

BRINGING ALASKAN GAS TO AMERICAN CONSUMERS

A History of the Alaska Natural Gas Transportation System
and the U.S. Office of the Federal Inspector

David J. Kling

The History Project
Office of the Federal Inspector for
the Alaska Natural Gas Transportation System

Washington, D.C.

March 5, 1985

TABLE OF CONTENTS

Preface

Introduction

Part One: The Project History
The ANGTS Mission Defined

- 1 The First Year
- 2 Alternatives Emerge
- 3 Disunion and Polarization
- 4 Posturing for Certification
- 5 The Alaska Natural Gas Transportation Act
- 6 The President's Decision
- 7 Executive Reorganization
- 8 Selecting the Federal Inspector
- 9 Ancillary Issues
- 10 Getting Started

Part Two: The Agency History
The OFI Mission Applied

- 11 Jack Rhett Takes Command
- 12 The OFI Hits Stride
- 13 The Waiver Package
- 14 The East Leg Experience
- 15 Inertia and the TAGS Challenge
- 16 Epilogue

Assessment

Footnotes

PREFACE

This project was authorized by the Office of the Federal Inspector in January 1983 to consolidate relevant historical information on the Alaska Natural Gas Transportation System (ANGTS) and the U.S. Office of the Federal Inspector (OFI). It was researched and written, largely under the supervision of Deputy Federal Inspector Peter L. Cook, by David J. Kling, in conjunction with his varied service to the OFI and with volunteer time associated with his own doctoral study in political science (public organizations) at The Johns Hopkins University.

The Project History (Part One) is in its third draft, while the Agency History (Part Two) may be considered in a final. Neither has been subject to official external comment. Unfortunately, footnotes are available at this time only for the Agency History.

Significant contributions to and reviews of this project were offered by many present and past OFI officials, including J. Richard Berman, Rhodell Fields, Benjamin White, Earl N. Kari, Nancy M. Ellett, William G. Laxton, Willis E. Greenstreet, Gregory Peck, C. Allen Olson, Antonio J. Jover, Linda F. Adams, Dennis Schroeder, David C. Rector, Amos C. Mathews, Robert Stuart and Richard Russell. A special acknowledgement must be afforded to Mr. Cook, who encouraged an objective, independent evaluation and recognized its value to federal public management and administration. A substantial number of other government officials submitted to interviews, particularly John A. Adger, Lloyd W. Ulrich, Guy Martin, Don Smith, Michael Woo, Al Cobb and Jack Donahoe. Several leading sponsor and industry officials were also consulted, but most prefer to remain nameless. Hannah Soorenko, Lois J. Tayman and Gerald Martin, all of the OFI, were essential to the production of the manuscript.

Finally, I must express my great appreciation to John T. Rhett, the Federal Inspector, who made himself available to a series of interviews, examined the drafts and recommended numerous clarifications and corrections. He authorized the study with hope that the OFI story and experience would not be lost to history. I trust, in some way, this history reflects the wisdom, skill and public interest which Mr. Rhett and his staff consistently demonstrated as they pursued the ANGTS mission. I apologize at the outset for any inaccuracies, misinterpretations or other deficiencies associated with this effort, for which I bear full responsibility.

David J. Kling

March 5, 1985
Washington, D.C.

INTRODUCTION

In 1966, Tom Miklautsch, a Fairbanks druggist, and Cliff Burglin, owner of an office supply business in the same Alaskan frontier city, became "prospectors" in what would become the state's black gold rush. As partners, they paid \$1 per acre for drilling leases on 4,787 acres in the Prudhoe Bay area on the North Slope of Alaska. It was not a particularly risky or expensive venture, as Alaskan adventures go. But Miklautsch and Burglin were following, if somewhat timidly by comparison, in the well-traveled footsteps of men who had for generations sought their fortune at the Arctic's edge.

There was no dispute that somewhere, below the frozen North, large oil deposits existed. Federal geologists had reported many decades before that Prudhoe Bay showed signs of a major oil and gas deposit. Vihjalmur Stefansson, the fabled Arctic explorer, witnessed oil traces as far north as Canada's Melville Island in 1915. Private and government scientists, on dogsleds and later in helicopters, slowly charted Alaskan and Canadian Arctic topography, encouraging speculation and stirring occasional energy exploration. Development, predictably, was very slow. As long as cheap, high-quality petroleum was readily accessible in the southwestern United States, Middle East and, most recently, western Canada, Arctic energy would be properly left on ice.

