

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: rhatchett@westtexasgas.com; reed@westtexasgas.com

January 24, 2022

Richard Hatchett
President
WTG-Hugoton, LP
211 North Colorado
Midland, TX 79701

CPF 3-2022-029-NOA

Dear Mr. Hatchett:

From June 29, 2021 to July 1, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected WTG-Hugoton's procedures for system operation and maintenance in Hugoton, Kansas.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within WTG-Hugoton's plans or procedures, as described below:

1. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a)
 - (b) ***Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (1)
 - (6) **Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.**

WTG-Hugoton's procedures for maintaining compressor stations were inadequate because they failed to include provisions to address purging of air from compressors and/or associated piping when returning units

to service. Proper purging is essential to ensure that no hazardous mixture of gas and air remains in the system. WTG-Hugoton provided an updated procedure P-192.605(b)(6) on September 13, 2021 to address this item. No further action is required.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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 inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that WTG-Hugoton, LP maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2022-029-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Ray Reed, Director of Pipeline Compliance rreed@westtexasgas.com

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings