

IDAHO PIPELINE CORPORATION

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Mr. Chris Hoidal
Director, Western Region
Pipeline & Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, Colorado 80228

June 22, 2009

Re: CPF No. 5-2008-5036

Dear Mr. Hoidal:

Please find enclosed a copy of the Idaho Pipeline Corporation (IDPC) Integrity Management Plan (IMP) as requested in your letter dated April 27, 2009 and CPF No. 5-2008-5036. Additionally, IDPC has initiated implementation of this IMP.

Our determination that the IDPC pipeline was located in a HCA was based on Zoning Mapping provided through the National Pipeline Mapping System (NPMS). Although there are not any actual populated areas along the IDPC pipeline, other than the Idaho Air National Guard Base located at the last pipe segment of the pipeline, which is only .32 miles, the NPMS Zoning Map delineation is very broad in nature and identifies the entire IDPC pipeline system as being located within an HCA.

Also, please find the enclosed aerial map that highlights the location of the IDPC pipeline system relative to the Idaho Air National Guard. This map clearly shows that the entire pipeline, except for the last segment entering the IANG, is an unpopulated area.

IDPC constantly strives to ensure the highest standard of public safety and protection of the environment through strict compliance to established operational procedures, maintenance activities, and periodic inspections of its pipeline system. As such, IDPC did not challenge the NPMS HCA Zoning and desires to apply any additional proactive management practices or tools that will further ensure public safety and environmental protection through the overall integrity of our pipeline system.

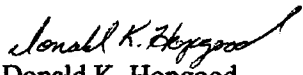
Previously, IDPC elected to follow a program for testing its pipeline on risk-based criteria as an alternative to the pressure testing per 49 CFR § 195.303. Initial pressure testing was performed on the system at time of construction and based on the Risk Classification of the IDPC pipeline; additional pressure testing was not required.

To satisfy the IMP criteria for establishing a baseline assessment of the pipeline, IDPC has scheduled pressure testing to be performed on August 28, 2009. Since IDPC is the soul pipeline into the Idaho Air National Guard, and provides storage for the vast majority of their fuel supply, it is essential that we minimize the down-time of the pipeline and reduce the possibility of product contamination. Based on these factors and the necessity to support the IANG flying mission, we have determined using JP-8 as the test medium would allow us to avoid jeopardizing product quality, yet enable us to put the system back in service quickly should it become necessary.

Testing will be performed after normal hours and coordinated with appropriate IANG personnel to ensure that all buildings within 300 feet of the pipeline are unoccupied during the pressure testing. The testing pressure will be limited to 375 PSI. Also, regular patrols will maintain surveillance of the pipeline while it is under pressure, and continuous communication will be established along the entire pipeline.

IDPC appreciates your assistance in reviewing the enclosed Integrity Management Plan and working together with us to further ensure public safety and environmental protection into the future operation of our pipeline system.

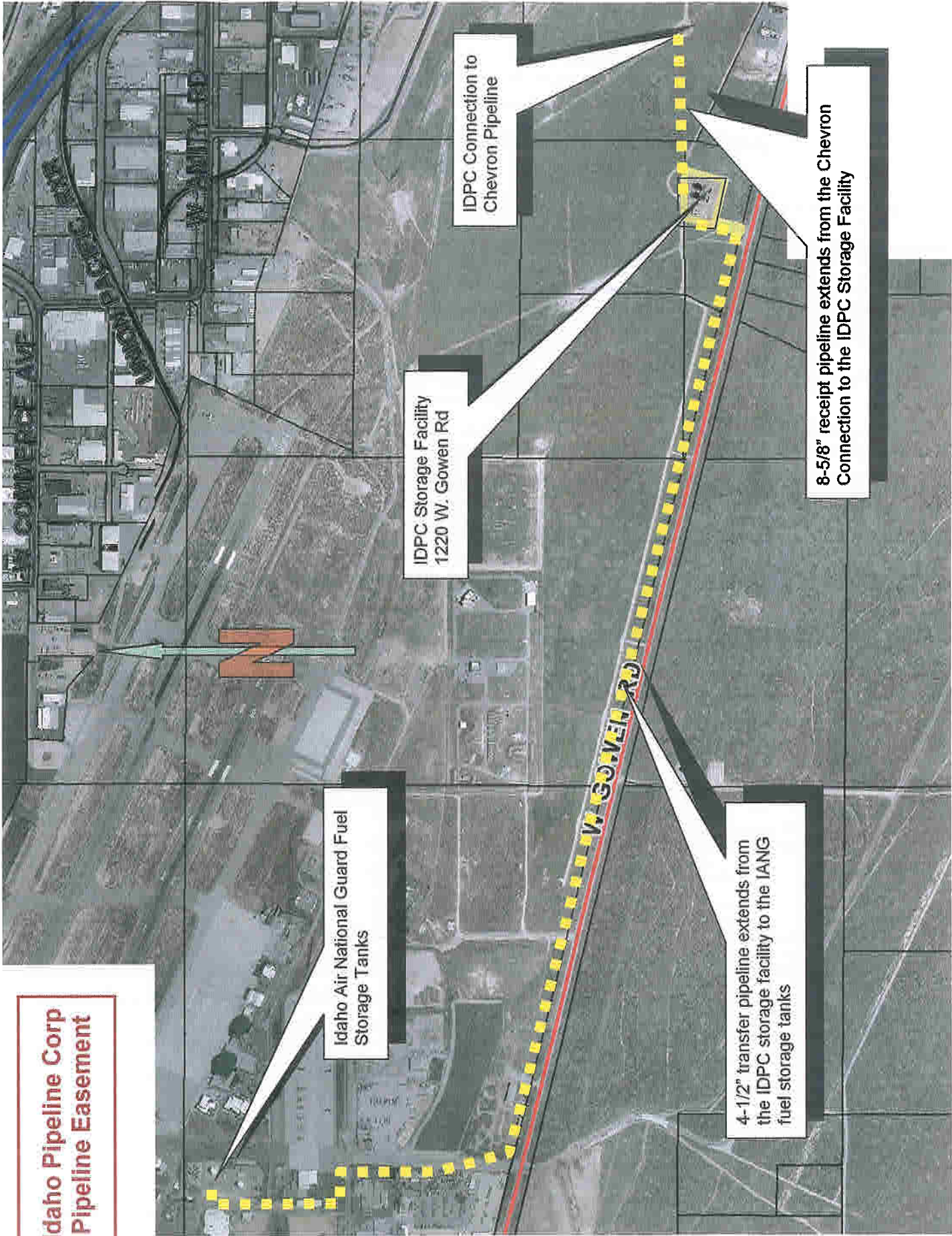
Sincerely,


Donald K. Hopgood
General Manager
Pipeline Division
Tampa Pipeline Corporation

Enclosure

cc: Robert Rose, President
Joe LaRose, Terminal Mgr.

**Idaho Pipeline Corp
Pipeline Easement**



Idaho Air National Guard Fuel Storage Tanks

IDPC Storage Facility
1220 W. Gowen Rd

IDPC Connection to
Chevron Pipeline

4-1/2" transfer pipeline extends from
the IDPC storage facility to the IANG
fuel storage tanks

8-5/8" receipt pipeline extends from the Chevron
Connection to the IDPC Storage Facility

IDAHO PIPELINE CORPORATION

PIPELINE INTEGRITY MANAGEMENT PROGRAM

Original Date: January 2009

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM
TABLE OF CONTENTS

	<u>Page</u>
Table of Contents.....	i
Record of Changes.....	ii
Forward.....	iii
Introduction.....	iv
Section 1: Pipeline Segments That Could Affect High Consequence Areas.....	1-1
Section 2: Baseline Assessment Plan.....	2-1
Section 3: Integrity Assessment Results Review.....	3-1
Section 4: Remedial Action.....	4-1
Section 5: Risk Analysis.....	5-1
Section 6: Preventive and Mitigation Measures.....	6-1
Section 7: Continual Process of Evaluation and Assessment.....	7-1
Section 8: Program Evaluation.....	8-1

ATTACHMENTS

- Attachment A: High Consequence Area
- Attachment B: Line Section Risk Factors
- Attachment C: Baseline Assessment Schedule
- Attachment D: Line Section Drawings
- Attachment E: Mitigation and Line Data
- Attachment F: Review/Comment Sheet

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

FORWARD

Idaho Pipeline Corporation (IDPC) is a jet-fuel storage and pipeline facility located in southeast Boise, Idaho. This facility was originally built in 1987 by Kinley Corporation. The facility was designed to receive, store, and transfer Department of Defense owned jet fuel to the Idaho Air National Guard (IANG). This facility was purchased by IDPC in 1999.

Immediately upon purchase, IDPC initiated an expansion project to increase the facility's operational and storage capability, while continuing the Department of Defense fuel support for the IANG. The goal of the expansion project was the vision of the current owner, Robert Rose, to offer commercial jet-fuel storage and pipeline support for the Boise Idaho Municipal Airport.

The original facility was designed by Ancira Engineering Services of Laredo, Texas. The original system design consisted of two-12, 000 barrel above ground storage tanks, and a 2.5 mile underground pipeline. Jet fuel is received directly from the Chevron Pipeline, which is located approximately ½ half mile east of IDPC and inter-connected, via an 8 5/8" buried pipeline. After certification of product quality, fuel is transferred, as required, to the IANG via a two-mile long, 4½" buried pipeline. IDPC transfers approximately 4 million gallons of military grade jet-fuel (JP-8) annually in support of the IANG.

Idaho Pipeline Corporation receives all jet fuel from the Chevron Pipeline system. The local Chevron pipeline is an interstate system that consists of two-8" lines that originate in Salt Lake City, Utah, and terminate at the Chevron terminal in Boise, Idaho.

The Chevron Pipeline Control Center personnel in Houston, Texas monitor the various fuel shipments within the Chevron Pipeline (CPL) through the use of electronic sensors, strategically located along the length of the pipeline. As Chevron Pipeline receives the monthly pipeline fuel requirements, they provide their customers with a schedule that indicates the estimated arrival times.

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

INTRODUCTION

This Pipeline Integrity Management Plan (IMP) is prepared and implemented as required by the Office of Pipeline Safety, Research and Special Programs Administration, U.S. Department of Transportation, and in accordance with Title 49, Code of Federal Regulations, Part 195 (49 CFR 195). The Idaho Pipeline Corporation's (IDPC) Pipeline is categorized as a **category 2**, as it existed on May 29, 2001, and is owned and operated by an operator who owns or operates less than 500 miles of pipeline subject to this part.

Incorporated matter: Files, records, and other facility plans pertaining to emergency response procedures, system design, operation and maintenance, inspection, and inventory accounting are located in stand-alone files and therefore are not incorporated into this plan, but will be referenced throughout this plan. Material contained in the company's Facility Response Plan and Operations & Maintenance Procedures Manual may be used to augment information contained in this plan, these procedural manuals will be referenced in this plan.

Identification of IDPC pipeline segments that could affect HCA: Based on information provided by Pipeline and Hazardous Material Safety Administration (PHMSA), and the National Pipeline Mapping System (NPMS), which delineates HCA zoning maps, the pipeline is located within a High Consequence Area (HCA). IDPC consists of a bulk storage facility and a 2.69-mile, (three segments) buried, carbon steel pipeline that is exteriorly coated with a fusion bond epoxy. (See attachment E of this plan for further piping size and capacity.) The location and mileage of IDPC pipeline is as follows; 0.37 miles of 8½-inch pipe from the Chevron Pipeline tie-in to the IDPC Storage Facility; 2.0 miles of 4½-inch pipe from the IDPC facility to the Zeppelin Road valve, and 0.32 miles of pipe from the Zeppelin Rd valve to the IANG fuel storage facility. (See attachment F for drawing).

NOTE: Although the mapping provided by NPMS was used to analyze the IDPC system relative to HCA, the mapping is very general in nature and indicates that the entire IDPC pipeline system is in a HCA zone. Although the entire pipeline has been identified as HCA, the only populated area along the entire 2.69 miles is located in the last 0.32 miles of pipeline from Zeppelin Road Valve to the IANG fuel storage facility, (see attachment A). Therefore, the *primary focus* for implementation, assessment, mitigation and evaluation of this IMP would be based on impact to the actual area of population.

Summary: The Integrity Management Program (IMP) developed by Idaho Pipeline Corporation (IDPC) provides the initial framework for the development of a comprehensive and systematic program. This program is designed to ensure the safety of HCA's through a continual process of risk assessment, inspections, analysis, and mitigation. The specific components of the IMP framework include:

- Identifying Pipeline Segments That Could Affect HCA's
- Development of A Baseline Plan
- Comprehensive Review and Evaluation of Assessment Results
- Remedial Actions
- Risk Analysis
- Preventive and Mitigation Measures
- Continual Process of Evaluation and Assessment
- Routine Evaluation of IMP Effectiveness

SECTION 1

PIPELINES THAT COULD AFFECT HIGH CONSEQUENCE AREAS (HCA)

- 1.1 IDPC will utilize zoning maps provided through the National Pipeline Mapping System (NPMS) to determine the location of High Consequence Areas (HCA) relative to its pipeline system. An overlay of the NPMS HCA zoning map indicates that all three sections of the IDPC pipeline are within the delineated HCA. (See attachment A). IDPC will review and revise NPMS data every calendar year not to exceed 15 months concerning the HCA Zoning Maps relative to IDPC pipeline operations.
- 1.2 IDPC personnel will perform routine inspections of its pipeline right-of-way (ROW) at intervals not to exceed 3 weeks but at least 26 times each calendar year, to collect information which will be used to accurately reflect current conditions in the vicinity of the pipeline. These inspections will be documented on the facility inspection form # IDPC-39. Additional reports, if required, will be accomplished to reflect affected areas.
- 1.3 IDPC will perform an annual, not to exceed 15 months review and update the HCA boundaries based on information gathered from field surveys, local sources, and NPMS data. Any changes to HCA Boundaries affecting the IMP will be documented and reported as required.
- 1.4 Although the entire IDPC pipeline system exists within the HCA boundaries, as noted in paragraph 1.1 above, the location of highest possible impact from a release is where the pipeline runs in a western direction adjacent to the Idaho Air National Guard. For this reason, and for response planning purposes, this location is identified as the Worst Case Discharge (WCD) in the IDPC Facility Response Plan (FRP). For release locations and estimated spill volumes, see FRP (incorporated by reference) and attachment E for WCD location, and pipeline capacities.
- 1.5 Based on the calculated WCD release volume, operators response, spill resources and emergency procedures, the overland spread of liquid pool would be minimal and relatively containable. There is no navigable waterway that exists in the spill vicinity that would be affected. IDPC personnel would response according to the IDPC's Procedures Manual and Emergency Checklists and Facility Response Plan.
- 1.6 IDPC completed the identification of its entire pipeline system prior to December 31, 2001, as a Category 2 as defined in 49 CFR 195, Section 452.

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

SECTION 2

BASELINE ASSESSMENT PLAN

- 2.1 IDPC's initial baseline assessment for the IDPC pipeline system was determined by hydrostatic pressure testing performed at the time of construction, an independent cathodic protection survey is performed annually not to exceed 15 months, inspect and monitor the pipeline when exposed during excavation by contractors, and the risk-based alternative to pressure testing according to 49 CFR 195, Appendix B.
- 2.2 For the purposes of implementing this IMP, IDPC will utilize pressure testing as the method for continued baseline assessment. A prioritized schedule based on risk analysis of each line segment will be established by IDPC not to exceed 5-year intervals for continuing pressure testing the pipeline segments that could affect HCA's. (See attachment C for baseline assessment schedule).
- 2.3 Pressure testing and analysis will only be performed by qualified individuals identified by IDPC. Results will be appropriately documented and maintained for the life of the system.
- 2.4 IDPC has not experienced any release of product during the last 10 years, had any abnormal operations, or other situations that would require an out-of-normal assessment and evaluation to be conducted.
- 2.5 The initial baseline pressure testing performed on the IDPC pipeline indicated that the system is sound. The original pressure tests records are on file at the IDPC office and will be used to overlay all consecutive assessment for evaluation..
- 2.6 Evaluations of annual cathodic protection surveys have been in accordance with NACE standards, and have consistently indicate no significant change in pipe-to-soil readings.
- 2.7 Only qualified personnel approved by the IDPC Terminal Manager will conduct all pressure testing, analysis, evaluation, and documentation of results.
- 2.8 A risk-assessment value matrix that provides information about the criticality of each pipe segment relative to the HCA (See Attachment B) will be used to identify potential threats. This matrix will be reviewed and/or updated annually not to exceed 15 months or as required based on results of future assessments or pertinent information that may change the risk assessment value for a particular line segment.

SECTION 3

INTEGRITY ASSESSMENT RESULTS REVIEW

- 3.1 The Terminal Manager will perform the IDPC review and evaluate the integrity assessment.
- 3.2 IDPC personnel's training records will identify the IDPC individuals qualified to perform and evaluate the integrity assessment process. The individuals training record will be documented and certified to the qualifications of the individual.
- 3.2 Additional information about the pipeline will be integrated into the assessment to help characterize defects and obtain an improved understanding of the pipe's condition. This information will include, but is not limited to, pipe-to-soil readings, visual observation of external pipe coating anytime the pipeline is exposed, and other factors that could impact the physical integrity of the pipeline.
- 3.3 IDPC will plan, schedule and administer additional training to achieve and maintain individual proficiency.
- 3.4 Pressure testing will be the primary assessment method for all sections of the IDPC pipeline system. If at a future date management and assessment requirements dictate that an In-Line Inspection (ILI) method would be utilized, then IDPC will incorporate those requirements into this program at that time, and submit all changes to PHMSA for their review.
- 3.5 IDPC will perform an information analysis through the integration of assessment results with other pertinent information about the risk-conditions of the pipeline to uncover issues that might not be evident from the assessment data alone. This analysis will include critical information about mitigating damage that was discovered during any excavation, corrosion control monitoring/cathodic protection surveys, as well as population changes along the ROW.
- 3.6 IDPC will promptly, but no later than 180 days after an integrity assessment, obtain sufficient information about the discovery of a condition to determine its potential threat to the integrity of the pipeline. Otherwise, IDPC must demonstrate if the 180-day determination period is impracticable.
- 3.7 Assessments of pipe using pressure-testing methods that indicate possible failures will require immediate investigation and repair prior to returning the pipeline into service. Indications of corrosion or other assessment factors that do not pose immediate threat to HCA will be scheduled for remediation and repair.

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

SECTION 4

REMEDIAL ACTION

- 4.1 The IDPC Facility Manager will ensure prompt action to address all conditions that could reduce a pipeline's integrity when discovered through the integrity assessment and information analysis. A documented prioritized schedule will address correcting those deficiencies in the order based on the specific threat and extent of damage.
- 4.2 IDPC's schedule for correcting pipeline deficiencies when discovered will comply with the criteria and requirements established in 49 CFR 195.
- 4.3 IDPC will evaluate and provide remediation for all conditions that could reduce the integrity of the pipeline. The priority of the remediation will be based upon the extent of damage to the pipeline, any damage that pose an immediate threat will be repair immediately and will require the pipeline pressure be reduced by 50% of maximum operation pressure until the repairs are made or worse case the pipeline will be shut down until repairs are made. All other damage that does not pose an immediate threat will be repaired within one year from the discovery.
- 4.4 Any changes to the remediation schedule will be fully justified and documented by IDPC to demonstrate the schedule changes will not jeopardize public safety, HCA's or cause further any environmental damage to the pipeline.

SECTION 5

RISK ANALYSIS

- 5.1 A comprehensive matrix-based approach for evaluating risk factors has been used by IDPC for consideration of all relevant risk categories and operating conditions for ranking pipeline segments that could pose a threat to HCA.
- 5.2 The matrix-based approach includes relevant factors that might constitute a threat to the actual populated area of the HCA zone, such as external/internal corrosion, third party damage, material problems, equipment failure, acts of god, or human error.
- 5.3 See attachment B for matrix used for risk analysis. Factors that are used need to be considered for relevance and accuracy during every subsequent risk assessment evaluation, which will be reviewed and update annually not to exceed 15 months.
- 5.4 The risk analysis will use the most accurate available data to represent pipeline characteristic the analysis of different segments, including integrity assessments
- 5.5 IDPC must focus on subjective information such as forms, surveys, interviews, quality checks, etc., as part of the information analysis used in the risk assessment process.
- 5.6 IDPC will verify that risk analysis results are useful in drawing conclusions and insights about the IMP, decision reliability and pertinence as far as identifying the correct threats and remedy for each segment of line pipe in the HCA.
- 5.7 The IDPC Facility Response Plan (FRP), and Operations Procedures Manual incorporate additional risk factors relative to the pipeline assessment for the preventive and mitigation actions of associated facilities connected to the pipeline system, to include pumps, break-out tanks, and other related equipment failures.
- 5.8 Risk assessments for HCA will consider those factors and critical information outlined in the IDPC Facility Response Plan (FRP) for determining overall risk analysis, consequences of a release, and mitigation decision when evaluated.
- 5.9 IDPC will integrate and analyze all available information about the integrity of the pipeline base on integrity assessments and with FRP identifying the consequences of a failure affecting the HCA.

SECTION 6

PREVENTIVE AND MITIGATIVE MEASURES

- 6.1 Third party damage to the pipeline system is considered the number one factor outside of the physical integrity of the pipe that could pose a threat to HCA. A systematic one-call program for Idaho, DIGLINE, provides notification to pipeline operators regarding planned excavation operations that are near the ROW boundaries of the pipeline easement. Additional, IDPC, Operation & Maintenance checklists are incorporated to ensure additional measures to protect pipeline integrity.
- 6.2 IDPC receives DIGLINE notifications and if determined that excavation activity will be in close proximity to pipeline ROW, the third party contractor is contacted for exact location and the time the digging will begin. IDPC personnel will mark the line location in the area of the digging, and will be present during the excavation. If any contractor will be boring over or beneath the pipeline, IDPC will require the pipeline to be exposed prior to the boring and will be monitored until the boring is completed and ensure there is no further threat to the pipeline.
- 6.3 All DIGLINE location notices are verified by IDPC personnel to ensure there is no conflict that would affect the pipeline and there will be no excavating closer then 25' of the pipeline. Should these restriction not determined procedures set forth in paragraph 6.2 of this section will apply.
- 6.4 IDPC personnel perform routine inspections of the entire pipeline system and ROW, as a minimum, every 3 weeks and at least 26 times per calendar year, in accordance with 49 CFR, Part 195. All ROW inspections are document by the date the inspection is performed and any abnormal conditions that are found during the inspection. The Terminal Manager is immediately notified of all abnormal conditions noted during the inspection. These inspections are documented on IDPC form 39, and filed in the IDPC office.
- 6.5 Routine operator maintenance performed on the system is documented and maintained on IDPC form 39 and is stored in the historical files for the life of the system. These records are also used in the informational analysis for overall risk assessment evaluation. ROW markings/signs are installed to readily identify buried pipelines for public safety.
- 6.6 IDPC Operational Procedures Manual is reviewed and revised if necessary, annually not to exceed 15 months. This review and revision will ensure the manual is effective, and maximizes safety.
- 6.7 Additional measures to prevent and mitigate potential threats to HCA is provided by IDPC's Public Awareness Program and periodic meetings with local agencies to communicate response activities, resources, and incident planning. IDPC maintains the records and documentation of these meetings in the IDPC office.
- 6.8 Product inventory, receipt quantities, meter tickets, and tank gauging records are closely monitored by IDPC operators to ensure strict accountability of product movement through pipeline system, as a means of leak detection.

SECTION 7

CONTINUAL PROCESS OF EVALUATION AND ASSESSMENT

- 7.1 IDPC will perform evaluation and assessments of pipeline integrity every five years, not to exceed 68 months, to ensure we can update the latest condition of the pipeline and reduce the chance of an integrity threat. The frequency of this schedule is subject to change based on re-assessment method analysis and evaluation of pipe integrity, changes in technologies, and regulatory requirements.
- 7.2 The periodic assessment schedule intervals developed by IDPC are based on the specific risk factors associated with the pipeline. The risk factors associated with the pipe integrity were incorporated into a prioritized value-matrix to associate a threat value to each line segment. Periodic integrity assessment intervals are based on the segment of pipe receiving the highest threat-value weight that could reasonably have an adverse affect on HCA. (See attachment B).
- 7.3 The risk factors used for establishing the frequency of inspection interval includes the location of segment/s relative to HCA, results from previous inspections and testing, known corrosion or condition of pipeline, cathodic protection history, type and quality of pipe coating, age of pipe, type of product transported, size of pipe, geological threats, security, time since the last interval inspection, trend analysis showing any pipe integrity deterioration, operating pressures and stress levels, ability of operator to locate and respond to releases.
- 7.4 IDPC will notify PHMSA for any variances in integrity assessments and evaluations that exceed the 5-year maximum schedule. Engineering justification must be submitted to PHMSA 270-days before the end of the 5-year deadline with a proposed alternate interval. Notification must describe use of other technology such as external monitoring to provide equivalent understanding of the condition of line pipe and proposed alternative interval.
- 7.5 IDPC will perform Pressure Testing of its pipeline segments as the preferred method for assessing pipeline integrity. If future assessment evaluations determine that integrity conditions have changed, other methods of assessment can be incorporated to include external corrosion direct assessment, and the use of in-line inspection tools. Incorporation of other methods of assessment will require a complete IMP review to ensure all applicable changes to plan and procedures is properly documented.
- 7.6 If technology other than pressure testing, external corrosion direct assessment, or in-line inspection is planned for use, IDPC will submit a notification to PHMSA at least 90-days before conducting the assessment. If decision is made to use Other Technology, written notification must be made to OPS 180-days before the end of the five-year interval IAW 49 CFR 195.452(j)(4) and 195.452(m). Notification should demonstrate interim actions to evaluate integrity of pipeline segment and provide an estimate of when assessment can be completed.

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

- 7.6 IDPC will ensure that all integrity assessments are well documented and detailed to ensure that all data collected and observed during the assessment is properly evaluated against pipe integrity and clearly communicated in required reports.

SECTION 8

PROGRAM EVALUATION

- 8.1 This section identifies the scope, objectives, and frequency requirement for IDPC to measure the effectiveness of its Integrity Management Program (IMP), in assessing and evaluating pipeline integrity and in protecting the high consequence area (HCA).
- 8.2 The IDPC Facility Manager will conduct an annual not to exceed 15 month review and audit of the IMP, evaluate the threat specific factors associated within the assessment process, redefine program goals, investigate trend analysis, perform root cause analysis, and communicate program results and lessons learned. The framework of the IMP provides a building block for the continuous improvement process in ensuring program effectiveness, relevancy, and proactively eliminating or mitigating situations that could affect pipeline integrity and subsequent impact to HCA.
- 8.3 Performance measures will be used by IDPC in the evaluation of the IMP effectiveness. The performance measures include, but are not limited to, monitoring surveillance and preventive activities implemented by IDPC, operation and maintenance trends that indicate when the integrity of the pipe is weakening despite preventive measures, and failure histories. IDPC will fully analyze possible root causes of any pipe integrity issue, provide recommended corrective action, and communicate those lessons learned through distribution of the final IMP Evaluation report.
- 8.4 IDPC will ensure adequate communication of the results of program effectiveness through appropriate internal and external channels that may need to utilize the information. Appropriate channels include field offices, general manager, corporate staff, and contractors. Additionally, IDPC will maintain liaison with appropriate suppliers and customers to ensure availability of resources, technical services and other pertinent information to consider during IMP effectiveness assessments and performance evaluations.
- 8.5 The IDPC Facility Manager will, upon completion of review of IMP effectiveness, prepare a draft report that adequately captures the results of the IM Program Evaluations and Assessment. This audit report will incorporate feedback communication received from other internal and external sources regarding the IMP program evaluation. The draft report will be provided to management for an internal audit and review to ensure that the goals and objectives have been met in IMP Evaluation.
- 8.6 Documents to support the decisions and analyses, including any modifications, justifications, variances, deviations and determinations made, and actions taken, to implement and evaluate each element of the integrity management program will be maintained for the life of the pipeline.

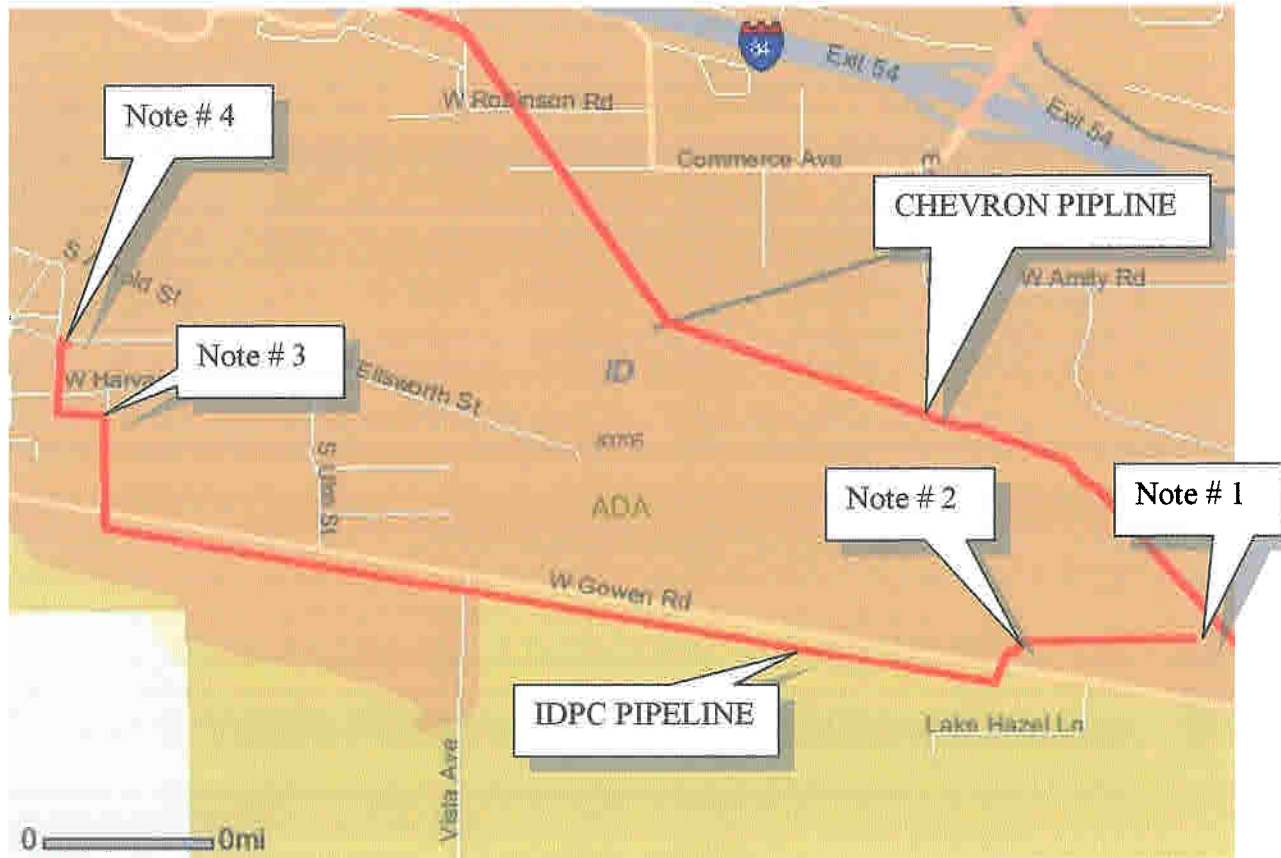
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PIPELINE INTEGRITY MANAGEMENT PROGRAM

- 8.7 It is IDPC's policy to attempt to obtain the key Integrity Management documents from previous owner/operator during the acquisition of a pipeline.
- 8.8 O&M Manual, ROW Inspection, observation, and reporting assist managers and supervisors in identifying and analyzing changes to the pipeline (e.g., operations, material conditions) and the local terrain, environment, and population for impacts on pipe segments identification, risk analysis, and other IM Program elements. The ROW Inspections provide significant information concerning conditions and activities that afford managers the ability to provide immediate attention to any discrepancy noted.
- 8.9 To provide a pro-active approach in ensuring the adequacy of the process for periodic review and evaluation audit of IM Program effectiveness, IDPC will ensure the following areas are used to document annual plan review, (1) The requirements of the IM Rule are captured, (2) The technical basis and assumptions used in each element of the program are delineated, (3) The procedures required to implement the IMP are identified, (4) There is sufficient detail and specificity to allow successful implementation of each element, (5) The responsibilities for implementing all required actions are identified (e.g., by organizational group or title), (6) The distribution of key IMP documents to appropriate individuals and organizations is defined, (7) Management involvement in key elements of the IMP is identified, and (8) documented internal review or quality assurance mechanisms are in place to assure accurate, complete and consistent results.

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

Attachment A

HIGH CONSEQUENCE AREA



NPMS HCA ZONING MAP w/ IDPC Pipeline Overlay

- Note # 1: Location of IDPC's pipeline tie-in to the CHEVRON pipeline system.
- Note # 2: IDPC pumping and storage facility, located ½-mile from the tie-in.
- Note # 3: Point of entry to the Idaho Air National Guard (IANG) property.
- Note # 4: IDPC pipe termination at the IANG Fuel Storage Terminal.

The IDPC pipeline system consists of three pipeline segments and a storage and pumping facility.

- Segment 1 is an 8" receipt line extending 1/3-mile from the CHEVRON pipeline (note #1) to the IDPC storage facility (note #2)
- Segment 2 is a 4" line extending 2-miles from the IDPC storage facility to the isolation valve (note #3) at the IANG.
- Segment 3 is a 4" line continuing from the isolation valve to the termination point at the IANG fuel storage area

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

Attachment B

LINE SECTION RISK FACTORS

Risk Factors	Line Segment 1	Line Segment 2	Line Segment 3
Age of Pipeline	2	2	2
Pressure Tested	2	2	2
Threat to HCA	2	4	4
Close Interval Survey	2	2	2
Leak History	1	1	1
Product Transported	2	2	2
External Corrosion	1	1	1
Operating Pressure	2	2	2
Natural Forces	2	2	2
Construction Errors	2	2	2
Material Problems	1	1	1
TOTAL VALUES	19	21	21

NOTE: The above Risk-Factor Matrix is used to determine the line segment that presents the greatest threat to the HCA. Risk values of 1 through 5 are used to indicate the criticality of each line segment. The segment with the highest risk-value score will receive the priority for IMP considerations for assessment, evaluation and mitigation of pipe integrity.

IDPC will assess and evaluate all three segments of the pipeline system to ensure pipeline integrity, with additional emphasis on the line segments 2 and 3 due to their additional potential for probable threat to IANG facility, which is the only populated area of the HCA zone.

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

Attachment C

**BASELINE ASSESSMENT SCHEDULE
(PROJECTED SCHEDULE)**

	LINE SEGMENT 1	LINE SEGMENT 2	LINE SEGMENT 3
PRESSURE TESTING	28 AUG 09	28 AUG 09	28 AUG 09

IDAHO PIPELINE CORPORATION
PIPELINE INTEGRITY MANAGEMENT PROGRAM

Attachment D

LINE SECTION DRAWINGS

LINE SECTION DRAWINGS ARE FILED AT THE IDPC OFFICE

Attachment E

MITIGATION AND LINE DATA

LINE SEGMENT #1: Chevron Tie-In to IDPC Storage Facility

8-5/8" pipe, Length 1,953 '
1,953' x 2.61 gal/ft = 5,103 gallons = 121 barrels

LINE SEGMENT #2: IDPC Facility to Isolation IANG Isolation Valve

4-1/2" pipe, Length 10,560'
10,560 x 0.65 gal/ft = 6,896 gallons = 164 barrels

LINE SEGMENT #3: IANG Isolation Valve to IANG Fuel Storage

4-1/2" pipe, Length = 1,690'
1,690 x 0.65 gal/ft = 1,098 gallons = 26 barrels

NOTE: The Worse Case Discharge (WCD) scenario calculations are outlined in the IDPC Facility Response Plan (incorporated by reference). Based on flow rate, pipe volume and reaction time, line segment # 2 would have a possible WCD of approximately 214 bbls. The Facility Response Plan outlines the available resources and actions that would occur in the event of a WCD.