

Pipeline Integrity –

Lessons Learned from PHMSA Closed Cases

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 (Transcontinental Gas Pipeline)
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PHMSA – Pipeline & Hazardous Materials Safety Administration

- The Department of Transportation (**DOT**) is the Federal Agency which has enforces the Natural Gas Pipeline Safety Act of 1968.
- The **RSPA** (Research and Special Programs Administration) was the group under DOT that had oversight of pipelines and it existed up until 2004.
- In 2005 **PHMSA** was created as a result of the Special Programs Improvement Act of 2004.
- Office of Pipeline Safety (**OPS**) is under PHMSA and is responsible for overseeing 2.3 million miles of natural gas and liquid pipelines.
 - **PHMSA's stated mission** is to protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives. To do this, the agency establishes national policy, sets and enforces standards, educates, and conducts research to prevent incidents. We also prepare the public and first responders to reduce consequences if an incident does occur.
 - **PHMSA maintains a website that contains all of the Cases Initiated, Orders Issued, and Cases Closed.**
 - The website is as follows:
https://primis.phmsa.dot.gov/comm/reports/enforce/CaseStatus_opid_0.html?nocache=6896#_TP_1_tab_1



Summary of Enforcement Case Status

- This table provides the total number of cases opened for each year, and a count of how many of these cases were closed at the time this report was generated.

Overall Case Status: 2002-2018					
Year Opened	Number of Cases Opened	Corresponding Cases Closed	Percent Cases Closed	Percent Cases Pending	
2002	160	160	100%	0%	
2003	144	144	100%	0%	
2004	223	223	100%	0%	
2005	297	297	100%	0%	
2006	233	233	100%	0%	
2007	255	255	100%	0%	
2008	182	182	100%	0%	
2009	181	181	100%	0%	
2010	199	198	99%	1%	
2011	207	205	99%	1%	
2012	276	272	99%	1%	
2013	266	260	98%	2%	
2014	154	144	94%	6%	
2015	197	182	92%	8%	
2016	164	114	70%	30%	
2017	229	167	73%	27%	
2018	64	19	30%	70%	
Totals	3431	3236	94%	6%	

Table extracted from: http://arjmis.phmsa.dot.gov/comm/reports/enforce/CaseStatus_opid_0.html | Report generated on: 05/08/18



Corrective Action Orders (CAOs)

- A Corrective Action Order usually addresses issues resulting from an accident, spill, or other significant, immediate, or imminent safety or environmental concern.

Cases Involving Corrective Action Orders: 2002-2018					
Year Opened	Number of Cases Opened	Corresponding Cases Closed	Percent Cases Closed	Percent Cases Pending	
2002	7	7	100%	0%	
2003	19	19	100%	0%	
2004	9	9	100%	0%	
2005	9	9	100%	0%	
2006	7	7	100%	0%	
2007	7	7	100%	0%	
2008	6	6	100%	0%	
2009	5	5	100%	0%	
2010	11	10	91%	9%	
2011	10	10	100%	0%	
2012	10	7	70%	30%	
2013	5	4	80%	20%	
2014	6	5	83%	17%	
2015	11	4	36%	64%	
2016	9	2	22%	78%	
2017	2	1	50%	50%	
2018	1	0	0%	100%	
Totals	134	112	84%	16%	

Table extracted from: http://arjmis.phmsa.dot.gov/comm/reports/enforce/CaseStatus_opid_0.html | Report generated on: 05/08/18



Notices of Probable Violations (NOPVs)

- These notices may include proposed civil penalties, a proposed compliance order requiring the operator to take one or more corrective actions, or both proposed civil penalties and a proposed compliance order.

Cases Involving Notices of Probable Violation: 2002-2018				
Year Opened	Number of Cases Opened	Corresponding Cases Closed	Percent Cases Closed	Percent Cases Pending
2002	58	58	100%	0%
2003	48	48	100%	0%
2004	86	86	100%	0%
2005	58	58	100%	0%
2006	53	53	100%	0%
2007	69	69	100%	0%
2008	45	45	100%	0%
2009	58	58	100%	0%
2010	43	45	100%	0%
2011	70	69	99%	1%
2012	77	77	100%	0%
2013	82	77	94%	6%
2014	46	39	85%	15%
2015	52	48	92%	8%
2016	63	26	41%	59%
2017	61	17	28%	72%
2018	31	0	0%	100%
Totals	1042	913	88%	12%

Table extracted from: http://pimis.phmsa.dot.gov/comm/reports/enforce/CaseStatus_opid_0.html | Report generated on: 05/03/18



Notices of Amendment (NOAs)

- A Notice of Amendment alleges that an operator's written plans or procedures fail to meet regulatory requirements and proposes that they be amended.

Cases Involving Notices of Amendment: 2002-2018				
Year Opened	Number of Cases Opened	Corresponding Cases Closed	Percent Cases Closed	Percent Cases Pending
2002	60	60	100%	0%
2003	48	48	100%	0%
2004	93	93	100%	0%
2005	133	133	100%	0%
2006	104	104	100%	0%
2007	102	102	100%	0%
2008	59	59	100%	0%
2009	50	50	100%	0%
2010	41	41	100%	0%
2011	60	60	100%	0%
2012	102	102	100%	0%
2013	85	85	100%	0%
2014	34	33	97%	3%
2015	54	53	98%	2%
2016	35	30	86%	14%
2017	62	47	76%	24%
2018	13	1	8%	92%
Totals	1335	1301	97%	3%

Table extracted from: http://pimis.phmsa.dot.gov/comm/reports/enforce/CaseStatus_opid_0.html | Report generated on: 05/03/18



Notices of Proposed Safety Order

- A Notice of Proposed Safety Order addresses pipeline integrity risks that may not constitute a hazardous facility requiring immediate corrective action, but do need to be addressed over time.

Cases Involving Notices of Proposed Safety Order				
Year Opened	Number of Cases Opened	Corresponding Cases Closed	Percent Cases Closed	Percent Cases Pending
2010	3	3	100%	0%
2011	6	5	83%	17%
2012	4	3	75%	25%
2013	2	2	100%	0%
2014	2	1	50%	50%
2015	4	1	25%	75%
2016	3	2	67%	33%
2017	2	0	0%	100%
2018	1	0	0%	100%
Totals	27	17	63%	37%

Table extracted from: http://primis.phmsa.dot.gov/comm/reports/enforce/CaseStatus_oid_0.html | Report generated on: 05/03/18



Why?

- Good statistics on various PHMSA enforcement actions and amounts of fines but **why do I care?**
- The **take away** is not in these numbers but in the **actual details of the cases** themselves.
- These are what we will call the “**Lessons Learned**” from the events that have occurred.
- As a group, the people involved in Pipeline Integrity have a **tendency not to discuss their short comings** with each other.
- The **information presented herein is a matter of public record** and the stated goal is to use this information to **get us as Operators talking about what we have done wrong and more importantly what we have done to correct those mistakes.**
- Hopefully, we will all be able to take these “Lessons Learned” back with us to our companies and **ultimately make each Operator safer as a result.**



2017 Closed Cases (Total of 210 – Page 1/7)

- PHMSA "closes" enforcement cases once it is satisfied that all identified correction actions have been taken, all inadequate procedures corrected, and all civil penalties paid.

Cases Closed 2017					
Case Number	Date Closed	Operator	Region	Date Opened	Case Number
3	01/04/17	SUNBIT MIDSTREAM PARTNERS LLC	Central	01/04/17	3001700134
4	01/04/17	VIKING GAS TRANSMISSION CO	Central	01/04/17	3001700135
5	01/04/17	VIKING GAS TRANSMISSION CO	Central	01/04/17	3001700136
6	01/09/17	CITY OF SUSANVILLE	Western	07/05/16	5001600174
7	01/09/17	COLEB GAS TRANSMISSION L.L.C. (SPECTRA ENERGY PARTNERS LP)	Southwest	11/09/16	4001600118
8	01/23/17	TRANSPORT LOG DEVELOPMENT L.P.	Southwest	05/11/17	4001700039
9	01/23/17	WICHITA PIPELINE COMPANY	Western	01/25/16	5001600115
10	01/23/17	CHARBARRAL ENERGY LLC	Southwest	09/18/15	4001500113
11	01/26/17	TEXAS EASTERN TRANSMISSION LP (SPECTRA ENERGY PARTNERS LP)	Eastern	09/28/15	1201700123
12	01/26/17	ALCOQUIN GAS TRANSMISSION L.L.C. (SPECTRA ENERGY PARTNERS)	Eastern	01/20/17	1201700130
13	01/26/17	SHELL PIPELINE CO. L.P.	Central	03/08/13	1001500111
14	01/25/17	ARLINGTON STORAGE COMPANY LLC	Eastern	11/17/15	1201510336
15	01/26/17	CPENDE NGL PIPELINE LLC	Central	06/12/09	0800900111
16	01/23/17	KIMBER PIPELINE LOGS (WYOMING) LLC	Eastern	11/01/16	1201600118
17	01/24/17	COULDER PIPELINE CO.	Central	05/28/15	0301500119
18	02/02/17	COFFEEVILLE RESOURCES (TRUBE TRANSPORTATION) LLC	Central	09/15/16	3101600134
19	02/06/17	TEXAS EASTERN TRANSMISSION LP (SPECTRA ENERGY PARTNERS LP)	Eastern	02/06/17	1201700144
20	02/07/17	WABASH GAS	Western	11/15/16	5201600134
21	02/09/17	TEXAS GAS TRANSMISSION LLC	Southwest	02/09/17	4001700139
22	02/09/17	OCCIDENTAL CHEMICAL CORP.	Southwest	02/09/17	6001500139
23	02/09/17	JAMB PIPELINE CO.	Southwest	02/09/17	6001700139
24	02/09/17	ETOWE ENERGY	Southwest	02/09/17	6001700139
25	02/09/17	WABASH GAS	Western	02/09/17	5201700139
26	02/09/17	CONOCO PIPELINES (SEF - L) LP	Southwest	02/09/17	4001700140
27	02/09/17	GULF SOUTH PIPELINE COMPANY LP	Southwest	02/09/17	4001700141
28	02/09/17	WABASH PIPELINE OPERATING PARTNERSHIP L.P.	Western	02/18/17	5201700140
29	02/09/17	INDIANASCO INC.	Western	02/18/17	5201700140
30	02/09/17	TEGONO GREAT PLAINS MIDSTREAM LLC	Central	06/18/16	3101600139



2017 Closed Cases (Total of 210 – Page 2/7)

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Cases Closed 2017					
Case Number	Date Closed	Operator	Region	Date Opened	Case Number
31	02/01/17	TOTAL PARTNER SERVICES	Eastern	01/27/16	1001600134
32	02/01/17	SECO LP	Western	01/29/17	5201700139
33	02/01/17	SUNCO ENERGY (SUN) PIPELINE CO.	Western	02/01/17	5201700139
34	02/01/17	DE WIND NATURAL GAS CO.	Western	02/01/17	5201700139
35	02/01/17	DE WIND NATURAL GAS CO.	Western	02/18/17	5201700139
36	02/01/17	SUNOCO PIPELINE L.P.	Southwest	06/02/16	6001600134
37	02/01/17	ALCOQUIN GAS TRANSMISSION L.L.C. (SPECTRA ENERGY PARTNERS)	Eastern	01/27/17	1201700139
38	02/01/17	COULDER PIPELINE CO.	Southwest	02/23/17	4001700139
39	02/01/17	MARSHALL PIPELINE COMPANY LP	Southwest	09/29/15	4001500119
40	02/01/17	MARATHON PIPE LINE LLC	Central	01/25/16	3101600139
41	02/01/17	MARSHALL PIPELINE COMPANY LP	Southwest	01/25/17	4001700139
42	02/01/17	EASTERN SMOKE NATURAL GAS CO.	Eastern	01/06/17	1201700139
43	02/01/17	MARATHON & NORTHWEST PIPELINE L.L.C. (SPECTRA ENERGY PARTNERS)	Eastern	01/18/17	1201700139
44	02/01/17	WICHITA PARTNERS LP	Central	01/28/16	5001600139
45	02/01/17	ROCK ROCK MIDSTREAM LP	Southwest	01/29/16	4001600139
46	02/01/17	FRONT RANGE PIPELINE LLC	Western	01/21/17	4001700139
47	02/01/17	FRONT RANGE PIPELINE LLC	Western	01/21/17	4001700139
48	02/01/17	EQ OPERATING LLC	Western	01/27/17	5201700139
49	02/01/17	WABASH GAS	Western	01/27/17	5201700139
50	02/01/17	PLAINS PIPELINE L.P.	Southwest	01/26/16	4001600139
51	02/01/17	ENRICH GAS TRANSMISSION LLC	Southwest	11/25/15	4001510336
52	02/01/17	CO. PIPELINE OPERATIONS INC.	Central	04/01/16	1001600139
53	02/01/17	NATIONAL GAS PIPELINE CO. OF AMERICA (NGL)	Central	04/18/15	1001510336
54	02/01/17	MARSHALL PIPELINE COMPANY LP	Central	01/19/17	4001700139
55	02/01/17	ETMO PRODUCTS PIPELINE CO.	Southwest	04/04/17	4001700139
56	04/04/17	ARMARCO PETROLEUM CORP.	Western	04/04/17	5201700139
57	02/01/17	REHMANCO OPERATING LLC	Southwest	04/26/17	4001700139
58	02/01/17	COLONIAL PIPELINE CO.	Eastern	04/04/17	1201700139
59	02/01/17	MEPC LLC	Eastern	09/29/15	1001510336
60	02/01/17	COPIER CHEMICAL DISTRIBUTION LLC	Southwest	01/18/17	4001700139



2017 Closed Cases (Total of 210 – Page 3/7)

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Cases Closed: 2017					
Case Number	Operator	Region	Date Closed	Case Number	
61	04/11/17	BUCKEYE DEVELOPMENT & LOGISTICS LLC	Eastern	04/11/17	128175049W
62	04/12/17	BUCKEYE PARTNERS LP	Eastern	11/29/14	128143987
63	04/12/17	SOUTHWEST ENERGY PIPELINE LLC	Central	04/12/17	128176000W
64	04/14/17	MID-CONTINENT FERTILISER AND STORAGE LLC	Central	04/14/17	128176000W
65	04/14/17	MID-CONTINENT EXPRESS PIPELINE LLC	Southwest	08/17/16	45061809
66	04/20/17	BUCKEYE PARTNERS LP	Eastern	01/11/15	128176000W
67	04/24/17	DANVILLE CITY OF	Eastern	04/24/17	128176000W
68	04/24/17	EL PASO NATURAL GAS CO	Southwest	07/14/16	426183884M
69	04/24/17	HILLTOP ALBERTA LLC	Western	04/24/17	128176000W
70	05/04/17	FRONTIER ENERGY SERVICES L.L.C.	Southwest	05/04/17	426175617W
71	05/04/17	ENTERPRISE PRODUCTS OPERATING LLC	Eastern	05/04/17	128176000W
72	05/04/17	TRANSCONTINENTAL GAS PIPE LINE COMPANY	Eastern	05/04/17	128176000W
73	05/04/17	BOVDY PIPELINE LLC	Central	05/04/17	128176000W
74	05/22/17	BRIDGER TRAILER SERVICE LLC	Western	05/18/17	128176000W
75	05/24/17	WORTH CLIFF PIPELINE LLC	Central	05/24/17	128176000W
76	05/24/17	ST. LOUIS PIPELINE OPERATING LLC	Central	11/20/15	128176000W
77	05/24/17	WYOMING PIPELINE COMPANY	Western	05/24/17	128176000W
78	05/29/17	DANVILLE CITY OF	Eastern	11/29/15	128176000W
79	05/29/17	DANVILLE CITY OF	Eastern	11/29/15	128176000W
80	05/29/17	DANVILLE CITY OF	Eastern	11/29/15	128176000W
81	05/29/17	BUCKEYE PARTNERS LP	Eastern	01/14/15	128176000W
82	05/29/17	RAE HAWKINS FERTILISER LLC	Western	05/29/17	128176000W
83	05/29/17	MARSHALL THERMAL RESOURCES LP	Eastern	12/11/16	128188000M
84	05/29/17	RESOLUTE NATURAL RESOURCES COMPANY	Western	05/29/17	128176000W
85	05/29/17	OP MARKETING COMPANY	Western	05/29/17	128176000W
86	05/29/17	HILLTOP ALBERTA LLC	Western	04/29/17	128176000W
87	05/29/17	HILLTOP ALBERTA LLC	Western	04/29/17	128176000W
88	05/29/17	BUCKEYE DEVELOPMENT & LOGISTICS LLC	Central	04/11/17	128175049W
89	05/29/17	MARSHALL THERMAL RESOURCES LP	Eastern	04/29/17	128176000W
90	05/29/17	DANOTA RESOURCES	Central	04/21/17	128176000W



2017 Closed Cases (Total of 210 – Page 4/7)

- PHMSA "closes" enforcement cases once it is satisfied that all identified correction actions have been taken, all inadequate procedures corrected, and all civil penalties paid.

Cases Closed: 2017					
Case Number	Operator	Region	Date Closed	Case Number	
91	06/01/17	GULF SOUTH PIPELINE COMPANY LP	Southwest	06/01/17	426173007W
92	06/02/17	UTICA EAST OHIO DISTRIBUTION LLC	Eastern	06/02/17	128176000W
93	06/02/17	ISSHO PIPELINE CORP	Western	06/12/17	128176000W
94	06/02/17	FRONTIER ENERGY SERVICES L.L.C.	Southwest	06/12/17	426175022W
95	06/13/17	CANTON LMS LLC	Southwest	06/13/17	426175022W
96	06/15/17	DANVILLE CITY OF	Eastern	06/15/17	128176000W
97	06/15/17	TC ON PIPELINE OPERATIONS INC	Central	11/20/15	128155819
98	06/15/17	TRANSCONTINENTAL GAS PIPE LINE COMPANY	Eastern	05/09/17	128176000W
99	06/20/17	ENTERPRISE PRODUCTS OPERATING LLC	Western	01/21/16	128188000M
100	06/20/17	CHALMERS CITY OF	Western	06/20/17	128188000M
101	06/21/17	HOLY ENERGY PARTNERS - OPERATING LP	Western	06/21/17	128176000W
102	06/21/17	COALBUSH CITY OF	Western	06/21/17	128176000W
103	06/21/17	ENCON TOMMORROW INC	Eastern	03/22/17	128176000W
104	06/26/17	HOLY ENERGY PARTNERS - OPERATING LP	Western	06/26/17	128176000W
105	06/27/17	PHILIPP PIPELINE LLC	Western	06/27/17	128176000W
106	06/27/17	WILLIAMS FIELD SERVICES	Eastern	10/11/16	128155819
107	06/27/17	TRANSCONTINENTAL GAS PIPE LINE COMPANY	Eastern	11/22/16	128155819
108	06/28/17	WARTONS PIPELINE CORP	Eastern	06/28/17	128176000W
109	06/28/17	TALWAGS FERTILISER PIPELINE LLC	Western	03/22/16	128155819
110	06/28/17	ANASARBO DISTRIBUTION CORP	Western	06/28/17	128176000W
111	06/28/17	ANASARBO DISTRIBUTION CORP	Western	06/28/17	128176000W
112	06/29/17	CANADIAN INTEGRATE PIPELINE	Southwest	06/29/17	426173009W
113	07/06/17	CALMEX PIPELINE CO	Western	07/06/17	128176000W
114	07/07/17	ALPINE TRANSPORTATION CO	Western	07/07/17	128176000W
115	07/07/17	KAWARAK TRANSPORTATION CO	Western	07/07/17	128176000W
116	07/11/17	SABINE PASS LNG LP (CORPORATE)	Southwest	10/17/16	426183882
117	07/11/17	CEPUSO CHEMICALS OPERATING LLC	Southwest	08/29/16	426183882
118	07/11/17	ENHATA NATURAL GAS CO	Western	07/11/17	128176000W
119	07/11/17	ALVINA ENERGY SERVICE CO	Western	06/30/17	128176000W
120	07/14/17	BUCKEYE PARTNERS LP	Eastern	04/29/17	128176000W



2017 Closed Cases (Total of 210 – Page 5/7)

- PHMSA "closes" enforcement cases once it is satisfied that all identified correction actions have been taken, all inadequate procedures corrected, and all civil penalties paid.

Case Number	Date Closed	Operator	Region	Cadre Operated	Case Number
131	02/20/17	BUCKEYE PARTNERS LP	Eastern	03/30/17	1101750100
132	02/20/17	USA WINDLAND PIPELINE LLC	Central	03/20/17	1003300000
133	02/20/17	CLINTON NATURAL BYPASS LLC	Western	04/20/17	1101750100
134	02/20/17	SOUTHERN NATURAL GAS LLC	Southwest	07/20/17	2001710000
135	02/20/17	SUNCO FUGLE POWER	Western	07/20/17	1003300000
136	02/20/17	IRVINGHOE CITY GP	Eastern	07/20/17	1003300000
137	02/20/17	WILCOX THERMAL	Western	03/13/17	1001700000
138	02/20/17	HERSCOCO INC	Western	03/08/17	1001700000
139	02/20/17	WISCONSIN ENERGY CORPORATION	Western	06/20/17	1001700000
140	02/20/17	MARATHON PIPELINE LLC	Central	07/24/16	1001400000
141	02/20/17	NOBLE INDUSTRIES SERVICES LLC	Western	06/01/17	1003300000
142	02/20/17	ALBERTA PIPELINE SERVICES LTD	Western	08/01/17	1003300000
143	02/20/17	ROCKWELL CITY GP	Eastern	08/01/17	1003300000
144	02/20/17	WHITING PETROLEUM CORP	Western	09/01/17	1003300000
145	02/20/17	ENTER PIPELINE COMPANY LLC	Southwest	04/16/17	1001700000
146	02/20/17	ENTERPRISE PRODUCTS OPERATING LLC	Southwest	05/24/17	1001700000
147	02/20/17	CONOCOPhillips ALASKA INC.	Western	08/03/17	1003300000
148	02/20/17	ILLUMINATE	Western	08/01/17	1003300000
149	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
150	02/20/17	INTEGRAL TECHNOLOGIES PARTNERSHIP L.P.	Eastern	09/15/17	1001500000
151	02/20/17	TRINITY GAS TRANSMISSION LLC	Western	10/21/17	2001500000
152	02/20/17	SUNBELT INDUSTRIES PARTNERSHIP LLC	Western	02/21/17	1001700000
153	02/20/17	COALINDIA CITY GP	Western	03/13/17	1001500000
154	02/20/17	EMVICK PIPELINE LLC	Southwest	06/24/17	1003300000
155	02/20/17	ARADARCO PETROLEUM CORP	Western	05/24/17	1001700000
156	02/20/17	OMNIPAC PIPELINE COMPANY	Western	03/13/17	1001500000
157	02/20/17	TEFAN ALASKA INC	Western	04/06/17	1003300000
158	02/20/17	TEFAN ALASKA INC	Western	05/26/17	1003300000
159	02/20/17	SUNOCO PIPELINE L.P.	Eastern	08/01/17	1003300000
160	02/20/17	PUNTBELL RESOURCES LLC	Central	09/01/17	1001700000



2017 Closed Cases (Total of 210 – Page 6/7)

- PHMSA "closes" enforcement cases once it is satisfied that all identified correction actions have been taken, all inadequate procedures corrected, and all civil penalties paid.

Case Number	Date Closed	Operator	Region	Cadre Operated	Case Number
161	02/20/17	EMVICK PIPELINE LLC	Central	09/01/17	1003300000
162	02/20/17	WILCOX THERMAL	Western	03/08/17	1001700000
163	02/20/17	NOBLE INDUSTRIES SERVICES LLC	Southwest	06/01/17	1003300000
164	02/20/17	ENTER PIPELINE COMPANY LLC	Western	04/16/17	1001700000
165	02/20/17	SUNOCO PIPELINE L.P.	Eastern	08/01/17	1003300000
166	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
167	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
168	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
169	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
170	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
171	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
172	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
173	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
174	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
175	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
176	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
177	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
178	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000
179	02/20/17	WILLIAMS FIELD SERVICES	Eastern	08/24/17	1001700000
180	02/20/17	WILLIAMS FIELD SERVICES	Western	08/24/17	1001700000



2017 Closed Cases (Total of 210 – Page 7/7)

- PHMSA "closes" enforcement cases once it is satisfied that all identified correction actions have been taken, all inadequate procedures corrected, and all civil penalties paid.

ID	Date Closed	Operator	Region	Date Opened	Case Number
181	11/06/17	CHEYENNE PIPE LINE CO.	Western	11/06/17	2201750139
182	11/06/17	CHEYENNE PIPE LINE CO.	Western	11/06/17	2201750140
183	11/06/17	CHEYENNE PIPE LINE CO.	Western	11/06/17	2201750138
184	11/06/17	CHEYENNE PRODUCTS COMPANY	Western	08/11/17	2201750137
185	11/20/17	TRIM GAS TRANSMISSION LLC	Southwest	10/11/16	2201750089
186	11/20/17	MOJO VALLEY PIPELINE CO.	Southwest	06/12/17	2201750091
187	11/20/17	BP PIPELINE (NORTH AMERICA) INC.	Central	02/21/15	2201750094
188	11/20/17	AMR PIPELINE LLC	Central	01/20/17	2201750095
189	11/27/17	DRYFLAME GAS TRANSMISSION CO.	Central	09/11/17	2201750097
190	11/29/17	SUNOCO PIPELINE LP	Eastern	06/16/17	2201750098
191	11/29/17	KANSAS CITY OF	Eastern	03/11/17	2201750099
192	11/29/17	MARSHFIELD ENERGY SERVICES INC. - MARSHFIELD	West/Br.	06/21/15	2201750100
193	11/29/17	EMERALD GAS PIPELINE LLC	Southwest	08/24/17	2201750101
194	11/29/17	COLUMBIA GAS TRANSMISSION LLC	Eastern	11/29/17	2201750102
195	12/01/17	PROCOMP ENERGY LLC	West/Br.	12/01/17	2201750103
196	12/01/17	SMITH PIPELINE CORP.	Southwest	08/21/17	2201750104
197	12/01/17	SMITH PIPELINE CORP.	Southwest	08/21/17	2201750105
198	12/01/17	SMITH PIPELINE CORP. I CO.	Southwest	08/21/17	2201750106
199	12/01/17	ENERGY PIPELINE CORP.	Southwest	05/01/17	2201750107
200	12/01/17	BRIDGEMAN PIPELINE LLC	Western	01/11/17	2201750108
201	12/01/17	ERS PIPELINE LLC	Southwest	03/01/17	2201750109
202	12/01/17	CITY OF BRIDGE	Eastern	05/21/16	2201750110
203	12/01/17	DEK PIPELINE COMPANY	Western	12/01/17	2201750111
204	12/01/17	EASTERN SAGINA NATURAL GAS CO	Eastern	01/11/17	2201750112
205	12/01/17	COLUMBIA MIDSTREAM GROUP LLC	Eastern	12/01/17	2201750113
206	12/01/17	EMERALD CITY OF	Eastern	12/01/17	2201750114
207	12/01/17	EMERALD CITY OF	Eastern	12/01/17	2201750115
208	12/01/17	AMR PIPELINE CO.	Central	03/16/17	2201750116
209	12/01/17	COLUMBIA GAS TRANSMISSION LLC	Central	08/11/15	2201750117
210	12/01/17	TRANGOCENTRAL GAS PIPELINE COMPANY	Eastern	10/11/17	2201750118
211	12/01/17	PLAINS PIPELINE L.P.	Southwest	09/01/17	2201750119
212	12/01/17	CENTROTERRENA GAS CO	Southwest	12/01/17	2201750120

211: Table extracted from: http://dphms.phmsa.dot.gov/comm/CaseInfo/AllCasesClosed.asp_014901 Report generated on: 01/24/18



01/04/17 – Summit Midstream Partners, LLC (#1)

Case Summary

Operator	SUMMIT MIDSTREAM PARTNERS, LLC
Case Number	2201750104
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Central
Date Opened	01/04/17
Status	CLOSED
Date Closed	01/04/17

Summit's procedures were inadequate because its Damage Prevention/Public Awareness plan dated 12-31-2013 was missing the following:

- Learn the responsibility and resources of each government organization that may respond to a hazardous liquids pipeline emergency.
- Identify the types of pipeline emergencies of which the operator notifies the officials.
- Acquaint the officials with the operator's ability in responding to a hazardous liquids pipeline emergency and means of communication.
- Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.
- Identify if any combined operator/public agency training sessions/activities are needed.

Summit must address the items above in its procedures.



01/04/17 – Viking Gas Transmission Co (#2)

Case Summary

§192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

Viking did not document its integration of data for assessment review to identify potential threats to pipeline integrity. Viking integrated ILI or ECDA results with data on encroachments and foreign line crossings in the same segment to define locations of potential third party damage manually, but results of integration were not documented for assessment review.

2. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

(a) Threat identification. An operator must identify and evaluate all potential threats to each covered pipeline segment. Potential threats that an operator must consider include, but are not limited to, the threats listed in ASME/ANSI B31.8S (incorporated by reference, see §192.7), section 2, which are grouped under the following four categories:

- (1) Time dependent threats such as internal corrosion, external corrosion, and stress corrosion cracking;
- (2) Static or resident threats, such as fabrication or construction defects;
- (3) Time independent threats such as third party damage and outside force damage; and
- (4) Human error.

Viking did not evaluate all potential threats to each covered pipeline segment according to ASME/ANSI B31.8S, Section 2. Viking's integrity management program failed to list all of the threats associated with the categories. As a result, a relief valve leak in 2013 was not incorporated into the risk model.

Operator	VIKING GAS TRANSMISSION CO.
Case Number	326571081W
Case Type	Warning Letter
Subject(s)	Integrity Management - Gas Pipeline
Region	Central
Date Opened	01/04/17
Status	CLOSED
Date Closed	01/04/17



01/04/17 – Viking Gas Transmission Co (#3)

Case Summary

1. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

Viking's procedures are inadequate because its integrity management program (IMP) does not include all potential threats listed in ASME/ANSI B31.8S Section 2. As a result a relief valve leak in 2013 was not incorporated into the risk model. Viking must amend its IMP to include these potential threats.

2. §192.935 What additional preventive and mitigative measures must an operator take?

Viking's procedure is inadequate because it does not require either monitoring of excavations or bi-monthly patrols and the language of the procedure allows for "other provisions" to be utilized rather than monitoring. Pipelines operating below 30% SMYS in Class 3 or 4 locations but not in an HCA require either monitoring of excavations near the pipeline or bi-monthly patrolling. Viking's procedures must be amended to clarify that the excavation must be continuously monitored if excavation is occurring near the pipeline or that bi-monthly patrols must be performed.

3. §192.945 What methods must an operator use to measure program effectiveness?

Viking's procedures are inadequate because it failed to include in its integrity management program the required performance measures specified in ASME/ANSI B31.8S and ASME/ANSI B31.8S, Appendix A. Specifically, the process did not require bench-marking performance against data from outside the company. Additionally there are inconsistencies within the IMP. Performance measures tracked in IMP Performance Measures of Specific Threats spreadsheet do not match the table in procedure Section 11.5. Viking's procedures must be amended to include benchmarking performance against data from outside the company and to correct the inconsistencies between the spreadsheet and the table in procedure Section 11.5.

Operator	VIKING GAS TRANSMISSION CO.
Case Number	326571082W
Case Type	Notice of Abandonment
Subject(s)	Integrity Management - Gas Pipeline
Region	Central
Date Opened	01/04/17
Status	CLOSED
Date Closed	01/04/17



01/09/17 – City of Susanville (#4)

Case Summary

1. §192.459 External corrosion control: Examination of buried pipeline when exposed.	Operator	CITY OF SUSANVILLE
	Case Number	5211000276
The Susanville Operations and Maintenance Plan does not contain procedures explicitly requiring exposed pipe be examined for evidence of corrosion or coating deterioration, coating, and documenting any findings or required remedial action in accordance with §192.459	Case Type	Notice of Amendment
	Subject(s)	Corrosion Control - Gas Pipelines Welding - Gas Pipelines
	Region	Western
	Date Opened	07/05/16
2. §192.233 Miter joints.	Status	CLOSED
	Date Closed	01/09/17

- (a) A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 30 percent or more of SMYS may not deflect the pipe more than 2".
- (b) A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of less than 30 percent, but more than 10 percent of SMYS may not deflect the pipe more than 12 1/2" and must be a distance equal to one pipe diameter or more away from any other miter joint, as measured from the creck of each joint.
- (c) A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 10 percent or less of SMYS may not deflect the pipe more than 90".

The City of Susanville O&M Plan allows installation of miter joints on transmission lines and mains with the permission the engineer. This procedure language is vague as to which engineer will approve, how much miter is allowed per joint and under what circumstances miter joints will be allowed. §192.233 is prescriptive and must be followed if miter joints are allowed to be installed on a gas pipeline. Susanville must incorporate the requirements of §192.233 if they intend to allow miter joints.

On December 15-17, 2015, representatives from the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to chapter 601 of 49 United States Code, conducted an on-site pipeline safety inspection of The City of Susanville Gas Distribution System (Susanville) procedures for Operation and Maintenance in Susanville, California. As a result of the inspection, Susanville was issued a Notice of Amendment on July 6, 2016, which proposed amendment of your procedures.

Susanville submitted its amended procedures on October 28, 2016. My staff reviewed the amended procedures, and it appears that the inadequacies outlined in this Notice of Amendment have been corrected.

This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.



01/09/17 – Ozark Gas Transmission, LLC (#5)

Case Summary

Ozark Gas Transmission, LLC (Spagna's) written Operator Qualification (OQ) plan, Section 8.0 Management of Change, does not include a categorization of changes due to mergers and acquisitions, increasing span of control ratios, and other changes identified in PHMSA's ADB 2009-001. Spagna failed to notify PHMSA of changes to their OQ program that were identified as significant and clarified by ADB-09-01 when it acquired the Express Pipeline pipeline in 2003 (Express Holdings (SNA), LLC, OPHD 11729). The acquisition resulted in the addition of venturis (16) new covered tanks (legisks) to its annual covered tank lists and venturis (17) new tanks to its continuous covered tank list on July 02, 2003.	Operator	OZARK GAS TRANSMISSION, L.L.C. (SPECTRA ENERGY PARTNERS, LP)
	Case Number	4211000104
Spagna must update their written OQ program to include changes due to mergers and acquisitions, increasing span of control ratios, and other changes issued and identified as significant in PHMSA's ADB 2009-001.	Case Type	Notice of Amendment
	Subject(s)	Operations - Gas Pipelines Qualification of Pipeline Personnel - Historical Liquid Pipelines
	Region	Southwest
	Date Opened	11/05/15
	Status	CLOSED
	Date Closed	01/09/17

Spagna's written Administrative Procedure for Maximum Operating Pressure Calculation (Spagna No. AP-CD3-8) outlines a procedure that can be utilized in establishing an alternative MAOP. This procedure outlines procedures to establish the MAOP of a pipeline that does not already have documentation of an MAOP.

The procedure in Section 2E of Spagna's manual states that "If documentation of an MAOP cannot be found, an MAOP may be established using the highest pressure experienced over the previous 5 years without causing damage or safety problems. This pressure must have been held for several hours. The operator must consult with the regulatory agency to establish an MAOP in this manner."

The establishment of an MAOP utilizing this procedure is outside the regulatory requirements contained in Part 192. This provision as such cannot be used to establish MAOP on any of Spagna's pipelines and should be removed from the procedures.



01/12/17 – Freeport LNG Development, LP (#6)

Case Summary

Operator	FREEPORT LNG DEVELOPMENT, L.P.
Case Number	4201730016
Case Type	Warning Letter
Subject(s)	General - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	01/12/17
Status	CLOSED
Date Closed	01/12/17

1. §195.1 Which pipelines are covered by this Part?

Freeport LNG (FLNG) failed to show that a 2.2 mile long 8-inch NGL pipeline meets the requirement for an exception under §195.1 (b)(3)(ii). FLNG constructed a 1.2 mile long hazardous liquid pipeline designed to transport natural gas liquids from their pre-treatment facility near Freeport, TX to a truck loading facility near Texas Highway 523 and Jeffers Road. The operator then claimed the pipeline was exempt from Part 195 Regulation because the length of the pipeline outside the facility was 0.02 miles. FLNG stated that they had acquired or leased property to increase the pre-treatment facility site to over a mile across which reduced the length of the hazardous liquid pipeline to less than one mile.

In order to verify this, PHMSA requested the following documentation: FLNG's survey procedures, the surveyors training and qualifications records, field notes that were made during the survey, the equipment used in order to conduct the survey and accompanying calibration certificates, any GIS software used to conduct the survey, plot plans that show what areas will be fenced and what types of fencing will occur around the 8-inch NGL line, and easement agreements along the length of the property that the 8-inch NGL traverses showing the operator controls the site property, and "as-built" drawings of the pipeline.

According to FLNG email response, the requested documents are not available or have not been developed at the time of the inspection. As a result, FLNG failed to provide evidence to support their exception requirement of §195.1 (b)(3)(ii).



01/12/17 – Wyoming Pipeline Company (#7a)

Case Summary

1. Findings of Pipeline Integrity Risk

Respondent did not contest the proposed findings in the Notice that its Crude System has a condition or conditions that pose a pipeline safety risk. Accordingly, pursuant to 49 U.S.C. § 60117(i) and 49 CFR § 190.239, I find as follows:

1. The affected pipeline facility is WPC's Crude System (Crude System), which is used to transport crude oil to a refinery in Newcastle, Wyoming, using three main trunk lines. The crude oil is first transported to WPC's Mush Creek Pump Station and then to the refinery.

2. Approximately 148 miles of the Crude System are regulated low-stress rural pipelines as defined under 49 C.F.R. § 195.12. However, the Crude System has a 1.86-mile segment of 8-inch pipeline that crosses a non-rural area within the boundaries of Newcastle, Wyoming – an Other Populated Area (OPA) and High Consequence Area (HCA) as defined in 49 C.F.R. § 195.450. The Crude System also crosses the Cheyenne River, Oil Creek, Bobcat Creek, and several small streams.

3. The Crude System has two segments, consisting of 6-inch, 8-inch, and 10-inch low-stress crude oil transmission lines in Niobrara County and Weston County, Wyoming (the Affected Segments). In 2012, the pumps for these two segments were shut down and mainline valves closed. Crude oil was present in many of the segments. These two segments are not currently operating and the only pressure on the line is due to elevation changes.

4. The first segment is the Lance Creek to Buck Creek Station segment, approximately 19 miles long. The second segment is the Buck Creek Station to Mush Creek Station segment, approximately 48 miles long. The Affected Segments are located in semi-arid, rural ranch land with a low population density and little likelihood of population growth. These locations also have right-of-ways traversing streams.

Operator	WYOMING PIPELINE COMPANY
Case Number	4201660018
Case Type	Notice of Proposed Safety Order
Region	Western
Date Opened	01/25/16
Status	CLOSED
Date Closed	01/12/17



01/12/17 – Wyoming Pipeline Company (#7b)

Case Summary

5. On October 22, 2012, a PHMSA representative inspected the facilities and records of WPC in Newcastle, Wyoming. At the time of inspection, WPC had failed to develop written procedures to accomplish the requirements of 49 C.F.R. § 195.5.¹

6. On March 26, 2014, PHMSA issued a Final Order to WPC in CPF No. 5-2013-6003. Under this Final Order, WPC was to complete a conversion to service under 49 CFR § 195.5 for the Crude System, which included the Affected Segments.² On December 23, 2015, WPC informed PHMSA that it had completed all the items in the Compliance Order and contained in the Final Order, except for Items 1(b), 1(c) and 1(e) due to scheduling delays. An extension to complete Items 1(b), 1(c) and 1(e) was granted until December 31, 2016. The remaining items in the Compliance Order (Items 1(a), 1(d), 1(f), 1(g), 1(h), and 1(i)) were deemed fulfilled and closed.

7. On August 24, 2015, at approximately 3:00 pm M.S.T., a contractor working for WPC noticed a leak on a portion of the Affected Segments located approximately 6.5 miles northwest of where the Affected Segments cross Mainway Road (Leak Site). At the Leak Site, the contractor noted approximately two to three barrels of crude oil had been released.

8. On the evening of August 24, 2015, WPC sent representatives to the Leak Site to assess and repair the leak. They used an 8-inch steel clamp and 3-inch diameter rubber hole plug to temporarily repair the portion of the Affected Segments at the Leak Site. According to the repair technicians, the small hole was due to internal corrosion. Following the leak, WPC did not return the Affected Segments to service.

9. The Leak Site encompasses rural ranch property. The leak impacted no waterways, had minimal environmental damage (related to soil contamination), and caused no harm to persons or property. The leak cost approximately \$2,000 in damage and repairs.

Operator	WYOMING PIPELINE COMPANY
Case Number	2016A0018
Case Type	Notice of Proposed Safety Order
Region	Western
Date Opened	01/25/16
Status	CLOSED
Date Closed	01/12/17



01/12/17 – Wyoming Pipeline Company (#7c)

Case Summary

10. WPC estimates anywhere from 1600 to 1800 barrels remain in the Affected Segments. WPC claims that the pressure required to purge the Affected Segments would result in ruptures to the Crude System. However, WPC stated that it could tap into the line at two low spots and vacuum the line, thus removing the majority of crude remaining in the line.

