

August 30, 2017

VIA Email: cinda@wcstriegel.com

Cinda WC Striegel 17030 CO-64 Rangely, CO 81648

RE: Delta Petroleum; Paradox Pipeline

Dear Cinda:

Pacific Energy and Mining Company acquired the Paradox Pipeline from Delta Petroleum in 2011. Subsequently, Fidelity Exploration and Production Company connected to the pipeline in 2014. As conditions to the connection, Pacific was required to become DOT compliant.

Pacific received all of the records from Delta, but evidently the qualifications for the welders were not included. Could you review your records and get us copies of the qualifications of the welders for this job?

Specifically, here is the language of the DOT requirements:

192.227/229 Qualification of welders and welding operators:

§ 192.227 Qualification of welders and welding operators.

- (a) Except as provided in paragraph (b) of this section, each welder or welding operator must be qualified in accordance with section 6, section 12, Appendix A or Appendix B of API Std 1104 (incorporated by reference, see § 192.7), or section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see § 192.7). However, a welder or welding operator qualified under an earlier edition than the listed in § 192.7 of this part may weld but may not requalify under that earlier edition.
- (b) A welder may qualify to perform welding on pipe to be operated at a pressure that produces a hoop stress of less than 20 percent of SMYS by performing an acceptable test weld, for the process to be used, under the test set forth in section I of Appendix C of this part. Each welder who is to make a welded service line connection to a main must first perform an acceptable test weld under section II of Appendix C of this part as a requirement of the qualifying test.

- § 192.229 Limitations on welders and welding operators.
- (a) No welder or welding operator whose qualification is based on nondestructive testing may weld compressor station pipe and components.
- (b) A welder or welding operator may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder or welding operator was engaged in welding with that process.
- (c) A welder or welding operator qualified under § 192,227(a) -
- (1) May not weld on pipe to be operated at a pressure that produces a hoop stress of 20 percent or more of SMYS unless within the preceding 6 calendar months the welder or welding operator has had one weld tested and found acceptable under either section 6, section 9, section 12 or Appendix A of API Std 1104 (incorporated by reference, see § 192.7). Alternatively, welders or welding operators may maintain an ongoing qualification status by performing welds tested and found acceptable under the above acceptance criteria at least twice each calendar year, but at intervals not exceeding 7 1/2 months. A welder or welding operator qualified under an earlier edition of a standard listed in § 192.7 of this part may weld, but may not re-qualify under that earlier edition; and,
- (2) May not weld on pipe to be operated at a pressure that produces a hoop stress of less than 20 percent of SMYS unless the welder or welding operator is tested in accordance with paragraph (c)(1) of this section or re-qualifies under paragraph (d)(1) or (d)(2) of this section.
- (d) A welder or welding operator qualified under § 192.227(b) may not weld unless -
- (1) Within the preceding 15 calendar months, but at least once each calendar year, the welder or welding operator has re-qualified under § 192.227(b); or
- (2) Within the preceding 7 1/2 calendar months, but at least twice each calendar year, the welder or welding operator has had -
- (i) A production weld cut out, tested, and found acceptable in accordance with the qualifying test; or
- (ii) For a welder who works only on service lines 2 inches (51 millimeters) or smaller in diameter, the welder has had two sample welds tested and found acceptable in accordance with the test in section III of Appendix C of this part.

W.C. Striegel Construction August 30, 2017 Page 3 of 3

Please feel free to call me if you have any questions. Also attached is a sample of the inspection reports and an inspection listing showing the dates in question.

Sincerely,

Pacific-Energy and Mining Co.

Dan Green President

Ce: J Betham; via email: jbetham@utah.gov.

T Ahmad; via email: taroil@yahoo.com

PARADOX PIPELINE X-RAY WELDING INSPECTION LISTING

NUMBER OF TOTAL WELDS: 1660+ (FB 1 TO FB 89) + (1-18)	1767
NUMBER OF WELDS THAT DID NOT COMPLY:	12
% THAT DID NOT COMPLY ON FIRST TRY:	0.68

s.N.	WELD NO.	DATE OF INSPECTION	LOCATION OF DEFECT	REASON	DATE OF RE- INSPECTION
				BURN THROUGH; BOTTOM, WORK	
1	143	4/19/2008	O-B	SIDE	4/21/2008
2	325	4/25/2008	B-C	BURN THROUGH; WORK SIDE	4/26/2008
3	407	5/1/2008	в-с	BURN THROUGH; WORK SIDE	5/1/2008
4	412	5/2/2008	O-B	BURN THROUGH; WORK SIDE CONCAVE	5/2/2008
5	742	5/10/2008	C-0	STRINGER	5/10/2008
6	743	5/10/2008	В-С	CONCAVE STRINGER CONCAVE	5/10/2008
7	765	5/10/2008	C-0	STRINGER	5/10/2008
8	812	5/12/2008	О-В	CONCAVE STRINGER LACK	5/13/2008
9	893	5/14/2008	C-0	PENETRATION	5/14/2008
10	1376	5/29/2008	0-1	BURN THROUGH	?
11	FB 1	6/4/2008	1-2	BURN THROUGH	6/10/2008
12	XR 4	6/17/2008	0-1	CONCAVE STRINGER	6/17/2008

Contrauter; c. Streige/ H&G Services, Inc. P.O. Box 722305 - Housinn, Texas 77272 CLIENT: DELTA Petro. Green Town Row DATE: 04-17-08 SPECIFICATION. API 1104 19 Ted. PYPE INSPECTION: RT- Weld Qualit FILM SIZE 70mm x21" NO. FILM: 96 NO WELDS: 32 FILM TYPE. AGFA PENETRAMETER: ASTM 1B MATERIAL THICKNESS: 57D SOURCE: 192 SOURCE SIZE: .1 x .1 EXPOSURE TIME: 40 Sec. SCREENS: Lead .005 x .005 UG 00.02 max. DOES NOT WELD NO. PIPE SIZE COMPLIES REMARKS LOCATION XR NO. COMPLY WALL THK. STA, No. 0- B-C-0 16 x, 250 1107+33 14 15 30 086+62 INSPECTOR'S APPROVAL 3 ス TOTAL WELDS: TOTAL 40 UTAL HOURS: // MILES FROM ___0 __LEVEL (Signature) **TECHNICIAN** STANDBY (BAD WEATHER) CONTRACTOR NOT WORKING T. Privett 04/17/08 SHEET NO. ASST. TECH DATE Page 115 of 132

P.O. Box 7223 P.O. Box 7223 P.O. Box 7223 P.O. WELDS: 12 MATERIAL THICKNES SOURCE: Z	T-Weld			DATE: SPECIFI NO. FILM FILM TY	T: DELTA 04 17 08 CATION: API 11 A: 36 PE. AGFA	04 <u>CON</u> FILM : PENET	tractor: u SIZE: 70 mm X TRAMETER: AS	S.C. Streig
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ASST. TECH		0 //		Don	0 116 of 122	1111	0 1	SHELL NO.

PARADOX PIPELINE X-RAY WELDING INSPECTION LISTING

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s.n.	WELD NO.	DATE OF INSPECTION	LOCATION OF DEFECT	REASON	DATE OF RE- INSPECTION
				BURN THROUGH; BOTTOM, WORK	
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2	325	4/25/2008	B-C	BURN THROUGH; WORK SIDE	4/26/2008
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10	1376	5/29/2008	0-1	BURN THROUGH	7
11	FB 1	6/4/2008	1-2	BURN THROUGH CONCAVE	6/10/2008
12	XR 4	6/17/2008	0-1	STRINGER	6/17/2008

CLIENT: DELTA Petro. W.C. Streige/ H& G Services, Inc. P.O. Box 722305 · Houston, Texas 77272 (713) 771-1592 DATE: 04-17-08 Green Town Row SPECIFICATION API 1104 19 Tred, YPE INSPECTION RT- Weld Quality NO WELDS 37 NO FILM: 96 FILM SIZE 70mm x21" MATERIAL THICKNESS 57D SOURCE I + 192 PENETRAMETER ASTM 13 FILM TYPE AGFA SOURCE STRENGTH 70 Gunes SOURCE SIZE. 1 x 1 EXPOSURE TIME 40 Sec. SCREENS Lead 005 x 005 UG 00 02 max WELD NO. PIPE SIZE **DOES NOT** LOCATION COMPLIES REMARKS XR NO. WALL THK. COMPLY STA. No. 16 X, 250 0- B-C-0 V 4 6 1097+06 14 15 30 31 33 23 26 28 29 30 31 1086+62

CR-CRACK LP-LACK PENETRATION LP-LACK FUSION BT	BURN THROUGH CCS-CONCAVE STRINGER S-SLAG WT-WAGON TRAVEL REPORT
OTAL HOURS // TOTAL WELDS 32	MILES FROM TO TOTAL 40
(Signature) LEVEL TO	STANDBY (BAD WEATHER) CONTRACTOR NOT WORKING
ASST TECH T. Privett	DATE 84/17/08 SHEET NO /

Page 118 of 132

	Services, Houston, Texas (713) 771-1592	Inc. CLIEN	04/17/02	d	Town Row cfor: W.C. Streige! TO mmx 21" TER: ASTM 1B
NO. WELDS: 12	RT-Weld Qua	SPECIF	TICATION: <u>API II</u> M. <u>36</u> YPE: <u>AGFA</u>	EII M SITE	70 mm y 21"
NO. WELDS:	S STD	FILM T	YPE AGFA	PENETRAME	TER ASTM IB
MATERIAL THICKNES	192		E SIZE: .1 x .1	SOURCE ST	RENGTH: 70 Cunes
EXPOSURE TIME:			NS: Lead .005 x .005	UG 00 02 ma	
WELD NO.	PIPE SIZE WALL THK.	LOCATION	COMPLIES	DOES NOT COMPLY	REMARKS STA, No.
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et - /	HUVAL -	,	INAVEL	neroni <u>Sireci</u>	
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TECHNICIAN_	Nuplo	LEVEL		STANDBY (BAD V	VEATHER)
	(Sfgnature)			CONTRACTOR NO	
ACCT TECH 7	. Privett		DATE	04/17/08	SHEET NO. 2
ASST. TECH	/// . //	Dac	110 of 132	11/00	SHILL INU.

EXHIBIT "H"

Dan Green

From:

"Pat Diffenbaugh" <Pat.Diffenbaugh@mistrasgroup.com>

Date:

Tuesday, September 05, 2017 11:49 AM

To:

<dfgreen | @dslextreme.com>; "Ricky Krebs" <Ricky.Krebs@mistrasgroup.com>

Attach:

Inspection reports H and G 2008 20170905_0001.pdf

Subject:

FW: Mistras Group

Dan,

Thanks. I have copied Ricky Krebs who is the GM for our pipeline group for Mistras (formerly H&G). He will begin trying to track down any certifications available.

Ricky,

Attached are some of the reports for the work that Dan is needing a cert for. What he is needing is the Level II technicians certification during that project can you help him please?

thanks

Pat Diffenbaugh P: 281-478-1600 F: 713-473-6161 pat.diffenbaugh@mistrasgroup.com



MISTRAS Group, Inc. 4000 Underwood Road · La Porte · TX 77571 www.mistrasgroup.com

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From: Dan Green [mailto:dfgreen1@dslextreme.com]

Sent: Tuesday, September 05, 2017 1:46 PM

To: Pat Diffenbaugh <Pat.Diffenbaugh@mistrasgroup.com>

Subject: Re: Mistras Group

Hi Pat,

Here are 5 of the inspection reports. I looked through all of them and I didn't see any

other names.

Thanks for your help.

Dan

Dan Green PO Box 45620 Los Angeles, CA 90045 (310) 337-2820 Office (775) 636-3132 Cell

From: Pat Diffenbaugh
Sent: Tuesday, September 05, 2017 11:40 AM
To: dfgreen1@dslextreme.com
Subject: Mistras Group

Dan,

Please send me a few of the report sheets and I will try to have the pipeline group track down what they can....

Pat Diffenbaugh
P: 281-478-1600
F: 713-473-6161
pat.diffenbaugh@mistrasgroup.com



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Dan Green

From:

"Ricky Krebs" < Ricky.Krebs@mistrasgroup.com>

Date:

Tuesday, September 05, 2017 12:16 PM

To:

"Pat Diffenbaugh" <Pat.Diffenbaugh@mistrasgroup.com>; <dfgreenl@dslextreme.com>

Subject: **RE: Mistras Group**

Mr. Green,

We (Mistras Group) acquired H&G during this timeframe (April 2008) and unfortunately do not have any records or certifications for this individual. From my understanding, all records during the acquisition was stored on a sever and I was not aware of the ware-a-bouts being I was just starting that position approx.. 9 years ago. I wish I could be of more help. I did search the server I have now but with no avail.

