



EXHIBIT 5 - pg 1 of 7

Re: Conformance with all state and federal gas pipeline requirements.

3 messages

Jimmy Betham <jbetham@utah.gov>

Tue, Sep 3, 2013 at 3:21 PM

To: Mobashir Ahmad <mobashir.ahmad@yahoo.com>

Cc: Al Zadeh <azadeh@utah.gov>, Connie Hendricks <cshendricks@utah.gov>

Dear Mr. Mobashir Ahmad,

I am currently in Vernal UT performing an inspection. Below are requirements that the operator of an intrastate transmission pipeline need to perform in order to conform with state of Utah and Federal Requirements.

First an operator such as your company needs to file an annual report to PHMSA Portal Form 7100.2-1. See the link below that will give you instructions for compliance.

<http://www.phmsa.dot.gov/portal/site/PHMSA/menuitem.ebdc7a8a7e39f2e55cf2031050248a0c/?vgnextoid=885ec02b8be2d110VgnVCM1000009ed07898RCRD&vgnnextchannel=bc79c0124500d110VgnVCM1000009ed07898RCRD&vgnnextfmt=print>

Second, an operator needs to file a National Registry of Pipeline Operators both Forms (PHMSA F 1000.1 and 1000.2). See link below for instruction.

<http://www.phmsa.dot.gov/portal/site/PHMSA/menuitem.ebdc7a8a7e39f2e55cf2031050248a0c/?vgnextoid=639d82b1987d4310VgnVCM1000001ecb7898RCRD&vgnnextchannel=bc79c0124500d110VgnVCM1000009ed07898RCRD&vgnnextfmt=print>

<http://www.phmsa.dot.gov/portal/site/PHMSA/menuitem.ebdc7a8a7e39f2e55cf2031050248a0c/?vgnextoid=7e0382b1987d4310VgnVCM1000001ecb7898RCRD&vgnnextchannel=bc79c0124500d110VgnVCM1000009ed07898RCRD&vgnnextfmt=print>

Third, the State of Utah Pipeline Safety Office needs to perform the following annual inspections of the pipeline system.

[PHMSA Form-01](#)

[Standard Inspection Report of a Gas Transmission Pipeline](#)

[PHMSA Form-13](#)

[PHMSA Pipeline Drug & Alcohol Questions](#)

[PHMSA Form-14](#)

[Operator Qualification Inspection Form](#)

[PHMSA Form-15](#)

[Operator Qualification Field Inspection Protocol Form](#)

[PHMSA Form-21](#)

[Public Awareness Program Effectiveness Inspection Form](#)

[PHMSA GT Integrity Management \(IA Equivalent\)](#)

[GT Integrity Management Question Set](#)

[Finally I need to schedule with an onsite inspection of your procedures, records and field audit of your pipeline system. If you have any questions please feel free to contact me.](#)

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Regards,

On Tue, Sep 3, 2013 at 1:03 PM, Mobashir Ahmad <mobashir.ahmad@yahoo.com> wrote:
Dear Mr. Betham,

Reference my voice mail earlier today, I talked with Mr. Zadeh today and he has informed me that you indeed are the relevant engineer for our gas pipeline, therefore, I would like to know, in addition, to the information set forth in my email of 8/30/13:

Were any regulatory reports submitted by Delta Petroleum, the company who sold us this pipeline, to your organization?

If so, please let us know what documentation your require form us in order to obtain copies of the same.

Regards,

Mobashir Ahmad
Pacific Energy & Mining Company
Cell-775-742-1032

From: Mobashir Ahmad <mobashir.ahmad@yahoo.com>
To: "jbetham@utah.gov" <jbetham@utah.gov>
Cc: "azadeh@utah.gov" <azadeh@utah.gov>; "taroil@yahoo.com" <taroil@yahoo.com>
Sent: Friday, August 30, 2013 10:32 AM
Subject: Conformance with all state and federal gas pipeline requirements.

Dear Mr. Betham,

Reference our conversation earlier this morning. We would like to ensure that our natural gas pipeline in Utah, an already constructed and operating pipeline, described below, is in conformance with all state and federal regulations and thus are communicating with your department. You had mentioned an annual production reporting form, F7100.2-1 to be sent to PHMSA. In order to ensure that we are in full conformance please indicate all permits, forms, reports etcetera that we are to submit, with the necessary information such as form number, web address to download form, reporting frequency and organization, address, etc. of organization the form is to be sent to.

Description of gas pipeline: Operated by Pacific Energy & Mining Company, known as the Paradox Pipeline, purchased from Delta Petroleum in 2010. This is a 16" diameter buried natural gas line, that originates from the Greentown processing facility to the Northeast pipeline interconnect near Moab, and approximately 26 miles in length. If you need any further information please do communicate.

