



August 7, 2009

Mr. R. M. Seeley, Director
U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration
8701 South Gessner, Suite 1110
Houston, Texas 77074

RE: Revised Operations and Maintenance Manual (CPF 4-2009-1019M)

Please find enclosed a copy of the amended Welding Procedure found within the West Texas Gas, Inc. *Operations and Maintenance Manual* as requested in your July 6, 2009 Notice of Amendment.

Please call if you have any questions. (806) 358-1321

Sincerely,

A handwritten signature in cursive script that reads "Bart Bean".

Bart Bean
Operations Manager
West Texas Gas, Inc.



Description This procedure is used in conjunction with written welding procedures that have been destructively tested to ensure DOT pipelines are welded per DOT regulations.

- Regulatory Applicability**
- Regulated Transmission Pipelines
 - Regulated Gathering Pipelines (Type A)
 - Regulated Gathering Pipelines (Type B)¹
 - Regulated Distribution Pipelines

Frequency As needed

Reference

49 CFR 192.221	<i>Scope</i>
49 CFR 192.225	<i>Welding – General</i>
49 CFR 192.227	<i>Qualifications of welders</i>
49 CFR 192.229	<i>Limitations on welders</i>
49 CFR 192.231	<i>Protection from Weather</i>
49 CFR 192.233	<i>Miter Joints</i>
49 CFR 192.235	<i>Preparation for Welding</i>
49 CFR 192.241	<i>Inspection and Test of Welds</i>
49 CFR 192.243	<i>Nondestructive Testing</i>
49 CFR 192.245	<i>Repair or Removal of Defects</i>
49 CFR 192 Appendix C	<i>Qualification of Welders for Low Stress Level Pipe</i>
LA Title 43 Part XIII 1301	<i>Scope</i>
LA Title 43 Part XIII 1305	<i>Welding – General</i>
LA Title 43 Part XIII 1307	<i>Qualifications of welders</i>
LA Title 43 Part XIII 1309	<i>Limitations on welders</i>
LA Title 43 Part XIII 1311	<i>Protection from Weather</i>
LA Title 43 Part XIII 1313	<i>Miter Joints</i>
LA Title 43 Part XIII 1315	<i>Preparation for Welding</i>

¹ If the line is new, replaced, relocated or changed.



Reference (Cont'd)	LA Title 43 Part XIII 1321	<i>Inspection and Test of Welds</i>
	LA Title 43 Part XIII 1323	<i>Nondestructive Testing</i>
	LA Title 43 Part XIII 1325	<i>Repair or Removal of Defects</i>
	49 CFR 192 Appendix C <i>Level Pipe</i>	<i>Qualification of Welders for Low Stress</i>

Forms	F-192.225	<i>Pipeline Welding Packet</i>
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Related Specifications	API 1104	<i>Welding of Pipelines and Related Facilities (19th edition, 1999, including its October 31, 2001 errata; and 20th edition 2007, including errata 2008)</i>
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OQ Covered Task	0801	<i>Welding</i>
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(In order to perform the tasks listed above, personnel must be qualified in accordance with West Texas Gas's Operator Qualification program or directly supervised by a qualified individual.)



Procedure Steps

1. Welding Procedures (195.225)
 - a) All welding will be performed using qualified procedures or the new procedure will be qualified. All welding procedures will be qualified through destructive testing using the latest DOT approved (referenced in 49 CFR 192.7) section 5 of API 1104 or section IX of ASME Boiler and Pressure Vessel Code. In addition, design drawings and specifications for the particular job must be met. The written procedure and all records of qualified testing will be retained for the life of the pipeline.
 - b) If the procedure needs to be qualified refer to the Construction Manual: Joining of Pipes by Welding.
2. Welder Qualifications (195.227)
 - a) Welders must be qualified in accordance with section 6 of API Standard 1104 or section IX of ASME Boiler & Pressure Vessel Code (referenced in Part 192.7).
 - b) If the pipeline will operate at a pressure <20% SMYS, welders may be qualified under Section I of Appendix C of 49 CFR 192.
 - c) A welder qualified under an earlier edition than that listed in 49 CFR 192.7 may weld but not re-qualify under that earlier edition.
3. Limitations On Welders (192.229)
 - a) If a welder's qualifications were based upon nondestructive testing, he may not weld on compressor station pipe and components.
 - b) In order to weld with a welding process, the welder must have within the proceeding 6 months welded using that process.
 - c) Welders Qualified under API Standard 1104 or ASME Boiler & Pressure Vessel Code:
 - i) Will not weld on pipe operated at a pressure that produces a hoop stress of 20% or more of SMYS unless within the preceding 6 calendar months that welder has had one weld tested and found acceptable under Sections 6 or 9 of API Standard 1104 (See 49 CRF 192.7 for correct edition.)

NOTE: Welders may maintain an ongoing qualification status by performing welds tested and found acceptable under the above acceptance criteria at least twice each calendar year at intervals not exceeding 7 ½ months.
 - ii) May not weld on pipe that will be operated at a pressure producing a hoop stress of less than 20% of SMYS unless the welder is tested according to "i" above or re-qualifies according to d(i) or d(ii) below.
 - d) A welder qualified under 49 CFR Appendix C may not weld unless –
 - i) Within the preceding 15 months, but at least once each calendar year, he is requalified under Appendix C; or
 - ii) Within the preceding 7 ½ months, but at least twice each calendar year, he has had:



- (1) A production weld cut out, tested and found acceptable in accordance with the qualifying test; or
 - (2) If he will weld only on service lines 2 inches or smaller in diameter, has had two sample welds tested and found acceptable in accordance with the test in section III of 49 CFR 192 Appendix C.
4. Protection From Weather (192.231)
 - a) Welding must be protected from weather conditions that would impair the quality of the completed weld.
 5. Miter Joints (192.233)
 - a) A mitered joint on steel pipe that will be operated at a pressure that produces a hoop stress of 30% or more of SMYS may not deflect the pipe more than 3 degrees.
 - b) A miter joint on steel pipe that will be operated at a pressure that produces a hoop stress of less than 30%, but more than 10%, of SMYS may not deflect the pipe more than 12½° and must be a distance equal to one pipe diameter or more away from any other miter joint, as measured from the crotch of each joint.
 - c) A miter joint on steel pipe that will be operated at a pressure that produces a hoop stress of 10% or less of SMYS may not deflect the pipe more than 90 degrees.
 6. Preparation For Welding (192.235)
 - a) Before beginning to weld, ensure the weld surface is clean and free of any material that may be detrimental to the weld, and the pipe or component is aligned in a way that provides the most favorable condition for depositing the root bead.
 - b) Ensure that the alignment is preserved while the root bead is being deposited.
 7. Inspection Of Welds(192.241)
 - a) Refer to procedure P-192.241 for details on performing visual inspection of welds.
 - b) Visual inspection is to be conducted by an individual qualified by appropriate training and experience. The inspection is to ensure that the weld is performed according to the written procedure and that the weld is acceptable under d below.
 - c) If the pipeline is to be operated at a pressure that produces a hoop stress of 20% or more of SMYS the weld must be nondestructively tested in accordance with procedure P-192.243. However, welds on pipe with a nominal diameter of less than 6 inches do not have to be nondestructively tested if they have been inspected and approved by a qualified welding inspector. In addition, if the pipe is to be operated at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited that nondestructive testing is impractical, it is not required as long as they are visually inspected and accepted.
 - d) The acceptability of a weld shall be determined in accordance with section 9 of API Standard 1104 (referenced in Part 192.7) However, if a girth weld is unacceptable under these standards for a reason other than a crack, and if Appendix A to API 1104 applies to the weld, the acceptability of the weld may be further determined under that appendix.



- e) Welds that are found unacceptable according to d above, must be removed or repaired according to procedure P-192.245.

8. Maintenance Welding

NOTE: Prior to welding on the pipe surface, adequate pipe wall thickness must be determined (by nondestructive methods) to prevent burn-through. See procedure P-192.243

- a) Prior to welding, the bevel of a joint of pipe shall be inspected for proper dimension, cleanliness and angle and the pipe shall be free of dirt and foreign materials.
- b) For in-service pipeline welding, the pipeline pressure at the location that welding is being done shall be limited to either:
 - i) 30% of the specified minimum yield strength for the pipe wall thickness and grade, or
 - ii) 50% of MAOP for those pipelines that have an established MAOP.
- c) If excessive scale or hydrocarbon build-up, or pipe wall lamination is found, notify Supervisor or Project Inspector immediately.
- d) The ends of a repair sleeve must be positioned a minimum of 6 inches beyond a damaged area (including internal corrosion).
- e) Supports or braces may only be welded directly to jurisdictional pipelines in accordance with 49 CFR 192.161.
- f) Electrodes used in maintenance welding of patches and sleeves shall be low hydrogen Type E7010, E8010, or E6010.
- g) Maintenance welding procedures are located in the Construction Manual.
- h) Each bead must be grinded and cleaned prior to depositing subsequent filler passes.
- i) Consideration must be given to ensure the carbon equivalent of the pipe being sleeved is less than 0.45%.



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U.S. Department
of Transportation
**Pipeline and
Hazardous Materials Safety
Administration**

JUL 10 2009

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

COPY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 6, 2009

Richard Hatchett
West Texas Gas Inc.
211 North Colorado
Midland, Texas 79701

CPF 4-2009-1019M

Dear Mr. Hatchett:

Between July 11 and November 20, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected West Texas Gas Inc. procedures for Operations, Maintenance and Emergency operations in Amarillo and Houston, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within West Texas Gas Inc. plans or procedures, as described below:

1. **§192.227 Qualification of welders.**

(a) Except as provided in paragraph (b) of this section, each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME boiler and Pressure Vessel Code (incorporated by reference, see §192.7). However, a welder qualified under an earlier edition than listed in appendix A of this part may weld but may not re-qualify under that earlier edition.

✓ West Texas Gas Inc. must amend their Operation and Maintenance Procedures to state welding procedures must be qualified under Section 6 of API 1104 incorporated by reference that is recognized by PHMSA, or Section IX of ASME Boiler and Pressure Code (2004 ed. Including addenda through July 1, 2005).

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 inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.**

In correspondence concerning this matter, please refer to **CPF 4-2009-1019M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Materials Safety Administration

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