

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 5, 2018

Mr. Shawn Patterson
Chief Operations Officer
Southern Star Central Gas Pipeline, Inc.
4700 State Route 56
Owensboro, KY 42301

CPF 3-2018-1003W

Dear Mr. Patterson:

On August 31, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), received a Safety Related Condition Report (SRCR) regarding Southern Star Central Gas Pipeline, Inc. facilities (SSCGP) in Overland Park, KS.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

- 1. §192.619 Maximum allowable operation pressure: Steel or plastic pipelines.**
 - (a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following . . .**

SSCGP failed to operate a segment of steel pipeline at a pressure under the Maximum Allowable Operating Pressure (MAOP). SSCGP in a SRCR on August 31, 2017, informed PHMSA that on August 29, 2017, the Pressure Regulating Station in Overland Park, Kansas achieved a pressure of 321 psi. The MAOP of this pipeline is 260 psi; therefore, a pressure of 123% of MAOP was reached. Both the regulating and overpressure protection devices failed at the location causing 67 feet of the pipeline to exceed the MAOP for a total of 41 minutes.

Operation on this specific line was by-passed. SSCGP's operating regulator was removed, inspected, repaired, cleaned, and returned to service. The overpressure protection device was replaced.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists, up to a maximum of \$2,090,022 for a related series of violations. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Southern Star Central Gas Pipeline being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2018-1003W**. 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).

Sincerely,

Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration