

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 27, 2017

Mr. Ryan Coffey
Vice President of Operations
West Texas Gulf Pipeline Company
800 East Sonterra Boulevard
San Antonio, TX 78258

CPF 4-2017-5033W

Dear Mr. Coffey:

On June 5 - 8, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the West Texas Gulf Pipeline Company at your Corsicana Field Office (Wortham Station) in Corsicana, Texas.

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

1. §195.310 Records

(a) A record must be made of each pressure test required by this subpart, and the record of the latest test must be retained as long as the facility tested is in use.

(b) The record required by paragraph (a) of this section must include:

(4) The date and time of the test;

West Texas Gulf Pipeline Company (WTG-PELA) failed to provide complete records to PHMSA representative for the hydrostatic test of Breakout Tank 45.

West Texas Gulf Pipeline Company (WTG-PELA) states in two (2) separate procedures the retention period of all documentation shall be for the life of the tank and also, date, time and ambient temperature should be recorded at intervals not to exceed two (2) hours.

New hydrotest records were submitted to the Southwest Region via email on June 29, 2017 after they were initially reviewed in the field on June 8, 2017. PHMSA representatives gave WTG-PELA the opportunity to obtain the complete record.

WTG-PELA both hydrotest records to PHMSA representative included the following information: Date/time hydrotest started on January 8, 2016 and date/time hydrotest completed on January 14, 2016. 24-hour hold started on January 15, 2016 at 9:00 a.m. and to be completed on January 16, 2016 at 9:00 a.m.

However, both records reading and observation at two (2) hour intervals were dated from January 8, 2016 at 3:30 p.m. through January 15, 2016 at 9:00 a.m. The missing information included hydrotest date and time between January 15, 2016 at 9:00 a.m. through January 16, 2016 at 9:00 a.m.

As of April 27, 2017, under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists up to a maximum of \$2,090,022 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 West Texas Gulf Pipeline Co. 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 4-2017-5033W**. 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,

Terri J. Binns
Acting Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration