proper testing and documentation is included in the procedures.

Regarding NOPV Item # 7, *Qualification Program (192.805) – Annual review of program* – With 180-days of the final order, the Borough will review and revise (as-necessary) the Nuiqsut gas distribution system Operator Qualification plan. Formal written notice and documentation of plan review will be provided to the Director of the Western Region within 10 business days of completion.

Regarding NOPV Item # 8, *Integrity Management Plan (192.1007) – Periodic Evaluation and Improvement* – With 180-days of the final order, the Borough will review the results of integrity testing completed between 2014 and 2023. The Borough will also review the Distribution Integrity Management Plan (DIMP) and revise it as necessary. Formal written notice and documentation of plan review will be provided to the Director of the Western Region within 10 business days of completion.

Sincerely,

Scott K. Danner, Director
Department of Public Works

Cc: Michael Yeager (PHMSA), michael.yeager@dot.gov
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