

March 2, 2020

Mr. Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Re: 2019 Alpine Natural Gas (ANG) Damage Prevention Program SED Inspection
(GI-2019-12-ANG-35-14)

Mr. Lee,

Please find enclosed Alpine Natural Gas Operating Company No. 1, LLC written response to the SED General Order 112-F Inspection contained in your letter dated February 4, 2020. Generally, ANG's response to the findings involve referencing changes to Alpine's specific Operations, Maintenance and Emergencies Manual (OME) policies. In addition, Alpine provides herein, one new form and revision of another, to largely address the operational concerns and findings contained in the inspection letter.

The letter states probable violations: Alpine is unclear where actual violations to CFR 49 192 or 112-F exist. While it is acknowledged that detailed procedures may not always be enumerated, Alpine records demonstrate the performance of Alpine's Damage Prevention Plan. Alpine is a very small work force; an Administrator and two qualified operators with, little to no turnover. OME policies are written to ensure and demonstrate compliance to applicable law and regulations.

What was not reference previously in Alpine's OME Manual was compliance to the new Governmental Code 4216. Alpine's OME manual has been revised to address this omission.

A list of Policies and Forms that are attached below in "Attachment A", as well as copies of each, are included to improve Alpine's ability to comply and document compliance to applicable laws and regulations.

I. Probable Violations

§192.13(c) states:

"Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part."

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While ANG does have a damage prevention program in place, we believe some additional procedures are necessary and some existing procedures need to be more detailed in order to provide clarity, consistency and uniformity to ANG staff. We believe that ANG needs to modify procedures related to its Damage Prevention Program to address the following:

- 1) ANG needs to modify its Damage Prevention Plan to provide a clear statement that ANG will comply with all applicable state laws (including one-call) requirements in California Government Code Section 4216 (GC4216) applicable to ANG when it performs locates for its facilities, as well as when ANG is an excavator.

In Response please find enclosed Alpine's revised OME policy 614-A and OME xxx Customer Service that addresses this finding. A clear statement of Alpine's compliance to applicable state laws including 4216 are now included.

- 2) ANG procedures do not provide details on its USA ticket receipt and assigning process. Specifically, ANG's Damage Prevention Plan lacks details as to what, when, whom, etc. related to its procedure/process for the processing of USA tickets received and documenting of actions taken by ANG staff to close the USA ticket by providing various positive responses to the party providing notification. ANG needs to establish written procedures for its process for receiving, processing, completing and documenting excavation notices (USA tickets) it receives. ANG written procedures for conducting operations are required by regulations and would be essential towards training new employees and assuring uniformity and consistency in employee work activities. The procedures need to also provide for communication of a positive response to the notifying party noted on the USA ticket within two business days of the USA ticket notice, or by the legal start date noted on the USA ticket.

In Response please find enclosed Alpine's revised OME policy 614-C and the new Appendix B-8 Utility Locating Request Form that addresses this finding and documents the process of receiving, processing completing, and documenting excavation locate tickets.

- 3) ANG did not have any procedures related to horizontal drilling damage prevention. Though ANG has not performed horizontal drilling, SED discussed with ANG that it needs to give attention to providing details in its procedures as to what it requires from parties performing horizontal drilling activities near ANG facilities.

ANG indicated during the inspection that is considering modifying procedures and implementing a new form to capture more details related to mark and locate, as well as standby, activities. ANG's standby procedure needs to require the use of a detailed standby checklist which ANG develops; moreover, the checklist needs to record dates, observations, time on/off site, names of entities contacted, discussions, agreements, etc.

In Response please find enclosed Alpine's revised OME policies 614-B & 614-C and the new Appendix B-8 Utility Locating Request Form as well as the revised Form 614 B 3rd Party Monitoring, that addresses this finding and documents the performance of excavator communication and 3rd Party Monitoring where it was determined to be required or appropriate. Appendix C-1 is the revised letter to excavators that is sent annually. While the Excavator letter stated we provide location services prior to horizontal boring we now include notification that a pre-excavation on-site meeting is required wherever horizontal boring or drilling will be employed.

- 4) SED's review found some records lacking details as to who or when a response was provided to a notifying party. ANG needs to develop a uniform procedure for including details to be recorded, related to the USA ticket, before closing it. Examples include: Names, dates, information communicated agreements between ANG and other parties, etc. It is suggested that ANG take photographs of marked location as evidence of markings in the event of damages being experienced.

In Response please find enclosed Alpine's revised OME policy 614-C and Appendix B-8, Utility Locating Request Form that addresses this finding. Communication with caller when necessary and documentation of positive response by Alpine's operational personnel are emphasized in Appendix B-8.

- 5) ANG's Locating/Marking Underground Pipeline Procedure needs to develop specific, best practice marking practices and provide illustrative examples of how centerline, material type, material size, etc. are to be marked for conveying details in its subsurface facilities. ANG needs to incorporate the best practices from the latest version of the guidance provided by the Common Ground Alliance (CGA).

In Response please find enclosed Alpine's revised OME policy 614-A, 614-C and the new Appendix B-8 Utility Locating Request Form that addresses this finding. While CGA Best practices were referenced in OME 1371 they have included in Damage Prevention as well

- 6) ANG needs to establish a procedure to identify excavators who perform routine excavation activities in its territory and include them in its awareness notices. We believe two consecutive years of data related to excavators would be a minimum. USA North811 should be a good source for such data.

In Response please find enclosed Alpine's revised OME policy 616. Alpine reviews the excavator list annually and produces a revised list for distribution. Customer service and Record Keeping policy were revised to address this finding. Alpine will incorporate the use of USA ticket locate requests during the past two years to assist in developing this list.

- 7) ANG needs to make certain that its management of change process includes provisions to retrain its staff if its damage prevention plan is modified such that retraining is required.

In Response please find enclosed Alpine's revised OME policy 1005, Operator Qualification Plan Attachment E and OME 605-B8 provides for the review of OQ covered tasks and the assessment of operational retraining as well as continuous quality improvement review of the covered tasks procedures by the system administrator.

- 8) USA ticket W915100658 (5/31/19) ANG had a late mark due to extensive work on the USA ticket and other locates at the time. ANG made no request with excavator to obtain mutual agreement to extend time and/or schedule locates to facilitate contractor work. ANG needs to develop procedures for actions necessary to communicate to excavator if marks cannot be placed within the required legal start date shown on the USA ticket.

In Response please find enclosed Alpine's new Appendix B-8 Utility Locating Request Form that addresses this finding.

- 9) SED field inspected USA ticket X933602288 marked by Mark on 12/04/19 and field observed USA ticket W933700562 marked on 12/06/19. ANG provides no utility name or facility size as part of its standard 614-C. As noted in Item 6 above, ANG needs to continually update its standard to incorporate CGA Best Practices related to marking guidelines. ANG also needs to modify its standards to capture and document more details of its activities undertaken to close a USA ticket.

In Response please find enclosed Alpine's new Appendix B-8 Utility Locating Request Form that addresses this finding.

- 10) ANG needs to review its record retention requirements to confirm that they allow for SED audits currently anticipated to be performed every 3 years; therefore, ANG needs to maintain records for at least 4 years for current SED audit purposes. However, since GSRB schedules may extend beyond three years, we believe ANG should maintain mark and locate records for a minimum of 6 years.

In Response please find enclosed Alpine's revised OME policy 614-C and OME 709

- 11) ANG performs annual reviews of excavations damages to identify deficiencies and make improvements; however, it has no written procedure requiring this review and/or detailing the review process. This review needs to be proceduralized and details provided for how this review contributes to ANG's quality assurance/quality control activities.

In Response please find enclosed Alpine's revised OME policy 1005 and OME 1371 Methane Leakage Abatement Plan. OME Manual Review/Revision 605-A1 and OME Work Review- Covered Tasks.

II. Areas of Concern/Recommendations

- a) The requirement for ANG to perform a leak survey after any blasting operations occur near its facilities, is currently in ANG procedure 614-A (Third Party Excavation). ANG representatives indicated the company has not receive any notices or experienced any blasting operations near its facilities. SED suggests that in addition to the mandated post-blasting leak survey, ANG also include a need to perform a pre-blasting leak survey in order to have a before and after blasting comparison of leaks.

In Response please find enclosed Alpine's revised OME policies 614-A and 614-C as well as Form 614-B for 3rd Party Monitoring and the new Appendix B-8 Utility Locating Request Form that addresses this finding. Leak Surveys, Pre & Post excavation blasting activities, are required and will be documented in Appendix B-8 and Form 614-B.

- b) SED suggests that ANG include in its USA ticket processing procedure the need for ANG staff receiving the USA ticket to review USA tickets for notations related to delineations of planned excavation locations and obtain any necessary clarification from excavator about work location and pending activity for which delineations have not been provided. We urge ANG to require white delineations for excavations areas as part of ANG's locate process. We also suggest that ANG review its marking requirements for marking on private vs. public areas and size of marks to limit the negative aesthetic aspects of marks while meeting safety mandates.

In Response please find enclosed Alpine’s revised OME policy 614-C and the new Appendix B-8 Utility Locating Request Form that addresses this finding.

- c) GC 4216.2.(a) states: *“Before notifying the appropriate regional notification center, an excavator planning to conduct an excavation shall delineate the area to be excavated. If the area is not delineated, an operator may, at the operator’s discretion, choose not to locate and field mark until the area to be excavated has been delineated.”*

Currently ANG allows its locators to proceed locating and marking its facilities, based on information on the USA ticket, even if no white delineations are noted as being provided on the USA ticket and/or provided in the field by the excavator per requirements of GC 4216.2.(a). We suggest that ANG initiate efforts to develop policy/procedures which balance safety while encouraging excavators to comply with 4216 requirements for excavators to provide delineations of work area before ANG proceeds with marking its facilities related to the USA ticket. Perhaps ANG could begin urging compliance by requiring excavators to provide delineations, when a USA ticket received by ANG or its contractor denotes that white delineations have not been provided, before proceeding to the field to mark that USA ticket.

In Response please find enclosed Alpine’s revised OME policy 614-C and the new Appendix B-8 Utility Locating Request Form that addresses this finding. Delineation method of proposed area of excavation for all locate tickets are reviewed by both customer service and operational personnel. If delineation not provided, then Caller of the ticket will be contacted to provide the delineation.

Sincerely,



Michael Lamond, Administrator
Alpine Natural Gas Operating Company No. 1, LLC

Encl: Attachment A,
List of OME referenced policies

Email; Terence Eng, & Sunil Shori,

ATTACHMENT A

Alpine's OME Policy #	Name of Policy	Category	Revision Date	Supersedes Date
xxx	General Customer Service	General	2/20/20	12/28/12
605-A1	OME Manual Review/Revision	General	2/20/20	12/15/10
605-B8	OME Work Review-Covered Tasks	General	2/20/20	12/31/12
605-B3	Availability of Customer Records	General	2/12/20	7/15/04
605-B9	Excavation Safety	Construction	12/4/19	6/27/16
614-A	Damage Prevention Plan	Normal Ops.	2/25/20	12/4/19
614-B	Damage Inspection During 3 rd Party Excavation	Normal Ops.	2/25/20	12/4/19
614-C	Locating/Marking Underground Pipeline	Normal Ops.	2/25/20	12/4/19
616	Public Awareness	Normal Ops.	2/12/20	12/1/09
709	Record Keeping	Maintenance	2/24/20	7/15/04
1005	Integrity Management Plan		12/31/19	8/31/13
1371	Methane Leakage Abatement Plan		12/31/19	3/22/18

Alpine's Form #	Name of Form	Revision Date	Supersedes Date
614-B	3 rd Party Monitoring	2/5/20	Original
Appendix B-8	Utility Locating Request Form	12/15/19	Original
Appendix C-1	Damage Prevention Excavator Notification	2/24/20	12/105/10
Operator Qualification Plan Attachment E	Annual Plan Review- Covered Tasks	4/1/19	12/31/16
Appendix R-5	Integrity Management-IM Performance Data	4/1/13	3/2/12
Appendix R-7	Integrity Management-Threat Assessment	2/14/20	12/31/18



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

General-Customer Service	Approval; Date: 07/15/04
Revision date: 2/20/20	Supercedes:12/28/12

Customer Service

SCOPE AND PURPOSE

Alpine endeavors to efficiently, accurately and conveniently provide necessary information and documents to all current and new customers. A New Customer can be for either an existing service meter or to new construction or service line installation. Alpine welcomes all new applicants for service within Alpine's distribution system. Upon acceptance as a new customer each applicant will be assigned by Alpine's office personnel a unique customer account number, a permanent file and be entered into the electronic database and billing system.

It is the day to day responsibility of customer service to perform the necessary customer service functions including; customer contact, completing and maintain customer records, data entry, billing functions, payment collection, operations documentation, communication with operations utility locating requests, gas or odor leak calls and assisting system administrator with other tasks as assigned or communicated.

RESPONSIBILITY

The COO is the System Administrator and is charged with the responsibility to assure current customer service and billing administration policies are current and followed for all customer accounts. In addition, customer service assists the Administrator and OQ Gas Operations with compliance to laws, regulations, OME policies and documentation.

INSTRUCTIONS

All potential Alpine Natural Gas customers will receive a Customer Information Sheet along with an Application for Service form, prior to connection to the Alpine Natural Gas distribution system, (Appendix A-1 and A-2, respectively).

Current customers receive various other customer service forms that will also require distribution and or completion.

Active Customers, Noncustomers, excavators and public officials will receive periodic communications including information mailings about Natural Gas Safety, Public Awareness and Damage Prevention.

In addition, other information Alpine deems appropriate will be communicated to customers from time to time regarding buried pipelines and meter sets.

Customer Service will also provide prompt handling of all gas leak reports to ensure the Effective response to a notice of each type of emergency as in 49 CFR § 192.615(a) (3) (i-iv) including gas detected inside or near a building, fire, explosion or a natural disaster.

Locating and Marking of pipeline facilities by Alpines gas operations qualified operators starts with customer service receiving USA North locate tickets and generates a Utility Locate Request Form (Appendix B-8).

RELATED PROCEDURES

- Investigation of Gas Leaks
- 615 Emergency Plan
- 723 Leakage Survey, Leak Grading
- 605 B-1 General Pipeline Repair
- 605 D Safety Related Conditions Report
- 709 Record Keeping
- 614-A Damage Prevention
- 614-C Locating and Marking Pipeline
- 616 Public Awareness

Completion of OME Forms and Appendices



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

General 605-A1	Approval; Date: 07/15/04
Revision date: 2/20/20	Supercedes:12/15/10

OME Manual Review/Revision

SCOPE AND PURPOSE

This procedure is to ensure that Alpine Natural Gas has developed and maintains a manual of written procedures for conducting normal Operations, Maintenance and Emergencies activities as well as handling of emergencies as required by 49 CFR § 192.605(a).

This manual includes the following provisions:

1. Construction records, maps and operating history made available to appropriate personnel for safe operation and maintenance.
2. Provisions for gathering of data Necessary for the reporting of accidents in a timely and effective manner.
3. Provisions for operations, maintenance and pipeline repair.
4. Assessment of pipeline location areas that would require immediate operator response in case of failure/malfunction in order to protect the public.
5. Analysis of pipeline failures.
6. Minimization of potential for hazards during pipeline failure/malfunction.
7. Controlling Corrosion.
8. Pipeline startup and shut down procedures.
9. Attended monitoring during startup operations.
10. Abandonment of pipeline segments.
11. Procedures for minimization of accidental Ignition of gas.
12. Establishment and maintenance of a liaison with Police, Fire and other emergency response officials.
13. Operator personnel work review in order to assess the effectiveness of Operations, Maintenance and Emergencies procedures.
14. Adequate trench safety precautions for personnel.
15. Emergency condition procedures.
16. Safety-related condition reporting Requirements.
17. Periodic inspection and testing of pressure limiting equipment.
18. Updating OME Forms and Appendices to document compliance with applicable laws and regulations.

RESPONSIBILITY

The System Administrator is responsible for keeping this manual at all locations where Operations, Maintenance and Emergencies activities are conducted as well as performing a review of the provisions of this manual, and making appropriate revisions as deemed necessary, at the required intervals.

INSTRUCTIONS

Operator Qualification

This is not a covered task under the Operator Qualification Plan.

Review Frequency

This manual is to be reviewed and revised, as deemed necessary, by the System Administrator at an interval not exceeding 15 months, but at least once each calendar year. This review/revision effort will be recorded on Form 605-A1.

Review Steps

Any and all necessary procedural revisions will be made at the earliest opportunity.

REPORTING/NOTIFICATION

All manual revisions that effect operations, maintenance and emergency response procedures are to be communicated to all appropriate personnel at the earliest opportunity.

RELATED PROCEDURES

All operations, maintenance and emergency response requirements.



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

General 605-B8	Approval Date: 07/15/04
Revision date: 2/20/20	Supercedes:12/31/12

OME Work Review –Covered Task Evaluation

SCOPE AND PURPOSE

The purpose of this procedure is to ensure that all pipeline Operations, Maintenance and Emergencies work performed on Alpine Natural Gas facilities is in compliance with applicable state laws and federal regulations. And is periodically reviewed for effectiveness and adequacy as required under 49 CFR § 192.605 (b) (8) and 49 CFR § 192.805.

RESPONSIBILITY

The System Administrator is responsible for periodic review of Operations, Maintenance and Emergencies work performed by personnel on the pipeline and that Operations & Maintenance procedures are appropriately identified as Covered Tasks.

PERSONNEL SAFETY

Personnel safety records must be used as part of the review process in order to assess the effectiveness of work performance.

EQUIPMENT AND MATERIALS

No special equipment or materials are required.

OPERATOR QUALIFICATION

This activity is not a covered task under the Operator Qualification Plan. See OQ Plan for specific requirements for identification and evaluation of Covered Tasks.

INSTRUCTIONS

O & M procedures identified as Covered Tasks are evaluated.

Determination of adequacy of current OME procedures or need for change.

Field inspections of OQ task performance are evaluated. Evaluating need for continuous improvement of procedures or Operator training to promote compliance and efficiency.

INSPECTION FREQUENCY

All pipeline Operations, Maintenance and Emergencies work must be reviewed for effectiveness and adequacy once each calendar year, but at an interval not exceeding 15 months. This review can coincide with the annual review of the OME Manual.

REPORTING/NOTIFICATION

Each OME Work Review shall be documented by the System Administrator on Form 605-B8.

OQ Plan- Attachment E is completed after review and any changes or revisions to Covered Tasks will be revised in the OQ Plan.

RELATED PROCEDURES

605-A-1 OME Manual Work Review/Revision
1005 Integrity Management Plan
Appendix R-5 Threat Assessment.

All Covered Task related OME procedures



Procedural Manual for Operations, Maintenance and Emergencies

General 605-B3	Approval Date: 07/15/04
Revision date: 02/12/20	Supercedes: 07/15/04

ALPINE NATURAL GAS

Availability of Construction Records, Maps & Operating History

SCOPE AND PURPOSE

The purpose of this procedure is to ensure the safety of personnel during maintenance and operations according to the requirements under 49 CFR § 192.605(b)(3).

RESPONSIBILITY

The System Administrator is responsible for ensuring that all scheduled maintenance and operations functions are accompanied with a set of the most recent construction records and operating history such that personnel safety is maintained.

PERSONNEL SAFETY

There are no special personnel safety issues.

EQUIPMENT AND MATERIALS

Proper construction records and recent operating history for the segments(s) to be maintained/inspected.

INSTRUCTIONS

Operator Qualification

This activity is not a covered task under the Operator Qualification Plan

All operations and administrative personnel will maintain and archive operations and inspection records for at six years.

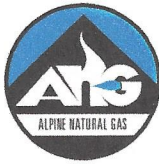
Construction records: including as built maps, notes and maintenance for all gas facilities are to be kept for the life of the distribution system.

REPORTING/NOTIFICATION

Field personnel performing maintenance and operations functions on the pipeline must request pertinent maps and records whenever necessary to ensure safety.

RELATED PROCEDURES

303 Construction
605-B1 General Pipeline Repair
Mainline and Service Line Construction
Binders
USA North Locate Ticket Appendix
Leak Survey Records



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Construction 605-B9	Approval Date: 07/15/04
Revision date: 12/4/19	Supercedes: 6/27/16

Excavation Safety

SCOPE AND PURPOSE

This procedure is to ensure employee safety in excavated trenches as required by 49 CFR § 192.605 (b) (9).

RESPONSIBILITY

The System Administrator is responsible for ensuring that all Alpine Natural Gas employees working in excavated trenches are protected according to the provisions of this procedure and personnel are provided training in Industry “Best Practices” and Safety procedures.

PERSONNEL SAFETY

Personnel have received trenching and confined space safety training.

EQUIPMENT AND MATERIALS

- Traffic cones and warning signs
- Traffic barricades
- Ingress/egress ladder
- Shoring equipment
- Breathing apparatus
- Rescue harness retrieval equipment

- In trenches <5 feet in depth, an ingress/egress ladder will be placed in the trench and a fire extinguisher will be readily available at the work site.
- In trenches ≥5 feet in depth, an ingress/egress ladder will be placed in the trench and a fire extinguisher will be readily available at the work site. Additionally, where trench sloping cannot be achieved a trench box or other approved shoring shall be used, and a rescue harness with lanyard shall be available for each employee in the excavated trench, including welding personnel.

Where a low oxygen atmosphere is detected, a breathing apparatus shall be used for each employee in the excavated trench, including welding personnel.

INSTRUCTIONS

All Alpine Natural Gas personnel are to utilize proper protective clothing/equipment when performing pipeline Operations, Maintenance and Emergencies functions while in excavated trenches.

Perform pre-planning functions including review permitting requirements, review of existing maps and records, Call in locate ticket to USA North of proposed excavation and mark in white paint to delineate proposed excavation.

OPERATOR QUALIFICATION

Construction activities are not covered tasks under the Operator Qualification Plan until new facilities are tied-in and gas is introduced. Refer to the OQ Plan for specific covered tasks and associated qualification requirements.

REPORTING NOTIFICATION

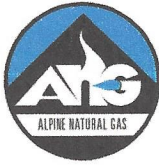
All excavated trench work must be documented on appropriate form for activity that required trenching.

Prior trenching or excavation notification within 500 feet of School or acute care hospital is required (PUC 955.5 3b). This written notification (ANG Form 605B9-a) not less than 3 working days prior to be directed to the school administration and filed and kept for at least 5 years.

RELATED PROCEDURES

All Operations, Maintenance and Emergencies Procedures performed in excavated trenches.

- Vault Maintenance-confined space safety
- 614-A Damage Prevention Plan
- 614-C Pipeline Marking and Locating
- Appendix B-8
- 614-B 3rd Party Monitoring & Form 614-B



Procedural Manual for Operations, Maintenance and Emergencies

Normal Ops. 614-A	Approval Date: 07/15/04
Revision date 12/4/19	Supersedes: 12/31/12

ALPINE NATURAL GAS

Damage Prevention Plan

SCOPE AND PURPOSE

The purpose of this Damage Prevention Plan is to establish procedures to assure the performance of damage prevention activities during excavation in compliance with applicable federal & state law:

- 1) by Alpine or its contractors and, or,
- 2) During Alpine excavation or encroachment by third parties, and
- 3) Alpine will meet or exceed the Common Ground Alliance "Best Practices" for its damage prevention procedures and
- 4) Alpine will comply with all aspects of operations, locating, marking and excavating under California Govt Code §4216 and
- 5) Establishes Alpine's participation in Underground Service Alert North (USANorth) a qualified one-call system and
- 6) Provides prior notification to all planned excavation
- 7) Provides for the receiving and recording of planned excavation by third parties and
- 8) Provides temporary locating and marking of Alpine's buried pipeline facilities, or
- 9) Provides temporary locating and marking in Operators intended area of excavation and or,

10) Provides adequate pipeline support during excavation activities and

11) Provides communication periodically to excavators, customers and the public to communicate the existence of Damage Prevention Plan.

This procedure describes damage prevention practices required to comply with 49 CFR § 192.614.

RESPONSIBILITY

The System Administrator is responsible to ensure that excavation by utility personnel or utility contractors is performed as described in this procedure.

PERSONNEL SAFETY

Every reasonable precaution shall be taken to protect employees and the general public.

Maintain a safe distance from construction equipment and the edge of the excavation.

EQUIPMENT AND MATERIALS

As Needed

OPERATOR QUALIFICATION

Some procedures associated with this activity are covered tasks under the Operator Qualification Plan, **ANG C.T. #14 & 15.**

INSTRUCTIONS

Frequency

Written correspondence should be sent by Alpine Natural Gas to all new customers.

Semi-Annually to existing customers basis (twice per calendar year).

Excavator Letter sent (**Appendix C-1**)
Annually



Procedural Manual for Operations, Maintenance and Emergencies

Normal Ops. 614-A	Approval Date: 07/15/04
Revision date 12/4/19	Supersedes: 12/31/12

ALPINE NATURAL GAS

Damage Prevention Plan

Steps

1. The Alpine Natural Gas Excavator Notification List (Appendix C) shall be updated annually prior to mailing of the Excavator Notification Letter (Appendix D). The list must include names and addresses of companies who have performed in the past two years excavation activities along the right of way and within the operating area of Alpine Natural Gas. Local architects and engineering companies should also be included. The written correspondence to excavators should include the Alpine Natural Gas emergency telephone number as well as utility location requirements through Alpine Natural Gas and Underground Service Alert (USA) One-Call System at, (811) or 1-800-227-2600.
2. Supplemental forms of damage prevention advisories may be implemented as deemed necessary including, but not limited to, public service announcements, newspaper advertisements, media/press releases. These advisories will be directed to the general public and excavators within the gas service area boundaries.
3. Alpine Natural Gas will establish a damage prevention liaison through membership/participation on local advisory boards, industry organizations, and representation at engineering pre-construction meetings such as; Home and Building Associations, County Excavation and Contractor Associations, Local Locating Groups.
4. Alpine Natural Gas shall maintain membership with the Underground Service Alert (USA) One-Call System.
5. Alpine Natural Gas will provide temporary location marking of all buried gas facilities in an area where excavation intent has been received.
6. Follow-up inspection of gas facilities that may be exposed and/or damaged by excavation activities will be performed on

the excavation commencement date and again within two, (2), working days after completion of the subject excavation in order to ascertain pipeline integrity. After all blasting activities, a follow-up inspection of the gas facilities in the surrounding area will be performed. A leakage survey may also be performed. This inspection will also be performed in order to determine if any corrosion is present on exposed steel piping and associated fittings. When corrosion is present, refer to 465 External Corrosion Control – Monitoring. **C.T. # 15.**

7. All written and verbal correspondence/communications to all excavators and landowners will include information regarding how the public can learn of the location of underground pipelines both under item 5., above, and through examination of gas system maps/plats, upon request.

Alpine Natural Gas will practice additional damage prevention activities regarding facility installation, as follows:

1. Gas distribution mains will have thirty-six inches, (36”), of cover. Gas service lines will have eighteen inches, (18”), of cover.
2. Tracer wire will be installed above all plastic facilities.
3. Tracer wire will be terminated above grade and wrapped around service risers for ease of access and locating.
4. Field personnel will use hand tools only when digging within twenty-four inches, (24”), of all located buried utilities.

REPORTING/NOTIFICATION

Alpine Natural Gas shall retain copies of any correspondence and promotional materials distributed in the Alpine Natural Gas operating area for a minimum of two years after distribution, or until the next correspondence period occurs.



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Normal Ops. 614-A	Approval Date: 07/15/04
Revision date 12/4/19	Supercedes: 12/31/12

Damage Prevention Plan

USA – North “5 steps to safe excavation”
Appendix N-3 is promoted in semiannual notice
to customers and excavators.

RE-LATED PROCEDURES

303 Construction
605-B1 General Pipeline Repair
465 External Corrosion Control – Monitoring
All other Operations, Maintenance and
Emergencies Procedures performed in
excavated trenches.
614-B 3rd Party Excavation & Form 614-B
614-C Line Locating/Marking
616 Public Awareness Plan
605-B9 Excavation Safety
Appendix B-8



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Normal Ops. 614-B	Approval Date: 07/15/04
Revision date: 12/4/19	Supercedes: 01/30/11

Damage Prevention Inspection during Third Party Excavation or Encroachment Activities

SCOPE AND PURPOSE

This procedure is to assure the performance of damage prevention activities during excavation by third parties. It describes damage prevention practices required to comply with §192.614.

RESPONSIBILITY

The System Administrator or other designee is responsible to determine when observation of a third (3rd) party excavation is necessary and to ensure that, when necessary, it is performed as described in this procedure.

Third (3rd) **Party Monitoring** procedure is also known as a “Stand-by” Procedure is to be performed when:

- a) excavation near Alpine’s high priority facility (defined by CA Gov’t. Code §4216 as >60 psi). This area is the only steel (28 feet total) pipe in Alpine’s system, entering (at 100 psi) Alpines vaulted Regulator Station
- b) Horizontal boring by excavator
- c) Proposed Blasting Activities
- d) Anytime OQ personnel determines 3rd Party Monitoring is necessary.

If, Operator believes pipeline could be damaged by excavation activities:

- An inspection must be performed as frequently as necessary during and after the activities to verify the integrity of the pipeline; and
- In the case of blasting, any inspection must include before and after leakage surveys.

PERSONNEL SAFETY (Where Applicable)

Maintain a safe distance from construction equipment and the edge of the excavation.

In the event the gas line is ruptured evacuate all personnel to a location upwind of the leak and implement the Emergency Plan.

EQUIPMENT AND MATERIALS

None

OPERATOR QUALIFICATION

This activity is a covered task under the Operator Qualification Plan and may only be performed by or directed and observed by an individual who is currently qualified to perform

this task. Refer to the OQ Plan for specific qualification requirements.

INSTRUCTIONS

- g. When arriving at the excavation site, locate the person in charge and identify yourself as a representative of Alpine Natural Gas. Tell them that there are gas pipelines in the area and you are there to observe and assist them to locate and work safely around the gas piping.
- h. Check that the **USANorth** has been notified and that all underground utilities have been properly marked. For proper marking refer to the requirements of **USANorth**
- i. Re-mark following procedure # 1 if the marking for the gas pipeline is removed or no longer visible.
- j. Encourage the excavator to hand dig near the markings to locate the buried facility. If directional boring is to occur, pothole to locate the marked facilities at the point where the bore is to cross the marked facilities.
- k. Ensure the excavator provides proper support for exposed pipe, both those owned by the utility and facilities owned by other utilities. Support should be provided to avoid excessive sagging. All supports should be free from sharp edges.



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Normal Ops. 614-B	Approval Date: 07/15/04
Revision date: 12/4/19	Supercedes: 01/30/11

Damage Prevention Inspection during Third Party Excavation or Encroachment Activities

- l. Ensure that care is exercised when digging or working around the utility's gas facilities. Care should be taken when equipment is working near exposed facilities.
- m. Nothing should be hung from or slung over exposed gas pipelines.
- n. If any portion of the utility's pipe is exposed, a visual inspection of the pipe condition must be performed before the gas pipe is reburied (See Procedure # 0151).
- o. Insure that installation of all facilities being installed maintain separation of at least 12" horizontally or vertically.
- p. Ensure that the backfill, even if it is the original soil, is free from old paving, rocks, debris, large clods or any other thing that might damage the pipeline or coating
- q. If the pipeline has been supported during excavation, do not remove the supports until the soil under the piping has been compacted until it can support the pipeline adequately. Fill evenly from both sides and compact in lifts so that the compaction is even and resembles original soil. Do not compact excessively on plastic mains or on tapping tees or other facilities that can be damaged by soil movement.

REPORTING/NOTIFICATION

Complete documentation in accordance with Operation and Maintenance Manual.

RELATED PROCEDURES

- 475 - Visual Inspection of Buried Pipe and Components When Exposed
- 614-C Locate Underground Pipelines
- 614-A Damage Prevention Plan



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Normal Ops 614-C	Approval Date: 08/25/06
Revision date: 12/4/19	Supercedes: 12/15/17

ALPINE NATURAL GAS

Locating/Marking Underground Pipeline

SCOPE AND PURPOSE

This procedure is to ensure that both the **Locating** of Alpine's buried gas pipeline facilities and for the **Marking** in the intended area/vicinity of proposed excavation activity is performed in accordance with 49 CFR §192.614(c)(5), California Gov't Code §4216 and meets or exceeds the standards of Common Ground Alliance(CGA)-"Best Practices".

RESPONSIBILITY

The System Administrator is responsible to ensure that underground pipelines are located as described in this procedure for Alpine Natural Gas distribution system and in compliance with existing regulations.

Alpine's Qualified Gas Operators are trained to:

- a) receive USA-North **Locate** tickets, perform locating and marking activities, completing and documenting all locate requests.
- b) **Mark** areas of intended excavation when Alpine is delineating an area of proposed excavation.

In most cases, the front office assists the Qualified Operator in receiving, processing and documenting the **USA ticket** received from excavators and homeowners by generating a **Utility Locate Request (Appendix B-8)**. **The front office also assists in the maintenance of the USA Ticket Binder.**

PERSONNEL SAFETY

Wear a reflective safety vest. Use care when locating lines under or near roadways and in other areas where vehicles are present. When arriving at the location look for obstacles, surface conditions and other features that may pose a safety hazard.

EQUIPMENT AND MATERIALS

USA Locate Ticket
Appendix B-8, Alpine's Utility Locate Request System Maps and records
 Line Locating Instrument
 Yellow paint, flags and/or other marking types
 Other equipment and materials as needed
 Manufacturer's instructions
 White-delineation paint

OPERATOR QUALIFICATION

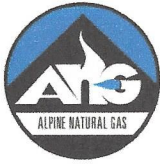
This activity is a covered task, **ANG C.T # 14** under the Operator Qualification Plan and may only be performed by or directed and observed by an individual who is currently qualified to perform this task. Refer to the OQ Plan for specific qualification requirements.

Check the batteries in both the transmitter and the receiver. If the batteries are low, replace them with new ones or recharge them according to the manufacturer's recommendations

INSTRUCTIONS

I. MARKING

1. Provide prior notice of intent to excavate, at least 2 business days, prior to all excavation.
2. Utilizing USANorth One Call System call in to create a Locate ticket for specific site of excavation.
3. Assure that a valid USA North ticket has been called in by printing up locate ticket sent by email or fax.
4. Mark intended area of excavation, boring & or trenching in white paint, white flags or similar.
5. Assure that all facilities have been marked prior to excavation by utilities with appropriate uniform color code markings.



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Normal Ops 614-C

Approval Date: 08/25/06

Revision date: 12/4/19

Supercedes: 12/15/17

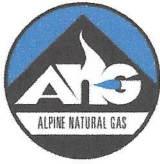
ALPINE NATURAL GAS

Locating/Marking Underground Pipeline

6. Determine if an Electronic Positive Response (EPS) has been received.
7. If no marks do not proceed with excavation. Contact Caller or USAN.
 - a. verify marking was done, or
 - b. no facilities at this location, or
 - c. locator had difficulties with location.
8. File Marking Ticket in appropriate folder/binder for record keeping.
9. Note ticket number and use as reference number on all applicable Alpine construction/OME documents.

II. LOCATING Pipeline Facilities

- a. When Front office receives a Locate ticket it to assure locate is performed in a timely manner it is reviewed for:
 - i) emergency or normal ticket locate and
 - ii) mark delineation method and
 - iii) If, no delineation, caller must be contacted to delineate location before locating is performed.
- b. Generate Utility Locate Request Form (Appendix B-8) and placed on rack with the USA ticket received, for OQ personnel perform locate.
- c. Front office maintains a copy of all tickets received in a binder by calendar year.
- d. Out of distribution system area tickets are returned to USA North to help refine mapped area maintained by USAN.
- e. Locator (Must be Operator Qualified) will review ticket and assess that the delineation method by caller is noted on ticket.
- f. If no delineation method is indicated on locate ticket, then the locator must telephone caller of ticket and inform that the pipeline will not be marked until the area of excavation is delineated (preferably in white paint).
- g. Locator will go to the location indicated on the locate ticket. Locate must be performed within two business days unless arrangements are made and documented with caller. Take and save a "before" photo if appropriate.
- h. If location ticket indicates a High Priority Facility(>60PSI), directional boring and or blasting activities then Locator will arrange meeting with Caller and employ the #rd Party Monitoring procedure.
- i. Consult the maps and/or records to verify the approximate location of the buried piping.
- j. Verify location requested is Delineated by described method. Communicate with caller, document and photograph as necessary.
- k. Perform locating as described below using CGA Best Practices. Provide a positive response with field markings including identifying (in yellow paint) Alpine "ANG", material size and type.
- l. Photograph "after" site is located showing yellow lines or indicate no ANG gas if appropriate. In a manner that the site can be later identified (house, address etc.), and presents delineated white marks and yellow locate marks.
- m. Communicate with Caller as necessary.
- n. Place all documents related to location to memorialize the completion of the requested pipeline location in the OQ staffs Location binder organized by calendar year.
- o. Complete the Locate Request Form Appendix B-8.



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Approval Date: 08/25/06

Revision date: 12/4/19

Supersedes: 12/15/17

ALPINE NATURAL GAS

Locating/Marking Underground Pipeline

III. LOCATING PROCEDURE

Alpine's current locating instrument is either the Pipehorn 100 or 800-HL. Prior to each use personnel will perform equipment check which verifies battery condition as well as the device performance.

- a. (Conductive method); Attach the pipe lead to the pipe, test station, tracer wire, or any appurtenance that is in good electrical contact with the structure to be located. Make sure that there is no rust or paint to interfere with the connection.
- b. (Inductive method); If there is no place to hook directly to the tracer wire, place the transmitter as nearly as possible directly over the tracer wire or pipeline. Follow the instructions for the locating instrument to prevent being too close to the transmitter with the receiver (typically 30 - 75 feet from the transmitter).
- c. For conductive method attach the ground wire to a suitable ground or ground stake located in the vicinity of the structure to be located. Turn the transmitter on and make any adjustments necessary to ensure proper operation. Use the lowest frequency possible at the lowest power output possible to minimize the "bleed over" of the signal to adjacent facilities. Note that not all locating devices have a frequency adjustment.
- d. Turn the receiver on and adjust the sensitivity setting on the receiver to a workable level.
- e. Follow the instructions for the line locating instrument to locate the buried piping.
- f. Mark the location of the gas lines. Markings may include one or any combination of the following: paint, chalk, flags, stakes, brushes or offsets.
 - (i) Indicate gas lines with yellow paint, or flags at the beginning and end of locates. Also, arrows should be placed

at the ends of markings to indicate that the underground facility continues.

(ii) To avoid confusion on long runs, the marks shall be frequent enough to identify the owner.

(iii) The marks shall indicate the approximate centerline of the gas lines. For example, the middle of the pipe shall be at the center of the dashed marks.

(iv) Location marks shall be 4 to 12 inches in length and at intervals of 5 to 10 feet.

(v) Extend marks outside the proposed work area by 20 to 30 feet if those facilities extend outside the proposed excavation area.

(vi) In areas such as flower beds, rock gardens, etc., flags or stakes may be an alternative to paint. The decision to use flags, paint, or stakes shall be based on the terrain and job conditions. For instance, flags or stakes in wet areas, offsets in dirt construction zones that have a high volume of traffic crossing their line location marks.

(vii) Dead ends, stub-outs, termination points, etc., shall be marked as follows:

← ABC---] [---XYZ→

(viii) Lines that have connections (e.g., T's) or changes in directions shall be clearly indicated. Marks indicating lines or connections shall clearly show the intersection and path of the line or connection. Marks that show changes in direction shall be placed closer together for more clarity and accuracy.

(ix) Valves shall be identified by using a circle and letters if they are not visible (dirt or pavement covering valve boxes).

(x) Facilities that cross but do not intersect shall be marked.



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Revision date: 12/4/19	Supercedes: 12/15/17

ALPINE NATURAL GAS

Locating/Marking Underground Pipeline

(xi) When facilities share the same trench, they shall be heavily identified and separated enough so that they can be readily identified.

(xii) If the facility to be marked has a diameter greater than 12", the size of the facility shall be indicated if known. If the size is not known, then the mark shall indicate greater than 12 inches.

(xiii) In areas where there is a strong likelihood that any or all marker types showing line location would be destroyed, offsets shall be placed on a permanent surface. However, offsets should be used only in conjunction with marks placed above a facility. Offset spacing should be every third or fourth mark.

IV. STAND BY or 3RD PARTY MONITORING PROCEDURE

1. OQ personnel will perform 3rd Party monitoring during:

- a) excavation near Alpine's high priority facility (defined by CA Gov't. Code §4216 as >60 psi). This area is the only steel (28 feet total) pipe in Alpine's system, entering (at 100 psi) Alpines vaulted Regulator Station

b) Horizontal boring by excavator in the vicinity of Alpine's facilities.

c) Proposed Blasting Activities in the vicinity of Alpine's facilities.

d) Anytime OQ personnel determines 3rd Party Monitoring is necessary.

2. OQ personnel will arrange a mandatory mutually agreeable site meeting to review project prior to excavation.

3. OQ personnel will monitor excavation until pipeline facilities are identified.

4. Document with field notes and photos including time arrived and time departed project site.

5. In case of blasting Pre & Post excavation Leak Surveys are required.

REPORTING/NOTIFICATION

Complete documentation in accordance with Operation and Maintenance Manual related policies.

RELATED PROCEDURES

Appendix B-8- Utility Locating Request Form
Patrolling

Valve Inspection

614-A Damage Prevention Plan

614-B 3rd Party Excavation

Form 614-B 3rd Party Monitoring Form

Leak Survey



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Normal Ops. 616	Approval; Date: 06/20/06
Revision date: 2/12/20	Supersedes: 12/1/09

ALPINE NATURAL GAS

Public Awareness Plan

SCOPE AND PURPOSE

The purpose of this standard is to establish procedures for communicating gas facility awareness to the public according to the requirements of 49 CFR § 192.616.

RESPONSIBILITY

The Alpine Natural Gas, Administration/CFO is the Public Awareness Plan Administrator and is responsible for the initial implementation and continual monitoring of this plan.

MANAGEMENT SUPPORT STATEMENT

The goal of Alpine Natural Gas is to provide reliable and safe natural gas service to our customers and ensure the safety of people residing and/or working near our natural gas facilities. Alpine Natural Gas is committed to enhanced Public Awareness as an essential component of our natural gas safety program. Therefore, each Alpine Natural Gas system employee must be dedicated to promoting the elements of this Plan. Alpine Natural Gas management is committed to providing the resources necessary to accomplish this goal.

PERSONNEL SAFETY

There are no special personnel safety issues associated with this procedure.

