



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

233 Peachtree Street Ste. 600
Atlanta, GA 30303

**NOTICE OF PROBABLE VIOLATION
AND
PROPOSED CIVIL PENALTY**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 6, 2008

Mr. David Goodwin
Vice President Compliance & Operations
Texas Gas Transmission, LLC
9 Greenway Plaza, Suite 2800
Houston, Texas 77046

CPF No. 2-2008-1004

Dear Mr. Goodwin:

On November 9, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, conducted an investigation of the incident (NRC#852967) at the Texas Gas Transmission (TGT) compressor station in Slaughters, Kentucky. The incident occurred on October 29, 2007 in which an employee was injured.

As a result of the investigation, it appears that you have committed probable violations as noted below of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The item reviewed and the probable violation is:

§192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

The Texas Gas Procedures, (T.70.53.01.07, Section 5.0 Running Pigs), requires that a site specific plan be prepared for running the pig which is to include:

- Launching the pig.
- Running the pig including controlling the speed, when required.
- Handling liquids and/or material received.
- Removing the pig from the trap.
- Addressing all safety concerns.

TGT employees were in the process of running two cleaning pigs in its 26-inch mainline on the discharge side of the Slaughters Compressor Station in Kentucky. TGT recognized that the second cleaning pig was not running properly. The pig trap was blown down to investigate the operation of the second cleaning pig. The employees did not have a way of determining the pressure inside of the pig trap prior to opening the door. When TGT employees opened the door to check the location of the pig, the pig dislodged, broke the door off and pinned an employee to a backhoe that was approximately 4 feet behind the launcher.

As a result of the incident, the TGT employee who was injured lost his leg. TGT determined that the second cleaning pig blocked a section of the blow-off piping and did not allow for full relief of the gas pressure in the pig trap. TGT did not follow *procedures requiring a site specific plan for the pigging operation performed at the Slaughters Compressor Station in Kentucky.*

Proposed Civil Penalty

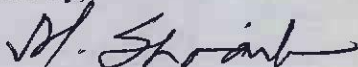
Under 49 United States Code § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation and has recommended that you be preliminarily assessed a civil penalty of \$100,000.

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 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 No. 2-2008-1004** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



Mohammed Shoab
Acting Director, Southern Region
Pipeline and Hazardous Materials Safety Administration

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