

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

November 3, 2022

Mr. Stanley Chapman III
President US & Mexico Natural Gas
Columbia Gas Transmission, LLC
700 Louisiana Street
Houston, Texas 77002

CPF 1-2022-075-WL

Dear Mr. Chapman:

From August 9, 2021 to May 16, 2022, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) performed an integrated inspection of Columbia Gas Transmission, LLC's (Columbia) PHMSA inspection system #1753, which included pipeline facilities inspected in Gragston, West Virginia and Paris, Kentucky.

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 item inspected and the probable violation 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.

Columbia failed to follow its manual of written procedures. Specifically, Columbia failed to follow its *Valve Numbering and Tagging Procedure, dated 07/01/19* (Valve Tag Procedure) for tagging valves at its Gragston and Paris mainline valve settings that may be necessary in an emergency, in accordance with § 192.605(a).

Columbia's Valve Tag Procedure identified that each designated emergency valve, among several other valve types, requires a tag. The procedure goes on to describe requirements for the design and installation of temporary and permanent tags.

During the field inspections conducted during the weeks of August 9, 2021, and May 16, 2022, PHMSA observed that Columbia failed to adequately place or replace legible valve identification numbers on at least (4) valves that could be used in an emergency at the Gragston MLV P-280 valve setting, and at least (1) valve at the Paris, Kentucky MLV 130 valve setting. For the Gragston valve station, Columbia discussed that temporary valve tags were installed after the field inspection that correspond to the pipeline system mapping. Permanent valve tags would be installed immediately upon delivery. For the Paris valve station, Columbia discussed concerns about providing an MLV ID tag as they are not the owner of the asset. However, Columbia is the operator of this asset, and the TC Energy sign was permanently attached to the fence surrounding the valve site.

Therefore, Columbia failed to follow its manual of written procedures for tagging valves, in accordance with § 192.605(a).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. 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.

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 Columbia Gas Transmission, LLC 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 1-2022-075-WL**. 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,

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