



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 16, 2012

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

CPF 4-2012-2001W

Dear Mr. Amundsen:

Between October 2011 and February 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the documentation of the re-route of Sea Robin Transmission pipeline #709. This pipeline is located in the Gulf of Mexico off the coast of Louisiana.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. §192.605 Procedural manual for operations, maintenance, and emergencies

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Sea Robin failed to follow their procedures while conducting hydrostatic pressure tests on several sections of the replacement pipe for the re-route of pipeline #709. Sea Robin abandoned approximately 843 feet of 24 inch pipe replacing it with approximately 1210 feet of like pipe. The abandonment/replacement was performed to re-route pipeline #709 (segment #3330) around the toppled Devon platform, Eugene Island 330A. During the review of construction records for this re-route, it was noted that three pressure tests performed by Pipeline Services International (PSI) did not follow the Panhandle Energy procedures. PSI was a contractor working for Sea Robin. The Panhandle Energy Standard Operating Procedure SOP I.19 Pressure Testing, section 7.1.8 Pressurizing, step 9 states, '**HOLD** the P (leak test) for 15 minutes with no pressure loss. **RECORD** readings every 5 minutes during the initial leak test'. After the leak test is completed and the desired test pressure has been achieved, the pressure test begins. Step 17 further states, '**RECORD** the deadweight pressures and ambient temperatures at regular intervals not to exceed 15 minutes'. In all three hydrostatic pressure tests, the initial leak test was not documented as required by the procedure. Pressure readings were not documented every 5 minutes. One reading was taken on the 15-minute interval. Beyond the two-hour stabilization period of the three pressure tests, the deadweight pressures and ambient temperature readings were recorded every 30 minutes. The requirement was not to exceed an interval of 15 minutes for recording the pressure and temperature readings.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Sea Robin subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2012-2001W**. 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).

Sincerely,



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

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