



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

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

## WARNING LETTER

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 24, 2013

Mr. Troy Valenzuela  
Vice President of Environmental Health and Safety  
Plains Pipeline, L.P.  
333 Clay Street, Suite 1600  
P.O. Box 4638  
Houston, TX 77002

**CPF 5-2013-5016W**

Dear Mr. Valenzuela:

On March 19-21, 2013 and June 11-12, 2013, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Railroad Commission of Texas and New Mexico Public Regulation Commission pursuant to Chapter 601 of 49 United States Code inspected your Control Room Facilities in Midland, Texas. We inspected your control room personnel, control systems, procedures and records.

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

1. **§195.446 (j)(2) Control room management**

**(j) Compliance and deviations. An operator must maintain for review during inspection:**

**(2) Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of the pipeline facility.**

Plains did not follow Management of Change (MOC) procedures when changes were made to the Pipeline Control Procedure Manual procedures. Additionally, changes were made to the critical alarm type description and response priority.

Plains did not follow their Change Management Procedure, Section 7 of the Midland Control Room Management Plan. Section 7.2, Communication During Changes to Pipeline Equipment states that “pipeline systems/processes which are generally covered by the MOC process include but are not limited to: purchase or sale of physical assets, new equipment coming online, retired equipment going offline, operations and maintenance manuals, new or revised procedures, operating responsibilities between pipeline controllers and field personnel or third-party operations, field maintenance activity affecting pipeline control room operations, control system changes, SCADA system changes.” At the time of the inspection, PHMSA representatives discovered that several procedures from different manuals were consolidated into a Pipeline Control Procedure Manual. The lack of documentation and interviews with control room staff demonstrates that Plains did not follow their MOC procedure for modifying their Pipeline Controller Procedure Manual.

**2. §195.446(j)(1) Control room management**

**(j) Compliance and deviations. An operator must maintain for review during inspection:**

**(1) Records that demonstrate compliance with the requirements of this section;**

At the time of inspection, PHMSA representatives discovered several Abnormal Operations forms (Form 103) were not completely filled out. The missing information included Maximum Operating Pressure (MOP) information, signatures and dates, and the reviewer’s signature.

**3. §195.446(j)(1) Control room management**

**(j) Compliance and deviations. An operator must maintain for review during inspection:**

**(1) Records that demonstrate compliance with the requirements of this section;**

There were not any records produced to demonstrate complying with this requirement to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 month.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 2013-5016W**. 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,

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

cc: PHP-60 Compliance Registry  
PHP-500 K. Nguyen (#142641)