



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 7, 2011

Mr. John Mollenkopf
COO/Senior Vice President
Markwest Oklahoma Gas Company, LLC
1515 Arapahoe Street, Tower I, Suite 1600
Denver, CO 80202-2126

CPF 4-2011-1009M

Dear Mr. Mollenkopf:

Between April and June, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Markwest Oklahoma Gas Company, LLC (Markwest) procedures for Operations and Maintenance.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Markwest's plans or procedures, as described below:

1. §192.16 Customer notification

(b) Each operator shall notify each customer once in writing of the following information:

- (1) The operator does not maintain the customer's buried piping.**
- (2) If the customer's buried piping is not maintained, it may be subject to the potential hazards of corrosion and leakage.**
- (3) Buried gas piping should be -**
 - (i) Periodically inspected for leaks;**
 - (ii) Periodically inspected for corrosion if the piping is metallic; and**
 - (iii) Repaired if any unsafe condition is discovered.**

(4) When excavating near buried gas piping, the piping should be located in advance, and the excavation done by hand.

(5) The operator (if applicable), plumbing contractors, and heating contractors can assist in locating, inspecting, and repairing the customer's buried piping.

(c) Each operator shall notify each customer not later than August 14, 1996 or 90 days after the customer first receives gas at a particular location, whichever is later. However, operators of master meters systems may continuously post a general notice in a prominent location frequented by customers.

Markwest did not have a procedure to notify each customer once in writing required by §192.16 informing them that they do not maintain the customer's buried piping to the entry of the first building downstream or up to the principal gas utilization equipment or the first fence that surrounds the equipment. Markwest must amend their procedure to include customer notification of customer piping in accordance with §192.16.

2. §192.613 Continuing Surveillance.

(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

Markwest's Section 401 Surveillance/Reporting Summary, page 69-70, Procedures were inadequate. The current procedure states what is needed in order to conduct the continuing surveillance program review, but it does not state what the review encompasses or what actions to take if there are changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

Markwest must modify the procedures to provide sufficient detail for conducting continuing surveillance on their pipeline system to meet the requirements of §192.613(a).

3. §192.736 Compressor stations: Gas detection.

(a) Not later than September 16, 1996, each compressor building in a compressor station must have a fixed gas detection and alarm system, unless the building is-

(1) Constructed so that at least 50 percent of its upright side area is permanently open; or

(2) Located in an unattended field compressor station of 1,000 horsepower (746 kilowatts) or less.

Markwest did not have a procedure in their O&M Manual to install fixed gas detection and alarm system at each compressor building which is 50 percent enclosed and has more than 1,000 horsepower. The procedure was in their Construction specifications, which needs to be incorporated or referenced in their O&M Manual.

Markwest needs to amend their procedures to include the installation of fixed gas detection and alarm system at each compressor station and meet the requirements of §192.736.

4. §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 § 192.7 of this part may weld but may not requalify under that earlier edition.

Markwest's Section 503 Welding of Steel Pipelines Procedures, page 131, were inadequate. The procedure states that welders will be qualified in accordance with Section 3 of API 1104 or Section IX of the ASME Boiler and Pressure Vessel Code. The procedure does not state what edition, either the 19th or 20th, of API 1104 will be followed during welder qualifications. In addition the welder must be qualified in accordance to Section 6 not Section 3 of API 1104.

Markwest needs to amend their procedures to meet the requirements of §192.227(a).

5. §192.243 Nondestructive testing.

d) When nondestructive testing is required under §192.241(b), the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference;

(3) In Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100 percent unless impracticable, in which case at least 90 percent. Nondestructive testing must be impracticable for each girth weld not tested.

Markwest's Section 503, Welding of Pipelines, Nondestructive Testing of Welds Procedures on page 133 were inadequate. The procedure did not require 100 percent nondestructive testing in Class 3 and Class 4 locations at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, unless impracticable, in which case at least 90 percent must be tested. The procedure was in their Construction specifications, which needs to be incorporated or referenced in their O&M Manual.

Markwest needs to amend their procedures to meet the requirements of §192.243(d)(3).

6. §192.477 Internal corrosion control: Monitoring

If corrosive gas is being transported, coupons or other suitable means must be used to determine the effectiveness of the steps taken to minimize internal corrosion. Each coupon or other means of monitoring internal corrosion must be checked two times each calendar year, but with interval not exceeding 7 1/2 months.

Markwest's Section 405, Corrosion Control, Internal Corrosion Control Procedures on page 98, were inadequate. The procedures are inadequate in determining the methods or equipment used to determine the effectiveness of the steps taken to minimize internal corrosion.

Markwest must amend their procedures to include the method that will be used to determine the effectiveness of their internal corrosion program and meet the requirements of §192.477.

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 45 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 4-2011-1009M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



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

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