



US Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St. S.W.
Washington, D.C. 20590

MAR - 4 2003

Mr. Greg Bilinski
Vice President - Transmission & Engineering
Texas Eastern Transmission Corporation
5400 Westheimer Court
Houston, TX 77056

Re: CPF No. 3-2003-1005-H

Dear Mr. Bilinski:

Enclosed is a Corrective Action Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It requires you to take certain corrective actions, including a pressure reduction, with respect to your Line 1 crossing at the Mississippi River in Scott County, Missouri. Service is being made by certified mail and facsimile. Your receipt of this Order constitutes service of that document under 49 C.F.R. § 190.5. The terms and conditions of this Corrective Action Order are effective upon receipt.

Sincerely,

Gwendolyn M. Hill
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED) AND TELECOPY

**DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
WASHINGTON, DC 20590**

In the Matter of _____
Texas Eastern Transmission Corporation, _____
Respondent. _____

CPF No. 3-2003-1005-H

CORRECTIVE ACTION ORDER

Purpose and Background

This Corrective Action Order is being issued, under authority of 49 U.S.C. § 60112, to require Texas Eastern Transmission Company (Respondent) to take the necessary corrective action to protect the public, property, and the environment from potential hazards associated with a leak on Respondent's Line 1 that crosses the Mississippi River in Scott County, Missouri, approximately 15 miles south of Cape Girardeau, Missouri.

On February 20, 2003, Respondent reported a leak on its high pressure natural gas pipeline into the Mississippi River. The cause of the failure has not yet been determined. The leak has not yet been repaired. Pursuant to 49 U.S.C. § 60117, the Central Region, Office of Pipeline Safety (OPS) initiated an investigation of the incident.

Preliminary Findings

1. On February 20, 2003, at approximately 9:00 A.M. CST, Texas Eastern Transmission Corporation received a call at its SCADA control center from employees of a nearby rock quarry informing Respondent of a possible leak at Respondent's pipeline in Scott County, Missouri under the Mississippi River. Respondent reported to the National Response Center that a leak had been discovered in a pipeline segment located in the Mississippi River, approximately 15 miles south of Cape Girardeau, Missouri
2. Respondent used divers to verify the leak was from Respondent's pipeline, and not from a Texas Eastern Products Company pipeline that also crosses the Mississippi at the same location. The divers found 100 feet of exposed pipe and a pinhole leak emanating from beneath a river weight. Respondent described the leak as a small but steady stream of bubbles that is not causing the water to boil.

3. The leak is in Respondent's Line 1, which runs from Longview, Texas to Staten Island, New York. The leak is located approximately 100 feet from the west bank of the Mississippi. The area where the leak occurred is approximately 15 miles south of Cape Girardeau, Missouri at Mile Post (MP) 448.07. This area is a rural area; however, there is a rock quarry on the west side of the river, and people work at the quarry. The nearest building to the leak location is approximately 1500 feet away.
4. There were no injuries, fatalities, or evacuations as a result of this leak. The Coast Guard has been redirecting river traffic to stay on the east side of the river until Respondent repairs the leak. Respondent also installed buoys to warn river traffic to stay away.
5. Respondent's preliminary assessment is that the leak may have resulted from a shifting river weight. The weights are a clam-shell type bolt-on weight. According to Respondent, in the area of the leak, the river weight appears to have rotated approximately 90 degrees. The bolts are normally located at the 3 and 9 o'clock positions but the bolts on this weight were located in the 12 and 6 o'clock positions. A possible explanation is that when the weight shifted, it rubbed the coating off and shielded the pipe from cathodic protection. Respondent verified that all the other river weights it had checked are still in the 3 and 9 o'clock positions.
6. The mainline valves are located on each side of the river and are approximately 4600 feet apart. The valve on the west side is located in the rock quarry, and the one on the east side is several hundred feet off the river bank.
7. During February 22-23, 2003, Respondent attempted to install a marine grade offshore bolt-on clamp but could not do so due to the rising water levels and an incoming cold front that created unfavorable river conditions for repair work. As interim measures, Respondent reduced the line pressure to 550 psig (70% of MAOP) and stated that it would keep the mainline valves attended around the clock.
8. Following the unsuccessful effort to repair the Line 1 crossing, Respondent decided on another plan to temporarily use another river crossing line until it can complete the Line 1 repairs. Respondent has a spare line that was removed from service two years ago after it sustained damage from an anchor. Respondent has maintained cathodic protection on that line. As part of this temporary measure, Respondent plans to tie in the spare line into the system. Respondent has begun repairs to the spare line and will hydrostatically test the line for integrity. Respondent anticipates March 8 or 9, 2003 as the completion date to place the spare line into service and to take the leaking crossing out of service.
9. The maximum allowable operating pressure (MAOP) of the line is 800 psig; the line had been operating at MAOP prior to Respondent being informed of the leak. The pipe is 24-inch, 0.500-inch w.t. with a yield strength of 37,000 psig. The line was installed in 1943.

10. The last internal inspection run on Line 1 was in 1993. Because of the bolt-on steel river weights, Respondent, in interpreting the data from the internal inspection tool, is unable to differentiate the interference from the extra metal and any metal loss.

Determination of Necessity for Corrective Action Order and Right to Hearing

Section 60112 of Title 49, United States Code, provides for the issuance of a Corrective Action Order, after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action as appropriate. The basis for making the determination that a pipeline facility is hazardous, requiring corrective action, is set forth both in the above referenced statute and 49 C.F.R. §190.233, a copy of which is enclosed.

Section 60112, and the regulations promulgated thereunder, provides for the issuance of a Corrective Action Order without prior opportunity for notice and hearing upon a finding that failure to issue the Order expeditiously will result in likely serious harm to life, property or the environment. In such cases, an opportunity for a hearing will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing preliminary findings of fact, I find that the continued operation of the Line 1 pipeline at the Mississippi River crossing in Scott County, Missouri, without corrective measures would be hazardous to life, property and the environment. Additionally, after considering the age of the pipe, the location of the leak at a river crossing, the proximity of the pipeline to vessel traffic, and the lack of a determination as to the cause for the leak, I find that a failure to expeditiously issue this Order, requiring immediate corrective action, would likely result in serious harm to life, property, and the environment.

Accordingly, this Corrective Action Order mandating needed immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Order are effective upon receipt.

Within 10 days of receipt of this Order, Respondent may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, delivered personally, by mail or by telecopy at (202) 366-4566. The hearing will be held in Kansas City, Missouri or Washington, D.C. on a date that is mutually convenient to OPS and Respondent.

After receiving and analyzing additional data in the course of this investigation, OPS may identify other corrective measures that need to be taken. In that event, Respondent will be notified of any additional measures required and amendment of this Order will be considered. To the extent consistent with safety, Respondent will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

Required Corrective Action

Pursuant to 49 U.S.C. § 60112, I hereby order Respondent to immediately take the following corrective actions with respect to its Line 1 at the Mississippi River Crossing in Scott County, Missouri:

- 1) Maintain an operating pressure not to exceed 70 percent of the maximum operating pressure. Specifically, the operating pressure is not to exceed 560 psig. This pressure restriction shall remain in effect until Respondent obtains written approval to return the pipeline to normal service from the Director, Central Region, OPS, as provided in paragraph 7 below.
- 2) Maintain site surveillance and continue to man the river crossing valves until the integrity of the river crossing has been verified.
- 3) Coordinate repair and pressure testing with the U.S. Coast Guard and U.S. Army Corps of Engineers, as applicable, so as to consider the safety of vessel traffic and other operations on the Mississippi River.
- 4) Re-evaluate any past leaks on this line in the river crossing, past in-line inspection tool runs, exposed pipe reports, past pressure tests, cathodic protection readings, river crossing patrols and inspections, pipe replacement, repairs, and other information relating to the integrity of the pipeline.
- 5) Submit a written return-to-service plan to verify the integrity of the entire river crossing. The plan must include a schedule for any evaluation or testing method Respondent plans to use. In addition, the plan must provide for any remediation of all known or suspected anomalies adverse to the safe operation of the pipeline.
- 6) The Regional Director must approve in advance each element of the plan. Approvals may be provided incrementally. Respondent must fully implement the Plan, as each element is approved, according to the plan schedule.
- 7) Respondent must obtain approval from the Director, Central Region, OPS to remove the pressure restriction set forth in this Corrective Action Order. Respondent must submit information that demonstrates that the hazard has been abated and that restoring the segment to its pre-leak operating pressure is justified based on an analysis showing that the pressure increase is safe considering all known defects, anomalies and operating parameters of the pipeline.

Respondent may appeal any decision of the Director, Central Region, OPS to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator are final.

The procedures for the issuance of this Order are described in Part 190, Title 49, Code of Federal Regulations, § 190.233, a copy of which is enclosed, is made part of this Order and describes the Respondent's procedural rights relative to this Order.

Failure to comply with this Order may result in the assessment of civil penalties of not more than \$100,000 per day and in referral to the Attorney General for appropriate relief in United States District Court.


Stacey Gerard
Associate Administrator
for Pipeline Safety

MAR - 4 2003

Date Issued