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Jimmy Betham <jbetham@utah.gov>

Tue, Oct 8, 2013 at 1:36 PM

To: Tariq Ahmad <taroil@yahoo.com>

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

Tariq,

Per conversation over the phone on 10/8/2013, your requested a template O&M. The APGA website partner with Security and Integrity Foundation to develop procedures that operator may use. Keep in mind that these procedures need to be reviewed by the operator and taylor maid to your Intrastate Transmission System. See link below:

<http://www.apgasif.org/i4a/pages/index.cfm?pageID=3289>



If you have any questions, feel free to contact me.

Regards,

[Quoted text hidden]



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Fwd: DOT Regulations concerning Paradox Pipeline, OPID 39049

2 messages

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

Fri, Nov 1, 2013 at 8:09 AM

FYI

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

From: **Mobashir Ahmad** <mobashir.ahmad@yahoo.com>
 Date: Thu, Oct 31, 2013 at 2:40 PM
 Subject: DOT Regulations concerning Paradox Pipeline, OPID 39049
 To: "jbetham@utah.gov" <jbetham@utah.gov>
 Cc: "taroil@yahoo.com" <taroil@yahoo.com>

Dear Mr. Betham,

Reference our conversation a few minutes ago, as directed this is our request for:

1. A delay in submitting the final reports to PHMSA and to Pipeline Safety until 2014.
2. A review of our Operations and Procedures Manual sent to you.
3. Additional information as to other small companies whose transmission lines are regulated in Utah.

This information can be Names and contact information for the responsible people at these companies that we can contact.

Any additional information that will help us in meeting DOT's pipeline safety requirements.

Thank you for your cooperation,

Mobashir (Moby) Ahmad
 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

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

Tue, Nov 19, 2013 at 4:15 PM

FYI

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

From: **Jimmy Betham** <jbetham@utah.gov>
 Date: Tue, Nov 19, 2013 at 4:14 PM
 Subject: Re: DOT Regulations concerning Paradox Pipeline, OPID 39049
 To: Mobashir Ahmad <mobashir.ahmad@yahoo.com>

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Moby,

The Utah OPS will grant the extension of the reports and inspection till Feb 2014. We are currently reviewing the O&M. As far as names and numbers of operator personnel, I have been told not to release that information. I can however direct you to their website of companies in the area.

<http://www.ldeenergy.com/>
<http://www.linde-gas.com/en/index.html>
<http://www.summitgasgathering.com/summitgasgatheringllc/index.html>
<http://www.anadarko.com/Home/Pages/Home.aspx>

Hope this helps.

Regards,

[Quoted text hidden]

[Quoted text hidden]

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Connie Hendricks <cshendricks@utah.gov>

**Re: Fw: Draft of Operation and Procedures Manual**

1 message

Jimmy Betham <jbetham@utah.gov>

Tue, Jan 7, 2014 at 10:43 AM

To: Tariq Ahmad <taroil@yahoo.com>

Cc: Mobashir Ahmad <mobashir.ahmad@yahoo.com>, Al Zadeh <azadeh@utah.gov>, Connie Hendricks <cshendricks@utah.gov>

Tariq,

I reviewed the Draft Operation and Maintenance Procedure. It appears that each procedure provides step-by-step instructions for performing one or several related operator qualification covered tasks. These procedures are a supplement to, not a substitute for, a written manual for operations, maintenance and emergency response ("O&M Manual") as required by 49 CFR Part 192.605. It is the responsibility of the operator of the pipeline facility to ensure that all the elements of their O&M Manual cross reference to the individual step-by-step procedures currently described in your Draft O&M Procedure and is complaint with state and federal pipeline safety regulations. The operator is also responsible to revise these procedures as required. State and local requirements can be more stringent than federal regulations.

I have provide some Guidance Material of Part 192.605 Procedural manual for operations, maintenance, and emergencies and 192.615 Emergency Plan to help aid in the initial development of your "O&M Manual"

Part 192.605 Procedural manual for operations, maintenance**1 GENERAL**

- (a) Each procedural manual for operations, maintenance, and emergencies should include a written statement, procedure, or other document addressing each specific requirement of §192.605. The requirements include the maintenance and normal operation of any pipeline; and the abnormal operations of transmission lines, other than those transmission lines operated in connection with a distribution system.
- (b) The comprehensive manual can consist of multiple binders with relevant sections kept at appropriate locations. Appropriate sections of other documents may be referenced instead of being incorporated, but the referenced documents are to be present at the location to which they apply.
- (c) The manual will necessarily vary in length and complexity depending upon the individual operator, its size, locale, policies, and types of equipment in use and the amount of material included in its entirety or cross-referenced, including manufacturers' instructions, where appropriate.
- (d) Procedures for only those facilities within the operator's system need be included in the manual. Therefore, it is not necessary to have a manual for each pipeline.
- (e) The required review of the manual should ensure that the operator's current facilities and any deficiencies in the manual are addressed. An operator should consider reviewing its operator qualification (OQ) processes and procedures since changes to the manual may affect the OQ program. More serious deficiencies, possibly identified following an accident, may require immediate correction.

2 TRAINING

- 2.1 Operations and maintenance procedures.
- 2.2 Operations and maintenance tasks.
- 2.3 Emergency response procedures.

3 MAINTENANCE AND NORMAL OPERATIONS

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- 3.1 Control of corrosion.
- 3.2 Availability of construction records, maps, and operating history.
- 3.3 Data gathering for incidents.
- 3.4 Starting up and shutting down a pipeline.
- 3.5 Maintaining compressor stations.
- 3.6 Starting, operating, and shutting down gas compressor units.
- 3.7 Periodically reviewing the work done by operator personnel.
- 3.8 Taking precautions in excavated trenches to protect personnel.
- 3.9 Responding promptly to a report of a gas odor inside or near a building.

4 ABNORMAL OPERATIONS

- 4.1 General.
- 4.2 Appropriate actions to abnormal conditions.
- 4.3 Prevention of condition from recurrence.
- 4.4 Follow-up monitoring.
- 4.5 Review of personnel response.

5 SAFETY-RELATED CONDITION REPORT

- 5.1 Potential safety-related conditions.
- 5.2 Procedures and guide material used to recognize a safety-related condition.
- 5.3 Analysis and follow-up of in-line inspection (ILI).

6 SURVEILLANCE, EMERGENCY RESPONSE, AND ACCIDENT INVESTIGATION**7 OTHER CONSIDERATIONS**

- 7.1 "Work authorization" programs.
- 7.2 Operator's use of powered equipment.

Guide material 192.615 Emergency plans**1 WRITTEN EMERGENCY PROCEDURES (§192.615(a))**

(a) Written procedures should state the purpose and objectives of the emergency plan and provide the basis for instructions to appropriate personnel. The objective of the plan should be to ensure that personnel who could be involved in an emergency are prepared to recognize and deal with the situation in an expeditious and safe manner.

(b) Establishing written procedures may require that parts of the plan be developed and maintained in coordination with local emergency response personnel (e.g., police, fire, and other public officials) and with other entities in or near the pipeline rights-of-way (e.g., other utilities, highway authorities, and railroads) that may need to respond to a pipeline emergency.

(c) Written procedures should also include instructions on interfacing with the Incident Command System (ICS) typically used by emergency responders.

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(d) To ensure the safety of the general public, written procedures should provide for the following as applicable.

- 1.1 Receiving, identifying, and classifying emergencies.
- 1.2 Establishing and maintaining adequate means of communication.
- 1.3 Prompt and effective response to each type of emergency.
- 1.4 Assuring the availability of personnel, equipment, tools, and materials.
- 1.5 Controlling emergency situations.
- 1.6 Emergency shutdown and pressure reduction.
- 1.7 Making safe any actual or potential hazard.
- 1.8 Restoration of service.
- 1.9 Providing for investigation of failures.
- 1.10 Incident Command System (ICS).

2 ACQUAINT APPROPRIATE OPERATING AND MAINTENANCE EMPLOYEES WITH THE PROCEDURES (§192.615(b))

- 2.1 Provide employees access to emergency procedures manual.
- 2.2 Training of employees.
- 2.3 Review of employee activities.

3 LIAISON WITH PUBLIC OFFICIALS (§192.615(c)) AND OPERATORS OF FACILITIES IN THE VICINITY OF THE PIPELINE

- 3.1 Compiling current information on the resources of government organizations.
- 3.2 Acquainting public officials with emergency procedures.
- 3.3 Identifying emergencies that require notification to and from public officials.
- 3.4 Plan with public officials and operators of facilities in the vicinity of the pipeline for mutual assistance.

The O&M Manual needs to also include but not limited to the following:

SubPart L - Operations

- §192.613 Continuing Surveillance.
- §192.614 Damage prevention program.
- §192.616 Public Awareness
- §192.623 Maximum and minimum allowable operating pressure:

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- §192.625 Odorization of gas.
- §192.627 Tapping pipelines under pressure.
- §192.629 Purging of pipelines.
- §192.631 Control room management

Hope this helps to get you started. Let me know if you have any other questions on the matter.

Regards,