



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

August 24, 2017

ONEOK NGL PIPELINE, LLC
Mr. Roger Thorpe - VP NGL Operations
100 WEST FIFTH STREET
Tulsa, OK 74102

CPF 4-2017-5030W

Dear Mr. Thorpe:

May 23-27, 2016, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your ONEOK NGL PIPELINE, LLC (ONEOK) Control Room in Tulsa, Oklahoma.

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. §195.505 Qualification program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks;**
- (b) Ensure through evaluation that individuals performing covered tasks are qualified;**

ONEOK failed to ensure through evaluation that the controller was qualified to perform covered tasks.

ONEOK CRM Controller Training Program last revised on August 25, 2015, Operator Qualifications states “each controller is responsible for successfully demonstrating the ability to perform the following covered tasks:

Sub-Task 64.1 Startup of a Pipeline

Sub-Task 64.2 Shutdown of a Pipeline,

Sub-Task 64.3 Monitor Pressures, Flow, Communications and Line integrity & Maintain Them Within Allowable Limits, and

Sub-Task 64.4 Remotely Open or Close Valves or Other Equipment.

Abnormal Operating Conditions are identified during these Sub-Tasks”.

The PHMSA inspector also reviewed ONEOK’s NGL Operator Qualification Plan, revised July 31, 2014, Appendix A: Covered Task List, and it indicates that these tasks require re-evaluation every three (3) years.

While reviewing records associated with the ONEOK shift schedule, the PHMSA inspector noted that an employee, Degroff, Tike was working at one of the Sterling Consoles during the month of November 2015. The PHMSA inspector reviewed the qualification record for this individual, and it indicated that his qualification expired on July 20, 2015. ONOK did not requalify him again until December 18, 2015.

If these covered tasks are performed by a non-qualified individual, ONEOK’s OQ Plan requires a span of control of one to three. According to the shift schedule documentation for the November 2015 provided by ONEOK, a qualified employee was not observing or directing this individual at the console.

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 identified in this letter. Failure to do so will result in ONEOK NGL PIPELINE, LLC (ONEOK) 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 4-2017-5030W**. 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,

A handwritten signature in black ink that reads "Frank Causey". The signature is written in a cursive style with a large, prominent "F" and "C".

Frank Causey
Acting Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration