



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 S. Gessner, Suite 630
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 29, 2017

Sempra US Gas & Power
Attn: Mr. John Pirraglia
Vice President, Cameron Interstate Pipeline
2925 Briarpark Dr, Suite 850
Houston, TX 77042

CPF 4-2017-1008W

Dear Mr. Pirraglia:

During the month of February, 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Cameron Interstate Pipeline ("Cameron") procedures for Operations and Maintenance (O&M), records and field visit in Ragley, LA.

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 items inspected and the probable violation is:

1. §192.603 General provisions

(b) Each operator shall keep records necessary to administer the procedures established under §192.605.

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

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(8) Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.

Cameron failed to keep records necessary to administer procedures established under §192.605.

During the inspection, PHMSA requested Cameron to provide the three years (2013, 2014 and 2015) records of periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found. Cameron provided the Forms OM000-01- Change request. PHMSA reviewed the forms and identified that the forms do not demonstrate whether the periodic review of work was exercised or not. When asked, Cameron field personnel agreed with the findings. Cameron created a new form, Form OM000-02A-Field Observation Effectiveness Review, and assured PHMSA that periodic review of work will be documented properly in the future.

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 Cameron being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2017-1008W**. 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,



Jon Manning
Acting Director, SW Region
Pipeline and Hazardous Materials Safety Administration