11. On August 25, 2015, WPC notified PHMSA of the August 24, 2015 leak by filing a PHMSA Accident Report, Hazardous Liquid Pipeline System # 20150302 – 20688. At this time, PHMSA became aware of numerous other past leaks in the system. Specifically, according to WPC, there were 33 releases on the Black Creek Station segment of the Crude System from January 2009 to August 2015. The volumes ranged from five gallons to 180 bbl. While most had a relatively low impact to the environment, several releases affected small streams. The majority of these releases were caused by internal or external corrosion. Additionally, thermal expansion was a presumed factor in some releases. WPC did not file any accident reports for these leaks.

Operator	WYOMING PIPELINE COMPANY
Case Number	2016A0018
Case Type	Notice of Proposed Safety Order
Region	Western
Date Opened	01/25/16
Status	CLOSED
Date Closed	01/12/17

II. Determination of Necessity for Safety Order

Section 60117(i) of Title 49, United States Code, provides for the issuance of a safety order, after reasonable notice and the opportunity for a hearing, requiring corrective measures, which may include physical inspection, testing, repair, or other action, as appropriate. The basis for making the determination that a pipeline facility has a condition or conditions that pose a pipeline integrity risk to public safety, property, or the environment is set forth both in the above-referenced statute and 49 C.F.R. § 100.230.

After evaluating the foregoing preliminary findings of fact and considering WPC's failure to comply with PHMSA regulations, including, but not limited to, the failure to file accident reports for leaks occurring on the Affected Segments from January 2009 through August 2015, WPC's failure to maintain adequate corrosion protection on the Crude System, and the lack of knowledge regarding the pipeline, I find that the continued operation of the Affected Segments without corrective measures would pose a pipeline integrity risk to public safety, property, or the environment. Accordingly, PHMSA issues this Safety Order, which requires that Respondent take certain measures specified below to address the potential risk.



01/12/17 – Wyoming Pipeline Company (#7d)

Case Summary

III. Required Corrective Actions

Pursuant to 49 U.S.C. § 60117(i) and 40 C.F.R. § 100.239, WPC must take the following corrective actions with respect to the Affected Segments:

1. WPC must gain written approval from the Director, Western Region, OPS (Director) of its plan and schedule to purge the Affected Segments of all crude oil, as set forth in its Response Plan (Plan).² As part of its Plan, WPC must identify additional steps to reduce the probability of leaks, and to monitor the right-of-way and purging pressure for evidence of a leak.³ Upon notice of approval from the Director, WPC must implement the Plan.
2. Within 60 days of completing the proposed corrective measures stated in Item 1, WPC must submit a report to the Director showing the completion of these corrective measures. Thereafter, WPC must submit reports to the Director every 180 days to provide updated information on the pipeline system.
3. PHMSA requests that WPC maintain documentation of the safety improvement costs associated with fulfilling this Safety Order and submit the total to the Director. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses; and 2) total cost associated with replacement, additions and other changes to pipeline infrastructure.

In your correspondence on this matter, please refer to CPF No. 5-2016-09015 and for each document you submit, please provide a copy in electronic format whenever possible.

Operator	WYOMING PIPELINE COMPANY
Case Number	201600018
Case Type	Notice of Proposed Safety Order
Region	Western
Date Opened	01/25/16
Status	CLOSED
Date Closed	01/12/17



01/12/17 – Wyoming Pipeline Company (#7e)

Case Summary

Operator	WYOMING PIPELINE COMPANY
Case Number	201600018
Case Type	Notice of Proposed Safety Order
Region	Western
Date Opened	01/25/16
Status	CLOSED
Date Closed	01/12/17

On January 25, 2016, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Proposed Safety Order to Wyoming Pipeline Company (WPC). On February 25, 2016, WPC responded with a tentative plan to comply with the Notice of Proposed Safety Order. On June 27, 2016, PHMSA issued a final Safety Order to WPC. The Order made a finding that your crude oil pipeline systems exhibited conditions that posed a pipeline integrity risk, and mandated actions that must be taken by WPC to ensure protection of the public, property, and the environment.

On August 26, 2016, WPC notified us of actions completed including the purging of the pipelines. Following my staff's review of your action, one of my inspectors visited your facility near Newcastle, Wyoming to verify the compliance with the Safety Order.

This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.

Sincerely,

Chris Hoidal,
Director, Western Region
Pipeline and Hazardous Materials Safety Administration



01/17/17 – Chaparral Energy, LLC (#8)

Case Summary

Operator	CHAPARRAL ENERGY, LLC
Case Number	42016904
Case Type	Proposed Civil Penalty
Subject(s)	Performance Process (Performance)
Region	Texas
Date Opened	08/20/15
Status	02000
Proposed Civil Penalty	\$113,200
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Wash for penalty reduction	Operator provided additional evidence
Compliance Order	No
Final Order Date	02/23/17
Date Closed	02/23/17

Chaparral Energy LLC (Chaparral) has the line shut-in, but has failed to reduce the pressure on their Coffeyville 8" carbon dioxide pipeline following BHMSEA's issuance of a CAO. On August 25, 2015, Chaparral experienced a reportable failure on your Coffeyville 8" carbon dioxide pipeline resulting in the release of over 2000 barrels of carbon dioxide while shut in at 1100 psig. The preliminary cause of the failure appears to be external corrosion, but the investigation is still ongoing.

On August 28, 2015, BHMSEA issued a CAO (CPF No. 4-2015-501780) to Chaparral to establish an 80% pressure restriction (from the pressure at the time of the release) on your pipeline. The CAO 80% pressure restriction would limit the pressure to 896 psig; however, the current pressure on the pipeline is 1107 psig.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$[total amount] as follows:

Item number	PENALTY
1	\$113,200



01/18/17 – Texas Eastern Transmission, LP (Spectra) (#9)

Case Summary

Operator	TEXAS EASTERN TRANSMISSION, LP (SPECTRA ENERGY PARTNERS, LP)
Case Number	03015002
Case Type	Proposed Civil Penalty
Subject(s)	Washal House Remedial Program Procedure Manuals - Gas Pipelines
Region	Texas
Date Opened	07/15/12
Status	02000
Proposed Civil Penalty	\$175,000
Assessed Civil Penalty	\$175,000
Collected Civil Penalty	\$175,000
Final Order Date	12/28/16
Date Closed	01/18/17



01/18/17 – Algonquin Gas Transmission LLC (Spectra) (#10)

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Case Summary

Operator	TEXAS EASTERN TRANSMISSION, LP (SPECTRA ENERGY PARTNERS, LP)
Case Number	17011019
Case Type	Proposed Civil Penalty
Subject(s)	Spill/Leak Prevention Program Procedure Manual - Gas Pipelines
Region	Eastern
Date Opened	09/28/15
Status	CLOSED
Proposed Civil Penalty	\$29,000
Assessed Civil Penalty	\$29,000
Collected Civil Penalty	\$29,000
Final Order Date	12/28/16
Date Closed	01/18/17



01/20/17 – Shell Pipeline CO., LP (#11a)

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Case Summary

Enclosed please find the Corrective Action Order issued in the above-referenced case. It finds that Shell Pipeline Company's hazardous liquid pipeline at the General Mitchell International Airport in Milwaukee County, Wisconsin, is hazardous to life, property, or the environment and requires you to take immediate corrective actions to ensure public safety.

On January 28, 2012, the National Response Center (NRC) received a report of a jet fuel spill at the Mitchell International Airport (Airport). In subsequent NRC reports, Shell confirmed that a jet fuel release had occurred in the area and estimated the amount of the spill at 215 barrels. Shell did not report any injuries or fatalities, but stated that the spill had reached a nearby waterway.

Pursuant to 49 U.S.C. § 60117, the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), initiated an investigation of the accident. OPS determined that the release originated from the Affected Pipeline, but the cause of the failure has not yet been determined. The preliminary findings of the investigation are as follows:

Operator	SHELL PIPELINE CO., LP
Case Number	1701250094
Case Type	Corrective Action Order
Region	Central
Date Opened	02/04/12
Status	CLOSED
Date Closed	01/20/17



01/20/17 – Shell Pipeline CO., LP (#11b)

Cause Summary

Preliminary Findings

- At 7:28 p.m. ET, on January 25, 2012, the NRC received a report of a jet fuel spill at the Mitchell International Airport. The accident date on this NRC report was January 23, 2012 at 1:00 pm CT. The caller did not identify the cause of the release, but stated that jet fuel was in a storm sewer near Wilson Park Creek. The caller estimated the amount of the spill to be approximately 100 gallons and noted that local responders had deployed pumps and booms in the area for containment.
- At 11:19 a.m. CT, on January 31, 2012, Shell shut down the Affected Pipeline by closing the valves at the Mitchell Field terminal and the Airport. Four hours later, at 4:15 p.m. ET, Shell informed the NRC that jet fuel had been released at the Airport. Shell reported that both the quantity and source of the release were unknown and that local responders had been onsite for the past several days.
- At 11:40 a.m. ET, on February 2, 2012, Shell provided a supplemental report to the NRC. Shell continued to report that both the cause and source of the failure remained unknown, but estimated the amount of the spill at 215 barrels of jet fuel.
- On February 3, 2012, Shell completed purging the Affected Pipeline of jet fuel and began excavating the pipeline at the closed crossing of a taxiway at the Airport.

Operator	SHELL PIPELINE CO., LP
Case Number	2012250054
Case Type	Corrective Action Cycle
Region	Central
Date Opened	02/04/12
Status	CLOSED
Date Closed	01/20/17



01/20/17 – Shell Pipeline CO., LP (#11c)

Cause Summary

- The Affected Pipeline transports commercial aviation jet fuel from the Mitchell Field terminal to the Airport. The Mitchell Field terminal is connected to the West Shore pipeline, which delivers commercial aviation jet fuel from refineries in the Chicago area.
- The Affected Pipeline is located in a High Consequence Area (HCA) (see 49 C.F.R. § 193.451) and runs parallel to a railroad, crosses local streets, and traverses the grounds of the Airport.
- The jet fuel spill originated near the midpoint of the Affected Pipeline at Milepost (MP) 2.0. There is a crossing on the pipeline at that location that crosses under Taxiway "Edie," Taxiway "Uniforma" is immediately adjacent to Taxiway "Edie" but the crossing does not continue in this area. The pipeline also runs under Taxiway "Duff."
- After the failure occurred, jet fuel from the Affected Pipeline entered a drainage ditch, the public storm sewer system, and Wilson Park Creek. Initially, the spill location was not known. Further investigation determined that the spill was under a portion of the taxiway. This spill has interrupted airport operations and led to the closure of three runways and causes to impact traffic. Hazardous atmosphere concerns, taxiway stability and construction requirements led to the taxiway and runway repairs that are ongoing.
- The Affected Pipeline was constructed in 1972 of 10-inch diameter, 0.293-inch wall thickness, with an electric resistance welded (ERW) seam. The manufacturer of the pipe is unknown.
- The Affected Pipeline has a coal tar coating and an impressed-current cathodic protection system.
- The maximum operating pressure (MOP) of the Affected Pipeline is 150 psig.

Operator	SHELL PIPELINE CO., LP
Case Number	2012250054
Case Type	Corrective Action Cycle
Region	Central
Date Opened	02/04/12
Status	CLOSED
Date Closed	01/20/17



01/20/17 – Shell Pipeline CO., LP (#11d)

Case Summary

- The Affected Pipeline was pressure tested in 1993 for eight hours to a pressure of 241 psig.
- The most recent internal assessment of the Affected Pipeline occurred in 2010 with a combination Hi-Resolution Magnetic Flux Leakage and Geometry inline inspection (ILI) tool. A previous internal assessment of the Affected Pipeline with an ILI tool occurred in 2007.
- Operational data indicates that the pressure of the Affected Pipeline began to decrease on January 14, 2012, when the pipeline was in a shutdown condition.
- Various federal, state, and local agencies, including the Wisconsin Department of Natural Resources and U.S. Environmental Protection Agency, have responded to the spill. Their efforts have included, but have not been limited to, deploying booms and other response, containment, and oil recovery measures.
- The cause of the failure is unknown and the investigation is ongoing.
- Shell is a wholly-owned subsidiary of Shell Oil Products US, a unit of Shell Oil Company, and transports over seven million barrels of crude oil and refined products every day, with pipelines in 21 states.²

Operator	SHELL PIPELINE CO., LP
Case Number	201700094
Case Type	Corrective Action Order
Region	Central
Date Opened	02/04/17
Status	CLOSED
Date Closed	05/24/17



01/25/17 – Arlington Storage Company LLC (#12)

Case Summary

The Class 1 and 2 patrols conducted on 6/4/2014 and 4/13/2015 exceeded the code requirement by 18 and 85 days respectively. The Class 3 patrols conducted on 6/11/2014 and 1/21/2015 exceeded the code requirement by 74 and 47 days respectively.

During the inspection conducted on 8/17/2015, the NYSDDS reviewed ASC's leak survey records and procedures for from 2013 through 2015. The records show that ASC failed to conduct leak surveys in a Class 3 location at a frequency required by §192.706(a). The leak survey performed on 6/11/2014 exceeded the code requirement by 23 days. In addition, only one leak survey was conducted in 2014. Thus, ASC failed to conduct two leak surveys on the Seneca West pipeline at the frequency required by §192.706(a).

The NYSDDS inspector asked for valve inspection records for 2014 and ASC stated that the valve inspection records for 2014 are missing and could not be located.

Operator	ARLINGTON STORAGE COMPANY LLC
Case Number	201700090
Case Type	Proposed Civil Penalty
Subject(s)	Maintenance - Gas Pipeline
Region	Eastern
Date Opened	11/17/16
Status	CLOSED
Proposed Civil Penalty	\$98,100
Assessed Civil Penalty	\$98,100
Collected Civil Penalty	\$98,100
Final Order Date	01/26/17
Date Closed	01/26/17

Item number	PENALTY
1	\$42,100
2	\$39,900
3	\$16,100



01/26/17 – Oneok NGL Pipeline, LLC (#13)

Case Summary

Operator	ONEOK NGL PIPELINE, LLC
Case Number	12019101
Case Type	Proposed Compliance Order
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Central
Date Opened	06/10/16
Status	Closed
Compliance Order	Yes
Final Order Date	04/06/17
Date Closed	03/26/17

ONEOK NGL Pipeline LP failed to adequately inspect the external pipe coating prior to lowering the pipe into the ditch. ONEOK did not properly apply the jacking method used as the final inspection process before the pipe was lowered into the ditch.

During a field inspection, PHMSA's inspector witnessed construction personnel inspecting for holidays without removing shipping tape from the pipe. The detector would not penetrate the shipping tape to inspect the external coating. An ONEOK engineer performed a test by creating a holiday in the coating then applying shipping tape over the holiday. The holiday detector did not detect this coating anomaly.

The failure of ONEOK NGL Pipeline LP to properly inspect the external pipe coating extended to 56.5 miles of pipeline. This included a 21 mile pipeline segment between MP 438 - 459, located in Washington County, CO and Yuma County, CO and a 35.5 mile pipeline segment between MP 591.1 - 626.6, located in Sheridan County, KS, Graham County, KS, Geary County, KS, and Trego County, KS. The pipeline was placed in service in November 2008.



01/27/17 – Kinder Morgan Liquid Terminals, LLC (#14)

Case Summary

Operator	KINDER MORGAN LIQUID TERMINALS, LLC
Case Number	1201630120
Case Type	Notice of Amendment
Subject(s)	Procedure Manual - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	11/02/16
Status	Closed
Date Closed	01/27/17



01/31/17 – Explorer Pipeline CO (#15)

Case Summary

Operator	EXPLORER PIPELINE CO
Case Number	320335069
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Construction - Hazardous Liquid Pipelines Corrosion Control - Hazardous Liquid Pipelines
Region	Central
Date Opened	03/26/15
Status	CLOSED
Proposed Civil Penalty	\$91,990
Assessed Civil Penalty	\$91,990
Collected Civil Penalty	\$91,990
Compliance Order	Yes
Final Order Date	07/09/15
Date Closed	01/31/17



02/03/17 – Coffeyville Resources Crude Transportation, LLC (#16)

Case Summary

Operator	COFFEYVILLE RESOURCES CRUDE TRANSPORTATION, LLC
Case Number	3201650079
Case Type	Notice of Amendment
Subject(s)	Incident Reports - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Central
Date Opened	05/15/16
Status	CLOSED
Date Closed	02/03/17



02/06/17 – Texas Easter Transmission, LP (Spectra) (#17)

Case Summary

Operator	TEXAS EASTERN TRANSMISSION, LP (SPECTRA ENERGY PARTNERS, LP)
Case Number	120171004W
Case Type	Warning Letter
Subject(s)	Construction - Gas Pipelines
Region	Eastern
Date Opened	02/06/17
Status	CLOSING
Date Closed	02/06/17



Appalachian Underground Corrosion Short Course

02/07/17 – Hawaii Gas (#18)

Case Summary

Operator	HAWAII GAS
Case Number	520160025H
Case Type	Notice of Amendment
Subject(s)	Integrity Management - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	11/15/16
Status	CLOSING
Date Closed	02/07/17



Appalachian Underground Corrosion Short Course

02/09/17 – Occidental Chemical Corp (#20)

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Case Summary

Operator	OCCIDENTAL CHEMICAL CORP
Case Number	420173935W
Case Type	Warning Letter
Subject(s)	National Registry Reports - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	02/09/17
Status	CLOSED
Date Closed	02/09/17



02/09/17 – ANR Pipeline CO (#21)

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Case Summary

Operator	ANR PIPELINE CO
Case Number	420171002W
Case Type	Warning Letter
Subject(s)	National Registry Reports
Region	Southwest
Date Opened	02/09/17
Status	CLOSED
Date Closed	02/09/17



02/09/17 – Stone Energy (#22)

Case Summary

Operator	STONE ENERGY
Case Number	4231720049
Case Type	Warning Letter
Subject(s)	Natural Gas Pipeline - Pipeline Asset Pipeline
Region	Southwest
Date Opened	01/09/17
Status	Closed
Date Closed	03/06/17

Stone Energy failed to file notification of divestiture for 7.65 miles of hazardous liquids pipeline no later than 60 days following the divestiture. Stone Energy submitted an Operator Registry Notification Type D for 3.6 miles of Onshore, Interstate pipeline, located in Cameron County, LA and 4.05 miles of Offshore OCS Gulf of Mexico pipeline. According to the information submitted, the divestiture was completed on February 1, 2016, and the notification was not received until May 25, 2016 (114 days). This notification was required by April 1, 2016.

For future files, please be aware that the notification required for the divestiture of less than 50 miles would be a Type B. Attached for your convenience is a copy of the "Instructions (rev 5-2015) for Form PHMSA F 1000.2 (rev 5-2015) OPERATOR REGISTRY NOTIFICATION" to submit the correct notification type.



02/09/17 – Hawaii Gas (#23)

Case Summary

Hawaii Gas did not have a detailed and comprehensive written integrity management (IM) program. Specifically, Hawaii Gas' written IM procedures, IM-001 titled "Preventive and Mitigative Measures," did not adequately describe the method for selection and implementation of additional preventive and mitigative measures (P&MM). A review of Hawaii Gas' Risk Assessment and P&MM Evaluation Report, dated February 10, 2014, showed P&MM results categories of "mandatory," "desired," and "optional." It was unclear how additional measures would be implemented or scheduled based on these result categories. Further, while the IM procedures referenced use of an "action plan" and "completion report" to document the decision-making process, the Risk Assessment and P&MM Evaluation Report referenced use of a "P&MM tracking form." None of these documents were provided during the inspection. Hawaii Gas must amend its procedures to clarify and reflect its process for selection and implementation of additional preventive and mitigative measures.

Hawaii Gas also did not have a detailed and comprehensive written IM program that reflects its current IM implementation process. For example, Hawaii Gas' IM procedure, IM-002 titled "Data Integration" stated "Hawaii Gas SMEs (Subject Matter Experts) obtain data for Data Integration from both internal and external sources. The majority of the data has been reviewed by SME's and imported into an Excel spreadsheet database. The database is used to capture and maintain data and to serve as a centralized database for Data Integration, Risk Assessment and Preventive and Mitigative Measures." During the inspection, Hawaii Gas failed to provide evidence of a centralized Excel database to demonstrate that one was created and maintained for its IM program. IM-003 titled "Risk Assessment" provides another example where Hawaii Gas' written IM program did not reflect its actual, current IM implementation processes. This procedure revealed use of a combination of SME's and relative risk assessment models in its risk assessment process. IM-003 stated "The Risk Algorithm is composed in the same Excel spreadsheet that is used for Data Integration. The model uses weighting factors that SME's have assigned based on data in the database." However, Hawaii Gas failed to provide evidence that demonstrated a risk assessment model was implemented during its risk assessment process. Hawaii Gas must amend its procedures to clarify and reflect its current IM implementation processes, specifically methods for data integration and risk assessment.

Operator	HAWAII GAS
Case Number	4231700236
Case Type	Warning Letter
Subject(s)	Natural Gas Pipeline, and Service Lines - Gas Pipeline Pipeline Component Design - Gas Pipeline
Region	Western
Date Opened	01/09/17
Status	Closed
Date Closed	01/09/17

Hawaii Gas' written operation and maintenance (O&M) procedures annual did not include the retention period for odometer program documentation in accordance with §192.789(c). For example, Hawaii Gas' O&M procedure, O-980 Odometer Program, Section VIII stated, "The results of the odometer test (audit test) performed by the Customer Service Department are filed with the Compliance Engineer for a period of three (3) years." Federal Regulation §192.789(c) requires "A record of each patrol, survey, inspection, and test required by Subparts L and M of this part must be retained for at least 3 years or until the next patrol, survey, inspection, or test is completed, whichever is longer." Hawaii Gas must amend its procedures to specify the five (5) year retention period required by §192.789(c).



02/09/17 – ConocoPhillips (E&P – L-48) (#24)

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Case Summary

Operator	CONOCOPhillips (E&P – L-48)
Case Number	4201710046
Case Type	Warning Letter
Subject(s)	National Registry Reports
Region	Southwest
Date Opened	02/09/17
Status	CLOSED
Date Closed	02/09/17



02/09/17 – Gulf South Pipeline Company, LP (#25)

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Case Summary

Operator	GULF SOUTH PIPELINE COMPANY, LP
Case Number	4201710016
Case Type	Warning Letter
Subject(s)	National Registry Reports
Region	Southwest
Date Opened	02/09/17
Status	CLOSED
Date Closed	02/09/17



02/10/17 – Nustar Pipeline Operating Partnership L.P. (#26)

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Case Summary

Operator	NUSTAR PIPELINE COMPANY, LP
Case Number	4201710016
Case Type	Warning Letter
Subject(s)	National Registry Reports
Region	Southwest
Date Opened	02/09/17
Status	CLOSED
Date Closed	02/09/17



02/10/17 – Norgasco Inc (#27)

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Case Summary

Operator	NORGASCO INC
Case Number	5001700004
Case Type	Warning Letter
Subject(s)	Qualification of Pipeline Personnel - Gas Pipelines
Region	Western
Date Opened	02/10/17
Status	CLOSED
Date Closed	02/10/17



02/10/17 – Tesoro Great Plains Midstream LLC (#28)

Case Summary

Operator	TESORO GREAT PLAINS MIDSTREAM LLC
Case Number	320162006H
Case Type	Notice of Amendment
Subject(s)	Drainage Management - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	09/19/16
Status	CLOSED
Date Closed	02/10/17



Appalachian Underground Corrosion Short Course

02/23/17 – Total Peaking Services (#29)

Case Summary

Operator	TOTAL PEAKING SERVICES
Case Number	320163002H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - LNG Facilities
Region	Eastern
Date Opened	11/22/16
Status	CLOSED
Date Closed	02/23/17



Appalachian Underground Corrosion Short Course

02/24/17 – SFPP, LP (#30)

Case Summary

Operator	SFPP, LP
Case Number	20171002W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines
Region	Western
Date Opened	02/24/17
Status	CLOSED
Date Closed	02/24/17

As revealed by the annual Cathodic Protection Surveys, the case crossing on the ES111 pipeline segment located at MP95.280 is "shorted" to the pipeline and not electrically isolated as required by §192.467 External corrosion control: Electrical isolation. The casing must either be electrically isolated from the carrier pipeline or cathodically protected as a single unit.

A review of the KM field notes shows that your inspector originally had a concern at the time of reviewing the annual survey records (2013, 2014, and 2015) that the casing crossing on LS-111 located at MP 95.280 was "shorted" to the pipeline and not electrically isolated. Subsequently, KM sent him a copy of our procedure showing the readings to be within compliance (+50 mV). While on-site during the field review, KM conducted field measurements, also demonstrating compliance. Further, the inspector made no mention of his original concern during the close-out meeting, leading to KM's belief that the concern had been addressed to the satisfaction of the inspector and that KM was in full compliance.

Long after the close-out meeting, and after learning about the possibility that a warning letter might be issued in this matter, KM conducted tests in January and March of this year, once again confirming electrical isolation. Results of each test indicated 118 mV between the casing and carrier and 0.202 ohms internal resistance between the casing and carrier, both of which values exceed KM and NACE standards.

**02/24/17 – Suncor Energy (USA) Pipeline CO. (#31)**

Case Summary

Operator	SUNCOR ENERGY (USA) PIPELINE CO.
Case Number	20175001W
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	02/24/17
Status	CLOSED
Date Closed	02/24/17



02/24/17 – El Paso Natural Gas CO (#32)

Case Summary

Operator	EL PASO NATURAL GAS CO
Case Number	320171002W
Case Type	Warning Letter
Subject(s)	Maintenance - Gas Pipelines
Region	Western
Date Opened	02/24/17
Status	CLOSED
Date Closed	02/24/17



02/24/17 – Enstar Natural Gas CO (#33)

Case Summary

Operator	ENSTAR NATURAL GAS CO
Case Number	320150007
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Annual Reports - Gas Pipelines Corrosion Control - Gas Pipelines Damage Prevention Program - Gas Pipelines Emergency Response - Gas Pipelines Maintenance - Gas Pipelines (withdrawn) Operations - Gas Pipelines
Region	Western
Date Opened	04/18/13
Status	CLOSED
Proposed Civil Penalty	\$24,800
Assessed Civil Penalty	\$6,100
Collected Civil Penalty	\$6,100
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Final Order Date	11/15/16
Date Closed	02/24/17



02/27/17 – Sunoco Pipeline LP (#34)

Case Summary

Operator	SUNOCO PIPELINE L.P.
Case Number	42045521M
Case Type	Notice of Amendment
Subject(s)	Procedure Manual - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	06/02/16
Status	CLOSED
Date Closed	03/27/17



02/27/17 – Algonquin Gas Transmission, LLC (Spectra) (#35)

Case Summary

Operator	ALGONQUIN GAS TRANSMISSION, L.L.C. (SPECTRA ENERGY PARTNER)
Case Number	130171000W
Case Type	Warning Letter
Subject(s)	Procedure Manual - Gas Pipelines
Region	Eastern
Date Opened	02/27/17
Status	CLOSED
Date Closed	03/27/17



02/27/17 – ExxonMobil Pipeline CO (#36)

Case Summary

Operator	EXXONMOBIL PIPELINE CO
Case Number	42817594W
Case Type	Warning Letter
Subject(s)	Incident Reports - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	02/27/17
Status	CLOSED
Date Closed	02/27/17



02/27/17 – Magellan Pipeline Company, LP (#37)

Case Summary

Operator	MAGELLAN PIPELINE COMPANY, LP
Case Number	428139018
Case Type	Proposed Compliance Order/ Warning Item
Subject(s)	Construction - Hazardous Liquid Pipelines National Registry Reports - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	09/24/15
Status	CLOSED
Date Closed	02/27/17



02/28/17 – Marathon Pipe Line LLC (#38)

Case Summary

- B. Marathon's ECDA procedures did not follow the requirement of NACE SP0502 Section 5 Direct Examination.** Section 6.1.1 of Marathon's ECDA procedures stated, "The Direct Examination Step requires excavations to expose the pipe upstream and downstream of the casing then a detailed inspection can be performed." But Marathon's ECDA procedures did not require the direct examination of the line pipe within casings to be required for prioritized indications, or other required direct examinations in the ECDA Region identified as most likely for external corrosion.

B. Marathon's ECDA procedures did not follow the requirement of NACE SP0502 Section 5 Direct Examination. Section 6.1.1 of Marathon's procedures stated, "The Direct Examination Step requires excavations to expose the pipe upstream and downstream of the casing then a detailed inspection can be performed." But Marathon's ECDA procedures did not require the direct examination of the line pipe within casings when required for prioritized indications, or other required direct examinations in the ECDA Region identified as most likely for external corrosion.

Marathon did not maintain for review during an inspection documents to support the decisions and analyses it made to evaluate its ECDA procedures, which were contained in its *Manual MPEMNTLLC* and were used to assess the integrity of line pipe in casings.

Marathon did not follow the requirements of NACE SP0502 when it used ECDA to assess the integrity of line pipe that could affect a High Consequence Area (HCA).

Operator	MARATHON PIPE LINE LLC
Case Number	02018021
Case Type	Proposed Civil Penalty
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines, Integrity Management - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	05/03/14
Status	CLOSED
Proposed Civil Penalty	\$24,400
Assessed Civil Penalty	\$24,400
Collected Civil Penalty	\$24,400
Compliance Order	Yes
Final Order Date	04/03/15
Date Closed	02/08/17

Item number 2 Penalty \$ 24,400



03/02/17 – Magellan Pipeline Company, LP (#39)

Case Summary

Operator	MAGELLAN PIPELINE COMPANY, LP
Case Number	420275007W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	03/02/17
Status	CLOSED
Date Closed	03/02/17

Magellan failed to conduct an atmospheric corrosion inspection at least once every 3 calendar years, but with intervals not exceeding 39 months as required by §195.583 for two aboveground manline valves at Carr Junction. Based on a review of atmospheric corrosion control records, it does not appear that the tests required by §195.583 were performed. Furthermore, Magellan indicated that the valves were never included in a documented atmospheric inspection performed by a previous Operator and subsequently no atmospheric inspection records were generated.



03/06/17 – Eastern Shore Natural Gas CO (#40)

Case Summary

Operator	EASTERN SHORE NATURAL GAS CO
Case Number	1201730018
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Eastern
Date Opened	01/06/17
Status	CLOSED
Date Closed	03/06/17



03/16/17 – Maritimes & Northeast Pipeline, LLC (Spectra) (#41)

Case Summary

Operator	MARITIMES & NORTHEAST PIPELINE, L.L.C. (SPECTRA ENERGY PARTS)
Case Number	1201710079
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Eastern
Date Opened	01/16/17
Status	CLOSED
Date Closed	03/16/17



03/16/17 – Buckeye Partners, LP (Spectra) (#42a)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	10140082
Case Type	Proposed Civil Penalty
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	03/28/14
Status	CLOSED
Proposed Civil Penalty	\$271,398
Assessed Civil Penalty	\$271,398
Collected Civil Penalty	\$271,398
Compliance Order	Yes
Fiscal Order Date	04/22/14
Date Closed	03/16/17

On May 17, 2011, Buckeye Partners, L.P. (Buckeye) discovered a gasoline leak on Line 413 at the Findlay Junction facility near Findlay, Ohio. The leak occurred in a two-inch diameter steel riser pipe, connected to a buried twelve-inch pipe through an isolation valve. An above ground pressure transmitter was connected to the top of the two-inch riser pipe. The riser pipe was oriented perpendicular to the twelve-inch pipe and was enclosed in a large diameter steel culvert, i.e., a vault. A representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code investigated this leak at Findlay Junction.

As a result of the investigation, it appears that you have committed probable Violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:



03/16/17 – Buckeye Partners, LP (Spectra) (#42b)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	10140082
Case Type	Proposed Civil Penalty
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	03/28/14
Status	CLOSED
Proposed Civil Penalty	\$271,398
Assessed Civil Penalty	\$271,398
Collected Civil Penalty	\$271,398
Compliance Order	Yes
Fiscal Order Date	04/22/14
Date Closed	03/16/17

1. §195.581 Which pipelines must I protect against atmospheric corrosion and what coating material may I use?

(a) You must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

Buckeye failed to clean and coat each pipeline or portion of the pipeline that is exposed to the atmosphere. Specifically, Buckeye did not clean and coat a two-inch diameter steel riser pipe, connected to a buried twelve-inch pipe through an isolation valve to protect against corrosion. The pipe was installed in 1997 and, per a metallurgical analysis, the leak was caused by external pitting corrosion on the exterior of the two-inch uncoated pipe. In addition to the leaking corroded area, the metallurgical analysis report documented many relatively large and deep pits on the riser with the deepest pits being 71% of the nominal wall thickness. The two-inch riser pipe was installed in a vault that was exposed to the atmosphere with a soil-to-air interface present; therefore, the exceptions in §195.581(c) do not apply.



03/16/17 – Buckeye Partners, LP (Spectra) (#42c)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	10110082
Case Type	Proposed Civil Penalty
Subtype(s)	Proposed Compliance Order Corrosion Control - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	03/28/14
Status	CLOSED
Proposed Civil Penalty	\$271,000
Assessed Civil Penalty	\$271,000
Collected Civil Penalty	\$271,000
Compliance Order	Yes
Final Order Date	08/12/14
Date Closed	03/16/17

2. §195.583 What must I do to monitor atmospheric corrosion control?

(b) During inspection you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

Buckeye failed to properly monitor atmospheric corrosion of its pipe at a soil-to-air interface. Specifically, on August 4, 2010, Buckeye did not perform an adequate inspection of riser pipes exposed to the atmosphere in five vaults at the Findlay Junction facility. The riser pipes in the vaults contained soil-to-air interfaces. One of the riser pipes had a corrosion failure that resulted in a product release on May 17, 2011. The August 4, 2010, inspection documented on Buckeye's *Internal Final Inspection Form* indicated on the Riser Condition section of the form completed as "Air-Ground interface coating in good condition" and "No rust visible." However, during the onsite failure investigation, less than a year later, PHMSA observed that none of the riser pipes in the five vaults at Findlay Junction facility were coated and rust was visually present. The metallurgical report of the failed riser pipe documented areas of thick corrosion deposits, deep pits and no coating at point present.



03/16/17 – Buckeye Partners, LP (Spectra) (#42d)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	10110082
Case Type	Proposed Civil Penalty
Subtype(s)	Proposed Compliance Order Corrosion Control - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	03/28/14
Status	CLOSED
Proposed Civil Penalty	\$271,000
Assessed Civil Penalty	\$271,000
Collected Civil Penalty	\$271,000
Compliance Order	Yes
Final Order Date	08/12/14
Date Closed	03/16/17

3. §195.565 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an accident as defined in Part 195;

Buckeye failed to properly evaluate an individual that had reason to believe contributed to an accident through the performance of a covered task. Specifically, following the discovery of a corrosion caused leak at the Findlay Junction facility, Buckeye did not evaluate in a timely manner a single employee regarding performance of covered task 001019 "Inspect Normally Exposed Pipe." On August 10, 2011, and repeatedly on December 7, 2011, and March 19, 2012, PHMSA made email information requests associated with the provisions of Buckeye's Operator Qualification plan. None of these information requests resulted in evaluation information being provided for this single employee. The atmospheric corrosion inspection on August 4, 2010, was inadequate and external pitting corrosion was the cause of the May 17, 2011, leak. The metallurgical report documented that there was no evidence of accelerated corrosion mechanisms such as bacteria or microbial-influenced corrosion (MIC) that played a role in the leak. On June 27, 2012, Buckeye completed the accident investigation and concluded that an inadequate inspection of the covered task on August 4, 2010, was a causal factor in the pipe failure. An additional email request was made and an answer received on June 24, 2013, indicating that an evaluation had still not been completed.

Item number	Penalty
1	\$127,800
2	\$100,000
3	\$ 47,500



03/21/17 – Rose Rock Midstream LP (#43)

Case Summary

Operator	ROSE ROCK MIDSTREAM LP
Case Number	42065003
Case Type	Proposed Civil Penalty Warning Item
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Southeast
Date Opened	03/29/16
Status	CLOSED
Proposed Civil Penalty	\$693,200
Assessed Civil Penalty	\$693,200
Collected Civil Penalty	\$693,200
Final Order Date	03/02/17
Date Closed	03/21/17



03/27/17 – Front Range Pipeline, LLC (#44)

Case Summary

Operator	FRONT RANGE PIPELINE, LLC
Case Number	52917902W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Integrity Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	03/27/17
Status	CLOSED
Date Closed	03/27/17



03/27/17 – Thunder Basin Pipeline, LLC (#45)

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Case Summary

Operator	THUNDER BASIN PIPELINE, LLC
Case Number	2201760069
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Emergency Response - Hazardous Liquid Pipelines Emergency Response Plans - Oil Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	03/27/17
Status	CLOSED
Date Closed	03/27/17



03/27/17 – FDL Operating LLC (#46)

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Case Summary

Operator	FDL OPERATING, LLC
Case Number	220176012W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Fire Protection - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	03/27/17
Status	CLOSED
Date Closed	03/27/17



03/27/17 – Hawaii Gas (#47)

Case Summary

Operator	HAWAII GAS
Case Number	520170003w
Case Type	Warning Letter
Subject(s)	Integrity Management - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines Safety Control Registry
Region	Western
Date Opened	03/27/17
Status	CLOSED
Date Closed	03/27/17



03/27/17 – Plane Pipeline, LP (#48)

Case Summary

Operator	PLAINS PIPELINE, L.P.
Case Number	42035303
Case Type	Proposed Civil Penalty
Subject(s)	Damage Prevention - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	01/06/16
Status	CLOSED
Proposed Civil Penalty	\$150,000
Assessed Civil Penalty	\$184,300
Collected Civil Penalty	\$184,300
Basis for penalty reduction	Operator provided additional evidence
Final Order Date	05/02/17
Date Closed	03/27/17



03/30/17 – Enable Gas Transmission, LLC (#49)

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Case Summary

Operator	ENABLE GAS TRANSMISSION, LLC
Case Number	4001410149
Case Type	Notice of Abandonment
Subject(s)	Integrity Management - Gas Pipelines Safety Condition Reports
Region	Southwest
Date Opened	12/20/16
Status	CLOSED
Date Closed	03/30/17



03/30/17 – TC Oil Pipeline Operations Inc. (#50)

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Case Summary

Operator	TC OIL PIPELINE OPERATIONS INC
Case Number	3001450034
Case Type	Corrective Action Order
Region	Central
Date Opened	04/05/16
Status	CLOSED
Date Closed	03/30/17



03/30/17 – Natural Gas Pipeline Co of America (#51)

Case Summary

Operator	NATURAL GAS PIPELINE CO OF AMERICA (DN)
Case Number	320151002
Case Type	Proposed Civil Penalty
Subject(s)	Integrity Management - Gas Pipelines (withdrawn)
Region	Central
Date Opened	04/20/15
Status	CLOSED
Proposed Civil Penalty	\$47,300
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Basis for penalty reduction	Operator provided additional evidence
Final Order Date	03/30/17
Date Closed	03/30/17



03/30/17 – Magellan Pipeline Company, LP (#52)

Case Summary

Operator	MAGELLAN PIPELINE COMPANY, LP
Case Number	320170026
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Central
Date Opened	03/30/17
Status	CLOSED
Date Closed	03/30/17



04/04/17 – Citgo Products Pipeline Co (#53)

Case Summary

Operator	CITGO PRODUCTS PIPELINE CO
Case Number	430175010W
Case Type	Warning Letter
Subject(s)	Incident Reports - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	04/04/17
Status	CLOSED
Date Closed	04/04/17



04/04/17 – Anadarko Petroleum Corp (#54)

Case Summary

Operator	ANADARKO PETROLEUM CORP
Case Number	500176507W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	04/04/17
Status	CLOSED
Date Closed	04/04/17



04/05/17 – Renaissance Offshore, LLC (#55)

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Case Summary

Operator	RENAISSANCE OFFSHORE, LLC
Case Number	4201720016
Case Type	Warning Letter
Subject(s)	National Registry Reports Qualification of Pipeline Personnel - Gas Pipelines
Region	Southwest
Date Opened	04/05/17
Status	CLOSED
Date Closed	04/05/17



04/06/17 – Colonial Pipeline Co (#56)

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Case Summary

Operator	COLONIAL PIPELINE CO
Case Number	1201750126
Case Type	Warning Letter
Subject(s)	Construction - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	04/06/17
Status	CLOSED
Date Closed	04/06/17



04/06/17 – MIPC LLC (#57)

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Case Summary

Operator	MIPC LLC
Case Number	120150017
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Integrity Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	09/29/15
Status	CLOSED
Proposed Civil Penalty	\$110,300
Assessed Civil Penalty	\$108,300
Collected Civil Penalty	\$108,300
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Final Order Date	12/02/16
Date Closed	04/06/17



04/10/17 – Corpus Christi Liquefaction LLC (#58)

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Case Summary

Operator	CORPUS CHRISTI LIQUEFACTION, LLC
Case Number	420173004W
Case Type	Warning Letter
Subject(s)	Construction - LNG Facilities
Region	Southwest
Date Opened	04/10/17
Status	CLOSED
Date Closed	04/10/17



04/13/17 – Buckeye Development & Logistics LLC (#59)

Case Summary

Operator	BUCKEYE DEVELOPMENT & LOGISTICS, LLC
Case Number	128145607
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	04/13/17
Status	Closed
Date Closed	04/13/17



04/13/17 – Buckeye Partners, LP (#60)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	128145607
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Eastern
Opened	11/28/14
Status	Closed
Penalty	\$181,700
Assessed Civil Penalty	\$185,000
Collected Civil Penalty	\$181,000
is for penalty reduction	Operator provided additional evidence.
Compliance Order	Yes
Final Order Date	12/31/15
Date Closed	04/13/17

Buckeye failed to test each overhead protection system, in accordance with §195.428(d), at intervals not exceeding 15 months, but at least once each calendar year to determine that it is functioning properly, in as good mechanical condition, and in adequate form the standpoint of capacity and reliability of operation for the service in which it is used.

Buckeye failed to inspect the physical integrity of in-service atmospheric steel aboveground breakout tanks according to API Standard 653 (incorporated by reference, see § 195.3).

Buckeye failed to inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not exceeding 30 months. Buckeye conducted an atmospheric corrosion inspection at the Huntington Pump Station near Leaside, NJ on 6/23/2010. During that inspection, Buckeye failed to inspect the piping located at three valves.

On October 18, 2012, The PHMSA inspector reviewed the Huntington Pump Station & Terminal Visual Inspection Form dated 6/23/2010, conducted a field inspection of the station and noted that there were three valve pits at the pump station that did not appear on the inspection record.

- At the time of the PHMSA inspection, the pits were full of water and the piping in the pits could not be seen through the grating on top of the pit since the pipes were covered with water.
- The PHMSA inspectors asked Buckeye to describe the piping configurations in the valve pits. Buckeye stated that they had removed three valves from the pits when the pump station was removed from service and that blind flanges and a welded spool were installed in place of the valves.
- PHMSA created a sketch of what Buckeye described. The sketch shows the blind flanges that were installed in two of the pits and a welded spool was installed in the third pit. The blind flanges and the welded spool all are full line process.
- PHMSA asked if the flanges and piping in the three pits had been inspected for atmospheric corrosion. Buckeye stated that inspections had not been performed.

Item number	PENALTY
1	\$77,700
2	\$57,600
3	\$45,700
4	\$70,700

During the site visit in October 2012, PHMSA reviewed Station & Terminal Visual Inspection Form for atmospheric corrosion inspections conducted in June 2010. PHMSA noted that the records were incomplete, had conflicting information and did not indicate the disposition of the deficiencies identified during the inspection. PHMSA asked if the deficiencies noted below were being tracked to ensure that they were evaluated and addressed. Buckeye indicated that they have pending projects identified and that the work noted on the Station & Terminal Visual Inspection Form would be part of the pending project work. PHMSA asked for details of the pending projects. Buckeye provided the documents below, however, none of the items noted in the records reviewed were specifically addressed.



04/14/17 – Markwest Michigan Pipeline, LLC (#61)

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Case Summary

Operator	MARKWEST MICHIGAN PIPELINE, LLC
Case Number	229176001W
Case Type	Warning Letter
Subject(s)	Control Room Management - Hazardous Liquid Pipelines
Region	Central
Date Opened	04/14/17
Status	CLOSED
Date Closed	04/14/17



Appalachian Underground Corrosion Short Course

04/14/17 – Mid-Continent Fractionation and Storage, LLC (#62)

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Case Summary

Operator	MID-CONTINENT FRACTIONATION AND STORAGE, L.L.C.
Case Number	320176002W
Case Type	Warning Letter
Subject(s)	Emergency Response Plans - Oil Pipelines
Region	Central
Date Opened	04/14/17
Status	CLOSED
Date Closed	04/14/17



Appalachian Underground Corrosion Short Course

04/18/17 – Midcontinent Express Pipeline LLC (#63)

Case Summary

Operator	MIDCONTINENT EXPRESS PIPELINE LLC
Case Number	420241508
Case Type	Proposed Compliance Order
Subject(s)	Integrity Management - Gas Pipelines
Region	Southwest
Date Opened	08/17/16
Status	CLOSED
Compliance Order	Yes
Final Order Date	04/18/17
Date Closed	04/18/17



04/20/17 – Buckeye Partners, LP (#64)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	120155018
Case Type	Proposed Civil Penalty
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	10/15/16
Status	CLOSED
Proposed Civil Penalty	\$50,488
Assessed Civil Penalty	\$50,488
Collected Civil Penalty	\$50,488
Compliance Order	Yes
Final Order Date	12/15/16
Date Closed	04/20/17



04/24/17 – Danville, City of (#65)

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Case Summary

Operator	DANVILLE CITY OF
Case Number	1391700019
Case Type	Warning Letter
Subject(s)	Operations - Gas Pipelines
Region	Eastern
Date Opened	04/24/17
Status	CLOSED
Date Closed	04/25/17



04/24/17 – El Paso Natural Gas Co (#66)

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Case Summary

Operator	EL PASO NATURAL GAS CO.
Case Number	420161006H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Southwest
Date Opened	07/14/16
Status	CLOSED
Date Closed	04/24/17



05/01/17 – Hilcorp Alaska, LLC (#67)

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Case Summary

Operator	HILCORP ALASKA, LLC
Case Number	52027102H
Case Type	Corrective Action Order
Region	Western
Date Opened	04-07-17
Status	CLOSED
Date Closed	05/01/17



05/04/17 – Frontier Energy Services, LLC (#68)

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Case Summary

Operator	FRONTIER ENERGY SERVICES, L.L.C.
Case Number	420173027W
Case Type	Warning Letter
Subject(s)	Incident Reports - Hazardous Liquid Pipeline Operations and Maintenance - Hazardous Liquid Pipeline
Region	Southwest
Date Opened	05/04/17
Status	CLOSED
Date Closed	05/04/17



05/04/17 – Enterprise Products Operating LLC (#69)

Case Summary

Operator	ENTERPRISE PRODUCTS OPERATING LLC
Case Number	1201750284
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines Security - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	05/04/17
Status	CLOSED
Date Closed	05/04/17



05/08/17 – Transcontinental Gas Pipe Line Company (#70a)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	1201710124
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Eastern
Date Opened	05/08/17
Status	CLOSED
Date Closed	05/08/17

1. § 192.495 Procedural Manual for operations, maintenance, and emergencies

- (a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operation and maintenance activities are conducted.

Transco failed to follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, Transco failed to follow its written procedure 20.06.01, *Cathodic Protection Criteria*, Rev.13, dated 1/27/2013 (Procedure), pursuant to 192.465(a).

§192.463 (a) states: "Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria."

Transco's Procedure establishes the CP protection criteria utilized to confirm adequate external corrosion control on their facilities. The 5 criteria listed in this procedure are:

1. -0.850 Volt Pipe-to-Soil (with IR drop considered);
2. 100 mV Voltage Shift (Polarization Decay); and
3. 500 mV Shift.



05/08/17 – Transcontinental Gas Pipe Line Company (#70b)

Case Summary							
Section 1.0. Using the -0.850 Volt Pipe-to-Soil Criteria, paragraph 1.3 states "Consider any voltage (IR) drops according to WISOP O&M 20.06.03 – Methods for IR Drop Correction."							
During the inspection, the PHMSA Inspector reviewed annual CP survey records for 2014, 2013 and 2012 for test points within Transco's Virginia - North district.							
The 2014 records at relative station engineering numbers 78599-25, 78599-26 and 78599-27 (test points 30, 31 and 32), located at the V-266 flow control valve within the Transco-Antioch M&E station, indicated the following:							
1. Inspection remarks: "IR drop not interrupted"							
2. Structure P-S [Pipe to Soil] and Structure IRF [IR Free]:							
a. Values recorded under the "Structure IRF" column were more negative than the values in the "Structure P-S" column at test points 30 and 31, indicating that current sources may have been interrupted and that IR drop had not been considered.							
b. Transco Asset Integrity personnel indicated that there are nonintermittent anodes at this location that are not detached during annual CP surveys.							
Structure P-S	Structure IRF	IRF	DCP	IRF	Inspection Remarks	Inspection Date	
-1.178	-1.180				IR drop not interrupted	03/02/14	
-1.102	-1.191					03/02/14	
-1.142	-1.206					4/1/2014	
-1.084	-1.174				IR drop not interrupted	03/02/14	
-1.086	-1.111					03/02/14	
-2.811	-1.285					6/1/2014	
-4.301	-2.107				IR drop not interrupted	03/02/14	



05/08/17 – Transcontinental Gas Pipe Line Company (#70c)

Case Summary							
3. The "Native P-S" column of the report was blank. The lack of active pipe-to-soil readings in the "Native P-S" column prevents application of criteria other than the -0.850 Volt Pipe-to-Soil criteria, such as the 100 mV Voltage Shift or 100 mV Criteria found in Transco's 20.06.03 procedure for CP criteria.							
Thus, Transco did not demonstrate that IR-drop was considered at these test points, or that another valid cathodic protection criterion was utilized at this location in accordance with their written procedures.							
Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$205,638 per violation per day the violation persists up to a maximum of \$2,056,380 for a related series of violations. For violation occurring between January 4, 2012 to August 1, 2016, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the issue identified in this letter. Failure to do so will result in Transco being subject to additional enforcement action.							
Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document, you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).							

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	120171012W
Case Type	Warning Letter
Subject(s)	Procedures Manuals / Gas Pipelines
Region	Eastern
Date Opened	05/08/17
Status	CL0000
Date Closed	05/08/17

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Acting Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to CPE 1-1017-4912W on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.



Tenaska - Antioch M&R

Valve V-266 at M.P. 1502.292 / SS 6096+41 - Fluvanna County, Virginia

Power Operator removed and replaced with Manual Operator

WGP Form #0200A FA Tracker MOCR #71821

Galvanic anodes disconnected and valve section now protected by impressed current anodes powered by rectifier system

Explanation of action taken in regard to PHMSA warning letter dated 5/8/2017 - CPF 1-2017-1021W

by Conway Wolfrey and Bill Deaton



PHMSA Warning Letter CPF 1-2017-1012W dated May 8, 2017 - relevant information highlighted

CPF 1-2017-1012W

PHMSA LETTER

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

WARNING LETTER

RESPONSIBLE PARTY BELIEVED:
Mr. [Name Redacted]

DATE: May 8, 2017

PHOTOGRAPHIC EVIDENCE:
10" Water Gas Pipeline
Transportation Safety Law Center
One Williams Center
Falls, VA 24120

CPF 1-2017-1012W

Dear Mr. [Name Redacted]:

On May 8, 2017, PHMSA received a report regarding a gas pipeline that was found to be in violation of the Pipeline Safety Act (PSA) and the Pipeline Safety Regulations (PSR). The report was received from the Virginia Department of Transportation (VDOT) and the Pipeline Safety Law Center (PSLC).

The report stated that the pipeline was found to be in violation of the PSA and the PSR because it was not properly maintained and it was not properly inspected. The report also stated that the pipeline was found to be in violation of the PSA and the PSR because it was not properly labeled and it was not properly marked.

PHMSA is providing you with this warning letter to inform you of the violations and to give you an opportunity to correct the violations. You have 30 days from the date of this warning letter to correct the violations. If you do not correct the violations within the 30-day period, PHMSA may take enforcement action against you.

The violations identified in this warning letter are:

- Violation of 49 CFR 192.201(a)(1) - Pipeline Safety: The pipeline was not properly maintained and it was not properly inspected.
- Violation of 49 CFR 192.201(a)(2) - Pipeline Safety: The pipeline was not properly labeled and it was not properly marked.

If you have any questions regarding this warning letter, please contact the Pipeline Safety Law Center at (800) 875-5042.

Sincerely,
[Signature]
Director, Pipeline Safety Administration

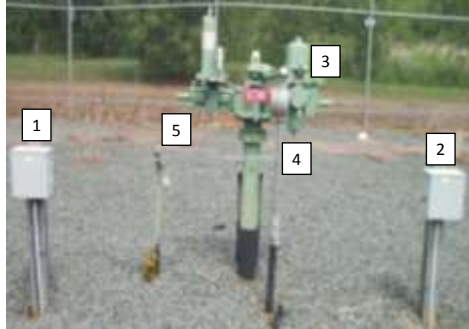
PHMSA
Pipeline Safety Administration

Page 3 of 3 1-2017-1012W Warning Letter 05/08/2017 11:22:00 AM Page 3 of 3



Valve V-266 with operator May 2014

1. Upstream insulating flange box with flange wires unbonded. Galvanic anodes connected to the valve side of flange.
2. Downstream insulating flange box with flange wires unbonded. Galvanic anodes connected to the valve side of flange.
3. Gas powered valve operator.
4. Control and signal wire conduit connected to operator for control and valve position indication.
5. Power Gas connected to operator.



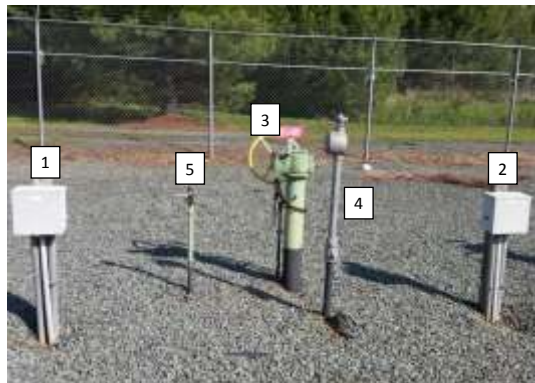
Resolution

- Interruption could have been performed but it was determined that the operator and associated conduit were not needed anymore. So, it was decided that this equipment would be removed so that the galvanic anodes could be detached, the isolation flanges bonded, and allow the impressed current from nearby rectifiers protect the pipe.
- IR free pipe to soil readings were first required in 2013 but the interruption of small banks of galvanic anodes is difficult to perform due to the resistance of current interrupters. The current interrupters typically do not allow the flow of current due to their internal resistance.
- Despite not taking IR free pipe to soil readings at this location per Procedure 20.06.03, the galvanic anodes have protected the below ground valve and associated piping from corrosion.



Valve V-266 with operator May 2017

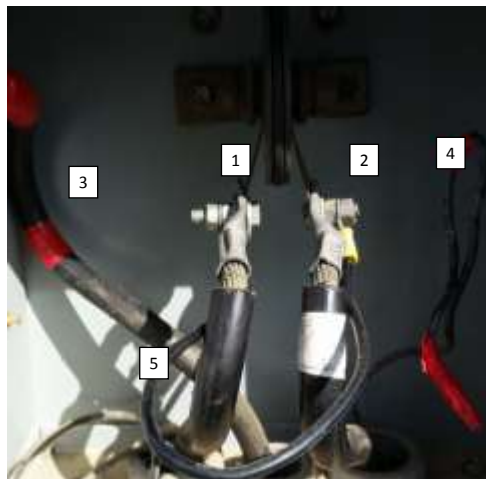
1. Upstream insulating flange box with flange wires bonded. Galvanic anodes disconnected from the valve side of flange.
2. Downstream insulating flange box with flange wires bonded. Galvanic anodes disconnected from the valve side of flange.
3. Manual valve operator with hand wheel.
4. Control and signal wire conduit disconnected from operator.
5. Power Gas disconnected from operator.





Inside view of upstream flange box May 2017

1. Flange wire.
2. Flange wire.
3. Anode wire.
4. Anode wire.
5. Bonding wire.



Inside view of downstream flange box May 2017

1. Flange wire.
2. Flange wire.
3. Anode wire.
4. Anode wire.
5. Bonding wire.



05/08/17 – Rover Pipeline, LLC (#71)

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Case Summary

Operator	ROVER PIPELINE, LLC
Case Number	320171004W
Case Type	Warning Letter
Subject(s)	Construction - Gas Pipelines
Region	Central
Date Opened	05/08/17
Status	CLOSED
Date Closed	05/08/17

05/10/17 – Bridger Transfer Services, LLC (#72)

Case Summary

Operator	BRIDGER TRANSFER SERVICES, LLC
Case Number	520176025H
Case Type	Notice of Amendment
Subject(s)	Damage Prevention - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	05/16/17
Status	CLOSED
Date Closed	05/23/17



05/11/17 – White Cliffs Pipeline, LLC (#73)

Case Summary

Operator	WHITE CLIFFS PIPELINE, LLC
Case Number	220175004W
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Central
Date Opened	05/11/17
Status	CLOSED
Date Closed	05/11/17



05/11/17 – St Louis Pipeline Operating LLC (#74)

Case Summary

Operator	ST LOUIS PIPELINE OPERATING LLC
Case Number	529123029
Case Type	Proposed Compliance Order
Subject(s)	Integrity Management - Hazardous Liquid Pipelines
Region	Central
Date Opened	12/28/12
Status	CLOSED
Compliance Order	Yes
Final Order Date	10/20/13
Date Closed	05/11/17



05/16/17 – Wyoming Pipeline Company (#75)

Case Summary

Operator	WYOMING PIPELINE COMPANY
Case Number	529176015W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Emergency Response Plans - Oil Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	05/16/17
Status	CLOSED
Date Closed	05/16/17



05/19/17 – Danville, City of (#76a)

Item number 1 PENALTY \$18,700

Case Summary

Operator	DANVILLE CITY OF
Case Number	12010014
Case Type	Proposed Civil Penalty
Subject(s)	Wasting Fuel Corrosion Control - Gas Appliances (Leak/Inlet) Maintenance - Gas Appliances
Region	Eastern
State Opened	VA
Status	Closed
Proposed Civil Penalty	\$18,700
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Basis for penalty reduction	Operator provided additional evidence
Consent Order Date	07/19/16
Date Closed	04/18/17

The City of Danville (City) failed to cathodically protect, in accordance with Subpart I, each segment of buried or submerged pipe that is required to be repaired because of external corrosion. Specifically, the City repaired a segment of externally corroded buried pipe and failed on one occasion to cathodically protect the pipe as required by §192.483(e) after corrosion was found.

On 11/15/2011, the City repaired a corrosion leak on a 2 inch bare steel service line with a leak clamp. On 5/23/2013, after the finding was identified during the 5/8/2013 VA SCC inspection, the City replaced the service line with plastic pipe.



05/19/17 – Danville, City of (#76b)

Case Summary

The City's response:

Note that the allegation states that the subject gas service line at 101 Marshall Terrace was replaced on 5/21/13 with a two inch diameter service sixteen days after the 5/8/13 VA SCC visit.

In 1992 the City had approximately 5800 bare steel services in its natural gas distribution system. This bare steel service at that time accounted for approximately 37% of the City's services.

In 2005, the City began a very pro-active bare steel replacement program that utilized both City crews and contractor crews. As of this letter there are approximately 117 bare steel services remaining in the system.

The service line noted by the VA SCC was repaired in 11/15/2011 when the bare steel service lines were being aggressively replaced. In February 2012 the contract with the contractor working on the bare steel service line replacements expired and the City crew's focus shifted to cast iron and ductile iron main replacements.

Many of the remaining bare steel services are connected to cast iron and ductile iron mains; therefore, it was considered that the bare steel replacements would continue but at a slower pace. Since 1992, the City has spent nearly \$4,000,000 (average replacement cost of \$700 per service) to remove the bare steel service lines from its natural gas distribution system.

While the City's bare steel service replacement program is not directly connected to the issues addressed in this item, the City has spent a significant amount of money to remove over 94% of its bare steel services and it was always the intent of the City to replace the service identified in Item 1.

A review of our Annual Reports will verify the above replacement information.

Operator	DANVILLE CITY OF
Case Number	12010014
Case Type	Proposed Civil Penalty
Subject(s)	Wasting Fuel Corrosion Control - Gas Appliances (Leak/Inlet) Maintenance - Gas Appliances
Region	Eastern
State Opened	VA
Status	Closed
Proposed Civil Penalty	\$18,700
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Basis for penalty reduction	Operator provided additional evidence
Consent Order Date	07/19/16
Date Closed	04/18/17



05/19/17 – Danville, City of (#77)

Case Summary

Operator	DANVILLE, CITY OF
Case Number	120120006
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Item
Subject(s)	Corrosion Control - Gas Pipelines Corrosion Control - Gas Pipelines [withdrawn] Maintenance - Gas Pipelines Maintenance - Gas Pipelines [withdrawn] Pipeline Component Design - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines
Region	Eastern
Date Opened	12/13/12
Status	CLOSED
Proposed Civil Penalty	\$80,000
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Consent Order Date	07/19/14
Date Closed	05/19/17



05/19/17 – Danville, City of (#78)

Case Summary

Operator	DANVILLE, CITY OF
Case Number	120130008
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Maintenance - Gas Pipelines Procedure Manuals - Gas Pipelines [withdrawn]
Region	Eastern
Date Opened	12/22/13
Status	CLOSED
Proposed Civil Penalty	\$55,400
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Consent Order Date	07/19/14
Date Closed	05/19/17



05/22/17 – Buckeye Partners, LP (#79)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	120173008M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	03/16/17
Status	CLOSED
Date Closed	05/22/17



05/24/17 – Par Hawaii Refining, LLC (#80)

Case Summary

Operator	PAR HAWAII REFINING, LLC
Case Number	520170018W
Case Type	Warning Letter
Subject(s)	Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Western
Date Opened	05/24/17
Status	CLOSED
Date Closed	05/24/17



05/24/17 – Magellan Terminals Holdings, LP (#81)

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Case Summary

Operator	MAGELLAN TERMINALS HOLDINGS, LP
Case Number	120166001H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals – Hazardous Liquid Pipelines
Region	Eastern
Date Opened	12/15/16
Status	CLOSED
Date Closed	05/24/17



Appalachian Underground Corrosion Short Course

05/24/17 – Resolute Natural Resources Company (#82)

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Case Summary

Operator	RESOLUTE NATURAL RESOURCES COMPANY
Case Number	320175007W
Case Type	Warning Letter
Subject(s)	Corrosion Control – Hazardous Liquid Pipelines Operations and Maintenance – Hazardous Liquid Pipelines Public Awareness – Hazardous Liquid Pipelines Qualification of Pipeline Personnel – Hazardous Liquid Pipelines
Region	Western
Date Opened	05/24/17
Status	CLOSED
Date Closed	05/24/17



Appalachian Underground Corrosion Short Course

05/26/17 – QEP Marketing Company (#83)

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Case Summary

Operator	QEP MARKETING COMPANY
Case Number	320171001W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	05/26/17
Status	CLOSED
Date Closed	05/26/17



05/31/17 – Hilcorp Alaska, LLC (#84)

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Case Summary

Operator	HILCORP ALASKA, LLC
Case Number	320175004W
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	04/03/17
Status	CLOSED
Date Closed	05/31/17



06/02/17 – Hilcorp Alaska, LLC (#85)

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Case Summary

Operator	HILCORP ALASKA, LLC
Case Number	52817588W
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	06/02/17
Status	CLOSED
Date Closed	06/02/17



06/05/17 – Rockies Express Pipeline LLC (#86)

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Case Summary

Operator	ROCKIES EXPRESS PIPELINE LLC
Case Number	329121988
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Item
Subject(s)	Construction - Gas Pipelines Corrosion Control - Gas Pipelines Operations - Gas Pipelines Welding - Gas Pipelines
Region	Central
Date Opened	06/15/17
Status	CLOSED
Proposed Civil Penalty	\$247,600
Assessed Civil Penalty	\$312,670
Collected Civil Penalty	\$312,670
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Consent Order Date	11/02/17
Date Closed	06/05/17



06/06/17 – Marathon Pipe Line, LLC (#87)

Case Summary

Operator	MARATHON PIPE LINE LLC
Case Number	110176003W
Case Type	Warning Letter
Subject(s)	Construction - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	06/06/17
Status	CLOSED
Date Closed	06/06/17



06/06/17 – Dakota Midstream (#88)

Case Summary

Operator	DAKOTA MIDSTREAM
Case Number	320176003M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Central
Date Opened	04/21/17
Status	CLOSED
Date Closed	06/06/17



06/07/17 – Gulf South Pipeline Company, LP (#89)

Case Summary

Operator	GULF SOUTH PIPELINE COMPANY, LP
Case Number	420171007W
Case Type	Warning Letter
Subject(s)	Construction - Gas Pipelines
Region	Southwest
Date Opened	06/07/17
Status	CLOSED
Date Closed	06/07/17



06/08/17 – Utica East Ohio Midstream LLC (#90)

Case Summary

Operator	UTICA EAST OHIO MIDSTREAM LLC
Case Number	130176003W
Case Type	Warning Letter
Subject(s)	Control Room Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	06/08/17
Status	CLOSED
Date Closed	04/09/17



06/12/17 – Idaho Pipeline Corp (#91)

Case Summary

Operator	IDAHO PIPELINE CORP
Case Number	02073819a
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Emergency Response - Hazardous Liquid Pipelines Emergency Response Plans - Oil Pipelines Emergency Management - Hazardous Liquid Pipelines Public Awareness - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Western
Date Opened	06/12/17
Status	CLOSED
Date Closed	06/12/17



06/13/17 – Frontier Energy Services, LLC (#92)

Case Summary

Operator	FRONTIER ENERGY SERVICES, L.L.C.
Case Number	426175023W
Case Type	Warning Letter
Subject(s)	Construction - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	06/13/17
Status	CLOSED
Date Closed	06/13/17



06/13/17 – Cameron LNG, LLC (#93)

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Case Summary

Operator	CAMERON LNG, LLC
Case Number	420175024W
Case Type	Warning Letter
Subject(s)	Construction - LNG Facilities
Region	Southwest
Date Opened	06/13/17
Status	CLOSED
Date Closed	06/13/17

**06/15/17 – Danville, City of (#94)**

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Case Summary

Operator	DANVILLE, CITY OF
Case Number	120278902W
Case Type	Warning Letter
Subject(s)	Maintenance - Gas Pipelines
Region	Eastern
Date Opened	06/15/17
Status	CLOSED
Date Closed	06/15/17



06/15/17 – TC Oil Pipeline Operations Inc (#95)

Case Summary	
Operator	TC OIL PIPELINE OPERATIONS INC
Case Number	120139010
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Corrosion Control - Hazardous Liquid Pipelines (Withdrawn) Operations and Maintenance - Hazardous Liquid Pipelines
Region	Central
Date Opened	11/20/15
Status	CLOSED
Proposed Civil Penalty	\$107,320
Assessed Civil Penalty	\$135,480
Collected Civil Penalty	\$135,480
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Final Order Date	05/23/17
Date Closed	06/15/17



06/15/17 – Transcontinental Gas Pipe Line Company (#96a)

Case Summary																	
<p>1. §192.605 Procedural manual for operations, maintenance, and emergencies. (f) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subject and subject M of the part.</p> <p>Transco's written procedure 70.14.01, <i>Pipeline Repair</i>, Rev. 23, dated 11/09/16, is inadequate in that it contains conflicting information regarding methods of repair to be utilized for certain defects.</p> <p>Table 1 of Transco's procedure 70.14.01, <i>Pipeline Repair</i>, Rev. 23, dated 11/09/16, summarizes the repair options available for various types of defects. Section 3.1.3 of this procedure instructs the Asset Integrity Manager to "Determine the appropriate repair method according to Table 1".</p> <p>The information in Table 1 conflicts with the options provided in the rest of the procedure regarding repair options for external corrosion defects that are greater than 80% of the wall thickness, but not leaking. The Table indicates that the preferred method for repairing these defects is a Type "A" Sleeve or Cut Out. For Type "B" Sleeves it states that they are "optional/not recommended" as a repair method.</p> <p>Figure 4 of the procedure provides a decision flow chart for repairing corrosion defects. Following through the flowchart, it indicates the repair option when less than 20% of the wall thickness remains at a corrosion anomaly are a Type "B" Sleeve or Cut Out.</p> <p>Finally, Section 4.1.2.3 of the procedure states the following when evaluating corrosion: "If the remaining wall thickness is less than 20% of nominal, cut out and replace as a cylinder or install a type "B" sleeve."</p> <p>The information in Table 1 conflicts with the flowchart found in Figure 4 and with Section 4.1.2.3 of the procedure. As Table 1 is to be used as reference by the Asset Integrity Manager in determining the appropriate repair method for a defect under section 5.1.1, there should be no conflict between its contents and the repair methods recommended by other portions of the procedure.</p>	<table border="1"> <tbody> <tr> <td>Operator</td> <td>TRANSCONTINENTAL GAS PIPE LINE COMPANY</td> </tr> <tr> <td>Case Number</td> <td>120170134</td> </tr> <tr> <td>Case Type</td> <td>Status of Administrative</td> </tr> <tr> <td>Subject(s)</td> <td>Procedure Manual - Gas Pipelines</td> </tr> <tr> <td>Region</td> <td>Eastern</td> </tr> <tr> <td>Date Opened</td> <td>05/09/17</td> </tr> <tr> <td>Status</td> <td>CLOSED</td> </tr> <tr> <td>Date Closed</td> <td>06/15/17</td> </tr> </tbody> </table>	Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY	Case Number	120170134	Case Type	Status of Administrative	Subject(s)	Procedure Manual - Gas Pipelines	Region	Eastern	Date Opened	05/09/17	Status	CLOSED	Date Closed	06/15/17
Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY																
Case Number	120170134																
Case Type	Status of Administrative																
Subject(s)	Procedure Manual - Gas Pipelines																
Region	Eastern																
Date Opened	05/09/17																
Status	CLOSED																
Date Closed	06/15/17																



06/15/17 – Transcontinental Gas Pipe Line Company (#96b)

Case Summary

2. §192.605 Procedural manual for operations, maintenance, and emergencies.
(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

Transco's written Policy 70.16.00.07, *DOT Valve Maintenance*, Rev. 7, dated 12/31/2012, is inadequate in that it does not provide sufficient detail for meeting the requirements of 192.745(a) §192.745(a) states in part: "Each transmission line valve that might be required during an emergency must be inspected and partially operated."

During the inspection, the PHMSA inspectors reviewed Transco's valve inspection records and Transco's Operation and Maintenance (O&M) procedures.

Transco's Policy 70.16.00.07 *DOT Valve Maintenance* states in part:

"1.2.B is the policy that the District maintains a list of DOT valves.

1.1.1 Depending on the facilities in the District, this list may include the following valves that could be utilized during an emergency:

- Compression Station Block Valves
- Compression Station Sate Gate Valves
- Compression Station Blowdown Valves
- Mainline and Lateral Block Valves
- Mainline and Lateral Crossover Valves (between parallel lines)
- Mainline and Lateral Block B1 and B2 Valves (bypass)
- Newer Station Top Valves
- Automatic ESD Station Fuel Gas Supply Valves
- Offshore Platform Isolation Valves
- Offshore Platform Blowdown Valves

1.1. The District Manager is responsible for compliance with this policy throughout their assigned geographic region."

The procedure and policy failed to provide details, such as:

1. Criteria/procedures for the emergency valve designation process
2. Individuals responsible for developing the valve designation criteria
3. Process for keeping the list of emergency valves current
4. Documentation requirements
5. Process to review records for completeness and accuracy



06/15/17 – Transcontinental Gas Pipe Line Company (#96c)

Case Summary

3. §192.605 Procedural manual for operations, maintenance, and emergencies.
(2) Controlling corrosion in accordance with the operation and maintenance requirements of Subpart I of this part.

Transco's written procedures for corrosion control, including 20.06.03, *Cathodic Protection Criteria*, Rev. 13, dated 05/27/2013, and 20.07.01, *Annual Cathodic Protection Surveys*, Rev. 14, dated 1/30/2013, fail to address the requirements of 192.463(c). Specifically, they are inadequate in that they do not contain information such as criteria, investigation or remedial measures regarding excessive polarization or overprotection of facilities.

Procedures for controlling corrosion in accordance with the requirements of Subpart I are required under §192.605(b)(2) §192.463(c), found in Subpart I of 49 C.F.R. Part 192, requires that "The amount of cathodic protection must be controlled so as not to damage the protective coating on the pipe."

The procedures do not include sufficient guidance on controlling the amount of cathodic protection, such as:

1. Criteria for what indicates over voltage, such as a threshold polarized potential,
2. A process for determining if indications of over voltage are a threat to the integrity of a pipeline or its protective coating, and
3. Remedial actions if the over voltage is determined to be a threat to the pipeline or its protective coating



06/15/17 – Transcontinental Gas Pipe Line Company (#96d)

Case Summary

- 4. §192.605 Procedural manual for operations, maintenance, and emergencies. (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

Transco's written procedure 20.53.04, *Auxiliary Flange Joints*, Rev. 6, dated 2/25/2013, is inadequate in that it fails to provide sufficient guidance with regards to §192.467(d). Specifically, it does not provide guidance consistent with Transco's current practices for determining when further testing is required after a potential, unintentional short is discovered.

Procedures for controlling corrosion in accordance with the requirements of Subpart I are required under §192.605(b)(2) §192.467(d), found in Subpart I of 49 C.F.R. Part 192, requires that "Inspection and electrical tests must be made to assure that electrical isolation is adequate."

Transco's procedure 20.53.04, dated 2/25/2013, Section 2.2 states in part "Consider further testing as outlined in the following processes in this procedure if the IR drop is less than 100 mV" when testing IR drop across an insulating flange. The procedure lacks specificity on how it is determined that further testing is needed. Transco personnel indicated that after a potential, unintentional short at an electrical insulating flange is discovered based on an IR drop across it of less than 100 mV,

no further testing or other actions are performed if the cathodic protection levels remain adequate (gas utilized cathodic protection criteria). The procedure does not include sufficient guidance for making this determination.

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Status of Administrative
Subject(s)	Procedure Manuals – Gas Pipeline
Region	Eastern
Date Opened	06/05/17
Status	CLOSED
Date Closed	06/15/17



06/15/17 – Transcontinental Gas Pipe Line Company (#96e)

Case Summary

Table 1 – Permanent Repairs for Pipeline Defects

Defect Type	Available Repair Method						
	Recoat Only	Grinding	Type "W" Sleeve	Type "B" Sleeve	Blank Dr. Flange	Composite Reinforced Sleeve	Out-Out
Leaking Defects	Not Permitted	Not Permitted	Not Permitted	Optional	Optional - Corrosion Asses. Required	Not Permitted	Preferred method
Leaking Mechanical (Dresses) Coupling	Prohibit by tightening, using housing (bumpers) or slugs						
Mechanical Equipment Leaks (Worms and Fillings)	Repair in accordance with manufacturer's guidelines, or out and seal replica.						
Minor Loss < 10% Nominal WT	Preferred method	Not Permitted	Optional	Optional	Optional	Optional	Optional
Minor Loss < 10% & 40% Nominal WT & Flange (STDW)/ RCMG	Preferred method	Not Permitted	Optional	Optional	Optional	Optional	Optional
Minor Loss < 10% & 40% Nominal WT & Flange RSTRMG	Not Permitted	Not Permitted	Optional	Optional	Not Permitted	Preferred method	Optional
Minor Loss < 50% of Nominal WT	Not Permitted	Not Permitted	Not Permitted	Optional	Optional - Corrosion Asses. Required	Not Permitted	Preferred method

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Status of Administrative
Subject(s)	Procedure Manuals – Gas Pipeline
Region	Eastern
Date Opened	06/05/17
Status	CLOSED
Date Closed	06/15/17



06/15/17 – Transcontinental Gas Pipe Line Company (#96f)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Status of Amendment
Subject(s)	Procedure Manuals – Gas Pipelines
Region	Eastern
Date Opened	06/05/17
Status	CLOSED
Date Closed	06/15/17

1.0 If the polarized potential (*Instant Off*) is less than -1200 mV overprotection possibilities need to be further investigated.

NOTE: Attempt to locate all additional current sources to properly determine polarized potentials. Take into account coating type, pipe specifications and readings to determine if there is a threat to integrity. Use of coupons, close interval survey, smart tools, or other technologies may be warranted for further investigation. If feasible mitigate the over protection by decreasing your rectifier readings.



06/15/17 – Transcontinental Gas Pipe Line Company (#96g)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Status of Amendment
Subject(s)	Procedure Manuals – Gas Pipelines
Region	Eastern
Date Opened	06/05/17
Status	CLOSED
Date Closed	06/15/17

2.2 Take a voltage (IR) drop from one side of the flange to the other side.

NOTES:

- This number should approximate the difference between the two P/S potentials taken in the previous step.
- Perform further testing as outlined in the following processes in this procedure if the IR drop is less than 100 millivolts (mV) regardless of whether both sides meet Cathodic Protection polarization criteria or not.



06/15/17 – Transcontinental Gas Pipe Line Company (#96h)

Case Summary	
Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Status of Amendments
Subject(s)	Procedure Manuals – Gas Pipelines
Region	Eastern
Date Opened	06/05/17
Status	CLOSED
Date Closed	06/15/17

1.2 It is the policy that each District maintain a list of DOT valves. The list may exist in Maximo, OMS, or some other electronic or hardcopy version. This list must be reviewed annually.

1.3 It is the policy to conduct maintenance and inspection in accordance with 07.10.322-PMR – VA-V Valve Inspection and Maintenance. Complete form F07-812 – Valve Inspection Report or information can be kept in the Computerized Maintenance Management System (CMMS), i.e. Maximo or OMS, if all the required data is captured.



06/15/17 – Transcontinental Gas Pipe Line Company (#96i)

Case Summary	
Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Status of Amendments
Subject(s)	Procedure Manuals – Gas Pipelines
Region	Eastern
Date Opened	06/05/17
Status	CLOSED
Date Closed	06/15/17

1.4 Review each submitted F07-812 – Valve Inspection Report for completeness and accuracy. Take prompt remedial action to correct any valve found inoperable, unless an alternative valve can be designated. Document remedial actions taken on the F07-812 Valve Inspection Report.

2.2 The frequency of reviewing the DOT valve list shall be at intervals not exceeding 15 months, but at least once each calendar year.

3.0 Responsibility

3.1 The District Manager is responsible for compliance with this policy throughout their assigned geographic region.



06/15/17 – Transcontinental Gas Pipe Line Company (#96j)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	12817012M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals – Gas Pipeline
Region	Western
Date Opened	05/09/17
Status	CLOSED
Date Closed	06/15/17

Between May 23, 2016 and October 28, 2016, a representative from the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to chapter 601 of 49 United States Code, inspected Transcontinental Gas Pipe Line Company's (TranSCO) plans and procedures as part of an integrated inspection of TranSCO's Charlottesville and Princeton Divisions. As a result of the inspection, TranSCO was issued a Notice of Amendment on May 9, 2017, which proposed amendment of your procedures.

TranSCO submitted its amended procedures on June 9, 2017. My staff reviewed the amended procedures, and it appears that the inadequacies outlined in this Notice of Amendment have been corrected.

This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.



06/20/17 – Freeport - Mcmoran Oil & Gas (#97)

Case Summary

Operator	FREEPORT-MCMORAN OIL & GAS
Case Number	200187031B
Case Type	Notice of Proposed Safety Order
Region	Western
Date Opened	01/22/16
Status	CLOSED
Consent Order Date	04/14/16
Date Closed	06/20/17



06/20/17 – Coalinga, City of (#98)

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Case Summary	
Operator	COALINGA, CITY OF
Case Number	3201800138
Case Type	Notice of Amendment
Subject(s)	Emergency Response - Gas Pipelines Material Joining other than Welding - Gas Pipelines Public Awareness - Gas Pipelines
Region	Western
Date Opened	08/21/16
Status	CLOSED
Date Closed	04/20/17



06/21/17 – Holly Energy Partners – Operating, LP (#99)

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Case Summary	
Operator	HOLLY ENERGY PARTNERS - OPERATING, L.P.
Case Number	3201760229
Case Type	Warning Letter
Subject(s)	Integrity Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	04/21/17
Status	CLOSED
Date Closed	05/21/17



06/22/17 – Coalinga, City of (#100)

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Case Summary

Operator	COALINGA, CITY OF
Case Number	SD0170006W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines
Region	Western
Date Opened	06/22/17
Status	CLOSED
Date Closed	06/22/17



06/22/17 – Ergon Terminals Inc. (#101)

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Case Summary

Operator	ERGON TERMINALS, INC.
Case Number	120175005H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	02/27/17
Status	CLOSED
Date Closed	06/22/17



06/26/17 – Holly Energy Partners – Operating, LP (#102)

Case Summary

Operator	HOLLY ENERGY PARTNERS - OPERATING, L.P.
Case Number	520175009H
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	06/26/17
Status	CLOSED
Date Closed	06/26/17



06/27/17 – Phillips 66 Pipeline LLC (#103)

Case Summary

Operator	PHILLIPS 66 PIPELINE LLC
Case Number	520175014W
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	06/27/17
Status	CLOSED
Date Closed	06/27/17



06/27/17 – Williams Field Services (#104)

Case Summary

Operator	WILLIAMS FIELD SERVICES
Case Number	123147018
Case Type	Proposed Civil Penalty
Subject(s)	National Registry Reports - Hazardous Liquid Pipeline
Region	Eastern
Date Opened	16/01/18
Status	CLOSED
Proposed Civil Penalty	\$22,400
Assessed Civil Penalty	\$22,400
Collected Civil Penalty	\$22,400
Final Order Date	06/27/17
Date Closed	06/27/17



06/27/17 – Transcontinental Gas Pipe Line Company (#105a)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	123147020
Case Type	Proposed Civil Penalty
Subject(s)	Welding - Gas Pipelines
Region	Western
Date Opened	16/02/18
Status	CLOSED
Proposed Civil Penalty	\$14,700
Assessed Civil Penalty	\$14,700
Collected Civil Penalty	\$14,700
Final Order Date	06/27/17
Date Closed	06/27/17

From September 15 -19, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 602 of 49 United States Code, inspected Williams' Transcontinental Gas Pipe Line Company's (Tranco) replacement of sections of mainlines A, B and C within Unit 42831-Elliott City in Orange Mills, MD.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

1. §49.1243 Nondestructive testing.
 - (b) Nondestructive testing of welds must be performed.
 - (3) In accordance with written procedures,...

Tranco failed to non-destructively test a weld in accordance with its written procedure, which references API Standard 1104.

Specifically, Tranco did not place an image quality indicator (IQI) across the repaired area of a repair weld as prescribed in API Std. 1104, Subsection 11.1.6 Placement of Image Quality Indicators. The Operator in Williams's SOP states that "The purpose of this Williams procedure is to establish the minimum requirements for Nondestructive Testing (NDT), inspection, and/or evaluation to meet or exceed the NDT requirements as set forth in American Petroleum Institute (API) 1104, latest Pipeline and Hazardous Materials Safety Administration (PHMSA) accepted edition."

API Std. 1104, Section 11, Procedures for Nondestructive Testing, Subsection 11.1.6 Placement of Image Quality Indicators (IQI), paragraph 11.1.6.1 Film, outlines the placement of IQI on film to be interpreted. Paragraph 11.1.6.3 states in part that:

- "The IQI shall be placed as follows:
- a. ... When a repaired weld is radiographed, an additional IQI shall be placed across each repaired area."



06/27/17 – Transcontinental Gas Pipe Line Company (#105b)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	13104100
Case Type	Proposed Civil Penalty
Subject(s)	Violating Gas Pipeline
Region	Western
COG# Assigned	1430348
Status	Closed
Proposed Civil Penalty	\$39,700
Assessed Civil Penalty	\$39,700
Collected Civil Penalty	\$39,700
Final Order Date	06/27/17
Date Closed	06/27/17

During the inspection, the PHMSA inspector requested Line C NDT records for any welds which required repair. Transco provided x-ray film and records associated with weld ML-20 and its repair identified as ML-20R.

The PHMSA inspector observed that there was no IQI placed across the repaired area of the weld. Subsequent to PHMSA's identification of the issue, Transco re-radiographed the repaired weld ML-20R with proper IQI placement, as required in API Std. 1104. On September 18, 2016, the PHMSA inspector photographed the original x-ray film for ML-20 and ML-20R, along with the corrected x-ray film for ML-20R, depicting proper placement of the IQI across the repaired area within 94-80.

Therefore, Transco did not meet the requirement in Subsection 11.1.6 Placement of Image Quality Indicators, paragraph 11.1.6.1 Film of API Std. 1104 which it incorporated into its written NDT procedures.

Proposed Civil Penalty:

Under 49 United States Code, § 60112, you are subject to a civil penalty not to exceed \$205,638 per violation per day the violation persists up to a maximum of \$2,094,800 for a related series of violations. For violations occurring between January 4, 2012 to August 1, 2016, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with maximum penalty not to exceed \$1,000,000 for related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$39,700 as follows:

Item Number	PENALTY
1	\$39,700



06/27/17 – Transcontinental Gas Pipe Line Company (#105c)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	13104100
Case Type	Proposed Civil Penalty
Subject(s)	Violating Gas Pipeline
Region	Western
COG# Assigned	1430348
Status	Closed
Proposed Civil Penalty	\$39,700
Assessed Civil Penalty	\$39,700
Collected Civil Penalty	\$39,700
Final Order Date	06/27/17
Date Closed	06/27/17

Respondent did not contest the allegation of violation and paid the proposed civil penalty of \$39,700. In accordance with 49 C.F.R. § 190.208(a)(1), such payment authorizes the Associate Administrator to make a finding of violation and to issue this final order.

The Notice alleged that Respondent violated 49 C.F.R. § 192.243(b)(1) by failing to nondestructively test a weld in accordance with its written procedure, which references American Petroleum Institute Standard (API Std.) 1104. Specifically, Transco did not place an image quality indicator (IQI) across the repaired area of a repair weld as prescribed in API Std. 1104, subsection 11.1.6, "Placement of IQIs."

Respondent did not contest this allegation of violation. Accordingly, based upon a review of all of the evidence, I find that Respondent violated 49 C.F.R. § 192.243(b)(1) by failing to nondestructively test a weld in accordance with its written procedure that references API Std. 1104, which requires an additional IQI to be placed across each repaired area of a weld that is radiographed.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

In summary, having reviewed the record and considered the assessment criteria for each of the Items cited above, I assess Respondent a total civil penalty of \$39,700. Transco paid the full penalty amount by wire transfer on November 16, 2016.



06/28/17 – Kiantone Pipeline Corp (#106)

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Case Summary

Operator	KIANTONE PIPELINE CORP
Case Number	120178022W
Case Type	Warning Letter
Subject(s)	Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	06/18/17
Status	CLOSED
Date Closed	06/28/17



06/28/17 – Tallgrass Pony Express Pipeline, LLC (#107)

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Case Summary

Operator	TALLGRASS PONY EXPRESS PIPELINE, LLC
Case Number	120145003M
Case Type	Notice of Amendment
Subject(s)	Construction - Hazardous Liquid Pipelines
Region	Western
Date Opened	07/27/16
Status	CLOSED
Date Closed	06/28/17



06/28/17 – Anadarko Petroleum Corp (#108)

Case Summary

Operator	ANADARKO PETROLEUM CORP
Case Number	320176025W
Case Type	Warning Letter
Subject(s)	Emergency Response Plans - Oil Pipelines Operations and Maintenance - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Western
Date Opened	04/28/17
Status	CLOSED
Date Closed	06/28/17



06/28/17 – Anadarko Petroleum Corp (#109)

Case Summary

Operator	ANADARKO PETROLEUM CORP
Case Number	320174010M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	04/04/17
Status	CLOSED
Date Closed	06/28/17



06/29/17 – Cameron Interstate Pipeline (#110)

Case Summary

Operator	CAMERON INTERSTATE PIPELINE
Case Number	4201710694
Case Type	Warning Letter
Subject(s)	Operations - Gas Pipelines
Region	Southwest
Date Opened	06/29/17
Status	CLOSED
Date Closed	06/29/17



07/06/17 – Calnev Pipeline Co (#111)

Case Summary

Operator	CALNEV PIPELINE CO
Case Number	1001750124
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	07/06/17
Status	CLOSED
Date Closed	07/06/17



07/07/17 – Alpine Transportation Co (#112)



Case Summary

Operator	ALPINE TRANSPORTATION CO.
Case Number	52017501296
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	07/07/17
Status	CLOSED
Date Closed	07/07/17



07/07/17 – Kuparuk Transportation Co (#113)



Case Summary

Operator	KUPARUK TRANSPORTATION CO.
Case Number	52017501796
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Western
Date Opened	07/07/17
Status	CLOSED
Date Closed	07/07/17



07/11/17 – Sabine Pass LNG, LP (Cheniere) (#114)

Case Summary

Operator	SABINE PASS LNG, LP, (CHENIERE)
Case Number	42064003
Case Type	Proposed Civil Penalty
Subject(s)	National Registry Reports
Region	Southwest
Date Opened	10/17/16
Status	CLOSED
Proposed Civil Penalty	\$12,400
Assessed Civil Penalty	\$12,400
Collected Civil Penalty	\$12,400
Final Order Date	06/05/17
Date Closed	07/11/17



07/11/17 – Corpus Christi Liquefaction, LLC (#115)

Case Summary

Operator	CORPUS CHRISTI LIQUEFACTION, LLC
Case Number	42014301
Case Type	Proposed Civil Penalty
Subject(s)	National Registry Reports
Region	Southwest
Date Opened	08/02/16
Status	CLOSED
Proposed Civil Penalty	\$44,000
Assessed Civil Penalty	\$44,000
Collected Civil Penalty	\$44,000
Final Order Date	06/05/17
Date Closed	07/11/17



07/12/17 – Enstar Natural Gas Co (#116)

Case Summary

Operator	ENSTAR NATURAL GAS CO
Case Number	52917007W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines
Region	Western
Date Opened	07/12/17
Status	CLOSED
Date Closed	07/12/17



07/13/17 – Alyeska Pipeline Service Co (#117)

Case Summary

Operator	ALYESKA PIPELINE SERVICE CO
Case Number	520133006
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Western
Date Opened	08/01/13
Status	CLOSED
Proposed Civil Penalty	\$145,000
Assessed Civil Penalty	\$145,000
Collected Civil Penalty	\$145,000
Compliance Order	Yes
Final Order Date	10/08/15
Date Closed	07/12/17



07/24/17 – Buckeye Partners, LP (#118)

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	120175008
Case Type	Proposed Civil Penalty
Subject(s)	Construction - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	04/03/17
Status	CLOSED
Proposed Civil Penalty	\$34,400
Assessed Civil Penalty	\$34,400
Collected Civil Penalty	\$34,400
Final Order Date	07/24/17
Date Closed	07/24/17

**07/27/17 – Buckeye Partners, LP (#119)**

Case Summary

Operator	BUCKEYE PARTNERS, LP
Case Number	120175010M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	05/16/17
Status	CLOSED
Date Closed	07/27/17



07/27/17 – USG Wheatland Pipeline, LLC (#120)

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Case Summary

Operator	USG WHEATLAND PIPELINE, LLC
Case Number	02017000W
Case Type	Warning Letter
Subject(s)	Construction - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines Public Awareness - Hazardous Liquid Pipelines
Region	Central
Date Opened	07/27/17
Status	CLOSED
Date Closed	07/27/17



Appalachian Underground Corrosion Short Course

07/27/17 – Calumet Montana Refining, LLC (#121)

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Case Summary

Operator	CALUMET MONTANA REFINING, LLC
Case Number	020170013H
Case Type	Notice of Amendment
Subject(s)	Emergency Response Plans - Oil Pipelines
Region	Western
Date Opened	04/03/17
Status	CLOSED
Date Closed	07/27/17



Appalachian Underground Corrosion Short Course

07/27/17 – Southern Natural Gas Co (#122)

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Case Summary

Operator	SOUTHERN NATURAL GAS CO
Case Number	2201710030
Case Type	Warning Letter
Subject(s)	Pipeline Component Design - Gas Pipelines
Region	Southern
Date Opened	05/27/17
Status	CLOSED
Date Closed	07/27/17



07/28/17 – Silicon Valley Power (#123)

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Case Summary

Operator	SILICON VALLEY POWER
Case Number	5291700006
Case Type	Warning Letter
Subject(s)	Annual Reports
Region	Western
Date Opened	07/28/17
Status	CLOSED
Date Closed	07/28/17



07/28/17 – Richmond, City of (#124)

Case Summary

Operator	RICHMOND, CITY OF
Case Number	124179922W
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Eastern
Date Opened	07/28/17
Status	CLOSED
Date Closed	07/28/17



07/28/17 – NGL Crude Terminals (#125)

Case Summary

Operator	NGL CRUDE TERMINALS
Case Number	520376001
Case Type	Proposed Compliance Order Warning Sign
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines Public Awareness - Hazardous Liquid Pipelines
Region	Western
Date Opened	02/13/17
Status	CLOSED
Compliance Order	Yes
Final Order Date	06/27/17
Date Closed	07/26/17



08/03/17 – Norgasco Inc (#126)

Case Summary

Operator	NORGASCO INC
Case Number	320170001M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines
Region	Western
Date Opened	02/10/17
Status	CLOSED
Date Closed	08/03/17

**08/03/17 – Midway Sunset Cogeneration Co (#127)**

Case Summary

Operator	MIDWAY SUNSET COGENERATION CO
Case Number	328171813M
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	04/22/17
Status	CLOSED
Date Closed	08/03/17



08/04/17 – Marathon Pipe Line LLC (#128)

Case Summary

Operator	MARATHON PIPE LINE LLC
Case Number	100490058
Case Type	Corrective Action Order
Region	Central
Date Opened	07/24/14
Status	CLOSED
Date Closed	08/04/17



08/10/17 – Noble Midstream Services, LLC (#129)

Case Summary

Operator	NOBLE MIDSTREAM SERVICES, LLC
Case Number	E201740284
Case Type	Warning Letter
Subject(s)	Emergency Response Plan - OJ Pipelines
Region	Western
Date Opened	08/10/17
Status	CLOSED
Date Closed	08/10/17



08/10/17 – Alyeska Pipeline Service Co (#130)

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Case Summary

Operator	ALYESKA PIPELINE SERVICE CO
Case Number	320173029W
Case Type	Welding Labor
Subject(s)	Procedure Manuals - Noncombustible Liquid Pipelines
Region	Western
Date Opened	08/10/17
Status	CLOSED
Date Closed	08/10/17



08/10/17 – Richmond, City of (#131)

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Case Summary

Operator	RICHMOND, CITY OF
Case Number	120170026W
Case Type	Welding Labor
Subject(s)	Qualification of Pipeline Personnel - Gas Pipelines
Region	Eastern
Date Opened	08/10/17
Status	CLOSED
Date Closed	08/10/17



08/10/17 – Whiting Petroleum Corp (#132)

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Case Summary

Operator	WHITING PETROLEUM CORP
Case Number	120176029W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Midwest
Date Opened	08/10/17
Status	CLOSED
Date Closed	08/10/17



Appalachian Underground Corrosion Short Course

08/14/17 – Oktex Pipeline Company, LLC (#133)

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Case Summary

Operator	OKTEX PIPELINE COMPANY, LLC
Case Number	420171005M
Case Type	Notice of Abandonment
Subject(s)	General - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines
Region	Southwest
Date Opened	08/10/17
Status	CLOSED
Date Closed	09/14/17



Appalachian Underground Corrosion Short Course

08/15/17 – Enterprise Products Operating LLC (#134)

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Case Summary

Operator	ENTERPRISE PRODUCTS OPERATING LLC
Case Number	420175020H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	05/10/17
Status	CLOSED
Date Closed	08/15/17



Appalachian Underground Corrosion Short Course

08/15/17 – Conocophillips Alaska Inc (#135)

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Case Summary

Operator	CONOCOPHILLIPS ALASKA, INC.
Case Number	320176030H
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Western
Date Opened	08/15/17
Status	CLOSED
Date Closed	08/15/17



Appalachian Underground Corrosion Short Course

08/18/17 – Island Energy (#136)

Case Summary

Operator	ISLAND ENERGY
Case Number	5201700126
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Maintenance - Gas Pipelines
Region	Western
Date Opened	08/18/17
Status	CLOSED
Date Closed	08/18/17



08/23/17 – Williams Field Services (#137)

Case Summary

Operator	WILLIAMS FIELD SERVICES
Case Number	120171558H
Case Type	Notice of Amendment
Subject(s)	Construction - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	08/23/17
Status	CLOSED
Date Closed	08/23/17



08/24/17 – Nustar Terminals Operations Partnership LP (#138)

Case Summary

Operator	NUSTAR TERMINALS OPERATIONS PARTNERSHIP L.P.
Case Number	120155015
Case Type	Proposed Civil Penalty Proposed Compliance Order
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines [withdrawn]
Region	Eastern
Date Opened	09/19/15
Status	CLOSED
Proposed Civil Penalty	\$54,700
Assessed Civil Penalty	\$0
Collected Civil Penalty	\$0
Basis for penalty reduction	Operator provided additional evidence.
Compliance Order	No
Final Order Date	08/24/17
Date Closed	08/24/17



Appalachian Underground Corrosion Short Course

08/24/17 – Texas Gas Transmission, LLC (#139)

Case Summary

Operator	TEXAS GAS TRANSMISSION, LLC
Case Number	229151005
Case Type	Proposed Compliance Order
Subject(s)	Qualification of Pipeline Personnel - Gas Pipelines [withdrawn]
Region	Southern
Date Opened	10/12/15
Status	CLOSED
Compliance Order	No
Final Order Date	08/24/17
Date Closed	08/24/17



Appalachian Underground Corrosion Short Course

08/24/17 – Summit Midstream Partners, LLC (#140)

Case Summary

Operator	SUMMIT MIDSTREAM PARTNERS, LLC
Case Number	520176003
Case Type	Proposed Compliance Order Warning Item
Subject(s)	Construction - Hazardous Liquid Pipelines Emergency Response - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	02/13/17
Status	CLOSED
Compliance Order	Yes
Final Order Date	08/24/17
Date Closed	08/24/17



08/24/17 – Coalinga, City of (#141)

Case Summary

Operator	COALINGA, CITY OF
Case Number	520160014
Case Type	Proposed Compliance Order
Subject(s)	Corrosion Control - Gas Pipelines
Region	Western
Date Opened	08/31/16
Status	CLOSED
Compliance Order	Yes
Final Order Date	08/24/17
Date Closed	08/24/17



08/24/17 – Oneok NGL Pipeline, LLC (#142)

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Case Summary

Operator	ONEOK NGL PIPELINE, LLC
Case Number	420179026W
Case Type	Warning Letter
Subject(s)	Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	08/24/17
Status	CLOSED
Date Closed	08/24/17



08/25/17 – Anadarko Petroleum Corp (#143)

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Case Summary

Operator	ANADARKO PETROLEUM CORP
Case Number	558174824H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	06/28/17
Status	CLOSED
Date Closed	08/25/17



08/25/17 – Olympic Pipe Line Company (#144)

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Case Summary

Operator	OLYMPIC PIPE LINE COMPANY
Case Number	520155014
Case Type	Proposed Compliance Order
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Western
Date Opened	07/02/19
Status	CLOSED
Compliance Order	Yes
Final Order Date	01/13/16
Date Closed	08/25/17



08/30/17 – Titan Alaska LNG (#145)

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Case Summary

Operator	TITAN ALASKA LNG
Case Number	5201700156
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Maintenance - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines
Region	Western
Date Opened	08/30/17
Status	CLOSED
Date Closed	08/30/17



08/30/17 – Titan Alaska LNG (#146)

Case Summary

Operator	TITAN ALASKA LNG
Case Number	120173003W
Case Type	Warning Letter
Subject(s)	Corrosion Control - LNG facilities
Region	Western
Date Opened	08/30/17
Status	CLOSED
Date Closed	08/30/17



09/01/17 – Sunoco Pipeline LP (#147)

Case Summary

Operator	SUNOCO PIPELINE L.P.
Case Number	120173001W
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	09/01/17
Status	CLOSED
Date Closed	09/01/17



09/01/17 – Flint Hills Resources LC (#148)

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Case Summary

Operator	FLINT HILLS RESOURCES, LC
Case Number	200175803M
Case Type	Notice of Amendment
Subject(s)	Control Room Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Central
Date Opened	09/01/17
Status	CLOSED
Date Closed	09/01/17



Appalachian Underground Corrosion Short Course

09/01/17 – Dakota Midstream (#149)

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Case Summary

Operator	DAKOTA MIDSTREAM
Case Number	220176009W
Case Type	Warning Letter
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines
Region	Central
Date Opened	09/01/17
Status	CLOSED
Date Closed	09/01/17



Appalachian Underground Corrosion Short Course

09/05/17 – WBI Energy Transmission Inc. (#150)

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Case Summary

Operator	WBI ENERGY TRANSMISSION, INC.
Case Number	020170510W
Case Type	Warning Letter
Subject(s)	Maintenance – Gas Pipeline
Region	Western
Date Opened	09/05/17
Status	CLOSED
Date Closed	09/05/17



Appalachian Underground Corrosion Short Course

09/08/17 – DCP Midstream (#151)

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Case Summary

Operator	DCP MIDSTREAM
Case Number	420170529W
Case Type	Notice of Amendment
Subject(s)	Construction - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	08/07/17
Status	CLOSED
Date Closed	09/08/17



Appalachian Underground Corrosion Short Course

09/12/17 – Philadelphia Energy Solutions Refining and Marketing LLC (#152)

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Case Summary

Operator	PHILADELPHIA ENERGY SOLUTIONS REFINING AND MARKETING, LLC
Case Number	152171806
Case Type	Warning Letter
Subject(s)	Emergency Management - Hazardous Liquid Pipeline Operations and Maintenance - Hazardous Liquid Pipeline
Region	Eastern
Date Opened	09/12/17
Status	CLOSED
Date Closed	09/12/17



Appalachian Underground Corrosion Short Course

09/15/17 – QEP Marketing Company (#153)

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Case Summary

Operator	QEP MARAETONG COMPANY
Case Number	153171806
Case Type	Notice of Imminent
Subject(s)	Emergency Response - Gas Pipeline Pressure Release - Gas Pipeline
Region	Western
Date Opened	09/26/17
Status	CLOSED
Date Closed	09/25/17



Appalachian Underground Corrosion Short Course

09/15/17 – Sunoco Pipeline L.P. (#154)



Case Summary

Operator	SUNOCO PIPELINE L.P.
Case Number	120110019
Case Type	Proposed Civil Penalty
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	09/05/17
Status	C0360
Proposed Civil Penalty	\$15,500
Assessed Civil Penalty	\$15,500
Collected Civil Penalty	\$15,500
Final Order Date	09/16/17
Date Closed	09/16/17



09/15/17 – Venoco Inc (#155)



Case Summary

Operator	VENOCO, INC.
Case Number	S20170008W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Emergency Response - Gas Pipelines Integrity Management - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	09/15/17
Status	C0360
Date Closed	09/15/17



09/15/17 – Unev Pipeline, LLC (#156)

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Case Summary

Operator	UNEV PIPELINE, LLC
Case Number	220173521W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipeline Emergency Response Plans - Oil Pipelines Operations and Maintenance - Hazardous Liquid Pipeline
Region	Western
Date Opened	09/15/17
Status	CLOSED
Date Closed	09/15/17



09/15/17 – Venoco, Inc (#157)

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Case Summary

Operator	VENOCO, INC
Case Number	220173901W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Integrity Management - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	09/15/17
Status	CLOSED
Date Closed	09/15/17



09/21/17 – Plains Pipeline, LP (#158)

Case Summary

Operator	PLAINS PIPELINE, LP
Case Number	320135015
Case Type	Proposed Compliance Order Waiting Item
Subject(s)	Emergency Response - Hazardous Liquid Pipelines Integrity Management - Hazardous Liquid Pipelines Pressure Testing - Hazardous Liquid Pipelines [with/without] Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Western
Date Opened	09/11/15
Status	CLOSED
Compliance Order	Yes
Final Order Date	09/21/17
Date Closed	09/21/17



09/22/17 – Phillips 66 Pipeline LLC (#159)

Case Summary

Operator	PHILLIPS 66 PIPELINE LLC
Case Number	320165028
Case Type	Proposed Compliance Order
Subject(s)	Operations and Maintenance - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Western
Date Opened	10/26/16
Status	CLOSED
Compliance Order	Yes
Final Order Date	09/16/17
Date Closed	09/22/17



09/29/17 – Statoil Oil & Gas LP (#160)

Case Summary

Operator	STATOIL OIL & GAS LP
Case Number	20170210W
Case Type	Warning Letter
Subject(s)	Design - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	09/29/17
Status	CLOSED
Date Closed	09/29/17



Appalachian Underground Corrosion Short Course

09/29/17 – Caliber North Dakota (#161)

Case Summary

Operator	CALIBER NORTH DAKOTA LLC
Case Number	2017002W
Case Type	Warning Letter
Subject(s)	Emergency Response - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines Public Awareness - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Central
Date Opened	09/29/17
Status	CLOSED
Date Closed	09/29/17



Appalachian Underground Corrosion Short Course

10/05/17 – Tennessee Gas Pipeline Company (#162)

Case Summary

Operator	TENNESSEE GAS PIPELINE COMPANY
Case Number	220175006W
Case Type	Warning Letter
Subject(s)	Maintenance - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Southern
Date Opened	10/05/17
Status	CLOSED
Date Closed	10/05/17



10/05/17 – Delaware Pipeline Company, LLC (#163)

Case Summary

Operator	DELAWARE PIPELINE COMPANY, LLC
Case Number	120175026W
Case Type	Warning Letter
Subject(s)	Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	10/05/17
Status	CLOSED
Date Closed	10/05/17



10/06/17 – DCP Midstream (#164)

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Case Summary

Operator	DCP MIDSTREAM
Case Number	5201700104
Case Type	Notice of Abandonment
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	06/26/17
Status	CLOSED
Date Closed	10/06/17



10/13/17 – Air Products & Chemicals Inc (#165)

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Case Summary

Operator	AIR PRODUCTS & CHEMICALS INC
Case Number	4201700104
Case Type	Notice of Abandonment
Subject(s)	Qualification of Pipeline Personnel - Gas Pipelines
Region	Southwest
Date Opened	08/24/17
Status	CLOSED
Date Closed	10/13/17



10/16/17 – Utility Safety and Designs Inc (#166)

Case Summary

Operator	UTILITY SAFETY AND DESIGNS INC
Case Number	2201710676
Case Type	Warning Letter
Subject(s)	Integrity Management - Gas Pipelines Operations - Gas Pipelines
Region	Southern
Date Opened	10/16/17
Status	CLOSED
Date Closed	10/16/17



10/16/17 – Dominion Energy Carolina Gas Transmission, LLC (#167)

Case Summary

Operator	DOMINION ENERGY CAROLINA GAS TRANSMISSION, LLC
Case Number	220141006
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Dam
Subject(s)	Public Awareness - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines
Region	Southern
Date Opened	10/22/14
Status	CLOSED
Proposed Civil Penalty	\$46,400
Assessed Civil Penalty	\$46,400
Collected Civil Penalty	\$46,400
Compliance Order	Yes
Final Order Date	02/17/16
Date Closed	10/16/17



10/20/17 – Sinclair Transportation Company (#168)

Case Summary

Operator	SINCLAIR TRANSPORTATION COMPANY
Case Number	229125006
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Letter
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Integrity Management - Hazardous Liquid Pipelines
Region	Central
Date Opened	06/03/13
Status	CLOSED
Proposed Civil Penalty	\$34,200
Assessed Civil Penalty	\$34,200
Collected Civil Penalty	\$34,200
Compliance Order	Yes
Final Order Date	10/15/15
Date Closed	10/20/17



10/20/17 – Whitecap Pipe Line Company, LLC (#169)

Case Summary

Operator	WHITECAP PIPE LINE COMPANY, LLC
Case Number	4291770066
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	10/20/17
Status	CLOSED
Date Closed	10/20/17



10/24/17 – DCOR, LLC (#170)

Case Summary

Operator	DCOR, LLC
Case Number	520177001
Case Type	Proposed Compliance Order
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Emergency Response Plans - Oil Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Western
Date Opened	03/22/17
Status	CLOSED
Compliance Order	Yes
Final Order Date	10/24/17
Date Closed	10/24/17

**10/27/17 – West Texas Gulf Pipeline Co (#171)**

Case Summary

Operator	WEST TEXAS GULF PIPELINE CO
Case Number	420175033W
Case Type	Warning Letter
Subject(s)	Pressure Testing - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	10/27/17
Status	CLOSED
Date Closed	10/27/17



10/27/17 – Cheniere Corpus Christi Pipeline (#172)

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Case Summary

Operator	CHENIERE CORPUS CHRISTI PIPELINE
Case Number	4231750268
Case Type	Issuance of Amendment
Subject(s)	Construction - Gas Pipeline
Region	Southwest
Date Opened	06/20/17
Status	CLOSED
Date Closed	10/27/17



Appalachian Underground Corrosion Short Course

10/27/17 – Enterprise Crude Pipeline LLC (#173)

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Case Summary

Operator	ENTERPRISE CRUDE PIPELINE LLC
Case Number	4231750349
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	10/27/17
Status	CLOSED
Date Closed	10/27/17



Appalachian Underground Corrosion Short Course

10/30/17 – Williams Field Services (#174)

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Case Summary

Operator	WILLIAMS FIELD SERVICES
Case Number	1291790316
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	10/30/17
Status	CLOSED
Date Closed	10/30/17



10/30/17 – Chevron Products Company (#175)

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Case Summary

Operator	CHEVRON PRODUCTS COMPANY
Case Number	523166013
Case Type	Proposed Compliance Order Warning Item
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Western
Date Opened	12/06/16
Status	CLOSED
Compliance Order	Yes
Final Order Date	04/02/17
Date Closed	10/30/17



10/30/17 – Titan Alaska LNG (#176)

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Case Summary

Operator	TITAN ALASKA LNG
Case Number	1201700144
Case Type	Notice of Amendment
Subject(s)	Procedure Rulings - Gas Pipelines Qualification of Pipeline Personnel - Gas Pipelines
Region	Western
Date Opened	08/30/17
Status	CLOSED
Date Closed	10/30/17



11/02/17 – Discovery DJ Pipeline LLC (#177)

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Case Summary

Operator	DISCOVERY DJ PIPELINE LLC
Case Number	1201760226
Case Type	Warning Letter
Subject(s)	National Registry Reports - Hazardous Liquid Pipelines
Region	Western
Date Opened	11/02/17
Status	CLOSED
Date Closed	11/02/17



11/07/17 – Marathon Pipe Line LLC (#178)

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Case Summary

Operator	MARATHON PIPE LINE LLC
Case Number	22018003H
Case Type	Contract Admin Order
Region	Southern
Date Opened	06/22/18
Status	CLOSED
Date Closed	11/07/17



11/08/17 – Chevron Pipe Line Co (#179)

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Case Summary

Operator	CHEVRON PIPE LINE CO
Case Number	233170022W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Emergency Response - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	11/28/17
Status	CLOSED
Date Closed	11/28/17



11/08/17 – Chevron Pipe Line Co (#180)

Case Summary

Operator	CHEVRON PIPE LINE CO
Case Number	5331700229
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Emergency Response - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	11/08/17
Status	CLOSED
Date Closed	11/08/17



11/08/17 – Chevron Pipe Line Co (#181)

Case Summary

Operator	CHEVRON PIPE LINE CO
Case Number	5331700249
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines Emergency Response - Gas Pipelines Procedure Manuals - Gas Pipelines
Region	Western
Date Opened	11/08/17
Status	CLOSED
Date Closed	11/08/17



11/09/17 – Chevron Products Company (#182)

Case Summary

Operator	CHEVRON PRODUCTS COMPANY
Case Number	2201748218
Case Type	Notice of Amendment
Subject(s)	Corrosion Control - Hazardous Liquid Pipelines
Region	Western
Date Opened	08/17/17
Status	CLOSED
Date Closed	11/09/17



11/14/17 – Texas Gas Transmission, LLC (#183)

Case Summary

Operator	TEXAS GAS TRANSMISSION, LLC
Case Number	2201310094
Case Type	Notice of Amendment
Subject(s)	Qualification of Pipeline Personnel - Gas Pipelines
Region	Southern
Date Opened	10/11/17
Status	CLOSED
Date Closed	11/14/17



11/14/17 – Mid – Valley Pipeline Co (#184)

Case Summary

Operator	MID - VALLEY PIPELINE CO
Case Number	2201790204
Case Type	Notice of Abandonment
Subject(s)	Procedure Abuses - Hazardous Liquid Pipelines
Region	Southam
Date Opened	04/13/17
Status	CLOSED
Date Closed	11/14/17



11/15/17 – BP Pipeline (North America) Inc (#185)

Case Summary

Operator	BP PIPELINE (NORTH AMERICA) INC
Case Number	120125004
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Item
Subject(s)	Inegrity Management - Hazardous Liquid Pipelines Integrity Management - Hazardous Liquid Pipelines (withdrawn) Operations and Maintenance - Hazardous Liquid Pipelines
Region	Central
Date Opened	02/15/17
Status	C10980
Proposed Civil Penalty	\$100,000
Assessed Civil Penalty	\$100,000
Collected Civil Penalty	\$100,000
Compliance Order	Yes
Final Order Date	09/25/17
Date Closed	11/15/17



11/16/17 – ANR Pipeline Co (#186)

Case Summary

Operator	ANR PIPELINE CO
Case Number	120175004
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Item
Subject(s)	Corrosion Control - Gas Pipelines Maintenance - Gas Pipelines Welding - Gas Pipelines
Region	Central
Date Opened	03/16/17
Status	CLOSED
Proposed Civil Penalty	\$46,500
Assessed Civil Penalty	\$46,500
Collected Civil Penalty	\$46,500
Compliance Order	Yes
Final Order Date	05/15/17
Date Closed	11/16/17



11/17/17 – Great Lakes Gas Transmission Co (#187)

Case Summary

Operator	GREAT LAKES GAS TRANSMISSION CO
Case Number	120175007
Case Type	Proposed Civil Penalty
Subject(s)	Integrity Management - Gas Pipelines Safety Condition Reports
Region	Central
Date Opened	05/11/17
Status	CLOSED
Proposed Civil Penalty	\$56,800
Assessed Civil Penalty	\$56,800
Collected Civil Penalty	\$56,800
Final Order Date	11/17/17
Date Closed	11/17/17



11/20/17 – Sunoco Pipeline L.P. (#188)

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Case Summary

Operator	RICHMOND, CITY OF
Case Number	12010000
Case Type	Proposed Compliance Order
Subject(s)	Corrosion Control - Gas Pipelines
Region	Eastern
Date Opened	03/17/19
Status	CLOSED
Compliance Order	Yes
Fiscal Order Date	11/13/19
Date Closed	11/21/17



11/21/17 – Richmond, City of (#189)

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Case Summary

Operator	RICHMOND, CITY OF
Case Number	12010000
Case Type	Proposed Compliance Order
Subject(s)	Corrosion Control - Gas Pipelines
Region	Eastern
Date Opened	03/17/19
Status	CLOSED
Compliance Order	Yes
Fiscal Order Date	11/13/19
Date Closed	11/21/17



11/22/17 – Signature Flight Support, M&O _ Honolulu (#190)

Case Summary

Operator	SIGNATURE FLIGHT SUPPORT, M&O _ HONOLULU
Case Number	3281M6035
Case Type	Notice of Proposed Safety Order (consent order)
Region	Western
Date Opened	06/22/13
Status	CLOSED
Consent Order Date	03/23/16
Date Closed	11/22/17



11/27/17 – Oneok NGL Pipeline, LLC (#191)

Case Summary

Operator	ONEOK NGL PIPELINE, LLC
Case Number	42217982191
Case Type	Notice of Amendment
Subject(s)	Control Room Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines
Region	Midwest
Date Opened	08/24/17
Status	CLOSED
Date Closed	11/27/17



11/28/17 – Columbia Gas Transmission, LLC (#192)

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Case Summary

Operator	COLUMBIA GAS TRANSMISSION, LLC
Case Number	120171009W
Case Type	Warning Letter
Subject(s)	Enforcement Process
Region	Eastern
Date Opened	11/28/17
Status	CLOSED
Date Closed	11/28/17



12/01/17 – Hilcorp Alaska, LLC (#193)

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Case Summary

Operator	HILCORP ALASKA, LLC
Case Number	120371002W
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines
Region	Western
Date Opened	12/01/17
Status	CLOSED
Date Closed	12/01/17



12/04/17 – Williams Energy, LLC (#194)

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Case Summary

Operator	WILLIAMS ENERGY LLC
Case Number	43173394H
Case Type	Notice of Amendment
Subject(s)	Emergency Response - Gas Pipelines Failure Investigation - Gas Pipelines Procedure Manuals - Gas Pipelines Qualification of Pipelines Personnel - Gas Pipelines
Region	Southeast
Date Opened	08/24/17
Status	CLOSED
Date Closed	12/04/17



12/04/17 – Shell Pipeline Corp (#195)

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Case Summary

Operator	SHELL PIPELINE CORP
Case Number	43173393H
Case Type	Notice of Amendment
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Southeast
Date Opened	05/02/17
Status	CLOSED
Date Closed	12/04/17



12/04/17 – Shell Pipeline Corp (#196)

Case Summary

Operator	SHELL PIPELINE CO., L.P.
Case Number	4201750169
Case Type	Notice of Amendment
Subject(s)	Corrosion - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	02/02/17
Status	CLOSED
Date Closed	12/04/17



12/04/17 – Energy XXI Pipeline, LLC (#197)

Case Summary

Operator	ENERGY XXI PIPELINE, LLC
Case Number	4201790206
Case Type	Notice of Amendment
Subject(s)	Emergency Response - Gas Pipelines Failure Investigation - Gas Pipelines Procedure Manuals - Gas Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	02/16/17
Status	CLOSED
Date Closed	12/04/17



12/04/17 – Bridger Pipeline, LLC (#198)

Case Summary

Operator	BRIDGER PIPELINE LLC
Case Number	001100034
Case Type	Corrective Action Order
Region	West
Date Opened	01/25/15
Status	CLOSED
Date Closed	12/04/17



12/04/17 – EPL Pipeline, LLC (#199)

Case Summary

Operator	EPL PIPELINE, LLC
Case Number	420179001M
Case Type	Notice of Abandonment
Subject(s)	Emergency Response - Gas Pipeline Failure Investigation - Gas Pipeline Procedure Manuals - Gas Pipelines Procedure Manuals - Hazardous Liquid Pipeline
Region	Southwest
Date Opened	02/02/17
Status	CLOSED
Date Closed	12/04/17



12/05/17 – City of Bangor (#200)

Case Summary

Operator	CITY OF BANGOR
Case Number	12006001
Case Type	Proposed Compliance Order
Subject(s)	Integrity Management - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines Qualification of Pipeline Personnel - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	09/27/13
Status	CLOSED
Compliance Order	Yes
Fiscal Order Date	04/25/16
Date Closed	12/05/17



12/05/17 – QEP Marketing Company (#201)

Case Summary

Operator	QEP MARKETING COMPANY
Case Number	20170119a
Case Type	Warning Letter
Subject(s)	Corrosion Control - Gas Pipelines National Pipeline Mapping System Qualification of Pipeline Personnel - Gas Pipelines
Region	Western
Date Opened	12/05/17
Status	CLOSED
Date Closed	12/05/17



12/07/17 – Eastern Shore Natural Gas Co (#202)

Case Summary

Operator	EASTERN SHORE NATURAL GAS CO
Case Number	120170088
Case Type	Notice of Amendment
Subject(s)	Construction - Gas Pipelines
Region	Eastern
Date Opened	05/11/17
Status	CLOSED
Date Closed	12/07/17



12/07/17 – Columbia Midstream Group, LLC (#203)

Case Summary

Operator	COLUMBIA MIDSTREAM GROUP, LLC
Case Number	120170094
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Hazardous Liquid Pipelines
Region	Eastern
Date Opened	12/14/17
Status	CLOSED
Date Closed	12/14/17



12/16/17 – Danville, City of (#204)

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Case Summary

Operator	DANVILLE, CITY OF
Case Number	120170025W
Case Type	Warning Letter
Subject(s)	Procedure Manuals - Gas Pipelines
Region	Eastern
Date Opened	12/16/17
Status	CLOSED
Date Closed	12/16/17



12/20/17 – Oneok NGL Pipeline, LLC (#205)

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Case Summary

Operator	ONEOK NGL PIPELINE, LLC
Case Number	120115038S
Case Type	Notice of Proposed Safety Order
Region	Central
Date Opened	06/15/13
Status	CLOSED
Closed Order Date	08/06/13
Date Closed	12/20/17



12/20/17 – ANR Pipeline Co (#206)

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Case Summary	
Operator	ANR PIPELINE CO
Case Number	220071003M
Case Type	Notice of Abandonment
Subject(s)	Integrity Management - Gas Pipelines
Region	Central
Date Opened	03/16/17
Status	CLOSED
Date Closed	12/20/17



12/20/17 – Columbia Gas Transmission LLC (#207)

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Case Summary	
Operator	CHITTAWOOD GAS CO
Case Number	228173081W
Case Type	Warning Letter
Subject(s)	National Pipeline Reasoning System Personnel Qualifications and Training - LNG Facilities
Region	Southern
Date Opened	12/28/17
Status	CLOSED
Date Closed	12/28/17



12/21/17 – Transcontinental Gas Pipe Line Company (#208)

Case Summary

Operator	TRANSCONTINENTAL GAS PIPE LINE COMPANY
Case Number	1301710006
Case Type	Warning Letter
Subject(s)	Welding - Gas Pipelines
Region	Eastern
Date Opened	11/21/17
Status	CLOSED
Date Closed	11/21/17

Williams provided 2016-2017 welder qualification records, which included Form WGP-0120 WISOP Welder Qualification Records (WGP-0120), and Form WGP-0140 WISOP Weld Inspection Film Report (WGP-0140).

The WGP-0120s documented that two welders were destructively qualified under the applicable procedure on September 17, 2016 and on September 19, 2016 at Station 175. Both welders were subsequently requalified by non-destructive examination (NDE) on November 23, 2016 per the requirements of § 192.229(c)(1) and Williams Procedures.

The WGP-0140s showed the acceptability of the welds under API 1104 Section 9. However, the November 23, 2016 forms did not properly identify the welders who performed the qualification welds. Typically, the radiographic inspection report utilized for welder requalification will include the following information, but not limited to:

- Objective for record keeping purposes
- Welder identification – name and/or last four digits of his social security
- Welder number or an assigned project strand in order to establish continuity

During the inspection exit meeting and in subsequent follow-up requests, Williams conveyed that it could not provide any documentation directly tying the two welders in question to the requalification welds and/or associated NDE records provided.

Therefore, Williams failed to maintain adequate documentation of two welders to support welder requalification, per the requirements of § 192.229(c) - API Std. 1104.



12/28/17 – Plains Pipeline, LP (#209)

Case Summary

Operator	PLAINS PIPELINE, LP
Case Number	420139007
Case Type	Proposed Civil Penalty Proposed Compliance Order Warning Letter
Subject(s)	Construction - Hazardous Liquid Pipelines Corrosion Control - Hazardous Liquid Pipelines Fire Protection - Hazardous Liquid Pipelines Operations and Maintenance - Hazardous Liquid Pipelines Procedure Manuals - Hazardous Liquid Pipelines
Region	Southwest
Date Opened	04/05/13
Status	CLOSED
Proposed Civil Penalty	\$102,400
Assessed Civil Penalty	\$102,900
Collected Civil Penalty	\$102,900
Basis for penalty reduction	Operator provided additional evidence
Compliance Order	Yes
Final Order Date	05/22/13
Date Closed	12/28/17



12/28/17 – Chattanooga Co (#210)

Case Summary

Operator	CHATTANOOGA GAS CO
Case Number	228LT3081W
Case Type	Warning Letter
Subject(s)	National Pipeline Reasoning System Personnel Qualifications and Training - LMS Facilities
Region	Southern
Date Opened	12/28/17
Status	CLOSED
Date Closed	12/28/17

