

## WARNING LETTER

### ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

August 6, 2021

Richard Hatchett  
President  
Western Gas Interstate Company  
211 North Colorado  
Midland, Texas 79701

CPF 4-2021-021-WL

Dear Mr. Hatchett:

From August 31, 2020 through October 6, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) virtually inspected Western Gas Interstate Company's (WGI) procedures and records.

Based on the inspection, it is alleged that WGI has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

**1. § 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.**

WGI failed to follow its written *Gas Operations and Maintenance Manual* (Revised May 2020) for documenting Cathodic Protection Surveys, Rectifier Inspections, Odorant Concentration Tests, and Abandonment of Facilities.

PHMSA reviewed WGI's Cathodic Protection Annual Survey Report and discovered that no cathodic protection readings were recorded for the B-100 Hinchey Test Station in the calendar year 2019. WGI explained that the B-100 Hinchey Test Station had no readings due to a damaged or defective test lead repaired on October 1, 2020. WGI failed to follow its *Gas Operations and Maintenance Manual, Remedial Action to Correct Deficiencies, P-192.465(d)* (Revised: May 2012) procedure, which requires "Upon the discovery of a cathodic deficiency that cannot be corrected onsite, immediately contact the District / Division Manager" and "Remedial action will be started and documented using F-192.465(d)." WGI could not provide this documentation at the time of the inspection.

Second, WGI failed to follow its *Gas Operations and Maintenance Manual, P-192.465(b), Inspect/Test/Repair Rectifier* (Revised: May 2019) procedures using the appropriate forms to document and record rectifier readings. WGI recorded its inspections from calendar years 2015 through 2020 in a spreadsheet rather than the correct form, WTG-1200 Rectifier Inspection, as stated in its O&M procedure P-192.465(b).

Third, WGI failed to follow its *Gas Operations and Maintenance Manual, P-192.625, Odorization of Gas* (Revised: May 2016) procedure using the appropriate forms to document and record odorant usage and concentration reports for the Beaver District. PHMSA inspectors found that WGI's Odorant concentration test results were not documented correctly utilizing WTG Form F-1303, as stated in its O&M procedure P-192.625. In addition, WGI did not maintain Odorant usage test reports for accuracy and completeness on WTG Form F-1301 for calendar years 2019 and 2020.

Fourth, WGI failed to maintain records of abandonment or deactivation of pipelines and facilities as required by § 192.709(c). WGI indicated that the abandonment of the pipeline segments was performed but failed to follow its *Gas Operations and Maintenance Manual, P-192.727, Abandonment or Inactivation of Facilities* procedure by using Form F-192.727. The following records were not provided for the abandonment of segments:

- 2016 WGI East Line, Texhoma, Texas & Oklahoma Re-route abandoned approximately 1.95 miles of 6" steel pipeline;
- 2016 WGI East Line, Tyrone, Oklahoma HWY 54 Road Expansion abandoned approximately 2.4 miles of 4-inch steel pipeline; and
- 2019 WGI West Line, Stratford, Texas Re-route abandoned approximately 0.85 miles of 6-inch and 2.13 miles of 4-inch steel pipelines.

In each of the above-referenced instances, WGI failed to follow its *Gas Operations and Maintenance Manual* procedures to document work performed.

Subsequent to the inspection, PHMSA requested that WGI submit evidence to reflect the information was transferred to the appropriate forms. WGI provided documentation related to cathodic protection, rectifier readings, and odorization in the correct format; however, the requested abandonment records were not provided.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, Western Gas Interstate Company is subject to a civil penalty not to exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violations occurring on or after January 11, 2021, and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019, and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violations occurring on or after November 27, 2018, and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violations occurring on or after November 2, 2015, and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022.

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 identified in this letter. Failure to do so will result in Western Gas Interstate Company 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 4-2021-021-WL**. 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,

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

Cc: Ray Reed, Director of Pipeline Compliance Management