

## NOTICE OF AMENDMENT

### 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 4-2017-5031M**

Dear Mr. Thorpe:

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

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within ONEOK's plans or procedures, as described below:

- 1. §195.446 Control room management**
  - (b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions.**

ONEOK's Controllers Physical Domain of Responsibility, last revised October 23, 2015, Scope states "Provide the Pipeline Controllers with a defined domain of responsibility for the pipeline system's physical assets and facilities per Console as well as who may assume control of any console. Intent also aims to comply with 195.446(b)(1) as the operator should clearly establish each controller's roles and domain of responsibility when more than one controller is on shift".

During the inspection, ONEOK informed the PHMSA Inspectors that it is not a periodic occurrence and any changes to Roles and Responsibility would be handled by Management of Change (MOC).

When the PHMSA inspector reviewed ONEOK's MOC process, last revised October 20, 2015, this activity is not required.

ONEOK must amend their MOC process to include this activity.

## 2. §195.446 Control room management

**(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**

**(1) Implement API RP 1165 (incorporated by reference, see §195.3) whenever a SCADA system is added, expanded or replaced, unless the operator demonstrates that certain provisions of API RP 1165 are not practical for the SCADA system used;**

ONEOK's CRM plan, OKSPCC2.0001, Section 4.3: ADEQUATE INFORMATION (192.631(C); 195.446(C)) states "Implement applicable sections of API RP 1165 whenever a SCADA system is added, expanded or replaced (all sections of API RP 1165 for hazardous liquid pipeline systems).

ONEOK did not include specific procedures to clarify which additions or expansions will require API RP1165 implementation. For example, the addition of a new pipeline system to the new SCADA system did not meet their definition of system expansion.

ONEOK must amend this process to define the types of changes to the SCADA system that constitute additions, expansions, or replacements.

## 3. §195.446 Control room management

**(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**

**(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months**

During the inspection, ONEOK representatives advised the PHMSA inspectors that ONEOK does not use a backup system for development. ONEOK has a secured test SCADA system that includes a primary and a backup SCADA server running as a HA (High Availability) pair. This system is isolated from the production system by isolation in a different subnet. The system is used for testing changes and Microsoft Windows patches prior to updating the production system.

The PHMSA inspector did not find this documented under ONEOK's CRM plan.

ONEOK must amend their Control Room Plan to add this information.

**4. §195.446 Control room management**

**(d) Fatigue mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:**

**(1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep.**

During the inspection, the PHMSA inspector learned that controllers are not on-call. Supervisors are salaried/on-call but are held to the same Hours of Service (HOS) limitations. This is not documented in ONEOK CRM plan. Also, the same plan failed to indicate that supervisors will not approve their own HOS deviations.

ONEOK must amend CRM plan to add this.

**5. §195.446 Control room management**

**(d) Fatigue mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:**

**(4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility.**

ONEOK CRM Fatigue Management, last revised date 9-8-2015 states “The shift holdover guideline limits are no more than, one 18-hour shift (19 hours with handover time), or two 14 hours shifts (15 hours with handover time) in any sliding 5-day period.

For a 12-hour shift, a one 18-hour shift (19 hours with hand-over time) in any sliding 5-day period during non-emergency situation does not meet the requirement of this section of the code. ONEOK must amend their procedure to remove 18-hour shift.

**6. §195.444 CPM leak detection.**

**Each computational pipeline monitoring (CPM) leak detection system installed on a hazardous liquid pipeline transporting liquid in single phase (without gas in the liquid) must comply with API RP 1130 (incorporated by reference, *see* §195.3) in operating, maintaining, testing, record keeping, and dispatcher training of the system.**

ONEOK implemented computational pipeline monitoring (CPM) to their pipelines in 2005. ONEOK’s CPM testing process is in draft form and does not currently address API 1130. ONEOK has been using Energy Solutions, Site Acceptance Test procedures which conform with the applicable element of API 1130, though not specifically mentioned. According to ONEOK, the CPM system complies with operating, maintaining, testing, and maintenance as recommended. However, the operator is working on improving the record-keeping aspect of the tests.

ONEOK must assure its CPM process meets the requirement of API 1130.

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 60 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.

It is requested (not mandated) that ONEOK NGL PIPELINE, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. Seeley, Director, Southwest, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2017-5031M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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