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Black Marlin Pipeline Company
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November 29, 2018

Ms. Mary McDaniel
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: CPF 4-2018-2002

Ms. McDaniel;

On October 30th, 2018, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) to Williams – Black Marlin Pipeline Company (Black Marlin), for alleged violations of Pipeline Safety Regulations that were identified during the inspection of the Black Marlin pipeline offshore and in Texas City, Texas that occurred between January 24th -27th and May 30th-31st, 2017.

Williams is fully committed to maintaining the safety of its construction projects. Williams has reviewed the alleged violation and has already addressed the findings identified in the Notice and as detailed in the response below.

- § 192.477 Internal corrosion control: Monitoring.**
If corrosive gas is being transported, coupons or other suitable means must be used to determine the effectiveness of the steps taken to minimize internal corrosion. Each coupon or other means of monitoring internal corrosion must be checked two times each calendar year, but with intervals not exceeding 7 ½ months.

PHMSA alleges that Black Marlin failed to monitor their offshore natural gas gathering pipeline system for internal corrosion, more specifically following an incident on April 11, 2014, the pipeline was taken out of service and shut-in at approximately 50psig. A copy of the latest records for the monitoring/sampling was requested but was not provided and at the time the pipeline had not been purged of gas and filled with an inert (nitrogen) gas.

Proposed Compliance Order: Black Marlin must conduct internal corrosion monitoring of the pipeline system or abandon the pipeline in accordance with §192.727 and provide PHMSA with an update of completed actions.

Black Marlin has corrected the alleged inadequacy by inserting corrosion coupons to monitor for internal corrosion. The pipeline has also been purged of gas and pressurized with nitrogen. At this time Black Marlin is not proceeding with abandonment per §192.727 and will continue to monitor and maintain the pipeline in accordance with requirements. In the future if Black Marlin elects to abandon the pipeline, all requirements of §192.727 will be followed.

2. **§192.479 Atmospheric corrosion control: General.**

(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

PHMSA alleges that Black Marlin failed to ensure that the above ground sections of piping at the Kinder Morgan Facility Meter Station were cleaned and coated, specifically the last inspection, dated 7/22/2014, Williams personnel noted, "Coating not adequate – skirting on vessel rusted thru". During the PHMSA field inspection, the area designated on records as the Kinder Morgan Facility Meter Station was noted to be in need of cleaning and painting and a work order had not been completed.

Proposed Compliance Order: None, PHMSA provided Warning

Black Marlin provided documentation to PHMSA on August 14, 2017 showing proof that the area of concern had been blasted and recoated.

3. **§192.605 Procedural manual for operations, maintenance, and emergencies.**

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

PHMSA alleges that Black Marlin failed to:

(a) provide documentation showing that the Emergency Plan for the Western GOM was reviewed in 2014 or 2015.

(b) follow the Williams Internal Corrosion Control Program, Procedure 7 .05-ADM-008; Section 2.6 Inspecting Pipe Removed from Service (195.579, 192.475(b)), and CSA Z662-1007 to inspect the internal pipe surface whenever pipe is removed

(c) follow procedure Williams SIP Emergency Response Plan; 12.01-ADM-002; Section 4.7.1 and did not use form 02-OPR-1638 - Emergency Response form as required.

(d) follow Williams 9.08-ADM-001-Job Planning Procedure and maintain records showing that a tailgate safety meeting was performed every day on a project.

Proposed Compliance Order: None, PHMSA provided Warning.

Black Marlin has discussed:

(a) the requirement to document annual reviews of the Emergency Plan, even if there are no necessary changes and conveyed the necessity to retain documentation to appropriate personnel.

(b) the requirement to document the internal pipe condition when pipelines are exposed and conveyed the necessity to retain documentation to appropriate personnel.

(c) the requirement to complete the entire 02-OPR-1638 form with personnel and conveyed the necessity to retain the documentation.

(d) the tailgate safety meeting documentation requirements with personnel and conveyed the necessity to retain the documentation.

4. **§192.707 Line markers for mains and transmission lines.**

(a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:

(1) At each crossing of a public road and railroad; and

(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.

(d) Marker warning. The following must be written legibly on a background of sharply contrasting color on each line marker:

(1) The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily

developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke.

(2) The name of the operator and the telephone number (including area code) where the operator can be reached at all times.

PHMSA alleges that Black Marlin failed to place and maintain line markers that meet the requirements of §192.707(d), specifically there was no line marker at the entrance to the Pelican Harbour Subdivision but the marker was placed on the fences of the residents on the corner. The line markers for the Black Marlin Pipeline were not visible to the public.

Proposed Compliance Order: Black Marlin should place and maintain adequate line markers in the referenced area.

Black Marlin has installed line markers in the area as referenced by the enclosed photographs.

Williams looks forward to working with PHMSA in the future. Please feel free to contact me at 405-626-1785 if you have any questions or concerns about the provided solutions to the PHMSA concerns in this letter.

Respectfully,



Clint Ratke
Manager – Pipeline Safety
Williams
Black Marlin Pipeline Company
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Enclosures (1): Pelican Harbour Subdivision Line Marker Photograph

cc: Pat Carrol, Vice President Operations – Gulf West
Mark Cluff, Vice President – Safety & Operational Discipline
Dan Byrne, Manager Operations – Texas South
Amy Shank, Director – Pipeline Safety & Asset Integrity

Pelican Harbour Subdivision Line Marker Photograph.

