

Dead Horse Oil Company

17 West Main Street
Greenriver, Utah 84525

(801) 554 2021

March 5, 2020

Public Service Commission of Utah

RE: DOCKET NO. 18-2602-01

Dear PSC:

In furtherance of our letter to the Public Service Commission dated February 10, 2020 and response filed with the PSC by the Division dated 27, 2020 this is to clarify the process and procedure used by Dead Horse Oil Company to completely evacuate natural gas from the Pipeline.

Paradox Pipeline is divided into three sections as follows:

1. Inlet at the Greentown plant to the Blue Hills plant interconnect;
2. Blue Hills Plant interconnect to the block valve at Moab Airport;
3. Moab Airport block valve to the Northwest Pipeline interconnect;

Pressure gauges are installed at the Greentown inlet and at Northwest Pipeline interconnect. In order to completely evacuate the pipeline, Dead Horse followed the following procedure:

1. Opened the block valves (Valves #18 and #20) at Northwest Interconnect in order to allow natural gas from Moab Airport to Northwest Pipeline interconnect to be in communication;
2. Opened the block valve at Moab Airport (Valve #14) in order to allow natural gas from Blue Hills Interconnect to Northwest Pipeline interconnect to be in communication;
3. Opened the block valve at Blue Hills Interconnect (Valve #9) in order to allow natural gas from Greentown Plant pig launcher to Northwest Pipeline Interconnect to be in communication;
4. Opened the block valves (Valves #5 and #7) at Greentown pig launcher in order to allow natural gas from Greentown Inlet to Northwest Pipeline Interconnect to be in communication;

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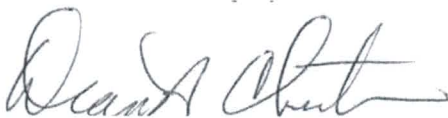
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5. Blew down the pipeline at the Greentown pig launcher (Valve # 8) from the Greentown Inlet to Northwest Pipeline Interconnect;
6. Observed and recorded the pressure gauge at the Greentown inlet to confirm zero pressure at the Greentown inlet;
7. Observed and recorded the pressure gauge at the Greentown pig launcher to confirm zero pressure at the Greentown pig launcher;
8. Closed the block valves (Valves #8, #5 and #7) at Greentown Pig Launcher and locked block valves (Valves #5 and #7);
9. Closed the block valve (Valve #9) at Blue Hills Interconnect and locked block valve;
10. Closed the block valve (Valve #14) at Moab Airport and locked block valve;
11. Opened the blow down valve (Valve #21) at the Northwest Interconnect and confirmed the pressure at the outlet to be at zero;
12. Closed valves (Valves #18, #20 and #21) at Northwest Interconnect and locked block valves;

In order for the division to confirm the pressure in the pipeline, Division should have contacted Dead Horse via email or a telephone call so that the inspection could have been made jointly thus alleviating the need to determine whether the Moab Airport block valve location had zero pressure. Division could also have opened the blowdown at Moab Airport to determine if there was any pressure. Dead Horse Oil Company reserves the right to add additional documentation.

Had division contacted Dead Horse they would have been able to confirm that the pipeline had zero pressure.

Sincerely,



Dean Christensen Manager