

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

October 29, 2018

Mr. Wes Christensen
Senior Vice President, Operations
ONEOK Gas Transportation, LLC
100 West Fifth Street
Tulsa, OK 74103

CPF 1-2018-0005M

Dear Mr. Christensen:

From April 5 – 8, 2018 a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected ONEOK Gas Transportation, LLC's (ONEOK's) procedures for Functional Integrity of Underground Natural Gas Storage in Tulsa, Oklahoma. Specifically, the Edmond Storage field in Edmond, Oklahoma was inspected.

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

1. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

ONEOK's written procedures for operations, maintenance and emergencies implementing the requirements of API RP 1171 were inadequate. Specifically, ONEOK's written procedures for annular pressure monitoring did not specify that ONEOK must monitor all types of wells for annular pressures in accordance with API RP 1171, Section 9.3.2, Well Integrity Monitoring. ONEOK informed PHMSA that only observation type wells were monitored for annular pressures.

2. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

ONEOK's written procedures for operations, maintenance and emergencies implementing the requirements of API RP 1171 were inadequate. Specifically, ONEOK's written procedures for thresholds for annular pressure monitoring did not define thresholds for annular pressures in accordance with API RP 1171, Section 9.3.2, Well Integrity Monitoring. Thresholds are necessary to be defined to know if and when further evaluations are necessary for annular pressures.

3. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

ONEOK's written procedures for operations, maintenance and emergencies implementing the requirements of API RP 1171 were inadequate. Specifically, ONEOK's written procedures for emergency responses did not reference its application to underground natural gas storage facilities in accordance with API RP 1171, Section 10.6.1, Emergency Preparedness/Emergency Response Plan. ONEOK's emergency response plan only alluded to gas transmission pipeline facilities.

4. § 192.12 Underground natural gas storage facilities.

(e) Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.

ONEOK's written procedures for operations, maintenance and emergencies implementing the requirements of API RP 1171, were inadequate. Specifically, ONEOK's procedures for operations, maintenance, and emergencies (OM&E) were inadequate because the OM&E manual was incomplete and not finalized, as required to be completed by January 18, 2018.

Written procedures for the operations and maintenance manual were required by January 18, 2018, in accordance with § 192.12(d). During the inspection, ONEOK presented procedures for "Wellhead Valve Inspection and Maintenance Procedure" that were incomplete and in "DRAFT" form.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 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 Gas Transportation, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2018-0005M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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