

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 4, 2017

Mr. Al Walker
President
Anadarko Petroleum Corporation
1201 Lake Robbins Drive
The Woodlands, TX 77380

CPF 5-2017-6011M

Dear Mr. Walker:

On October 26 through 30, 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Anadarko Petroleum Corporation's procedures for atmospheric corrosion control, and rectifiers and other devices inspections in Vernal, Utah.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Anadarko's plans or procedures, as described below:

- 1. §195.402 Procedural manual for operations, maintenance, and emergencies.**
(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

Anadarko Petroleum Corporation (APC) did not establish adequate written atmospheric corrosion control procedures to give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under bonded coatings, at pipe supports, in splash zones, at deck

penetrations, and in spans over water in accordance with §195.583(b). At the time of the inspection, it was noted that the procedure in the APC Manual does not provide sufficient guidance for performing the inspection of aboveground pipelines exposed to the atmosphere, especially pipe at soil-to-air interfaces, under thermal insulation, under disbanded coatings, or at pipe supports. Therefore, APC must modify their procedure to provide specific details on how to inspect the above ground pipelines for atmospheric corrosion as required by §195.583(b).

2. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (c) ***Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**
 - (3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

APC did not establish adequate written procedure for performing inspections of rectifiers, interference bonds, diodes, or reverse current switches in accordance with §195.573(c). At the time of the inspection, it was noted that the procedure in the APC Manual only specifies the inspection frequency for checking rectifiers and other devices in accordance with §195.573(c). Therefore, APC must modify their procedure to provide details on how to perform inspections of rectifiers, interference bonds, diodes, or reverse current switches as required by §195.573(c).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. §190.206). 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 5-2017-6011M** 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 D. Fehling (#153720)