Thank you for your cooperation,

Sincerely,
Mobashir Ahmad
Pacific Energy & Mining Company
Cell-775-742-1032

--
Jimmy W. Betham
Utah Pipeline Safety Engineer
State of Utah Department of Commerce, Division of Public Utilities

jbetham@utah.gov
Cell 801-580-7515
Fax 801-530-6512

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Mobashir Ahmad <mobashir.ahmad@yahoo.com>

Tue, Sep 3, 2013 at 5:10 PM

Reply-To: Mobashir Ahmad <mobashir.ahmad@yahoo.com>

To: Jimmy Betham <jbetham@utah.gov>

Cc: Al Zadeh <azadeh@utah.gov>, Connie Hendricks <cshendricks@utah.gov>, "taroil@yahoo.com" <taroil@yahoo.com>

Dear Mr. Betham,

Thank you for your response. We have just filed for an Operator ID, see copy of email below.

Please note that this pipeline was run as a gas gathering line, under Delta Petroleum and under Pacific Energy & Mining Co., it now will be run as a transmission line as it will be accepting natural gas from other operators. Once we receive the OPID, then we will submit the required documents, that require the OPID. I am reviewing the rest of the needed information and will get back with you shortly.

Regards,
Mobashir Ahmad
Pacific Energy & Mining
Cell-775-742-1032

----- Forwarded Message -----

From: "PHMSAPORTAL@dot.gov" <PHMSAPORTAL@dot.gov>

To: taroil@yahoo.com

Sent: Tuesday, September 3, 2013 3:17 PM

Subject: New OPID Request

Your operator ID assignment request 17822 was submitted successfully.

PHMSA will make every effort to process your request as expeditiously as possible; however, it could take up to two weeks or longer for your request to complete the review process. If you have questions or concerns regarding your ID assignment request, please send an email to InformationResourcesManager@dot.gov or call 202.366.8075 for immediate assistance.

From: Jimmy Betham <jbetham@utah.gov>

To: Mobashir Ahmad <mobashir.ahmad@yahoo.com>

Cc: Al Zadeh <azadeh@utah.gov>; Connie Hendricks <cshendricks@utah.gov>

Sent: Tuesday, September 3, 2013 2:21 PM

Subject: Re: Conformance with all state and federal gas pipeline requirements.

[Quoted text hidden]

Jimmy Betham <jbetham@utah.gov>

Tue, Jun 5, 2018 at 10:03 AM

To: Connie Hendricks <cshendricks@utah.gov>, Al Zadeh <azadeh@utah.gov>

FYI

**EXHIBIT 5 - pg 4 of 7**

Connie Hendricks <cshendricks@utah.gov>

Fwd: Fw: Detail for Paradox (Natural Gas) Gathering Pipeline.

5 messages

Jimmy Betham <jbetham@utah.gov>

Mon, Sep 16, 2013 at 12:10 PM

To: Al Zadeh <azadeh@utah.gov>, Connie Hendricks <cshendricks@utah.gov>

FYI

----- Forwarded message -----

From: **Mobashir Ahmad** <mobashir.ahmad@yahoo.com>

Date: Mon, Sep 16, 2013 at 11:18 AM

Subject: Fw: Detail for Paradox (Natural Gas) Gathering Pipeline.

To: "jbetham@utah.gov" <jbetham@utah.gov>

Cc: "taroil@yahoo.com" <taroil@yahoo.com>

Jimmy,

Reference our conversation a few minutes ago; I am sending you a copy of my communication to Terrence Larson at PHMSA's office in Lakewood. I talked with Tariq Ahmad, President of Pacific Energy & Mining Company, who is at the Greentown field at present. Please contact him at 775-240-0769 to arrange for your visit tomorrow.

Regards,
Mobashir Ahmad
775-742-1032

----- Forwarded Message -----

From: Mobashir Ahmad <mobashir.ahmad@yahoo.gov>

Cc: "taroil@yahoo.com" <taroil@yahoo.com>; Dan Green <dfgreen1@dslextreme.com>

Sent: Friday, September 13, 2013 4:51 PM

Subject: Detail for Paradox (Natural Gas) Gathering Pipeline.

Terry,

I am sending you a somewhat detailed description of my logic that the Paradox (Natural Gas) Gathering Pipeline does not fall under the scope of 49 CFR 192.1, under 192.1(b)(4)(ii) as it is not a regulated onshore gathering line (as determined in 49 CFR 192.8). The area in which this pipeline runs through is under development and if significant oil and gas discoveries will be made then this gathering pipeline will convey other producers' production to the Tie-in of Northwest Pipeline.

At present there is only one well producing, into this line, which is operated by Pacific Energy & Mining Company (PEMC). PEMC is currently developing its leases and will be conveying gas from other wells into this line. Additionally, another producer will also be conveying gas into this gathering line, as shown on Attachment 1 and mentioned in the attached communication.

