

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 10, 2014

Mr. Robert B Raines Jr.  
Senior Vice President  
Perryville Gas Storage, LLC  
3 Riverway, Suite 1350  
Houston, TX 77056

**CPF 4-2014-1011W**

Dear Mr. Raines:

During the month of April through May 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected your Perryville Gas Storage facilities in Winnsboro, LA.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

#### **1. § 192.631 Control room management**

**(g) *Operating experience.* Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:**

**(2) Include lessons learned from the operator's experience in the training program required by this section.**

Perryville failed to follow its Control Room Management Procedure for not conducting the operating experience review training on lessons learned. During the inspection, PHMSA identified two Abnormal Operating Condition (AOC) events that took place in Perryville Gas Storage facilities. The two AOCs were the loss of communication on 4/24/2014 and an unexpected station blowdown without an alarm on 4/12/2014.

Under Cardinal Control Room Management program, Section-Lessons Learned and Corrective Actions clearly states:

“Controllers shall confirm that lessons learned from its operating experience have been reviewed with corrective actions implemented as needed for:

- Controller fatigue
- Field equipment
- The operation of any relief device
- Procedures
- SCADA system configuration, and
- SCADA system performance

The records provided by Perryville do not reflect the operating experience review as well as lessons learned.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a 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 Perryville being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF4-2014-1011W**. 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