EQUIPMENT AND MATERIALS

Written and verbal correspondence/communications to the general public, schools, businesses, government agencies and excavators along and near Alpine Natural Gas facility right of way(s) and within the gas system service area including, but not limited to:

- Newspaper advertisements
- Radio announcements
- Customer Bill Stuffers

PLAN OBJECTIVES

The objectives of this Plan are as follows:

- 1) To educate gas customers and non-gas customers living and/or working near the Alpine Natural Gas distribution system how to recognize the odor of natural gas and how to react if they believe there is a natural gas leak.
- 2) To increase the awareness of the affected public and key stakeholders in the Alpine Natural Gas system service area of the presence of buried natural gas facilities.
- 3) To assist excavators in understanding the measures to be taken to avoid third party damage to buried natural gas facilities and how to respond properly if they cause damage to Alpine Natural Gas facilities.
- 4) To assist Fire, Police and other emergency response agencies that may assist Alpine Natural Gas during a natural gas emergency, of the proper action(s) to be taken in response to a release of natural gas or other natural gas emergency.

INSTRUCTIONS

Operator Qualification

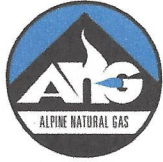
This activity is not a covered task under the Operator Qualification Plan.

Frequency

Each type of listed written correspondence/communications should be sent to the general public, schools, businesses, government agencies and excavators along all Alpine Natural Gas rights of way(s) and within the gas system service area according to the following recommended frequencies:

AT TIME OF NEW CUSTOMER SIGN UP

TWICE ANNUALLY:



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Revision date: 2/12/20	Supersedes: 12/1/09

ALPINE NATURAL GAS

Public Awareness Plan

Gas Customers

ANNUALLY:

Non-customer individuals living near the pipeline system
 Emergency Officials
 Excavators/Builders/Contractors
 One-Call Center
 School Administrators

3 YEARS:

Public Officials –

Mayor
 City/Town Manager
 Planning board
 Zoning/Licensing board
 Permitting board
 Building Code Enforcement

Steps

1. The Alpine Natural Gas Public Awareness directory shall be updated annually prior to mailing of correspondence.
2. The directory must include names and addresses of residents, business owners, schools, government agencies and excavators within the operating area of Alpine Natural Gas.
3. Excavator list is revised each year by using known local contractors and contractors who have called in locate tickets in the previous two years (a listing from USA North is requested annually for past callers).
4. The written and verbal correspondence/communications should include the Alpine Natural Gas emergency telephone number as well as information regarding Alpine Natural Gas pipeline markers, natural gas characteristics, recognition of gas odor, and guidance whenever a leak is suspected.

5. Supplemental Public Awareness requirements for excavators will be communicated in person during utility locate requests include instructions for reporting a gas emergency.
6. -Alpine's limited distribution area does not have a significant concentration of non-English speaking in the population. All Public Awareness Correspondence is distributed in the English.

CONTENTS

Examples of written and verbal correspondence/communications may include, but not be limited to:

PREVENTING GAS EMERGENCIES

1. Keep all appliances clean, properly vented and serviced regularly
2. Ensure that each person of appropriate age in your family knows how to operate gas appliances and shutoff valves
3. Don't use or store gasoline, aerosols or other flammable products near gas appliances
4. Don't use an open gas oven for heating your home or drying clothes
5. If you have a gas log in your fireplace, the damper must be permanently blocked in the open position
6. Whenever changing your furnace filter, be sure to replace your fan compartment door properly. Filters should be changed/cleaned monthly during the heating season.
7. Never cover fresh air vents that supply air to your gas appliances
8. Have all gas line alterations and appliance repairs performed by a licensed professional.
9. Before digging in streets, alleys, or your yard, be sure you know the location of underground utility services including gas. Alpine Natural Gas is a member of the Underground Service Alert (USA) One-Call System. Always call the Underground



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Revision date: 2/12/20	Supersedes: 12/1/09

ALPINE NATURAL GAS

Public Awareness Plan

Service Alert (USA) One-Call System at **811** or **1-800-227-2600** for free utility locates and before starting any excavation activities.

10. Write your local Fire and Police Department(s) telephone numbers in the front of your personal phone book and/or post them in a conspicuous place

NATURAL GAS PROPERTIES/ODOR

1. Natural gas is a non-toxic, colorless fuel, about one third, (1/3), lighter than air. Gas burns, but only when mixed with air in the right proportion and ignited by a spark or flame. In its purified state, natural gas has no smell. For your protection, Alpine Natural Gas stream contains a harmless distinctive odor so you can detect and report the slightest natural gas leak.

HOW SAFE IS NATURAL GAS ? GAS LEAK RECOGNITION AND REACTION

1. Whenever natural gas leaks from a pipe or pipe fitting, there is a possibility of fire or explosion
2. If leaking natural gas accumulates in a confined space, it can be displaced air and cause suffocation
3. If a gas appliance is not operating properly, incomplete combustion can produce a toxic gas called carbon monoxide (CO)
4. An appliance pilot light or gas burner can ignite combustible materials and flammable vapors such as gasoline, paint thinner or aerosols.

5. ANYTIME YOU SUSPECT A NATURAL GAS LEAK OR A POTENTIAL GAS EMERGENCY, CALL ALPINE NATURAL GAS at (209) 772-3006.

6. Attached and found in **ANG Appendix A-3** are examples of correspondence that should be sent to target audiences.

EMERGENCY PREPAREDNESS COMMUNICATIONS TO EMERGENCY RESPONSE AGENCIES/LOCAL OFFICIALS

1. Alpine Natural Gas will present an Emergency Response Liaison program for Fire, Police, other emergency response agencies and Local Officials according to the provisions of the Alpine Natural Gas Emergency Plan.
2. Fire, Police, other emergency response agencies, and Local Officials can obtain additional information by calling Alpine Natural Gas at **(209) 772-3006**.

SUPPLEMENTAL ELEMENT IMPLEMENTATION

Alpine Natural Gas will determine whether supplemental elements will be implemented for any or all identified stakeholder audience after each plan effectiveness assessment.

PLAN MANAGEMENT

The Plan Administrator will review all inquiries, input, remarks, and requests for further information based on materials sent and/or communicated to Alpine Natural Gas. Response to all incoming communication will be communicated by the Plan Administrator.

PLAN ASSESSMENT

The Plan Administrator will annually measure the effectiveness of the Plan information communicated to all listed stakeholder audiences by:

- Ensuring the Plan adheres to API RP 1162
- Specified Plan components have been implemented by utilizing gas Operations, Maintenance and Emergencies personnel and/or outside consultants



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Normal Ops. 616	Approval; Date: 06/20/06
Revision date: 2/12/20	Supersedes: 12/1/09

ALPINE NATURAL GAS

Public Awareness Plan

- Maintaining records of each annual assessment

Should the Plan be audited by the California Public Utilities Commission, (CPUC), in any calendar year, a record/report of such an audit will be maintained by the Plan Administrator and count as the annual assessment in lieu of conducting an additional annual assessment by Alpine Natural Gas.

PLAN EFFECTIVENESS EVALUATION

The Plan Administrator will determine the effectiveness of the Plan at least once every 4 years by measuring:

- Whether the Plan information is reaching the intended stakeholder audiences
- Estimating the percentage of target audience(s) reached
- Estimating the level of target audience comprehension of materials/messages
- Verification of target audience willingness to act on materials/message content
- Determining the impact of Plan information for facility damage reduction
- The frequency of material/message communication from target audiences
- Review of all third party damages

- Confirmation of target audience receipt of Plan materials/messages
- Comparison of ONE-CALL evaluations for Plan effectiveness (as available)

Whenever the results of the Plan effectiveness evaluation indicate that one or more stakeholder audience is not receiving and comprehending one or more of the stakeholder messages, the Plan Administrator will review the stakeholder message type, content, and delivery method(s) to determine if more effective means of communication are available

REPORTING/NOTIFICATION

Alpine Natural Gas shall retain copies of any and all Public Awareness correspondence and promotional materials distributed in the Alpine Natural Gas operating area, records of annual Plan assessments, and records of all Plan effectiveness evaluations for a minimum of five years after distribution.

Form 616 will be completed for each type of correspondence delivered/received. It is the responsibility of the system administrator to have the periodic notification mailing lists reviewed and compiled. USA-North locate tickets over the past two years is one tool used to compile a comprehensive list of local excavators.

Appendix A-3 is provided to all new customers in new-customer packet and annually. This notice also appears below.

Appendix N-1 semi-annual Customer Letter.
Appendix N-2 Annual Non-Customer Letter.
USA North Call Ticket Binder.



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Maintenance 709	Approval Date: 07/15/04
Revision date: 2/24/20	Supercedes: 07/15/04

ALPINE NATURAL GAS

Record Keeping

SCOPE AND PURPOSE

This procedure is to ensure the safe operation of the pipeline system by recording and maintaining records of all repairs, patrols, surveys, inspections and tests required by 49 CFR Subparts L and M.