Regards,
Mobashir Ahmad
PEMC
775-742-1032

Jimmy W. Betham
Utah Pipeline Safety Engineer
State of Utah Department of Commerce, Division of Public Utilities

EXHIBIT 5 - pg 5 of 7

jbetham@utah.gov
 Cell 801-580-7515
 Fax 801-530-6512

2 attachments

 **09132013-Paradox Pipeline Detail of Exemption from State, Federal regulation.docx**
 39K

 **Attachments 1, 2, 3 and 4..pdf**
 1158K

Al Zadeh <azadeh@utah.gov>
 To: Jimmy Betham <jbetham@utah.gov>, t.larson@dot.gov
 Cc: Connie Hendricks <cshendricks@utah.gov>

Tue, Sep 17, 2013 at 10:15 AM

Terry,
 We are in the process of determining the end point of gathering system of Paradox. We very much interested in PHMSA's point of view. Please, include Jimmy, Connie and I in your communicate with this operator.

Thnx.
 Al
 801-530-6673
 [Quoted text hidden]

Jimmy Betham <jbetham@utah.gov>
 To: Mobashir Ahmad <mobashir.ahmad@yahoo.com>
 Cc: Al Zadeh <azadeh@utah.gov>, Connie Hendricks <cshendricks@utah.gov>, taroil@yahoo.com, terrence.larson@dot.gov

Mon, Sep 23, 2013 at 2:37 PM

Dear Mobashir Ahmad,

Review of the submitted documents on September 13, 2013 did not demonstrate using sound engineering principles that the end point of gathering extended beyond the processing plant. My field visit on September 19, 2013 also confirmed the fact that the end point of this gathering system is the outlet of the processing plant. Utah Pipeline Safety considers 22 miles of 16 inch steel pipeline from the processing plant to the Northwest Tie-in as Intrastate Transmission Pipeline.

Please feel free to contact me if you have any questions. (801) 580-7515

Regards,

[Quoted text hidden]

Tariq Ahmad <taroil@yahoo.com>
 Reply-To: Tariq Ahmad <taroil@yahoo.com>
 To: Jimmy Betham <jbetham@utah.gov>, Mobashir Ahmad <mobashir.ahmad@yahoo.com>
 Cc: Al Zadeh <azadeh@utah.gov>, Connie Hendricks <cshendricks@utah.gov>, "terrence.larson@dot.gov" <terrence.larson@dot.gov>

Tue, Oct 8, 2013 at 1:08 PM

Jimmy

Can you give me a call so we can discuss this. We need to go over the OM manuals

Tariq I. Ahmad SPEC PE
PO Box 18148
Reno, NV 89511

1/29/2014

State of Utah Mail - Re: Conformance with all state and federal gas pipeline requirements.

PHMSA will make every effort to process your request as expeditiously as possible; however, it could take up to two weeks or longer for your request to complete the review process. If you have questions or concerns regarding your ID assignment request, please send an email to InformationResourcesManager@dot.gov or call 202.366.8075 for immediate assistance.

From: Jimmy Betham <jbetham@utah.gov>
To: Mobashir Ahmad <mobashir.ahmad@yahoo.com>
Cc: Al Zadeh <azadeh@utah.gov>; Connie Hendricks <cshendricks@utah.gov>
Sent: Tuesday, September 3, 2013 2:21 PM
Subject: Re: Conformance with all state and federal gas pipeline requirements.

[Quoted text hidden]

6/5/2018

State of Utah Mail - Fwd: Paradox Pipeline



Connie Hendricks <cshendricks@utah.gov>

Fwd: Paradox Pipeline

1 message

Jimmy Betham <jbetham@utah.gov>

Tue, Jun 5, 2018 at 10:02 AM

To: Connie Hendricks <cshendricks@utah.gov>, Al Zadeh <azadeh@utah.gov>

FYI

----- Forwarded message -----

From: <jason.dunphy@dot.gov>

Date: Wed, Oct 9, 2013 at 4:46 PM

Subject: Paradox Pipeline

To: jbetham@utah.gov, azadeh@utah.gov

Cc: terrence.larson@dot.gov

Al & Jimmy,

I spoke with Terry and relayed the information you and Al gave me. That the operators of the Paradox Pipeline were developing an O&M manual and had accepted Utah's determination.

Terry asked that I let you guys know Western Region will not research/investigate the issue further unless Utah asks us to. Terry and I both agree with Utah's determination that the 22 miles of 16" & 12" pipe extending from the gas plant to the delivery point (at Northwest Pipeline) is a transmission line.

If you guys need anything else lets us know.

Regards,

Jason Dunphy, P.E.

General Engineer

Pipeline and Hazardous Materials Safety Administration

Pipeline Safety

12300 W. Dakota Avenue, Suite 110

Lakewood, CO 80228

303-956-1873

Jason.dunphy@dot.gov