British Petroleum (BP), in the early 1960s, was among the first major companies to seek North Slope deposits in earnest. By 1967, however, its exploration crews had continually come up dry. Despite BP's frustration, a joint venture by Atlantic Richfield (ARCO) and the Humble Oil and Refining Company (an Exxon subsidiary) was launched in the Prudhoe Bay area. Again, no luck. Miklautsch and Burglin, like dozens of other small Alaskan speculators, began to suspect that their particular North Slope oil "elephant" (an deposit of at least a billion barrels) might be pink.

Finally, on February 8, 1968, a wildcat drilling rig, financed by the ARCO/Exxon team, struck oil at Prudhoe Bay State Well No. 1, located on 90,000 acres on the Alaskan Arctic Slope about 400 miles north of Fairbanks and 150 miles southeast of Point Barrow, on the Arctic Ocean. The preliminary tests were most encouraging: 2,415 barrels of oil and 40 million cubic feet of natural gas a day. A second well, Sag River No. 1, was completed six months later and located seven miles northwest of the first. Together, the two wells provided geologists with a fairly substantial basis for speculation. Robert Anderson, ARCO's chairman, was cautiously optimistic: "We believe this is a significant oil and gas discovery," he told reporters, but the extent of the discovery "must await further testing and exploratory drilling."

Few others were so restrained. Degolyer & MacNaughton, a prominent Dallas oil consultancy, described the field as potentially "one of the largest petroleum accumulations known to the world today." They

estimated between 5 and 10 billion barrels might lie below it. Walter J. Levy, a top international oil consultant, believed a 15 to 20 billion barrel estimate was "not particularly optimistic" while some initial estimates, including that of Alaskan Gov. Walter J. Hickel, rose as high as 50 billion barrels. "At the top of the world," Ruth Seldon Knowles wrote in the Wall Street Journal, "lies the largest untapped potential oil basin in the Western Hemisphere, perhaps one of the greatest oil provinces of the world. It may change the balance of world oil power." In the end, geologists settled on a more conservative forecast: 9.6 billion barrels of oil and 26 trillion cubic feet of natural gas. Nevertheless, this comprised the single largest stock of American oil and 10 per cent of all known American gas reserves. There was enough Prudhoe Bay gas alone to meet all the energy needs of a nation as large as Canada for 11 years.

As it happened, the Miklautsch and Burglin holdings lay less than six miles from State Well No. 1. In late 1968, they sold a half interest in their leases to General American Oil Company for over \$2 million in stock and, in doing so, became among the first Arctic oil millionaires. The future, however, would show that few dispositions on American Arctic oil and gas would be realized as swiftly and surely as the Miklautsch/Burglin fortune.

The transport of natural gas across the austere, forbidding Arctic is only superficially a geographical and technical exercise. The icy crevasses of the Brooks Range, the permafrost along the Sagavanirktó River basin and even the polar bears which roam the Phillip Smith Mountains are impressive physical obstacles, ones which require considerable engineering study and skill to surmount. Arctic roughnecks knew Prudhoe Bay would not easily surrender its oil and gas reserves, but they knew also that sufficient will, know-how and money would nevertheless draw them from the ground.

Many of those who built the Trans-Alaska Pipeline System (TAPS) believed that the principal obstacle to Arctic pipelining was neither geographical nor technical but instead political, specifically bureaucratic "red tape." TAPS, in turn delayed and expedited by governmental machinations, was finally built after \$9 billion and 10 years on the slope. It endured spills, welding deficiencies and permafrost, but now pumps some 1.5 million barrels of crude oil daily over the Brooks and Alaska mountain ranges to Valdez for tanker shipment abroad.

TAPS, its builders claim, suffered mightily from redundant, excessive administrative regulation, generated by a government unprepared for such oversight and uncertain as to its proper response. The "red tape," coupled with legal objection, froze TAPS when the Arctic winter could not. Pipeline advocates found that crossing the Yukon River with 48-inch pipe was simple when compared to filing massive environmental impact statements, satisfying legitimate native claims or pacifying

determined conservationists. Only after Congress intervened to circumvent regulatory and legal blocks did the pipeline, and Alaskan oil, finally reach Valdez.

The proposed Alaska Natural Gas Transportation System (ANGTS), first conceived in 1969 although not finally approved until eight years later, followed closely behind TAPS. The ANGTS was longer (4,800 miles) and more expensive (\$40 billion) than its oil predecessor. Gasline proponents knew they too would face important financial and environmental challenges. However, TAPS' economic viability and the apparent low level of environmental damage attributed to the pipeline must have been encouraging. There would also be additional "culture shock" to native groups and philosophical dissention from a large percentage of Alaskans who saw their state as an eternal refuge from progress rather than its next frontier. However, TAPS and its entourage had already vanquished the native innocence and lifestyle of the Alaskan Indian (snowmobiles everywhere had replaced dogsleds), while more and more Alaskans were coming to think of their home state as a meal ticket. Clearly, on these counts, the gas pipeline would enjoy a happier prospect than its predecessor.

In addition, the President and Congress moved with precision and dedication to remove any political barriers to Arctic gas development and transport. This time, the federal government would not merely "ride to the rescue" as Congress had done with the Trans-Alaska Pipeline Authorization Act in November 1973, but would instead to discourage prospective ambushers from the start with passage of the Alaska Natural Gas Transportation Act of 1976. Furthermore, a limited executive reorganization by President Jimmy Carter created an independent, single-purpose federal agency - the new Office of the Federal Inspector - to oversee all approvals and construction of the ANGTS. This was done to focus authority, responsibility and accountability, and to avoid the confusion and excess associated with federal TAPS monitoring.

Today, despite this substantial, concerted governmental response, ANGTS remains suspended on the threshold of its second development phase, short of necessary private funding. The ANGTS Phase I Prebuild, two transmission lines flowing from southern Alberta southwest into Oregon and southeast across the Great Plains to Iowa, were finished in Autumn 1982, under budget and on schedule. The Prebuild provides a direct American outlet for excess Canadian gas, which has been flowing swiftly since the Government of Canada changed its export policies in late 1984 and early 1985. The second phase, which includes Alaska and the major Canadian sections, has been delayed indefinitely, perhaps until the 1990s or even the next century, due to deregulatory policy and changes in the gas market structure.

The following history accounts private efforts to organize an Alaska Natural Gas Transportation System and federal government efforts to both regulate and facilitate its construction. It is, be forewarned, a story

without an ending, due to the Phase II suspension. The history details a major American public policy initiative, from its earliest conception through design, development and implementation. In this manner, it examines the federal government's ability to reorganize itself to facilitate a national priority. In particular, it tracks the institution and activity of the Office of the Federal Inspector. The OFI represents an experiment in public administration, in that it serves as a single point (the "one window") for all federal ANGTS contact and activities. The agency was directed to reconcile its missions of ANGTS regulation and facilitation.

Part One focuses on the project history. This section covers the emergence of the major gas transport alternatives, early certification posturing among the leading challengers, congressional modification of the standard regulatory procedures and Presidential selection of a sponsor and route. Also, a major executive government reorganization is examined and the beginnings of project oversight, illustrated. Part Two presents the agency history. It tracks the OFI from its inception and development, through its surveillance of Lower Leg Prebuild construction and its preparations for Phase II in Alaska. It also accounts its organization demise in the face of project suspension. A final Assessment section examines the OFI effort at mid-passage and evaluates its legacy for federal public policy.

Clearly, the final chapters of the ANGTS saga cannot yet be written or its leading characters cast. But while its history is incomplete, it remains instructive. A final chapter is not always required for important lessons to be identified. On the contrary, it may be precisely those lessons learned at mid-passage which will enable a sound course to be chosen and followed in the future.

What happened to suspend the Alaska Natural Gas Transportation System? Why did the ANGTS project fail?

Some project observers have, during the gradual ANGTS demobilization since late 1982, occasionally asked these two questions in tandem, as though the second flowed logically from the first. Although one may suggest explanations for the first question, those explanations do not suggest the conclusion implied by the second. Clearly, the ANGTS was not built in its entirety as originally planned, but this should not imply a failure of the system concept.

As the history will demonstrate, the project's mid-passage benefits have been quite substantial, as ANGTS Phase I has already gone far to satisfy many of the original objectives of the entire project. Furthermore, recent changes in the U.S. gas market structure may have rendered Phase II of less immediate importance than it appeared five years ago. The suspension of Phase II, rather than a sign of failure, could be

construed as a successful midstream adjustment to altered circumstances.