If we can be of further service or you need NDE serveries, please do not hesitate and contact us.

Regards,

Ricky Krebs General Manager Services Division P: 281-478-1706 M: 281-989-8667 F: 281-478-1785 ricky.krebs@mistrasgroup.com



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From: Pat Diffenbaugh

Sent: Tuesday, September 05, 2017 1:50 PM

To: dfgreen1@dslextreme.com; Ricky Krebs <Ricky.Krebs@mistrasgroup.com>

Subject: FW: Mistras Group

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Subject: Re: Mistras Group

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Thanks for your help.

Dan

Dan Green PO Box 45620 Los Angeles, CA 90045 (310) 337-2820 Office (775) 636-3132 Cell From: Pat Diffenbaugh

Sent: Tuesday, September 05, 2017 11:40 AM

To: dfgreen1@dslextreme.com Subject: Mistras Group

Dan,

Please send me a few of the report sheets and I will try to have the pipeline group track down what they can....

Pat Diffenbaugh
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F: 713-473-6161
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Dan Green

From:

"Dan Green" <dfgreen1@dslextreme.com>

Date:

Tuesday, September 05, 2017 11:45 AM

To: Attach: "Pat Diffenbaugh" <Pat.Diffenbaugh@mistrasgroup.com> Inspection reports H and G 2008 20170905 0001.pdf

Subject:

Re: Mistras Group

Hi Pat,

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From: Pat Diffenbaugh

Sent: Tuesday, September 05, 2017 11:40 AM

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F: 713-473-6161
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MISTRAS Group, inc.

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H& G PO. Box 722	Services, 305 • Houston, Texas (713) 771-1592	Inc. CLIEN	DELTA 04-17-08	Petro.	N Town Row
PE INSPECTION:	RT- Weld Que	wlity SPECIFI	CATION API 11	04 19 Ted.	70mm x21"
WELDS 37		NO. FILI	4 96	FILM SIZE	70mm x21"
MATERIAL THICKNES	ss_ <u>STD</u>	FILM TY	PE AGFA	PENETRAMI	ETER: HSTM 113
SOURCE }	147	THE PARTY OF THE P	E SIZE1 x .1		RENGTH: 70 Curies
-	40 sec.	SCREEN	S. Lead .005 x .005	7	ax
WELD NO.	PIPE SIZE WALL THK.	LOCATION	COMPLIES	DOES NOT COMPLY	REMARKS STA, No.
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32 -		7 - 9		- <u> </u>	1086+62
					1051
CR-CRAC		N. LE LACK FUSION	BT-BURN THROUGH	CCS-CONCAVE STRING	GER S-SLAG WT-WAGON
TOTAL HOURS:	. 1 1	s: 32	MILES		**
TECHNICIAN	O. Duplos (Signature)	LEVEL		STANDBY (BAD)	WEATHER) OT WORKING
ASST_TECH	T. Privett		DATE	64/17/0	

		Services, 305 · Houston, Text (713) 771-1592	Inc. CLIEN	T. DELTA 1	S			,
	PPE INSPECTION.	T-Weld Qua	117y SPECIF	ICATION: API II M. 36 YPE: AGFA	104 60	stractor: u	J.C. Strei	20/
-	NO WELDS 12	· · · · · · · · · · · · · · · · · · ·	NO. FIL	м. 36	FILI	M SIZE Zomm	Y 21"	_
3	MATERIAL THICKNES	S 57D	FILM T	YPE: ELG-FA	PER	IETRAMETER: AS	TM 18	_
1	SOURCE	112	SOURC	E SIZE: 1 x .1	SOI	JRCE STRENGTH:	Ci	11162
	EXPOSURE TIME:		SCREEN	IS Lead .005 x .005		00 02 max		
	WELD NO. XRNO.	PIPE SIZE WALL THK.	LOCATION	COMPLIES	DOES NO COMPLY		EMARKS STA, No 1086+0	2.
	33	16"x.250"	0-B-C-0	1	4		1086+0	0
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	37							-
	38			1				
	39							
	40		2(ft) = 6(ft)					
	41				-			- 0.5
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_	CR-CRAC	K · LP-LACK PENETRATIO	IN I F-LACK-FHSION .	BT-BURN THROUGH	CCS-CONCAVE	STRINGER - S-SI AG	WT-WAGON	-
. 1	MSPECTOR'S APP			TRAVEL	REPORT Sh	cet - 1		
	et - 1	- 6	10					
	OTAL HOURS:	TOTAL WELD)S: 12	MILES	FROM	101	OTAL	
Ţ	ECHNICIAN AC.	(Signature)	LEVEL	-		(BAD WEATHER) TOR NOT WORKING		
А	SST. TECH	. Privett	-	DATE	04/17/	108	SHEET NO. 2	_

