



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 20, 2007

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

SENT TO COMPLIANCE REGISTRY

Hardcopy  Electronically   
# of Copies 1 / Date 4/20/07

**CPF No. 5-2007-0016M**

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.

On the basis of the inspection, PHMSA identified the apparent inadequacies found within GTN's plans or procedures, as described below:

**1. §192.715 Transmission lines: Permanent field repair of welds.**

*Each weld that is unacceptable under §192.241(c) must be repaired as follows:*

- (a) If it is feasible to take the segment of transmission line out of service, the weld must be repaired in accordance with the applicable requirements of §192.245.*
- (b) A weld may be repaired in accordance with §192.245 while the segment of transmission line is in service if:
  - (1) The weld is not leaking;*
  - (2) The pressure in the segment is reduced so that it does not produce a stress that is more than 20 percent of the SMYS of the pipe; and*
  - (3) Grinding of the defective area can be limited so that at least 1/8-inch (3.2 millimeters) thickness in the pipe weld remains.**

***(c) A defective weld which cannot be repaired in accordance with paragraph (a) or (b) of this section must be repaired by installing a full encirclement welded split sleeve of appropriate design.***

GTN did not have procedures in their O&M manual that would allow them to implement a three part weld repair procedure. This would require repair of welds by reducing pressure first, using bolt on clamps or taking the pipeline out of service.

**2. §192.717 Transmission lines: Permanent field repair of leaks.**

***Each permanent field repair of a leak on a transmission line must be made by-***

***(a) Removing the leak by cutting out and replacing a cylindrical piece of pipe; or***

***(b) Repairing the leak by one of the following methods:***

***(1) Install a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS.***

***(2) If the leak is due to a corrosion pit, install a properly designed bolt-on-leak clamp.***

***(3) If the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size.***

***(4) If the leak is on a submerged offshore pipeline or submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design.***

***(5) Apply a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe.***

GTN did not have procedures in their O&M manual that would allow them to follow regulatory criteria when repairing field leaks. This criterion is outlined in 192.717(a) through (b) (5).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within [number of days] days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 5-2007-0016M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hoidal". The signature is fluid and cursive, with a large initial "C" and "H".

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

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

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