RESPONSIBILITY

The System Administrator is responsible to ensure that all pipeline records are properly obtained and maintained according to the provisions of this procedure.

PERSONNEL SAFETY

There are no special personnel safety issues.

INSTRUCTIONS

Operator Qualification

This activity is not a covered task under the Operator Qualification Plan

REPORTING/NOTIFICATION

The following records must be periodically obtained and maintained and recorded on appropriate forms.

Record Retention

<u>Record Type</u>	<u>Interval</u>
Public Awareness	5 years
Damage Prevention	5 years
Patrolling	5 years
Emergency Valves	5 years
Regulator Stations	5 years
Leakage Surveys	Lifetime
General Repair	Lifetime
Cathodic Protection	Lifetime
Abandoned Facilities	Lifetime
MAOP Establishment	Lifetime
Customer Owned Piping	3 years
USA Locate Tickets	5 years
Locate Request Forms	5 years
Construction Maps & Records	Lifetime

RELATED PROCEDURES

- 503 Facility Leak Test Requirements
- 605-B1 General Pipeline Repair
- 614 Damage Prevention
- 616 Public Awareness
- 619 Maximum Allowable Operating Pressure (MAOP)
Cathodic Protection (various standards)
- 721 System Patrolling
- 723 Leakage Surveys
- 727 Abandonment of Pipeline Facilities
- 739 Regulator Stations
- 747 Valve Inspection and Maintenance
- 614-C Locate & Marking Underground Pipelines



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Integrity Management Plan (DIMP). 1005	Approval Date: 08/25/06
Revision date:12/31/2019	Supersedes: 8/31/2013

Integrity Management Plan

SCOPE AND PURPOSE

This procedure was implemented as a requirement of 49 CFR § 192.1005 on August 1, 2011. Alpine developed this plan via a tool called SHRIMP, provided by the American Public Gas Association, The IM Plan is Appendix R1 here in Alpines OEM.

The purpose of Alpine’s Distribution Integrity Management Plan is to reference the procedures used to assess the threats and risks to the integrity of Alpine’s Natural Gas Distribution System. The Plan describes Alpines; Design, Operating Conditions, Environmental factors and Maintenance to continually monitor and evaluate in pipeline integrity.

RESPONSIBILITY

The System Administrator and Operator Qualified personnel are responsible for compliance with the provisions of this procedure and the development and implementation of required actions.

EQUIPMENT AND MATERIALS

INSTRUCTIONS

The gas systems integrity is managed on an ongoing basis. Threat assessment is reviewed annually.

Operator Qualification

These activities are not a covered task under the Operator Qualification Plan, however, see OQ Plan for specific covered tasks and associated qualification requirements for duties related to this Plan.

Current Rank: The tool was used to assess and rank the seven threats to Alpine’s Distribution system Integrity:

1. Excavation Damage
2. Material or Welds
3. Incorrect Operation
4. Equipment Failure
5. Natural Forces
6. Corrosion
7. Other Outside Forces

Other

Alpine quantified thresholds for incidence of specific major threats to the system. These are quantified in a table in Chapter 7 of the DIMP Plan. To assist management in the ongoing evaluation and maintenance of the systems safety and operations. Annual review of the data to evaluate need for additional measures or actions is the responsibility of the System Administrator.

Plan Evaluation

PHMSA annual Leak Report 7100 is collected to update distribution system data. PHMSA 7100.1-2 completed for mechanical fitting failures (this excludes meter sets)

Plan Revision

DIMP Plan is evaluated every two years (Biennially)

RELEVANT APPENDICES

R-1, R-2, R-3, R-4, R-5, R-6 and R-7

RELATED PROCEDURES

- 465 External Corrosion Control – Monitoring
- Internal Corrosion Measurement
- 605-B1 General Pipeline Repair
- 605 B5-7 Startup-Shutdown-Purging



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Integrity Management Plan (DIMP). 1005	Approval Date: 08/25/06
Revision date:12/31/2019	Supercedes: 8/31/2013

Integrity Management Plan

605-D Safety Related Conditions
625 Odorization
709 Record Keeping
723 Leakage Surveys
751 Prevention of Accidental Ignition
615 Public Awareness Plan
614 Damage Prevention



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Methane Leakage Abatement Plan 1371	Approval Date: 03/22/2018
Revision date: 12/31/19	Supercedes: Original

Methane Leakage Abatement Plan

SCOPE AND PURPOSE

This procedure was implemented because of the passage of California Senate Bill (SB) 1371 (2014, Leno) and SB 1383 (2016, Lara). Alpine supports the CPUC’s efforts to reduce methane emissions and recognizes that methane, which is the largest component of natural gas, as a Greenhouse Gas (GHG) harmful to the atmosphere.

Alpine and its employees, in its support of the Commissions efforts to reduce gas emissions, create this policy to comply with the Requirements of both SB 1371 and 1383 as they relate to the operation and maintenance of Alpine’s gas distribution system. In this regard Alpine acknowledges the gas emissions to the atmosphere include; Operations like valve opening, purging and venting, Excavation Damage and Fugitive emissions found at Meter Set Assemblies (MSA’s)

The purpose of Alpine’s Compliance with SB 1371 and SB 1383 includes developing a Methane Leakage Abatement Plan to guide company activities and ensure effective implementation to abate natural gas leakage and minimize methane emissions. The Commissions D.17-06-015 included:

- Development and submitting a Compliance Plan
- Awareness of CPUC, 2030 Target of 40% methane reduction
- 26 Best Practices (BP) for planning, leak detection/repair and worker training
- Annual reporting of gas emissions; from damage, operations or fugitive.

Alpine’s Leakage Abatement Plan integrates the OME maintenance and operations procedures including; Leak Investigation, Leak Survey, Leak Grading and Leak Repair in addition to training in the Operator Qualification Plan and

Alpine’s Integrity Management Plan that includes threat assessment to assess the threats and risks to the integrity of Alpine’s Natural Gas Distribution System.

INTRODUCTION-COMPLIANCE

Alpine’s OME policy 1371 includes the language from SB 1371 below:

Methane (CH4) is a hydrocarbon and the primary component of natural gas. Methane is also a potent and abundant greenhouse gas (GHG), which makes it a significant contributor to climate change, especially in the near term (10–15 years). Methane is emitted during the production and transport of coal, natural gas, and oil. Emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills and certain wastewater treatment systems. Methane is the second most abundant GHG after carbon dioxide (CO2), accounting for 14 percent of global emissions. Though methane is emitted into the atmosphere in smaller quantities than CO2, its global warming potential (i.e., the ability of the gas to trap heat in the atmosphere) is 25 times greater. As a result, it is estimated, methane emissions currently contribute more than one-third of today’s anthropogenic (man-made) warming.

Alpine’s Leak Repair Policy is to “Find it and Fix it”. Discovery of a leak can occur by and including; reports from customers, contractors working at in or around distribution system, during routine patrolling by Alpine personal, and annual leak surveys. Alpine leak repair policy is to immediately repair all Grade 1 leaks as they are discovered.

In addition, Alpine does have a policy to repair all Grade 2 and Grade 3 leaks upon discovery. Where conditions do not allow for prompt repair Grade 2 are monitored and repaired within six months and Grade 3 not to exceed 15 months.



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Methane Leakage Abatement Plan 1371	Approval Date: 03/22/2018
Revision date: 12/31/19	Supersedes: Original

Methane Leakage Abatement Plan

Alpine employees responsible for leak detection, leak repair and contractor monitoring not only contribute to safety and cost reduction, they also have an effect by minimizing emissions to the atmosphere.

RESPONSIBILITY

The System Administrator and Operator Qualified personnel are responsible for compliance with the provisions of this procedure and the development and implementation of required actions. And for the review of OME policies as they relate and adhere to CGA-Best Practices.

Operator Qualification

These activities are not a covered task under the Operator Qualification Plan, however, see OQ Plan for specific covered tasks and associated qualification requirements for duties related to this Plan.

Plan Evaluation

Alpine’s Management annually performs a threat assessment for Integrity Management beginning calendar year 2018 atmospheric emissions from; operations, excavation dig-ins and MSA fugitive leaks will be reviewed and quantified annually.

Reporting

PHMSA annual Leak Report 7100 is collected to update distribution system data.

Annual Leak Abatement Report filed with SED each June including current report Templates and spreadsheets.

