

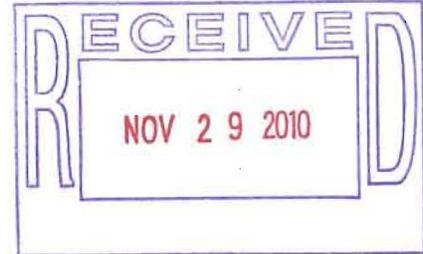


ONEOK NGL PIPELINE, L.L.C.

A SUBSIDIARY OF ONEOK PARTNERS, L.P.

November 24, 2010

Mr. R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074



RE: No. 4-2010-5016S

Dear Mr. Seeley:

ONEOK NGL Pipeline, L.P. respectfully submits this response to the subject Notice of Proposed Safety Order, received by ONEOK on November 16, 2010. This letter also serves as notification of ONEOK's intent to comply with the terms of the Notice, as proposed.

ONEOK appreciates that PHMSA representatives have been consistently available to discuss the cause of the accident and alternatives for further integrity evaluation. The communication between PHMSA and ONEOK representatives resulted in early identification of and agreement on the actions that most effectively confirm pipeline integrity and safe operation. Subsequently, ONEOK has made significant progress toward completing the actions outlined in the Notice, and has not identified any issues, per PHMSA regulatory guidelines, that affect operation of the pipeline at the previously established MOP (the line is still being operated at 80% of the pressure at the time of release). Progress related to each proposed action is provided in the attachment.

ONEOK also requests that an informal consultation be scheduled, as soon as possible following the Thanksgiving holiday, to review the details of actions completed, the status of actions still underway, and plans for future action.

Sincerely,

Wes Christensen
Senior Vice President – NGL Operations
ONEOK NGL Pipeline, L.P.
Attachment

100 West Fifth Street • Tulsa, OK 74103-4219

P.O. Box 871 • Tulsa, OK 74102-0871

(918) 588-7432 • Fax: (918) 588-7072

www.oneok.com

ONEOK Response to PHMSA No. 4-2010-5016S

Proposed Corrective Measures	Status	Remarks
1. ONEOK must perform the appropriate tests, analyses, and evaluation to establish probable cause of the accident as required in 195.402(c) (5).	Complete	Informal documentation has been submitted. Formal documentation to be submitted as required by Notice.
2. ONEOK must compare the previous ILI runs performed on the Sterling 1 Medford to Nevada Segment, identify specific areas where accelerated corrosion may be occurring, and remediate those areas in accordance with a plan approved by the Director.	Complete	Growth analysis of each pipeline segment from Medford to Nevada is complete. No ILI-predicted anomalies, even with growth applied, were calculated to have an SOP less than MOP at the location. Although no field evaluations were required due to SOP < MOP, locations were selected for field confirmation. Field confirmations are complete on Durant to Nevada. Field confirmations are being completed on the other 3 segments, and may be completed prior to the holiday. No areas of Microbiological Influenced Corrosion (MIC) have been identified.
3. ONEOK must perform an integrity assessment on the segment of the Sterling 1 pipeline from Durant, OK Station to Nevada Station near Royce City, TX to identify areas of accelerated corrosion and remediate those areas in accordance with a plan approved by the Director.	Ongoing	The ILI was completed on November 9, 2010. The vendor has submitted the preliminary report and no digs were required per 195.452 criteria. However, 2 locations were selected for field confirmation and are complete. The final report has not been received.

<p>4. Until the time that ONEOK receives approval from the Director to operate at operating pressures up to the established MOP of 1335 psig, ONEOK must operate the segment from Durant, OK Station to Nevada Booster Station at no more than 1064 psig discharge pressure at the Durant, OK Station, which is 80% of the operating pressure at the time of the accident.</p>	<p>Still being maintained</p>	<p>No anomalies have been identified through growth analysis, remaining strength calculations, field evaluations following growth analysis, or data from the recent ILI preliminary report that have an SOP < MOP at the location, using the previously established MOP of 1335 psig.</p>
<p>5. Within 30 days after a safety order is issued, develop and submit to the Director for approval, a written remedial work plan that includes corrective measures.</p>	<p>Not yet applicable</p>	<p>Due to discussions and agreement between PHMSA and ONEOK, a significant amount of progress has been made toward completing actions that will likely be included in the referenced plan, following the receipt of the safety order.</p>
<p>6. Revise the remedial work plan as necessary to incorporate new information obtained during the evaluations and associated remedial activities. Submit any such plan revisions to the Director for prior approval. The Director may approve plan elements incrementally. The remedial work plan shall become incorporated into the safety order.</p>	<p>Will comply as needed.</p>	
<p>7. Implement the work plan as it is approved by the Director, including any revisions to the plan.</p>	<p>Will comply</p>	<p>As stated, progress is already being made per PHMSA and ONEOK communication, prior to formal plan submission and approval.</p>
<p>8. Submit quarterly reports to the Director</p>	<p>Will comply as needed</p>	

9. The Director may grant an extension of time for compliance with any of the terms of the safety order upon a written request timely submitted demonstrating good cause for an extension.	No ONEOK action required, at this time	
10. Respondent may appeal any decision of the Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.	No ONEOK action required, at this time	