

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 17, 2018

Ms. Cynthia Warner  
Executive Vice President, Operations  
Andeavor  
19100 Ridgewood Parkway  
San Antonio, TX 78259

CPF 5-2018-0011W

Dear Ms. Warner:

On June 11 through 15, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, inspected Andeavor's transmission gas pipeline system's plans and records for operations and maintenance, and conducted a field evaluation of the pipeline systems in Long Beach, California.

As a result of the inspection, it is alleged that Andeavor has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violations is:

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
  - (a) **General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

Andeavor did not review its Emergency Response Plan (ERP) at intervals not exceeding 15 months, but at least once each calendar year. At the time of the inspection, Andeavor stated that the ERP has not been reviewed in 2017. In addition, the ERP's Review Log shown at the time of inspection did not indicate that the ERP was reviewed in 2017.

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. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 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 item identified in this letter. Failure to do so will result in Andeavour 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 5-2018-0011W**. 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  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 M. Garcia (#160546)