

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 31, 2016

Wes Christensen
Vice President, NGL Operations
ONEOK NGL Pipeline, LLC
100 West Fifth Street
Tulsa, Oklahoma 74102

CPF 4-2016-5006W

Dear Mr. Christensen:

Between the dates of January 2015 through March 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code reviewed the details of an accident that occurred in your Helena Pump Station on May 1, 2014 in Alfalfa, Oklahoma.

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

1. **§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.**

ONEOK NGL Pipeline (ONEOK) failed follow their written operations and maintenance procedural manual for preparing and following a stopple plan (PRC1602.202 Stopple Procedures) and by failing to communicate the most recent versions of the procedures in effect. On May 1, 2014, ONEOK experienced a 176 barrel leak of NGL through a flange assembly while installing a bypass within their Helena Pump Station using an older version of a stopple procedure. In addition, ONEOK was unable to provide a copy of the written stopple plan in place at the time of the stopple procedure on May 1, 2014.

2. 195.505(a) Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks;

ONEOK NGL Pipeline (ONEOK) failed to identify Joining of Pipe – Flange Assembly as a covered task in their written Operator Qualification Plan. The ONEOK covered task list did not include a task for installing/repairing flange assemblies within their pipeline system. On May 1, 2014, ONEOK experienced a 176 barrel leak of NGL through a flange assembly while installing a bypass within their Helena Pump Station.

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. Also, for LNG facilities, an additional penalty of not more than \$50,000 for each violation may be imposed. 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 ONEOK NGL 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 4-2016-5006W**. 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