



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 20, 2007

Mr. Ross Parker
Regional Director
GTN and North Baja Systems
1400 SW 5th Ave., Suite 900
Portland, WA 97201

SENT TO COMPLIANCE REGISTRY
Hardcopy Electronically
of Copies 1 / Date 4/20/07

CPF No. 5-2007-0015W

Dear Mr. Parker:

Between November 13 and December 1, 2006, a representative of the Washington Utilities and Transportation Commission (WUTC) acting as an agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Section 60106(a) of Title 49, United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities in Washington State.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192. The probable violations are:

1. **§192.619 Maximum allowable operating pressure: Steel or plastic pipelines.**
 - (a) **Except as provided in paragraph (c) of this section, no person may operate a segment of steel or plastic pipeline at a pressure that exceeds the lowest of the following:**
 - (3) **The highest actual operating pressure to which the segment was subjected during the 5 years preceding July 1, 1970 (or in the case of offshore gathering lines, July 1, 1976), unless the segment was tested in accordance with paragraph (a) (2) of this section after July 1, 1965 (or in the case of offshore gathering lines, July 1, 1971), or the segment was updated in accordance with Subpart K of this part.**

GTN's A-Line (36-inch) was installed and tested in 1960. GTN was unable to provide all pressure records for the 5 year period immediately preceding July 1, 1970. Some partial records were made available from GTN's Portland office. The pipeline segments in Washington State may not have operated at the current MAOP during the 5 years preceding July 1, 1970 and GTN may have a lower regulatory-based MAOP than they are currently using.

2. §192.615(b) Emergency plans.

(b) Each operator shall:

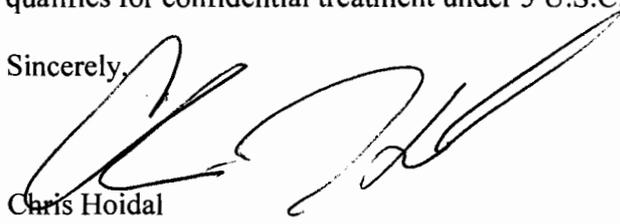
- (1) **Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.**

There was no Emergency manual on-site in the Starbuck compressor station. Apparently the operations supervisor keeps the E-plan in his vehicle which is not always present and on-site. TransCanada procedure OMI V-2 states "each supervisor shall keep the emergency procedures manual in each office in a clearly designated location. It could be argued that TransCanada does not consider the Starbuck compressor station to be an office. The issue is that there are people working there periodically and the supervisor may or may not be present. Therefore, the manual would not always be on-site in an emergency until the supervisor arrived.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any 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 GTN 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 5-2007-0015W**. 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,



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

cc: Alan Rathbun, WUTC
David Lykken, WUTC
PHP-60 Compliance Registry
PHP-500 Tom Finch