



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

12300 W. Dakota Ave., Suite 340
Lakewood, CO 80228

WARNING LETTER

VIA ELECTRONIC MAIL TO: esudduth@interiorgas.com

December 3, 2025

Ms. Elena Sudduth
General Manager
Interior Gas Utility
2525 Phillips Field
Fairbanks, AK 99709

CPF 5-2025-012-WL

Dear Ms. Sudduth:

From July 29 through August 3, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Interior Gas Utility's (IGU) Gas Control Plan, procedures, and records in Fairbanks and North Pole, Alaska.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. **§ 192.631 Control room management.**
 - (a) ...
 - (d) ***Fatigue mitigation.*** Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:
 - (1) ...
 - (2) **Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;**

(3) Train controllers and supervisors to recognize the effects of fatigue;

IGU failed to educate its controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue, and to recognize the effects of fatigue, as required by § 192.631(d)(2) and (3).

Specifically, during the inspection, PHMSA reviewed IGU's procedures and training records. PHMSA observed that the IGU could not provide records demonstrating that its controllers and supervisors received fatigue training focused on mitigation strategies and how off-duty activities contribute to fatigue, and how to recognize the effects of fatigue during the calendar years of 2022 and 2023.

A review of IGU's Gas Control Plan, Fatigue Mitigation and Scheduling, found that the plan was silent on the frequency in which controller education regarding fatigue mitigation would occur. Further, the plan did not include any criterion for successfully completing the fatigue mitigation training.

While PHMSA did observe a record dated December 2, 2022 labeled "Training Attendance Record: Subject G&D SOP Review," PHMSA was unable to determine if fatigue mitigation training was included as part of this training session. Further, there was nothing included with this record which demonstrated any fatigue training was conducted as part of this training session such as a training agenda or training materials related to fatigue mitigation.

PHMSA did observe a memo titled "Training Objective: CRM Fatigue Mitigation" during the inspection as evidence of its calendar year 2023 fatigue mitigation training. While the title stated it was fatigue training, the memo did not contain any supporting documentation that explained what was covered in the training such as an agenda or training materials. Further, the 2023 memo did not include a sign in sheet or attendance roster of who received the training. Without such a record, PHMSA could not confirm that IGU's controllers and supervisors were the IGU personnel who attended the training.

IGU was required per § 192.631(j)(1) to maintain for review during an inspection records that demonstrate compliance with § 192.631(d). Without such records, PHMSA cannot verify an operator complied with the requirements of the pipeline safety regulations.

Therefore, IGU failed to provide fatigue mitigation to its controllers and supervisors as required by § 192.631(d)(2) and (3).

2. § 192.631 Control room management.

(a) ...

(j) ***Compliance and deviations.*** An operator must maintain for review during inspection:

(1) ...

(2) **Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of a pipeline facility.**

IGU failed to provide documentation to demonstrate that any deviation from the procedures required by § 192.631 was necessary for the safe operation of a pipeline facility, as required.

Specifically, during the inspection, PHMSA reviewed the Hours of Service (HOS) deviations for controllers who worked shifts on the following dates: July 27, 2023, August 17, 2023, and August 18, 2023. However, none of the records provided included any justification explaining why the deviations were necessary for maintaining the safe operation of the pipeline. The deviation records lacked any rationale and were entirely silent on the operational necessity of the exceptions.

Therefore, IGU failed to provide documentation to demonstrate why deviations from procedures required by § 192.631 was necessary for the safe operation of the pipeline as required by § 192.631(j)(2).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this

time. We advise you to correct the items identified in this letter. Failure to do so will result in Interior Gas Utility being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2025-012 WL**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Sincerely,

Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 D. Fehling (24-298947)