



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 24, 2011

Mr. Richard Hatchett
V. P. of Operations
West Texas Gas, Inc.
Western Gas Interstate Co.
WTG-Hugoton, LP
211 North Colorado
Midland, TX 79701-4607

CPF 4-2011-1013W

Dear Mr. Hatchett:

On April 25-28, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your West Texas Gas, Inc., Western Gas Interstate Co and WTG-Hugoton, LP (WTG) Operator Qualification Program in Amarillo, TX.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. §192.807 Recordkeeping.

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

(2) Identification of the covered tasks the individual is qualified to perform;

WTG uses EnergyWorldNet for database storage and maintenance of OQ records and keeps various worksheets in-house to track and accumulate information pertinent to the OQ program, but these resources are not well-linked or integrated so that everyone within the company has consistent information and access to the information. Due to these inconsistencies and the fact

that both sources are not synced together, it is difficult to track an individual's qualification for a specific covered task.

In review of the employee qualifications from the Dalhart and Guymon Districts, it was discovered that numerous individuals were no longer qualified in core covered tasks. When PHMSA inspectors inquired into the reasoning behind the 'not qualified' status, WTG stated the individual or individuals no longer performs the tasks in question. WTG fails to meet the requirements of the code.

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 WTG 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 4-2011-1013W**. 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