Plan Revision

Plan is evaluated every two years (Biennially)

RELEVANT DOCUMENTS

- Appendix R-5 I.M. Performance Measurement
- Appendix R-7 Threat Assessment
- Appendix Z Leak Abatement
- Appendix AB- USA Locate Binder

RELATED PROCEDURES

- 615-a Odor and Leak Calls
- 605-B11 Leak Investigation
- 465 External Corrosion Control – Monitoring Internal Corrosion Measurement
- 605-B1 General Pipeline Repair
- 605 B5-7 Startup-Shutdown-Purging
- 605-D Safety Related Conditions
- 625 Odorization
- 709 Record Keeping
- 723 Leakage Surveys
- 751 Prevention of Accidental Ignition
- 615 Public Awareness Plan
- 614-A Damage Prevention
- 614-B 3rd Party Monitoring
- 614-C Locating/Marking Underground Pipeline
- Operator Qualification Plan
- Integrity Management Plan
- New Construction- including Service Line and Main Pipeline Installation
- New Meter Set Installations and Replacement
- Regulator Station Maintenance
- Emergency Plan
- 709 Record Keeping



Procedural Manual for Operations, Maintenance and Emergencies

Form 614-B	Approval Date: 02/5/20
Revision date: Original	Supercedes: None

ALPINE NATURAL GAS

3RD Party Excavation Monitoring Form

3rd Party Excavation: Caller _____

Caller telephone# _____ Company: _____

Date: _____ Time: _____ USA Ticket # _____ received

Location/ Description of excavation/construction: _____
Address _____

Property map & or Alpine Construction maps attached:

Location and or Pre-construction meeting completed YES NO

Photo taken: YES

Blasting during excavation planned: If, YES **Pre & Post Excavation Leak Surveys Required.**

Reason for 3RD Party Monitoring: _____

Directional Drilling: YES NO

Blasting: YES NO Pre-Blast Leak -Survey Performed Post-Blast Leak Pre-Survey Performed

Other: YES NO _____

Construction Start Date: _____ Time _____

Expected Completion Date: _____

Location of Alpine Buried Pipeline provided: YES NO

Alpine Operator witnessed the presence and identification Alpine's buried facilities. YES NO

Visual Inspection of Pipeline: YES Photos taken: YES Date _____ Time _____ Left Site

Misc. Field notes:

Safe Practices followed by Excavator:

Excavation completed safely:

Excavation site returned as before:

Operator Signature



Procedural Manual for Operations, Maintenance and Emergencies

Appendix B-8	Approval Date 12/15/19
Revision date: Original	Supercedes: Original

ALPINE NATURAL GAS

Utility Locating Request Form

USA Ticket Received

Received By: Office _____

Date: ___/___/___ Time: _____

Ticket # _____

Caller: _____ Homeowner

_____ Contractor

Locate Assigned to: _____ Property Map Attached Yes / No

Address: _____ Cross Street: _____

Description of Location if no address: _____

Involves: P.E. Service Line- Pipe Size _____ P.E. Main Line- Pipe Size _____

Standard Locate Yes / No [] Alpine Unable to perform locate in timely manner

Emergency Locate Yes / No [] Caller notified of need to extend locate

Locate performed by: _____

Positive Response to locate request- all facilities appropriately marked: yellow paint, flags or other.

Located on: Date: ___/___/___ Time: _____

Signature

Was Location properly delineated with white paint? Yes / No Caller notified to delineate

Before Photo's taken of area to be located? Yes / No (If No why)

Property Map Reviewed

After Photos taken of area located? Yes / No (If No why)

All Photos properly stored on operations computer:

Field Meeting required by Alpine Yes / No

Reason for Field Meeting: Blasting Other

Date: ___/___/___ of Field Meeting Scheduled Pre Blasting Leak Survey Scheduled Yes / No

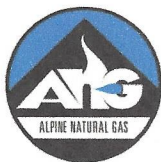
Will third party excavation monitoring be required during Excavation: Yes / No

Excavation at High Priority Reg Station Horizontal Boring Blasting Activities Other (OQ Determined)

Excavator Contacted? Yes / No Projected Date of Excavation: Date: ___/___/___

Comments:

Field Notes: _____



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Procedural Manual for Operations, Maintenance and Emergencies

Appendix C-1	Approval Date 12/15/08
Revision date: 2/24/20	Supercedes: 12/15/10

DAMAGE PREVENTION PLAN- EXCAVATOR NOTIFICATION LETTER

To: NAME
MAILING ADDRESS
CITY, CA ZIP

From: Alpine Natural Gas

SUBJECT: GAS FACILITY DAMAGE PREVENTION PROGRAM

Alpine Natural Gas is required by state and federal pipeline safety regulations to communicate on a periodic interval with all known local excavators and contractors working within the operations and service area of our gas distribution facilities. This communication is intended to promote continued public safety regarding the existence of our buried natural gas piping.

Our distribution system lies within the La Contenta, Rancho Calaveras, New Hogan Dam Estates and Gold Creek Estates subdivisions and along Highway 26.

If your company is planning an excavation, drilling, blasting or horizontal directional boring project in areas where Alpine Natural Gas has facilities, we will provide you with a free (no cost) gas pipeline location service.

The State of California requires that you call the Underground Service Alert (USA) One-Call Service at least two, (2), working days prior to the beginning of your excavation work. To save yourself time and frustration when calling One-Call, please have the following information at hand when you place the call:

1. Name of the company doing the excavation work.
2. Name of contact person for the company.
3. Street address or other location of the work site.
4. Name of the nearest intersecting street.
5. Legal description for the job site (i.e. R 14 south, T 78 west, Section 8).
6. Type of work being done.
7. Date work is to be started.

You may contact our office directly regarding gas facility locates, however, you are still required to call the Underground Service Alert (USA) One-Call Service at **1-800-227-2600** to locate any underground utilities that other operators may have in the area where you intend to excavate. Once notified, Alpine Natural Gas will mark all gas facilities with temporary fluorescent "yellow", yellow flags on wire and/or yellow "whiskers" depending on the type of surface.

For Horizontal drilling, blasting and excavation in the vicinity of our high priority facilities we require an on-site pre-excavation field meeting. Alpine will also need to arrange for 3rd Party monitoring during your excavation around our facilities.

We are happy to be able to provide this service to you, free of charge, and to work in conjunction with all contractors and excavators in our service area in order to maintain a high level of public safety. Please feel free to contact our office at, **209-772-3006**, if we can assist with this or any other issue.

Thank You,

Alpine Natural Gas

Encl; Gas Facility Map, Annual Letter to Non-Customers, Gas Emergency or Line Break

Attachment E

Annual Plan Review

Plan Administrator, Michael Lamond

Date: _____

Review of Covered Tasks listed in Attachment A

Observations/comments: _____

Review skills and abilities evaluations of covered tasks

Observations/comments: _____

Written Exam assessment

Observations/comments: _____

Assess need to change evaluation intervals

Observations/comments: _____

List of Plan Segments; Deleted, Added or Revised.

Observations/comments: _____



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Integrity Management	Approval Date 3/2/2012
Revision date: 4/01/13	Supersedes: 3/2/2012

ALPINE NATURAL GAS Appendix R-5

ANNUAL LOG FOR I.M. PERFORMANCE MEASUREMMENT DATA

YEAR OF DATA	# HAZARDOUS LEAKS		# LEAKS CAUSED BY EXCAVATION		# of Excavation Tickets	# of Leaks Repaired	# of Hazardous Repaired		SUMMARY OF MODIFICATIONS to Alpine's Leak Management Plan	Performance Data Evaluated by
	Service Lines	Main Line	USA ticket	No USA Ticket			Steel	P.E		
									Policies Modified or Created: Any additional Measures needed to Are Performance Measurements Effective?	
DATE EVALUATED										
Comments:										



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Integrity Management	Approval Date 3/2/2012
Revision date: 2/14/20	Supersedes: 12/31/18

ALPINE NATURAL GAS Appendix R-7- Threat Assessment

2020

Gas Leak Threat Assessment Summary
(To be completed annually by System Administrator)

Alpine's Piping-System

Cause of Leak	MAIN LINE		SERVICE LINE		NON-HAZARDOUS Leaks found on Meter, Service Regulator or Valve Cook MSA-NON-HAZARDOUS- UNGRADED	USA Ticket Y / N	Leak Grade	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS			GRADE 1	GRADE 3
Corrosion								
Natural Forces								
Excavation								
Other Outside Forces								
Material or Welds								
Equipment								
Incorrect Operations								
Other- NON-LEAKS								

of Gas Leaks Reported for the year _____

of Leaks Calls "Other Non-Leak" Table above, for the year _____ Non-Leaks found during Leak Survey Operations _____

of "No Gas Leaks Found" during investigation, for the year _____

of "Customer Owned Pipe or Appliance leaks found, for the year _____

of Gas Leaks Reported to PHMSA, for the year _____

of Gas Leaks Reported to CPUC, for the year _____

of Reports of Injury or Loss of Life, for the year _____

of Reports of Property Damage, for the year _____ \$ amount _____

Performance Measurement for identified Leak Cause. _____

NOTE: Non-Leaks are for emissions reporting purpose these do not meet definition of PHMSA Leak