



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**

March 21, 2011

Mr. Eric Amundsen  
Vice President of Technical Services  
Sea Robin Pipeline Company  
5444 Westheimer Road  
Houston, TX 77056-5306

**CPF 4-2011-2002M**

Dear Mr. Amundsen:

On September 20-23 and December 7, 2010, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Sea Robin Pipeline Co. procedures for the offshore natural gas transmission pipeline system, Unit ID 1874 – Sea Robin Transmission in Erath, LA.

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

**1. 192.13 What general requirements apply to pipelines regulated under this part?**

**(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.**

**A. Standard Operating Procedure (SOP) H.18 "Stationary Gas and Fire Detection Systems"**

In Standard Operating Procedure H.18 "Stationary Gas and Fire Detection Systems," section 7.1 "Testing and Inspection," step 1 states "Develop a specific procedure..." Sea Robin has developed a site specific procedure "Calibrate Gas Detectors". SOP H.18 is a "top level procedure" that doesn't capture the individual steps within the site specific procedure. Sea Robin's SOP H.18 is inadequate.

In accordance with 192.13(c), PHMSA recommends that Sea Robin modify SOP H.18 procedures addressing the calibration and testing of the gas detection systems to refer to the site specific procedure "Calibrate Gas Detectors."

## **B. The site specific procedure "Calibrate Gas Detectors"**

In the site specific procedure, step 7.12 states "Verify...an LEL gas alarm at 40%..." During the inspection, the device setting was observed to be 50% LEL on the MSA 5000 Gas Detection Monitor LED display. Although SOP H.18 references in Section 7.4, step 3, that the High alarm trip point should not be set above 50% LEL, the site specific procedure defines the setting in step 7.12 as being 40% LEL. The site specific procedure is inadequate.

In accordance with 192.13(c), PHMSA recommends that Sea Robin modify the site specific procedure to identify the specific value used for high alarm/shutdown. Prior to the close of the inspection, Sea Robin had modified the site specific procedure Calibrate Gas Detectors, step 7.12 to state "Verify...an LEL gas alarm at 50%..."

### 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 4-2011-2002M** 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*