

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

April 1, 2019

Mr. Stanley Chapman III
President, US Gas Pipelines
Columbia Gas Transmission, LLC
700 Louisiana Street, Suite 700
Houston, TX 77002

CPF 1-2019-1006W

Dear Mr. Chapman:

On July 12, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Columbia Gas Transmission, LLC's (CGT) WB Express construction project in Strasburg, Virginia.

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

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.**

CGT failed to follow its manual of written procedures for conducting maintenance activities. Specifically, CGT failed to follow its "Blow Down and Purge Procedure Gate Setting to Station Fire Valves VB, VB-5, VB-Loop to Bypass Station" dated 03/27/2018 (BD Procedure) by failing

to install locks and tags on valves 331 and 334 during maintenance activities at its Strasburg, Virginia compressor station.

During the inspection, the PHMSA inspector observed that valves 331 and 334 were not locked and tagged in the post-blowdown period during maintenance and construction activities when the station was in an outage. Specifically, CGT's BD Procedure required valves 331 and 334 be locked and tagged after the station is blown down and during an outage. In the section entitled "Individual Valve Operations Guide for Blow Down", operation #17 states, "Open, lock, and tag VB-5 receiver valve 334...". Also, operation # 26 of the same section states, "Open, lock, and tag VB-Loop receiver valve 331...". Subsequent to the inspection and the inspector notifying CGT of the observation, the valves were locked and tagged.

Therefore, CGT failed to follow its manual of written procedures for conducting maintenance activities by not locking and tagging valves 331 and 334 in accordance with its BD Procedure.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$213,268 per violation per day the violation persists, up to a maximum of \$2,132,679 for a related series of violations. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022. 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(s) identified in this letter. Failure to do so will result in Columbia Gas Transmission, LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, 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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2019-1006W** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration