



Panhandle Eastern Pipe Line
Trunkline Gas
Trunkline LNG
Sea Robin Pipeline
Florida Gas Transmission

5444 Westheimer Road
Houston, TX 77056-5306
P.O. Box 4967
Houston, TX 77210-4967
713.989.7000

April 22, 2011

Roderick Sealy
Director, Southwest Region
Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
8701 South Gessner, Suite 1110
Houston, TX 77074



Certified Mail – Return Receipt Requested

**RE: CPF 4-2011-2002M (March 21, 2011 PHMSA Letter)
Response to Notice of Amendment**

Dear Mr. Sealy:

In correspondence dated March 21, 2011 and received in our office on March 23, 2011 PHMSA alleges that certain SEA ROBIN procedures were inadequate. As noted by PHMSA, these allegations stem from an inspection of SEA ROBIN's Records and Facilities in Erath, LA. and offshore Louisiana during September and December of 2010.

**Item 1 (§192.13 What general requirements apply to pipelines regulated under this part?
(c))**

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.”

SEA ROBIN Response to Item A

SEA ROBIN has reviewed the above PHMSA statement and has initiated Change Management Record (CMR # **H3014**) according to SEA ROBIN's Management of Change Process to address this issue.

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%...”

SEA ROBIN Response to Item A

As stipulated by PHMSA above, SEA ROBIN Pipeline Company addressed the issue during the Inspection to PHMSA’s satisfaction.

Sincerely,



Eric Amundsen
Vice President and Chief Asset Integrity Officer

Attachment:
March 21, 2010 PHMSA Letter (CPF 4-2011-2002M)



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Geesner, 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*