



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED [70063450000171041852]

November 21, 2011

Mr. Larry Conti
Vice President – Operations and Gas Control
Questar Pipeline Company
180 E. 100 South
Salt Lake City, UT 84145-0360

CPF 5-2011-1010M

Dear Mr. Conti:

On May 9–13, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Arizona Corporation Commission (ACC), pursuant to Chapter 601 of 49 United States Code, inspected Questar Pipeline Company's (Questar) procedures for operations, maintenance, and emergency response in Salt Lake City, Utah.

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

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (8) **Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found.**

The Questar O&M manual did not contain a procedure for periodic review of the work performed by operator personnel to determine the effectiveness and adequacy of the procedures. The Questar O&M manual did not describe when or how the procedures are to be reviewed, as required by § 192.605(b)(8).

2. **§192.614 Damage prevention program.**
 - (c) **The damage prevention program required by paragraph (a) of this section must, at a minimum:**
 - (6) **Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:**
 - (ii) **In the case of blasting, any inspection must include leakage surveys.**

The Questar damage prevention program did not reference blasting as a condition to trigger a leak inspection, as required by § 192.614(c)(6)(ii).

3. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.**

Questar operates a transmission line which is in a Class 3 Area for more than 50% of its length downstream from a Class 3 area. Questar's sister company, Questar Gas Company (QGC) odorizes as is required; however, Questar does not have any procedures to monitor and measure the effectiveness of the odorization. Pursuant to § 192.605(b)(1), an operator must have procedures for each of the requirements of this subpart and Subpart M. Section 192.625(f) requires the operator to conduct periodic sampling to verify proper odorization. The Questar O&M manual did not have an odorization procedure describing how periodic sampling is to occur, and instead relied on its sister company to conduct periodic sampling.

4. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.**

The Questar O&M manual did not include a section required to inspect the right-of-way, or how the right-of-way is to be inspected. Questar's procedures pertaining to Part 192.14 are inadequate because Questar did not clearly indicate that inspections of the right-of-way are required to be conducted.

5. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

All repairs made by welding in accordance with §§ 192.713, 192.715, 192.717 must be examined. The Questar O&M Manual did not include a section that specifically describes the process of how “non-destructive” testing of repair sleeves is to occur, as required by § 192.719(b).

6. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

The Questar O&M manual did not provide specific examples for appropriate locations for warning sign postings, as required per § 192.751(c). The procedure did not state where warning signs should be posted to minimize the danger of accidental ignition of gas.

7. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

The Questar manual did not include specific language to quantify the term “prompt”, when referencing monitoring of external corrosion control, § 192.465(d).
If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion, as required per § 192.479. The Questar manual did not state how protection against corrosion is to be performed.

8. **§192.615 Emergency Plans.**
(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
(1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.

The Questar O&M manual did not reference any emergency events that would require an immediate response from the operator, as required by §192.615(a)(1). The manual did not contain the procedures required for receiving, identifying, and classifying notices of events requiring immediate response.

9. §192.615 Emergency Plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(9) Safely restoring any service outage.

The Questar O&M manual did not contain instructions describing how service outages are to be restored after the emergency has been rendered safe. Questar's procedures are inadequate pertaining to §192.615(a)(9) because Questar did not describe how service outages are to be restored after an emergency.

10. §192.615 Emergency Plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(10) Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.

The Questar O&M manual did not contain language requiring that accidents be investigated as soon as possible after the emergency.

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 ninety 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.

It is requested (not mandated) that Questar Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Chris Hoidal, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2011-1010M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Hoidal", written in black ink.

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

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

cc: PHP-60 Compliance Registry
PHP-500 D. Hubbard (#132781)