

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 5, 2017

Mr. Charles Stanley  
CEO, QEP Resources  
QEP Marketing Co.  
1050 17<sup>th</sup> St., Suite 800  
Denver, CO 80265

**CPF 5-2017-1013W**

Dear Mr. Stanley:

On August 21 through 25, 2017, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Clear Creek Gas Storage facility, northeast of Evanston, Wyoming.

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

- 1. §191.29 National Pipeline Mapping System.**  
**(b) The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at [www.npms.phmsa.dot.gov](http://www.npms.phmsa.dot.gov) or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.**

During the records review of the Clear Creek Gas Storage facility, it was noted that no notifications were sent to the National Pipeline Mapping System (NPMS) to comply with the annual requirements, or to document any changes from 2010 through 2016.

2. **§192.465 External corrosion control: Monitoring.**  
**(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.**

During the records review of your annual Cathodic Protection (CP) surveys, it was noted that QEP exceeded the once each calendar year, but not to exceed 15 months interval between your 2015 and 2016 annual surveys.

3. **§192.807 Recordkeeping.**  
**Each operator shall maintain records that demonstrate compliance with this subpart.**  
**(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.**

During the records review of your qualification of pipeline personnel, it was noted that one of your Operators did not have a record of qualification on file for performing an OQ task. The OQ task performed was for taking and recording rectifier readings from January through August of 2016, in accordance with §192.465(b).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists up to a maximum of \$2,090,022 for a related series of violations. 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 items identified in this letter. Failure to do so will result in QEP Marketing 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 5-2017-1013W**. 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,

Kim West  
Acting Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 J. Coleman (#156207)