The sources of ANGTS Phase II demise are not difficult to identify. Analysts seem to agree that, most importantly, the natural gas market situation changed dramatically and profoundly, closing the ANGTS window of opportunity almost before it had opened. The growing Alberta gas bubble, domestic gas deregulation (increased domestic supply) and reduced energy demand due to conservation are cited as reasons underlying the ANGTS Phase II delay.

There appear to be two different and opposing perspectives for assessing the current suspension. In one view, "the system worked." Alaskan economist Arlon R. Tussing is not alone when he suggests that the Phase II suspension is characteristic of what went right - the sponsors, producers, financiers and perhaps most importantly, the federal government each prudently adjusted their strategies and timing on the project to the changing market circumstances. As Federal Inspector John T. Rhett once observed, OFI had little incentive to facilitate a project which might collapse under its own weight, thus imposing higher gas prices on American consumers without significant return. Apparently, neither the North Slope producers, who owned the gas, nor U.S. investment houses, which would finance a large share of the Phase II adventure, cared very much for the new odds.

Those in agreement with Tussing argue that ANGTS Phase II was simply not ripe in 1982, and would not be so for another six to 10 years. The incremental demobilization - two short project slips and the eventual indefinite suspension - represents a reasonable response on behalf of the project principals to evolving market developments. The federal government, for its part, appeared to accept these changes, and cushion consequences for national energy security and Canadian relations as the project was left to its own fate.

There is a second perspective, one less guided by the market's invisible hand and with less faith in its subliminal logic. As the late Sen. Henry M. Jackson (D-Wash) maintained, the value of ANGTS could not be measured solely on the present market value of its natural gas. Even though the gas was no longer as urgently needed from a supply or economic standpoint, its importance from a strategic energy or national security perspective was not appreciably diminished. Public policy decisions based purely on market indicators are seldom satisfactory. In fact, federal government intervention has historically been triggered by the market's failure to provide a necessary service, such as national defense or public education. While the market can usually attend efficiency issues, it cannot generally weigh equity or value concerns.

The sooner construction began, Jackson and others maintained, the sooner Arctic gas would be a useable commodity. The ANGTS, as a transmission line from Prudhoe Bay, would also help open the wider Arctic energy frontiers of the Beaufort Sea, the Mackenzie Delta and the Cana-

dian Arctic Islands. Finally, Phase II would probably only become more expensive to build as time passed. As Jerome Hass, a Cornell University economist remarked, the nation could pay a great deal now for an Alaska gas transmission system or pay even more later.

Some observers, including Tussing, contend that the Alaska Leg was doomed from the outset by rapidly changing market circumstances, circumstances beyond the control of the project principals. John G. McMillian, the driving force behind the Alaska Leg partnership, would disagree. He would argue that ANGTS viability was real and sustained. After all, as late as June 1982 - after successful passage of waivers to the Alaska Natural Gas Transportation Act - project enthusiasts still spoke confidently about finding Phase II funds. The Alaska Leg partners and the producers had agreed to share design costs. With banks offering billions and the State of Alaska interested in investment, they were negotiating an appropriate debt and equity share which the producers should assume. To some informed spectators, Alaska Leg financing appeared on the verge of completion.

By then, however, it seems that market forces had taken control and the window was closing if it had not already closed. The Wall Street Journal, as early as September 1977, had insisted that the Alaska Leg would "never be built." Its editors foresaw the changing market situation even then, especially as they related to gas deregulation. "You simply won't get the expensive resources [such as Alaska gas] so long as there is a [chance] that cheaper ones may be around," it concluded, simply and prophetically. Tussing, a year later, advised the DOE that "the Alaska Highway gas pipeline is a marginal venture at best from a business standpoint." It would remain so, he added, even "if it did not face any catastrophic risks such as non-completion or enormous cost overruns," since its gas, by his estimates, could cost five times the prevailing domestic rate and twice that of Canadian and Mexican imports.

Although the window appeared to be closing in 1980 and 1981, McMillian maintained his conviction that Phase II could still find funding for immediate construction. In the federal government, some officials agreed that ANGTS still had an opening, that the 1981 ANGTA waivers carried genuine promise. By allowing producer equity ownership, pre-billing, conditioning plant inclusion in the project rate base and by establishing regulatory certainty, financial involvement did become much more attractive. However, after financing failed to materialize in early 1982 shortly after waiver passage, the project's immediate fate was becoming obvious, given producer disposition.

Project suspension has been a major disappointment for proponents, but the Alaska Natural Gas Transportation System - in its first phase - has nevertheless managed a variety of substantial accomplishments. Even if ANGTS, as Tussing and others contend, was doomed in its totality, it

was not a failed enterprise. Rather, Phase I, after some regulatory and export policy modification, has come to satisfy many of the original objectives of the total enterprise, both from private and national interest perspectives, and it left a valuable legacy of public policy innovation.

The East Leg Northern Border partnership and Pacific Gas Transmission (PGT), the West Leg sponsor for the initial phase, achieved their initial objectives with the completion of the Phase I Prebuild, constructed on schedule and within budget. Although gas throughput was initially low on these sections, recent changes in Canadian export policy and pricing have increased volumes dramatically in late 1984 and early 1985. Likewise, the Canadian Foothills consortium, led by S. Robert Blair's NOVA (formerly Alberta Gas Trunk Lines), has gained a major transmission outlet into a new and profitable market, the American Midwest. NOVA, already a major gas supplier to West Coast shippers and distributors, will increase its share of the U.S. market. Clearly, more Canadian excess gas will continue to reach U.S. consumer through the Prebuild.

Both national governments have been able to accomplish important public policy goals. The U.S. Government, for instance, has increased its energy security by facilitating the import of Canadian gas, thereby reducing the chances of an immediate domestic gas shortage. The Government of Canada, on the other hand, was able to accommodate western producer demands for increased production and export and should improve its balance of payments with the United States - both without reducing gas service to its own citizens.

The American gas consumer will share in the Phase I success. He has gained a sustained gas supply, at least in the immediate future, at a competitive price. The Alberta gas bubble is apparently sufficient to serve U.S. consumers downstream until the year 2000, by which time Arctic gas could be in service through Phase II. Canadian gas, at its new lower prices, could conceivably exert a downward pressure on domestic prices, which are rising as conventional domestic sources are depleted. In addition, consumers have been spared the premature financing of the expensive Phase II enterprise and its costly Alaska gas, which should not be required in the foreseeable future.

The impact of the Phase II suspension on the Prudhoe Bay producers and the Alaska Leg sponsors, however, is more severe. Clearly, the producers would have preferred to build the line and have their gas delivered to Lower 48 distributors on the original schedule - as long as the market would clear their gas. However, without a viable market for their product, they must be consoled in the successful completion of the Prebuild, through which their Alaska gas may someday flow, and must be satisfied with Phase II engineering and environmental pre-design progress on both the pipeline and the gas conditioning plant. In autumn 1983, the producers reiterated their support of the ANGTS and, earlier,

pledged to help provide debt and equity financing whenever the market signs sufficiently improved.

Suspension, however, has been an undeniable blow to the Alaska Northwest partnership, led by the Northwest Alaskan Pipeline Company (NWA) which McMillian formed to direct the project. In late 1984 and early 1985, the partnership lost three members, but did remain intact and publicly optimistic about ANGTS completion. The Alaska Leg partners have spent about \$750 million in preparation for Phase II construction, mostly on project pre-design and preliminary regulatory approvals. Most of this work should remain valid, as long as the ANGTS retains the federal government's Alaska gas transmission franchise. In fact, many of the costs associated with this work have already been approved by OFI for rate base inclusion.

Northwest Pipeline Company, NWA's corporate parent and one of the American West's largest transmission firms, should derive immediate benefits from the Phase I success. The Prebuild will enable Northwest, owned by The Williams Companies since a September 1983 purchase from McMillian's group, to ship greater volumes of Canadian gas to PGT and other firms along West Leg route or the associated Western Delivery System, in the Rocky Mountains and across the southwestern United States. The increase in Canadian gas sales, transported through the Prebuild, should take some sting out of project suspension for Northwest. And the project stall, despite its major disappointment, could still have a something of a silver lining for Northwest's affiliate, Alaska Leg operator NWA. The delays have allowed the firm, its consultants and the OFI to devote even extra attention to difficult Arctic engineering problems, such as frost heave mitigation. This further refinement of design criteria and methodology should enable NWA to expedite mile-by-mile project design and avoid major construction snafus once Phase II is underway.

The Office of the Federal Inspector legacy, as the final Assessment section will suggest, is somewhat mixed. From an management standpoint, the "one-window" agency concept appears quite valuable. Political and bureaucratic considerations, however, may become troublesome and undermine concept adoption or implementation, even when the operational benefits of consolidation appear compelling.

Most importantly, the OFI provided a single federal focus for all project activity - from preliminary design review and approval, permit scheduling and coordination, to field surveillance and enforcement - once initial regulatory grants were issued. The approach, by its consolidation of responsibility and authority, increased agency accountability to the President and the Congress, agency responsiveness to the sponsor, and executive department accommodation of the ANGTS mission. The "one window" enabled greater consistency, timeliness, balance and

cogency in all federal oversight activities, and also served as a convenient single point of contact for all private and governmental entities. Finally, the OFI concept enhanced administrative and operational flexibility, since the new agency was largely free to form its own oversight staff, organization structure and philosophy.

Despite these operational advantages, there remained strong bureaucratic resistance to OFI creation and the transfer of departmental legal authority, even in the temporary, limited ANGTS context. In addition, the convergence of project authority within the OFI did create new dilemmas in balancing the sometimes competing responsibilities of facilitation and regulation - a delicate and complex task.

Federal ANGTS oversight involves several other innovations - limited judicial review, "interactive" pre-design criteria review and new cost control mechanisms - not necessarily implied by the OFI "one-window" agency approach but fully compatible with it. The 1976 act, for instance, mandated expeditious legal review and limited challenge, so that any legal dispute over the ANGTS could be resolved quickly and any prolonged construction delay could be avoided. These provisions proved very successful not only in settling lawsuits quickly, but also in containing marginal legal matters and forcing the early resolution of controversial issues in general.

Analysts of TAPS frequently cited the project's incomplete design at the time of construction as a primary source of its many field construction problems and substantial cost escalation. Project legislation required a variety of pre-design criteria, design and planning approvals before construction could commence, leading the OFI to employ an "interactive" review process by which it could participate informally in sponsor plan development. Early "interactive" review helped clarify governmental requirements at the outset for the project sponsors, allowing them to incorporate federal guidance at the design stage and avoid disputes and costly revisions during construction.

The OFI must approve and monitor sponsor cost control systems to assure that ANGTS expenses are minimized and prudently incurred. This is accomplished implicitly, by the OFI's general oversight of sponsor systems, and explicitly, through direct cost control devices such as an incentive rate of return (IROR) mechanism and ongoing cost audits. While the IROR mechanism was only marginally successful, it appears that careful review of the sponsor's management plan, procurement policies, and cost and schedule control system, in conjunction with an ongoing audit of expended costs, did effectively control Phase I project costs. The ongoing cost audits, contrasted with traditional post-construction auditing, enable resolution of "prudency" issues early, allowing maximum cost savings, and reduce post-construction regulatory reviews, confusion and expense.

In sum, the "one-window" agency concept, in its limited Phase I application, brought a variety of operational and administrative advantages to governmental oversight of a large, technical construction project involving many disparate federal authorities and requiring timely action. The approach appears to facilitate consistent, balanced regulatory determinations and avoid interdepartmental entanglements, to promote political accountability, to encourage cost-effective, efficient oversight administration.

However, the OFI concept - its institution and success - may be contextually bound. Without an energy crisis, special legislative intervention (the 1976 act), energetic and persistent presidential, congressional and project sponsor support or the general consensus that federal TAPS oversight had been deficient, the concept may never have come to fruition. Bureaucratic objection, in the absence of strong, consensual and sustained political support for the "one-window" agency concept, may prevent its development and implementation.

PART ONE: The Project History

THE ANGTS MISSION DEFINED

Chapters

- 1 The First Year, 1
- 2 Alternatives Emerge, 10
- 3 Disunion and Polarization, 37
- 4 Posturing for Certification, 62
- 5 The Alaska Natural Gas Transportation Act, 85
- 6 The President's Decision, 90
- 7 Executive Reorganization, 114
- 8 Selecting the Federal Inspector, 132
- 9 Ancillary Issues, 138
- 10 Getting Started, 157

PART TWO: The Agency History

THE OFI MISSION APPLIED

Chapters

- 11 Jack Rhett Takes Command, 1
- 12 The OFI Hits Stride, 31
- 13 The Waiver Package, 97
- 14 The East Leg Experience, 135
- 15 Inertia and The TAGS Challenge, 177
- 16 Epilogue, 210