

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 16, 2009

Mr. Danny Rea
Vice President of Midstream
Anadarko Petroleum Corporation
1201 Lake Robbin Dr.
The Woodlands, TX 77380

CPF 5-2009-5038M

Dear Mr. Rea:

On September 8-11, 2009, a representative from the Western Region of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Granger to MAPCO (HVL) Line near Granger, Wyoming.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

At the time of the inspection the operator's O&M Manual was incomplete in the following sections as noted:

- A. 195.310(b)(2) - Pressure Testing Procedures section was incomplete as it did not require the pressure test records to include test instrument calibration data.
- B. 195.310(b)(10) - Pressure Testing Procedures section was incomplete as it did not require the pressure test records to include the temperature of the test medium or pipe during the test period.
- C. 195.403(a)(2) - Emergency training section was incomplete as it did not include training on the HVL characteristics; flammability, of mixtures with air, odorless vapors, and water reactions.
- D. 195.403(a)(3) - Emergency training section was incomplete as it did not include training to recognize conditions that are likely to cause emergencies, predict the consequences of malfunction or failures, and taking appropriate actions.
- E. 195.403(a)(4) - Emergency training section was incomplete as it did not include training on steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage.
- F. 195.403(a)(5) - Emergency training section was incomplete as it did not include training addressing the potential causes, types, sizes, and consequences of fire involving, where feasible, a simulated pipeline emergency condition.
- G. 195.404(a)(1)(iv) - Maps and Records section was incomplete as it did not require location and identification of pipeline valves on the operator's maps and in the operator's records.
- H. 195.404(a)(1)(vi) - Maps and Records section was incomplete as it did not require location and identification of rights-of-way on the operator's maps and in the operator's records.
- I. 195.404(a)(1)(vii) - Maps and Records section was incomplete as it did not require location and identification of 195.428(a) safety devices on the operator's maps and in the operator's records.
- J. 195.404(a)(2) - Maps and Records section was incomplete as it did not require location and identification all crossings of all buried utilities and foreign pipelines on the operator's maps and in the operator's records.
- K. 195.404(b)(2) - Maps and Records section was incomplete as it did not require the operator to maintain for at least 3 years daily operating records that indicate any emergency or abnormal operation to which the procedures under §195.402 apply.
- L. 195.404(c)(1) - Maps and Records section was incomplete as it did not require the date, location, and description of each repair made on the pipe be and maintain it for the life of the pipe.
- M. 195.404(c)(2) - Maps and Records section was incomplete and did not require the date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least one year.
- N. 195.404(c)(3) - Maps and Records section was incomplete and did not require the records for each inspection and test required by Subpart F shall be maintained for at least 2 years, or until the next inspection or test is performed, whichever is longer.
- O. 195.420(c) - Valve Maintenance section procedures were incomplete because they did not require the operator to provide protection for each valve from unauthorized operation and from vandalism.

- P. 195.442(b) – Damage Prevention Program section did not require the operator to participate in a qualified One-Call even though the operator is using the One-Call services and lists.
- Q. 195.442(c)(3) - Damage Prevention Program section did not identify a means of receiving and recording notification of planned excavation activities.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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). 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 a Final Order.

If, after opportunity for a hearing, 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. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 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.

In correspondence concerning this matter, please refer to **CPF 5-2009-5038M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

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

cc: PHP-60 Compliance Registry
PHP-500 B. Brown (#123921)