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IDAHO PUBLIC  
UTILITIES COMMISSION

January 25, 2019

Mr. Darrin M. Ulmer  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, Idaho 83720-0074

Re: Pipeline Safety Evaluation – Idaho Public Utilities Inspection – October 23-24, 2018

Dear Mr. Ulmer:

In response to your letter dated December 5, 2018, Northwest Gas Processing (NWGP) is respectfully submitting this letter in response to the following alleged violations:

**Item No 1**

**Description:** The inspection showed that no records were produced when requested. NWGP stated it was unable to locate training records maintained by a former employee.

**Requirement:** 49 CFR § 199.241 Training for Supervisors  
49 CFR § 199.117(a)(4) Recordkeeping

**NWGP Response:** Records were located following the inspection and are included as Attachment A.

**Item No 2**

**Description:** The inspection showed that no records were produced when requested. NWGP stated it was unable to locate records maintained by a former employee.

**Requirement:** 49 CFR § 192.745(a) Valve maintenance: Transmission lines

**NWGP Response:** Documentation has been located and is included as Attachment B.

**Item No 3**

**Description:** The inspection showed that no records were produced when requested. NWGP stated it was unable to locate records maintained by a former employee.

**Requirement:** 49 CFR § 192.465 External corrosion controls: monitoring

**NWGP Response:** Documentation has been located and is included as Attachment C.

**Item No 4**

**Description:** The inspection showed that no records were produced when requested. NWGP stated it was unable to locate records maintained by a former employee.

**Requirement:** 49 CFR § 192.481(a) Atmospheric corrosion control: Monitoring

**NWGP Response:** *Documentation from the Atmospheric Corrosion Survey is Attachment D.*

**Item No 5**

**Description:** The inspection showed that no records were produced when requested. NWGP stated it was unable to locate records maintained by a former employee.

**Requirement:** 49 CFR § 192.605(a) Procedural manual for operations, maintenance, and emergencies.

NWGP Gas Operations & Maintenance Plan, Section 4.1 Location of Records.

**NWGP Response:** *Operations and Maintenance Manual Review Revision Log included as Attachment E.*

**Item No 6**

**Description:** In the NWGP, LLC. Public Awareness Program (PAP) dated 1 May, 2018 (hereinafter the NWGP PAP) Section 5.2 Third-Party Vendors Used to Identify Stakeholders was missing information. The contact/address lists for the Northwest Stakeholder Audiences was not included in the PAP. See Question 4 on PHMSA Form 21).

**Requirement:** 49 CFR § 192.616(d),(e), and (f) Public Awareness.

**NWGP Response:** Audience Identification Records included as Attachment F with this letter.

**Item No 7**

**Description:** In the NWGP PAP dated 1 May, 2018, Section 5.4 Affected Public, and Section 5.7 Excavators, no Public Awareness & Damage Prevention Record keeping Reports were included. Therefore, the inspection could not validate that Audience Identification Records exist. See Question 5 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.616(d),(e), and(f) Public Awareness (as referenced above in Probable Violation 6)

**NWGP Response:** Audience Identification Records included as Attachment F with this letter.

**Item No 8**

**Description:** 8.1. Documentation of direct mailings that should include maps showing the "could affect" zone as well as a listing of each person's name and address that was targeted. No evidence of this documentation was provided during the inspection.  
8.2. Face to face meetings should include name, address and signature for each person met with, the topics of discussion and any material they have requested. No evidence of this documentation was provided during the inspection.  
8.3. Documentation should include copies of all business reply cards received as well as contact address & personnel changes on the Stakeholder listing. No evidence of this documentation was provided during the inspection.  
8.4. No evidence of the address/contact list for mail distribution, and proof of mail distribution to the Stakeholders was provided during the inspection. Additionally, the invitation list, attendance list and proof of invitation mailings to the Emergency Officials and Public Officials were not included in the PAP. See Question 10 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.616(c) Public Awareness.  
API RP 1162 Table 2-1.  
API RP 1162 Table 2-3.

**NWGP Response:** *The project was completed by an employee who is no longer with NWGP and most of the records from this project were misplaced in the transition. A record from a community meeting with officials is included as Attachment G. NWGP was represented by Ronda Louderman. The discussion is summarized in the attachment. Face to Face Liaison will be completed by NWGP by March 30, 2019.*

**Item No 9**

**Description:** Section 6.4, Liaison with Emergency Officials, of the NWGP PAP requires information describing the ongoing relationship between the operator and local emergency response officials in order to help prevent incidents and assure preparedness in emergencies. This information was not included in the NWGP PAP. *See* Question 11 on PHMSA Form 21.

Further the NWGP PAP does not show the establishment or maintaining of a liaison with appropriate fire, police and other public officials. *See* Question 11 on PHMSA Form 21.

**Requirement:** 49 CFR § 192 Procedural manual for operations, maintenance, and emergencies.  
49 CFR § 192(c)(1),(2),(3), and (4); Emergency Plans  
49 CFR § 192(c) Public Awareness.

**NWGP Response:** *In February 2018 a meeting was held with appropriate fire, police and other public officials as required by 49 CFR 192. The project was completed by an employee who is no longer with NWGP and most of the records from this project were misplaced in the transition. A record from a community meeting with officials is included as Attachment G. NWGP was represented by Ronda*

*Louderman. The discussion is summarized in the attachment. Face to Face Liaison is scheduled to be completed by NWGP by March 30, 2019.*

**Item No 10**

**Description:** Section 9.13, of the NWGP PAP, Measuring Program Implementation & Effectiveness, should show the annual audit/review and which of the three alternative methodologies was used in completing the audit/review. *See* Question 16 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.GIG(c) Public Awareness, as stated above in Probable Violation 10. 49 CFR § 192.616(i) Public Awareness.  
API RP 1162 8.3 Measuring Program Implementation.

**NWGP Response:** *The 2015-2018 Annual Evaluation has been completed by using number 2 from Section 9.13 Alternative Methodologies. Third-Party audits where the evaluation is undertaken by a third-party engaged to conduct an assessment and provide recommendations for improving the program design or implementation. Attachment H*

**Item No 11**

**Description:** Section 9.13 of the NWGP PAP, Measuring Program Implementation & Effectiveness, requires Forms 10.8-10.11- effectiveness questionnaires from all stakeholders used to measure program effectiveness. NWGP did not provide evidence of these records during the inspection. *See* Question 18 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.616(c) Public Awareness. (as referenced above in Probable Violation 10. API RP 1162 8.4 Measuring Program Effectiveness.

**NWGP Response:** *The 2015-2018 Effectiveness Evaluation has been completed by using number 2 from Section 9.13 Alternative Methodologies. Third-Party audits where the evaluation is undertaken by a third-party engaged to conduct an assessment and provide recommendations for improving the program design or implementation. Attachment H*

**Item No 12**

**Description:** Examples and evidence of all the measures taken under Section 9 of the NWGP PAP, Implementation of Program Measure 1, were not provided during the inspection. *See* Question 19 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.616(c) Public Awareness, as referenced above Probable Violation 10. API RP 1162 8.4.1 Measure 1-Outreach: Percentage of Each Intended Audience Reached with Desired Messages

**NWGP Response:** *Feedback information from the Response Cards can be located in the 2015-2018 Effectiveness Evaluation attached. Attachment H*

**Item No 13**

**Description:** No evidence was provided that NWGP PAP Forms 10.8-10.11 were sent out and returned in reference to Pre-test materials/Survey target stakeholder audiences.

Additionally, examples of items mentioned in API RP 1162 dated December 2003 *Appendix E: Additional Guidelines for Undertaking Evaluations that have been used to measure the understandability of message content* were not provided. See Question 20 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.616(c) Public Awareness as referenced above. API RP 1162 8.4.2 Measure 2-Understandability of the Content of the Message.

**NWGP Response:** *Pre-test materials/Survey documentation is included as Attachment I.*

**Item No 14**

**Description:** No proof or evidence of changes or modifications to the program based on results and findings of the program effectiveness evaluations were provided as a result of the inspection. See Questions 23 on PHMSA Form 21.

**Requirement:** 49 CFR § 192.616(c) Public Awareness as referenced above in Probable Violation 10. API RP 1162 8.5 Summary of Baseline Evaluation Program.

**NWGP Response:** *Supplemental Enhancements are outlined in the 4 year Effectiveness Evaluation Attachment H. To our knowledge there have been zero near hits or misses. In the event of a near hit or miss it would be tracked electronically for future retention and evaluation.*

Northwest Gas Processing is committed to full compliance with the Idaho Public Utilities Commission's rules and appreciates your consideration in this matter. Please contact me at 281-943-5581 or dkassab@high-mesa.com if you have any questions or require additional information.

Sincerely,



Diane M. Kassab  
Regulatory Compliance Manager

Attachments