



Sunrise Power Company, LLC

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661-615-4630

Kelly S. Lucas, Executive Director

May 22, 2013

SU-3459

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

RE: CPF 5-2013-0005W
Warning Letter – Sunrise Power Company, LLC

Dear Mr. Hoidal:

In response to your letter dated April 26, 2013, Sunrise Power Company (SPC) respectfully submits the following responses and O&M manual attachments for the probable violation:

Item 1: §192.616 Public Awareness.

(d.) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:

- (1) Use of a one-call notification system prior to excavation and other damage prevention activities;
- (2) Possible hazards associated with unintended releases from a gas pipeline facility;
- (3) Physical indications that such a release may have occurred;
- (4) Steps that should be taken for public safety in the event of a gas pipeline release;
- (5) Procedures for reporting such an event.

"Edison Mission Operation and Maintenance did not identify any possible excavators in its Public Awareness program as required by API RP 1162 Sections 2 and 3."

Sunrise's Response: See attached O&M Manual (July 9, 2012, Revision #6) Section 2.15 – Public Education; V. C. 5d. "Excavators." It contains an updated and complete list of SPC's excavators.

After reviewing the attachments, if you have any questions, please contact me at (661) 615-4684.

Sincerely,

Kelly Lucas
Executive Director
Sunrise Power Company, LLC

Attachments

cc: David King
Paul Dumke
Yvonne Hoeke

Dave Leach
Shelley Rosas
Ben Burns

Operations and Maintenance Procedures Manual

Gas Line

the surrounding areas. Examples may include platted subdivisions, trailer parks, multiple dwelling unit buildings or a group of houses in otherwise open country.

Note: These distances may be modified for particular situations if they give unreasonable results. The intent is to include persons who would be most likely to hear, see, or otherwise identify a pipeline problem so they can notify the Company or appropriate public officials.

4. Identification by mailing address is adequate for individuals and business locations where turnover is frequent.
5. Identification of the affected public, emergency officials, local public officials, and excavators should normally include the name of the organization or facility.
 - a. Affected Public – Bakersfield Pipe & Supply, Cal Trans and Chevron Global Power (Highway 33).
 - b. Emergency officials—Kern County Fire Department, and the California Highway Patrol
 - c. Local public officials—4th District Kern County Supervisor.
 - d. Excavators—an extensive list of some of the excavators and land/lease owners who may contract with excavators includes, but is not limited to: Sturgeon & Son, Bowman Asphalt, Brenderson Company, Gene Watson Construction, NTS, McKee Electric, Braun Electric, Robert Healy Construction, Ken Small Industries, Southwest Contractors, Oilfield Safety & Anchor Service, ARB, HDB Enterprises, ESI, Jerry Milton & Son Construction, RTC Resources, Soils Engineering, Gilliam & Sons, Ardent Companies, Oilfield Safety & Anchor Service, Plains Exploration & Production, AERA energy, Barry Petroleum, Occidental Petroleum, and Chevron.
6. The Plant Supervisor shall determine if a significant concentration of non-English speaking population exists along a pipeline, and shall review individual situations to determine if communication media are needed in languages other than English.

D. Communication Media

1. Communication media for use in the program may consist of calendars, letters, newspaper notices, maps, advertisements (television, radio, or