



September 25, 2020

Mrs. Mary L. McDaniel, P.E.
Director, Southwest Region
Office of Pipeline Safety
Pipeline Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: Notice of Amendment
ONEOK NGL Pipeline, L.L.C.
CPF 4-2020-004-NOA

Dear Mrs. McDaniel:

Pursuant to the Notice of Amendment CPF 4-2020-004-NOA dated August 25, 2020 (NOA), ONEOK NGL Pipeline, L.L.C. (ONEOK) respectfully submits the following response to the issues brought forth from the inspection of ONEOK's Natural Gas Liquids (NGL) Operations and Maintenance Manual in Tulsa, Oklahoma from February 10 -14 and February 24 – 28.

The Pipeline and Hazardous Materials Administration (PHMSA) listed items 1 and 2A – 2J in the NOA. As noted in the NOA, items 1, 2A, 2C – 2F, 2H and 2I were resolved on July 10, 2020, when ONEOK provided updated O&M procedures via email to PHMSA. ONEOK does not contest the NOA with respect to the remaining items 2B, 2G and 2J and, where applicable, has amended its procedures manual as described below.

NOA Item 2(B)

PHMSA observation: ONEOK's O&M Manual did not have an adequate procedure for providing protection against ignitions of breakout tanks as required under §195.405(a).

Although ONEOK's O&M Manual refers to the applicable API RP 2003, it does not contain procedures that address protection against ignitions of aboveground breakout tanks or provides justification in the O&M as to why compliance with all or certain provisions of API RP 2003 are not necessary for the safety of a breakout tank.

ONEOK's O&M must be amended to include a procedure for the protection against ignitions in accordance with §195.405(a) or provide a justification as to why compliance with all or certain provisions of API RP 2003 is not necessary.

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ONEOK's response:

ONEOK's NGL Operations and Maintenance Manual, Section 3, has been updated to reference the Prevention of Accidental Ignition – Breakout Tank Procedure that includes applicable requirements of 195.405(a) and API RP 2003.

NOA Item 2(G)

PHMSA observation: ONEOK's O&M Section 3-Normal Operations; Breakout Tank Inspection - §195.405; §195.428(d); §195.432 does not have the correct cross reference to other ONEOK procedures that ONEOK personnel utilized during inspections. While Section 4 includes reference to the applicable API Standards that should be used when conducting the breakout tank inspections, this procedure does not include a reference to the ONEOK's Breakout Tank Inspections Procedure (Document No: 2.200.2301; rev. 02; date revised-1/22/2020). In addition, this breakout tank inspection procedure is not referenced in any part of ONEOK's O&M Manual.

During the inspection, ONEOK representatives stated that the O&M staff, who conduct breakout tank inspections, rely on ONEOK's Breakout Tank Inspections Procedure, which provides detailed guidance in the performance of the breakout tank inspections. ONEOK must review its O&M Manual to ensure it references ONEOK's Breakout Tank Inspections Procedure in the appropriate and applicable sections and amend accordingly.

ONEOK's response:

ONEOK's breakout tanks are subject to §195.432(c) that requires each operator to inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to Section 6 of API Standard 510. ONEOK's Breakout Tank Inspection procedure meets this requirement, and ONEOK's NGL Operations and Maintenance Manual, Section 3, has been updated to reflect these requirements with a reference to ONEOK's Breakout Tank Inspection Procedure.

NOA Item 2(J)

PHMSA observation:

ONEOK's O&M Emergency Procedures are inadequate because the procedures did not provide a process or details for minimizing the likelihood of accidental ignition of vapors in areas near facilities identified in §195.402(c)(4) where the potential exists for the presence of flammable liquids or gases. Section 2 - Emergency Procedures, Accidental Ignition-§195.402(c)(11) does not provide written procedures but only recites the regulatory text of -§195.402(c)(11).

ONEOK must amend its procedures to address the specifics of the ONEOK NGL system by providing more details for minimizing the likelihood of accidental ignition vapors, and not simply paraphrasing §195.402(c)(11).

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ONEOK's response:

ONEOK's NGL Operations and Maintenance Manual, Section 3, has been updated to reference the Prevention of Accidental Ignition – Breakout Tank Procedure.

Our hope is that you will find the responses and information provided sufficient to address the NOA. If you require any additional information or clarification to any of these responses, please contact Gary Numedahl, Director, DOT Compliance, at 918-595-1546 or gary.numedahl@oneok.com.

Sincerely,

DocuSigned by:
Kevin Burdick
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Kevin Burdick
Executive Vice President and Chief Operating Officer

- Attachments:
1. Prevention of Accidental Ignition – Breakout Tanks Procedure
 2. Prevention of Accidental Ignition Procedure
 3. ONEOK Natural Gas Liquids Operations and Maintenance Manual
 4. ONEOK Natural Gas Liquids Operations and Maintenance Manual revisions log