

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 2, 2013

Ms. Meredith D. West
Joint Interest Director
Collins Pipeline Company
800 Bell Street
Houston, Texas 77002

CPF 2-2013-5003M

Dear Ms. West:

From November 5-8, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety, Southern Region inspected the Collins Pipeline Company (Collins) pipeline system's written Operations and Maintenance (O&M) procedures in Collins, Mississippi, pursuant to Chapter 601 of 49 United States Code.

On the basis of the inspection, PHMSA has identified an apparent inadequacy within the Collins written O&M procedures as described below:

- 1. §195.52 Immediate notice of certain accidents.
... (c) Calculation. A pipeline operator must have a written procedure to calculate and provide a reasonable initial estimate of the amount of released product.**

Collins' written O&M procedures regarding the reporting of certain accidents did not allow Collins to adequately calculate and provide a reasonable initial estimate of the amount of released product for all circumstances.

Collins' written O&M procedure *DOT Liquid Manual, Part 195-Subpart B Procedure 195.52 Immediate Notice of Certain Accidents* provided a formula "*For liquid spills if the volume is not otherwise easily estimated.*" The formula allows for the calculation of a spilled liquid volume in contaminated soil by multiplying the calculated contaminated soil volume by a porosity factor to determine an initial spill volume. The procedure did not, however, provide a means for the reasonable initial estimate of the amount of released product to be calculated when a release occurs in water, at night, in limited visibility conditions, and/or other possible release scenarios.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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.

If, after opportunity for a hearing, 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. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacy identified herein has been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Collins Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Wayne T. Lemoi, Director, Southern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 2-2013- 5003M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region

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