H&G	Services. 305 : Houston, Text	Inc. CLIEN	VI: Delta	Petro		1528
P.O. Box 722	305 • Houston, Texs (713) 771-1592	B 77272 DATE	04/18/			Row
EXPE INSPECTION:	AT- Wald Qual	SPECIF	ICATION. API 11	34/ 19	Tred.	
NO WELDS 3	<i>}</i>	NO. FIL	M: 96	FILE	A SIZE. 70mm	21"
MATERIAL THICKNES	SS STD	FILM T	YPE AGFA	PEN	IETRAMETER: AS	TM IB
SOURCE 2	1,192		E SIZE: 1 x .1	SÕI	IRCE STRENGTH:	69 Curios
EXPOSURE TIME:	40 sec.		NS: Lead 005 x .005		00.02 max	
WELD NO.	PIPE SIZE WALL THK.	LOCATION	COMPLIES	DOES NO	T	REMARKS
45	16"x . 250"	0-B-C-0	<u></u>			1077+40
416			-			
47						
48			_			
49			V			
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CR-CDAC	CK - LP-LACK PENEURATION	IN I E-I ACK CHICION	. RT.RIJEN THEOLICH	CCSCONCAVE	STRINGED C.CI A	G . WT.WAGON
INSPECTOR'S API		LI-ENORT DSIGN	TRAVEL	REPORT 1	r. Per I	
TOTAL HOURS: Z	TOTAL WELI	os: 32	MILES	FROM		TOTAL 40
TECHNICIAN	(Signature)	LEVEL			(BAD WEATHER) TOR NOT WORKIN	l G
ASST. TECH	Privett		DATE	04-18-	07	SHEET NO.

Confractor W.C. Streigel H&G Services, Inc. CLIENT: Delta Petro. P.O. Box 722305 Houston, Texas 77272 (713) 771-1592 DATE: 04-18-08 Green Town Row SPECIFICATION. API 1104 EXPE INSPECTION RT-Weld Quality FILM SIZE Zomm X 21" NO WELDS 24 NO. FILM. 72 PENETRAMETER: AST 127 MATERIAL THICKNESS. 577. FILM TYPE AGFA SOURCE STRENGTH: _____69 SOURCE SIZE: .1 x 1 40 500. EXPOSURE TIME. ___ SCREENS: Lead .005 x .005 UG 00.02 max. WELD NO. PIPE SIZE **DOES HOT** LOCATION COMPLIES REMARKS XR NO. WALL THK. COMPLY 16"x,250" 0-8-C-0 1054+72 Low 1045+00 00 CR-CRACK LP-LACK PENETRATION -LF-L'AGK-EUSION - BT-BURN THROUGH - CCS-CONCAVE STRINGER - S-SLAG - WT-WAGON TRAVEL REPORT _ FACO + INSPECTOR'S APPROVAL L≠ - / OTAL HOURS:

ASST. TECH T. Privatt DATE 04-18-05 SHEET NO 2

MILES FROM______TO_____TOTAL

STANDBY (BAD WEATHER)

CONTRACTOR NOT WORKING

TOTAL WELDS: 2.4

(Signature)

TECHNICIAN

P.O. Box 722	Services, 305 · Houston, Texa (713) 771-1592	s 77272 DATI		OF GrEEN TOWN	Rod
E INSPECTION	RT-weld gua	N' SPECI	FICATION APT 17	经债金 经路门票的	
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OSURE TIME	405		ENS Lead 005 x 005		
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CR-CRAC		ON LE LACK FUSION	BT-BURN THROUGH	CCS-CONCAVE STRINGER S-SI	AG WT-WAGON
AL HOURS Z		s 32		ROMTO	
HINICIANZ	O. Dept	LEVEL		STANDBY (BAD WEATHER CONTRACTOR NOT WORK	
	Privett			4/19/08	