

June 11, 2020

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Pipeline and Hazardous Materials Safety Administration
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Subject: Plan of Correction
Pipeline Safety Regulations, CPF 4-2020-7004
High Point Gas Gathering, L.L.C.

Dear Ms. McDaniel:

High Point Gas Gathering, L.L.C. (HPGG) is submitting this letter to your office to update the Pipeline Safety Division on HPGG's progress for resolution of the alleged violations from CPF 4-2020-7004.

Item No 1 Warning Item: Corrected

Item No 2

Requirement: §195.402 Procedural manual for operations, maintenance, and emergencies.

Description: (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:
(13) Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Comment: HPGG failed to periodically review the work performed by its operating personnel to evaluate the effectiveness of the Operation and Maintenance (O&M) procedures as required by § 195.402(c)(13).

HPGG's written procedure OM-195 – 8.8 Periodic Review of Work Done by Personnel-Rev.1 Eff. 09/04/18 requires Local Operations Supervision, AMID Training personnel, third party, or others designated by Operations Management to annually review the work done by operator personnel to determine the effectiveness of the procedures used in normal O&M and take corrective action where deficiencies are found.

During the inspection, HPGG failed to provide any records to demonstrate that its procedures were periodically reviewed to determine compliance and effectiveness since the acquisition in 2017.

HPGG Comment: In November 2020, HPGG will undertake the annual review of the work done by personnel to determine the effectiveness of the procedures used in normal operation and maintenance, document that review and the results of the review and take any necessary corrective action where deficiencies are found.

Item No 3

Requirement: §195.573 What must I do to monitor external corrosion control?

Description: (a) Protected pipelines. You must do the following to determine whether cathodic protection required by this subpart complies with §195.571:

(1) Conduct tests on the protected pipeline at least once each calendar year, but with intervals not exceeding 15 months. However, if tests at those intervals are impractical for separately protected short sections of bare or ineffectively coated pipelines, testing may be done at least once every 3 calendar years, but with intervals not exceeding 39 months.

Comment: HPGG failed to conduct an annual cathodic protection (CP) survey on its 10" offshore crude pipelines at Viosca Knoll-817 to Main Pass-290 at least once each calendar year, but with intervals not exceeding 15 months to ensure that the pipeline is protected.

HPGG's written procedure OM-195 – 14.3 External Corrosion Rev. 1 Eff. 09/04/2018, section 14.3.9a, requires tests to be conducted on the protected pipeline at least once each calendar year, but with intervals not exceeding 15 months.

During the inspection PHMSA requested CP survey reports for the system for the past three years. HPGG provided CP survey reports for year calendar years 2016 and 2017 performed by Genesis Offshore Holdings, the previous operator. HPGG stated that a CP survey was not performed on the systems for calendar year 2018.

HPGG Comment: HPGG conducted the annual cathodic protection (CP) survey on its 10" offshore crude pipeline at Viosca Knoll-817 to Main Pass-290 in 2019 and will continue to inspect at least once each calendar year, but with intervals not exceeding 15 months to ensure that the pipeline is protected. Documentation of the survey is attached.

Item No 4

Requirement: §195.583 What must I do to monitor atmospheric corrosion control?

Description: (a) You must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months.
Offshore	At least once each calendar year, but with intervals not exceeding 15 months.

Comment: HPGG failed to inspect exposed portions of its 10” offshore crude pipelines from Viosca Knoll-817 to Main Pass-290 for evidence of atmospheric corrosion within a calendar year not to exceed 15 months.

HPGG’s written procedure OM-195 – 14.5 Atmospheric Corrosion Rev. 1 Eff 09/04/2018, section 14.5.0 2.a. ii. Monitoring for Atmospheric Corrosion requires pipelines located offshore to be inspected for evidence of atmospheric corrosion at least once each calendar year, but with intervals not exceeding 15 months. Additionally, HPG’s written procedure requires AMID personnel to record atmospheric corrosion inspections.

During the inspection PHMSA requested Atmospheric Corrosion Inspection Reports for the system for the past three years. HPGG provided Atmospheric Corrosion Inspection report for calendar years 2016, and 2017, which were performed by Genesis Offshore Holdings, the previous operator. HPGG stated that an atmospheric corrosion inspection was not performed on the system for calendar year 2018.

HPGG Comment: Documentation of the 2018 atmospheric corrosion inspection has been located and is attached. HPGG conducted the Atmospheric Corrosion Inspection on its 10” offshore crude pipeline at Viosca Knoll-817 to Main Pass-290 in December 2018. The 2020 inspection is scheduled to be completed by August 1, 2020 (weather permitting). HPGG will continue to inspect at least once each calendar year, but with intervals not exceeding 15 months to ensure that the pipeline is protected.

High Point Gas Gathering, LLC is committed to full compliance with the Commission’s rules and appreciates your consideration in this matter.

Sincerely,

Kevin M. Stanley

Kevin Stanley
Sr. Manager, EHS
High Point Gas Gathering, L.L.C.