



May 16, 2022

Gregory A. Ochs

VIA EMAIL Gregory.Ochs@dot.gov

Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
901 Locust Street, Suite 462
Kansas City, Missouri 64106

Re: ONEOK OKTEX Pipeline Company, L.L.C.
Proposed Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order
CPF 3-2022-006 NOPV

Dear Mr. Ochs:

On April 18, 2022, ONEOK OKTEX Pipeline Company, L.L.C. (ONEOK), received the referenced amended Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order, issued by the Central Region Pipeline and Hazardous Materials Safety Administration. The NOPV is a result of the 2021 inspection and specifically the gas pipeline systems in El Paso and along the Texas/Oklahoma Border.

ONEOK has elected not to contest the allegations set forth in the Proposed Civil Penalty. Therefore, in accordance with the instructions in the NOPV, ONEOK will remit the full civil penalty amount for Item 3 in the amount of \$12,300, following the payment instructions in the Notice upon receipt of the Final Order.

In accordance with the Proposed Compliance Order, letter B and Item 5 of the Notice, ONEOK will review its Continual Assessment Plan (CAP) and submit documentation describing the justification and rationale for each assessment method selected to address the identified threats on the covered pipeline segments. This review is currently underway and ONEOK will be prepared to share the results within 90 days of receipt of the Final Order.

In the Proposed Compliance Order letter A and Item 1 of the Notice, ONEOK submits that the CIS being recommended in the Order for the consideration of IR of the annual surveys will not provide adequate results as these short line segments are anode protected. The CIS requires the ability to interrupt the current source to determine the instant off potential which is not possible. To better understand the cathodic protection effectiveness, ONEOK developed a project to install corrosion coupons and test stations at 38 locations for the six segments listed in the Notice and the specific segment details follow. This plan of action was discussed during the inspection of the cathodic protection system.

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ONEOK proposes the following alternative method to Item 1 to demonstrate the effectiveness of the anode protected pipeline segments for your review.


Install the following coupon test stations:

- BNT04A-100 – Gillette 2” Lateral - 0.57miles – 3 test point coupon stations
- BNT04B-100- Gato 2” Lateral – 0.1 miles – 3 test point coupon stations
- MNT04-1- Norteno #4 – 3.73 miles – 17 test point coupon stations
- MNT05-1 – Norteno #5 – 1.1 miles – 5 test point coupon stations
- OK-02 – 2.50 miles – 6 test point coupon stations
- OK-03 – 1.75 Miles - 4 test point coupon stations

This work has begun and ONEOK anticipates this work to be completed within 180 days of the Final Order.

If there are further questions, you can contact Gary Numedahl, Director DOT Compliance at 918-595-1546 or gary.numedahl@oneok.com.

Sincerely,

DocuSigned by:

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Scott Schingen
Sr. Vice President Operations
ONEOK

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PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to OKTEX Pipeline Company, LLC a Compliance Order incorporating the following remedial requirements to ensure the compliance of OKTEX Pipeline Company, LLC with the pipeline safety regulations:

A. In regard to Item number 1 of the Notice pertaining to consideration of IR when completing annual cathodic protection surveys on six pipeline segments, OKTEX Pipeline Company, LLC must perform a close interval cathodic protection survey (CIS), that includes consideration of IR, to demonstrate adequate cathodic protection on those line segments identified in the Notice for Item 2. OKTEX must submit a schedule for the CIS within 30 days of receipt of the Final Order and complete the CIS's required by this paragraph within 180 days of receipt of the Final Order.

B. In regard to Item number 5 of the Notice pertaining to documentation and technical justification of assessment method(s) chosen for covered segments in the integrity management program, OKTEX Pipeline Company, LLC must review its Continual Assessment Plan (CAP) and submit documentation describing the justification and rationale for each assessment method selected to address the identified threats on the covered pipeline segments within 90 days of receipt of the Final Order.

C. When Proposed Compliance Order items extend beyond 90 days to complete, OKTEX Pipeline Company, LLC must begin, and continue submitting quarterly reports until all work necessary to implement the Compliance Order items is complete and the Final Order closed. Quarterly reports shall be submitted to Gregory A. Ochs, Director, OPS Central Region, Pipeline and Hazardous Materials Safety Administration.

D. It is requested that OKTEX Pipeline Company, LLC maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.