

December Update

Natural Gas Compliance.

We are still moving forward with gas line replacements. As I stated earlier, December will be a little difficult to see progress due to 2 weeks of Railroad Commission audits. Last week we were audited on the contents of our Operations, Maintenance, and Emergency manual. Sometime back the City of Sweeny hired a retired Commission auditor to rewrite the manual and update it. It is very obvious he used a cookie cutter format. The manual should only contain items that truly pertain to our system, unfortunately, there is a lot of items in the manual that does not pertain to or operations. We will have to completely review the document and remove what is not needed and add some things that have changed recently. I was able to offset some issues using a manual that I wrote for Brazoria several years ago but it is not up to date with current rules since my retirement.

Non of the alleged violations are finable offenses at this time as long as we follow the administrative corrective action. This is the procedure I followed in in the spring to correct those issues.

We will be participating in an operational audit with Railroad Commission the remainder of this week.