



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 9, 2013

Mr. Danny Rea
Vice President, Midstream
Anadarko Petroleum Corporation
1201 Lake Robbins Drive
The Woodlands, TX 77380

CPF 5-2013-1001M

Dear Mr. Rea:

On June 19 to 22, 2012, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Wyoming Public Service Commission, pursuant to Chapter 601 of 49 United States Code, inspected Anadarko Petroleum Corporation's (Anadarko) procedures for their Control Room Management (CRM) Program. The inspection was conducted in Gillette, Wyoming. Anadarko's CRM program was reviewed for compliance with Title 49, Code of Federal Regulations Part 192 subpart L.

On the basis of the inspection, PHMSA identified apparent inadequacies within Anadarko's CRM procedures, as described below:

1. **§192.631 Control Room Management.**
 - (a) **General**
 - (2) **The procedures required by this section must be integrated, as appropriate, with operating and emergency procedures required by §§ 192.605 and 192.615. An operator must develop the procedures no later than August 1, 2011 and implement the procedures no later than February 1, 2013.**

Anadarko's Control Room Management Program did not adequately address the requirements of §192.631(a)(2), a requirement of 49 CFR Part 192, subpart L. Anadarko's written procedures are inadequate because they are not integrated into the Operation and Maintenance (O&M) and Emergency Response Plan either directly or by clear links and/or references.

2. **§192.631 Control Room Management.**

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must:

- (1) A controller's authority and responsibility to make decisions and take actions during normal operations;**
- (2) A controller's role when an abnormal operating condition is detected, even if the controller is not the first to detect the condition, including the controller's responsibility to take specific actions and to communicate with others;**
- (3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others; and**
- (4) A method of recording controller shift-changes and any hand- over of responsibility between controllers.**

Anadarko's Control Room Management Program did not address the requirements of §192.631(b), a requirement of 49 CFR Part 192, subpart L. Specifically, Anadarko's procedures did not require that a controller "log into" a console, and did not reflect current operational login practices. Additionally, Anadarko's procedures were not in place to require that only qualified individuals be allowed to control any console or log in to the control room computers.

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.

It is requested (not mandated) that Anadarko Petroleum Corporation maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Chris Hoidal, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2013-1001M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Hoidal", written in a cursive style.

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 J. Kenerson (#139189)