

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 16, 2014

Mr. Michael Pearson
Senior Vice President, Technical Services
Magellan Pipeline Company, LP
One Williams Center, MD 27,
P. O. Box 22186, Mail Drop 27
Tulsa, OK 74172

CPF 4-2014-5036W

Dear Mr. Pearson:

On March 31 – April 4, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected your Control Room Management Program in Tulsa, Oklahoma.

As a result of the inspection, it appears that you have committed § 195.446(a) of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. § 195.446 Control room management.

- (a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...**

Magellan did not follow its written control room management procedures by not documenting their controller's simulator training which was provided on August 23, 2013. Magellan stated

that because of the addition of nine new pump stations and the modification of two pump stations on the Longhorn pipeline; controllers were provided simulator training due to the changes in operational parameters. This training was not documented by the operator.

Magellan's Operations Control Training Procedure – 9.02-ADM-083, section 3.1.5 states:

“The Controller Trainee shall document attendance at training sessions on the Training Attendance Roster.”

There was no Training Attendance Roster for the Longhorn simulator training. Correspondence with operator after inspection indicated that the procedure will be revised to designate the event Trainer as the responsible party to ensure all training is documented, and will provide the documentation to the Application Analyst for record retention.

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. 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 item(s) identified in this letter. Failure to do so will result in Magellan being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2014-5036W**. 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).

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Response Options for Pipeline Operators in Compliance Proceedings*