U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration 1200 New Jersey Avenue SE Washington DC 20590

## OCT 2 2 2019

Mr. Steve Cooper Director of Operations Enstar Natural Gas Company 3000 Spenard Road P.O. Box 190288 Anchorage, AK 99519-0288

Dear Mr. Cooper:

In a June 18, 2019, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you asked for reconsideration of PHMSA's March 11, 2019, response to your request for interpretation on external corrosion control under § 192.467.

You based your request for reconsideration on the remoteness of the casing/pipeline location, low operating pressure (MAOP of 60 psig), leak survey frequency, and class location of the 8-inch pipeline diameter, 0.277-inch wall thickness distribution pipeline located in a Class 1 location.

PHMSA provides written clarifications based on current Federal pipeline safety regulations. As to the referenced interpretation (PI-86-004), please refer to PHMSA's March 11, 2019, response letter. After examining your latest information, PHMSA does not believe remoteness of a pipeline location and the quarterly leak survey frequency are justification for not complying with the pipeline safety regulations. PHMSA still believes the March 11, 2019, interpretation response letter correctly reflects the current pipeline safety regulations. Therefore, Enstar must perform inspections, tests, and remediation with procedures that are in accordance with  $\S$  192.467.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely. John A. Gale

Director, Office of Standards and Rulemaking

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.

JUN 27 2019



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June 18, 2019

U.S. DOT PHMSA Office of Hazardous Materials Standards Attn: John A. Gale East Building 1200 New Jersey Avenue, SE. Washington, DC 20590-0001

## **RE:** Interpretation Decision Letter

Pipeline Safety Officer,

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The following is in response to your March 11, 2019 letter to ENSTAR Natural Gas Company (ENSTAR) regarding the interpretation request for shorted pipeline casings.

Based on language in the PHMSA response, and after discussions with PHMSA staff, it was apparent that information important to this request was not being considered, or may not have been properly understood when PHMSA made their decision on this matter. ENSTAR wishes to clarify some points and respectfully requests that PHMSA reconsider this interpretation request dated November 14, 2016. In the initial request ENSTAR asked to be granted an interpretation similar to an existing one (PI-86-004) regarding shorted casings.

In two of the locations where this request would apply, the remoteness of the casing/pipeline location, the maximum operating pressure of the pipeline, leak survey frequency, and pipeline class location are all important factors that should be considered. In these cases the pipeline is an 8-inch diameter distribution pressure main (MAOP 60psi) with a wall thickness of 0.277 inches and in a Class 1 location. The main is a one-way feed to a remote community (Whittier, Alaska) that provides natural gas to 47 customers. As described in the following, unique challenges to remediation of the shorts at these locations have driven this request:

- The first shorted casing is located between a steep mountainside and Portage Creek, buried approximately 10 feet deep and, due to its location on the opposite side of the river from the driven road, only accessible by rail. Work to correct this short would almost certain require installing a new crossing of the river and completing a complicated tie-in between the railroad tracks and the river bank.
- The second shorted location is a few miles downstream of the first location and near where the pipeline transitions out of a 2-mile long utility tunnel that passes through a mountain on its way

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into Whittier. Repairing this short would require removing a portion of the tunnel entrance and replacing pipe back inside the tunnel. Replacing pipe inside the tunnel simply presents many challenges related to hot work in a confined space that while not impossible, are cumbersome and expensive.

These challenges while maintaining continuity of service to the end-of-the-road community during remediation work have made resolving isolation issues difficult. ENSTAR closely monitors the cathodic protection potentials of the casing and carrier pipe for deteriorating potentials, to date the potentials have not shifted. As an alternative solution to date ENSTAR has performed leak surveys every quarter year to ensure the integrity of the system. This process has been completed in accordance with a previous PHMSA interpretation, PI-86-004 3(A) iii, which was given to the Public Service Commission of Kentucky in 1986. ENSTAR requests that PHMSA grant the same guidance to ENSTAR as described in the interpretation PI-86-004, specifically *part 3. Reasonable time allowance and methods for operator correction of shorted casings.* 

Should you have any questions regarding this request for interpretation, please feel free to call me at 907-334-7730 between 8:00 AM and 5:00 PM AST.

Sincerely ENSTAR Natural Gas Company

Steve Cooper, P.E.

Director of Operations Steve.Cooper@enstarnaturalgas.com

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