

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 11, 2019

Joel Plauche
Vice President, HSE and Regulatory
Fieldwood Energy, LLC
2014 W. Pinhook Rd, Suite 800
Lafayette, Louisiana 70508

CPF-4-2019-5008M

Dear Mr. Plauche:

From July 18, 2017 to October 27, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Fieldwood Energy's procedures for Operations and Maintenance in Lafayette, Louisiana.

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

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (c) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**
 - (5) **Analyzing pipeline accidents to determine their causes.**

Fieldwood Energy's Safe Work Practice, Section C, Chapter 4: Incident Investigation Process was found to be inadequate and must be amended to ensure that this document includes procedures for analyzing pipeline accidents to determine their causes. The Inspector reviewed Section C, Chapter 4 and found that the Incident Investigation Process did not include any detailed analysis techniques or methods to analyze pipeline accidents to determine their causes. The Inspector also reviewed the DOT Pipeline Repair Protocols which states that failures shall be thoroughly investigated prior to repair, and that the completion of a DOT Gas or Hazardous Liquid Pipeline Leak and Repair

Report will constitute an adequate analysis for investigating failures. Neither the repair protocol document nor the report includes adequate procedures for analyzing pipeline accidents to determine their causes.

2. §195.402 Procedural manual for operations, maintenance, and emergencies.

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs:

(9) Providing for a post-accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found.

Fieldwood Energy's O&M Manual, Section C, Chapter 4: Incident Investigation Process was found to be inadequate and must be amended to include a requirement for post-accident reviews of employee activities to determine whether procedures were effective in each emergency and that corrective actions were taken where deficiencies were found. Fieldwood Energy's Incident Investigation Process did not include a procedure for conducting post-accident reviews of employee activities to ensure procedures were effective in each emergency and did not include a requirement to take corrective action where deficiencies were found.

3. §195.403 Emergency Response Training.

(c) Each operator shall require and verify that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under 195.402 for which they are responsible to ensure compliance.

Fieldwood Energy's Emergency Response Training Document was found to be inadequate and must be amended to ensure that this document includes the requirement for supervisors to maintain a thorough knowledge of that portion of the emergency response procedures for which they are responsible to ensure compliance, and a procedure for verification of the supervisor's knowledge. The Inspector reviewed the Emergency Response Training Document and it did not include any specific requirements that supervisors be knowledgeable of that portion of the emergency response procedures for which they are responsible.

4. §195.452 Pipeline integrity management in high consequence areas.

(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

(1) A process for identifying which pipeline segments could affect a high consequence area;

Fieldwood Energy's Integrity Management Plan (IMP) Section 1.05: Segment Identification:

Water Transport Analysis was found to be inadequate and must be amended to ensure the process to identify segments must account for the full range of relevant factors. The Inspector reviewed the Segment Identification: Water Transport Analysis and found that it did not include requirements to take additional factors into account to better understand water transport of a spilled commodity (changes in commodity properties due to interaction with the environment, commodity solubility, abnormal stream conditions, such as erosion of stream bottom or bank, subsurface water transport as well as surface water transport, indirect introduction into water, and introduction into water from spray releases.)

5. §195.555 What are the qualifications for supervisors?

You must require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under §195.402(c)(3) for which they are responsible for insuring compliance.

Fieldwood Energy's Corrosion Control Program document was found to be inadequate and must be amended to ensure that supervisors are required to maintain a thorough knowledge of that portion of the corrosion control procedures for which they are responsible for ensuring compliance. The Inspector reviewed the Corrosion Control Program document and it did not contain any specific requirements for corrosion control supervisors to maintain a thorough knowledge of their corrosion control procedures.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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 Fieldwood Energy, 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 Mary L. McDaniel, P.E., Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF-4-2019-5008M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

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