

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 12, 2012

Mr. Wes Christensen
Senior Vice President, NGL Operations
ONEOK Partners, NGL Pipeline L.P.
100 West Fifth Street
Tulsa, OK 74102

CPF 4-2012-5029M

Dear Mr. Christensen:

On September 2011 through January 2012, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected ONEOK Partners, L.P. (ONEOK) Operations and Maintenance Plan procedures in Tulsa and Medford, OK.

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

1. **§ 195.402 Procedural manual for operations, maintenance, and emergencies.**
(d) *Abnormal operation.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

(5) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

ONEOK's procedure for reviewing personnel does not mention the documentation of the periodic review of the response of operating personnel to determine the effectiveness of where deficiencies are found.

In reviewing ONEOK's Procedure 4.0 Abnormal Operations, Periodic Review, the procedure does not mention the documentation of the periodic review of the response of operating personnel to determine the effectiveness of the procedures controlling abnormal operations and taking corrective action where deficiencies are found. The procedure needs to be amended to include the date, the name of the personnel being reviewed, deficiencies found and any corrective actions taken to verify compliance with §195.402(d)(5).

2. § 195.402 Procedural manual for operations, maintenance, and emergencies.

- (a) *General.* Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

§ 195.452 Pipeline integrity management in high consequence areas.

(h) *What actions must an operator take to address integrity issues? (1) General requirements.* An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with §195.422 when making a repair.

(2) *Discovery of condition.* Discovery of a condition occurs when an operator has adequate information about the condition to determine that the condition presents a potential threat to the integrity of the pipeline. An operator must promptly, but no later than 180 days after an integrity assessment, obtain sufficient information about a condition to make that determination, unless the operator can demonstrate that the 180-day period is impracticable.

ONEOK's procedure to evaluate and correlate ILI data for validating ILI Tool runs does not mention the documentation of all data collected. In reviewing ONEOK's Procedure 52: ILI Data Evaluation and Correlation, the procedure does not mention the documentation of all data that is collected or verified to validate the ILI Tool runs. ONEOK needs to amend their procedure to include the documentation of all validation items mentioned in their procedure to comply with 195.452(h)(2).

3. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

§ 195.452 Pipeline integrity management in high consequence areas.

c) What must be in the baseline assessment plan? (1) An operator must include each of the following elements in its written baseline assessment plan:

(i) The methods selected to assess the integrity of the line pipe. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.

(A) Internal inspection tool or tools capable of detecting corrosion and deformation anomalies including dents, gouges and grooves;

ONEOK's tool run evaluation procedure, NGL Integrity Management Program Manual, Procedure 51: In-Line Inspection, Appendix A: ILI Vendor Requirements & Specifications, Section A.2.0, is inadequate to demonstrate the ILI tool run was an effective assessment.

ONEOK's Integrity management procedures are not specific enough to demonstrate that the ILI tool run was an effective assessment. The procedure needs to be amended to include documentation of the evaluations and the specified acceptance criteria for a successful ILI run.

4. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

The operator does not have adequate procedures for tracking and documenting abnormal operating conditions (AOCs) that could possibly affect the operation and integrity of the pipeline. ONEOK has been documenting reported AOCs in the Station Log/Abnormal Operation Report which is very difficult to track. AOCs are not differentiated in the Station Log from other varying conditions that do not fall in the category of an AOC.

ONEOK needs to amend their procedure to adequately track and document AOCs that could affect the operation and integrity of the pipeline.

5. § 195.402 Procedural manual for operations, maintenance, and emergencies.

- (a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

§ 195.442 Damage prevention program.

- (a) Except as provided in paragraph (d) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purpose of this section, the term “excavation activities” includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, or other earthmoving operations.**

In reviewing ONEOK’s procedure 5.2 – Foreign Structure Crossing, the procedure does not require the operator to inspect the pipeline for damage due to possible “excavation activities” in the vicinity of the pipeline. Excavation activities are defined in Part 195.442(a) of the pipeline regulation. In addition, there is no follow-up process for verifying one-call tickets have been established prior to third party damage. Finally, there was no procedure requiring the field technician to document status updates in the Dig Track database which is utilized by ONEOK to track the completion of one-call tickets.

ONEOK needs to amend their procedures to include the inspection of their pipelines for damage whenever there is suspected third party excavation. The procedures also need to be amended to include verification of one-call tickets after third party damage and to require the technician to utilize the Dig Track database to track the completion of one-call tickets.

6. § 195.402 Procedural manual for operations, maintenance, and emergencies.

- (a) *General.* Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

§ 195.446 Control room management.

- (b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

In reviewing ONEOK's Procedure "2.2 Classifying and Notification Procedures" and the PLM training power point in response to a leak detection, the procedure was deemed inadequate. The procedure does not require the controller to contact a leak detection engineer in accordance with the PLM training provided. The PLM trains the controller to contact a leak detection engineer whenever a leak is detected.

ONEOK needs to amend the procedure to require the controller to contact a leak detection engineer whenever a leak is detected.

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 30 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 ONEOK maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2012-5029M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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