



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

**NOTICE OF PROBABLE VIOLATION  
and  
PROPOSED COMPLIANCE ORDER**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

June 19, 2008

Mr. Perry Richards  
General Manager  
Questar Gas Management  
1050 17<sup>th</sup> Street, Suite 500  
Denver, CO 80265

**CPF 5-2008-5019**

Dear Mr. Richards:

On April 23, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Integrity Management Program (IMP) near Lyman, Wyoming.

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. §195.452 Pipeline integrity management in high consequence areas.**

**(b) What program and practices must operators use to manage pipeline integrity?**

**Each operator of a pipeline covered by this section must:**

**(3) Include in the program a plan to carry out baseline assessments of line pipe as required by paragraph (c) of this section.**

**(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;**
- (B) Pressure test conducted in accordance with subpart E of this part;**
- (C) External corrosion direct assessment in accordance with §195.588; or**
- (D) Other technology that the operator demonstrates can provide an equivalent understanding of the condition of the line pipe. An operator choosing this option must notify the Office of Pipeline Safety (OPS) 90 days before conducting the assessment, by sending a notice to the address or facsimile number specified in paragraph (m) of this section.;**
- (ii) A schedule for completing the integrity assessment;**
- (iii) An explanation of the assessment methods selected and evaluation of risk factors considered in establishing the assessment schedule.**
- (2) An operator must document, prior to implementing any changes to the plan, any modification to the plan, and reasons for the modification.**

Questar Gas Management (QGM) completed a pressure test of their propane line as a baseline assessment in July of 2005. The pressure record provided to our inspector indicated that the test was not conducted in accordance with 49 CFR Part 195, Subpart E. The test pressure was only maintained for four hours on a pipeline that could not be visually inspected. Buried lines must be tested for at least eight hours. In addition, nitrogen was inappropriately used as the test medium.

#### Proposed Compliance Order

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Questar Gas Management. Please refer to the *Proposed Compliance Order* that is enclosed and made a part of this Notice.

#### Response to this Notice

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.

In your correspondence on this matter, please refer to **CPF 5-2008-5019** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



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

Enclosures: *Proposed Compliance Order*  
*Response Options for Pipeline Operators in Compliance Proceedings*

cc: PHP-60 Compliance Registry  
PHP-500 H. Nguyen (#121193)

## PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Questar Gas Management a Compliance Order incorporating the following remedial requirements to ensure the compliance of Questar Gas Management with the pipeline safety regulations:

1. In regard to Item Number 1 of the Notice pertaining to your pipeline systems, Questar Gas Management must conduct a pressure test in accordance with Part 195 Subpart E.
2. **Within 60 days of issuance of the Final Order, Questar Gas Management must complete the above items, and submit the required documentation and procedures to the Director, Western Region, Pipeline and Hazardous Materials Safety Administration, 12300 West Dakota Avenue, Suite 110, Lakewood, Colorado 80228.**
3. Questar Gas Management shall maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Chris Hoidal, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. Costs shall be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.