



VIA ELECTRONIC MAIL TO: Gregory.Ochs@dot.gov

January 31, 2022

Mr. Greg Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

RE: CPF 3-2022-030-NOPV

Dear Mr. Ochs:

This letter is in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA), Notice of Probable Violation and Proposed Civil Penalty CPF 3-2022-NOPV dated January 24, 2022. This notice from PHMSA contained a 30-day notification period to submit a response and the response option(s) that WTG-Hugoton is utilizing within this response. The following is WTG-Hugoton's official response.

PHMSA alleges that WTG-Hugoton committed two (2) probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). Our response is organized as following: **a)** PHMSA's proposed violations, **b)** the response option from WTG-Hugoton, and **c)** WTG-Hugoton's supporting information concerning the issue.

The first noted violation within the NOPV document:

- a) 1. § 192.227 Qualification of welders and welding operators.**
(a) Except as provided in paragraph (b) of this section, each welder or welding operator must be qualified in accordance with section 6, section 12, Appendix A or Appendix B of API Std 1104 (incorporated by reference, see §192.7), or section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see § 192.7).

WTG-Hugoton (WTG) failed to properly qualify a welder that performed repairs to its KSG-390-01 pipeline in Finney County, KS. From a review of welder qualification records, PHMSA found that a welder qualification dated April 23, 2019, showed that the welder did not adhere to the parameters of WTG's "Standard Welding Procedure Specification #6" (Procedure). The Procedure was qualified according to the requirements of API Standard 1104, 20th Edition. Regarding welder qualification, Section 6.2.1 of the API Standard states that "a welder shall make a test weld using a qualified procedure."



The test weld record showed that the welder failed to follow the specification for amperage and welding electrode (rod) size, as follows:

	Specified parameters	Recorded parameters
Root bead current	110-130 amps	93-98 amps
Root bead electrode size	5/32"	1/8"
Cap pass current	135-175 amps	124-130 amps
Cap pass electrode size	3/16"	5/32"

By allowing the welder to qualify using amperage and electrodes that did not conform to the qualified welding procedure, WTG failed to properly qualify the welder.

- b) WTG-Hugoton is not contesting the first noted violation, option 1.
- c) The WTG-Hugoton admits the contract welder failed to follow company welding procedures. In our defense, during the qualification testing, the weld passed the destructive testing process. In addition, the repair welds on the KSG-390-01 were non-destructive tested and passed all criteria.
To assist in prevent re-occurrence; WTG-Hugoton has revised O&M procedure P-192.225 Pipeline Welding, Section 2 Welder Qualifications includes the requirement of using WTG approved welding procedures during the qualification process and documentation of the testing on WTG forms. These forms clearly state what welding procedure was used during the qualification process.

The second noted violation within the NOPV document:

- a) **2. § 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.
 - (b) Maintenance and normal operations.** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
 - (1)
 - (2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.



WTG failed to follow its written procedural manual regarding controlling corrosion. WTG's procedure P-192.465(a) requires personnel performing cathodic protection (CP) monitoring to "field-analyze readings to ensure that they meet one of the following criteria as allowed in 49 CFR 192 Appendix D" and to "promptly notify appropriate personnel if readings do not fall within desired range." Procedure P-192.465(d) further directs field personnel to "immediately contact the District / Division Manager" upon discovery of a cathodic deficiency that cannot be corrected onsite, and states that "[r]emedial action will be started and documented using F-192.465(d)."

WTG stated that the -850mV and 100mV polarization shift criteria from Appendix D are applied to evaluate the adequacy of their cathodic protection. From a review of the 2019 and 2020 annual cathodic protection monitoring surveys, PHMSA found that the following test points showed that cathodic protection did not meet the criteria required by Part 192, Appendix D:

CP Test Station	Test Date	Energized CP Potential	Instant Off Potential	Depolarized Potential
Drip #5	03/25/2019	-0.818	-0.715	-0.670
Rmillo Farm Tap	03/25/2019	-0.880	-0.669	-0.631
SV Wilson F#3	03/25/2019	-0.993	-0.727	-0.660
TL & Sec Ln Road	03/25/2019	-0.971	-0.665	-0.601
SV TO KB608 – BV TO	03/13/2020	-0.850	-0.712	-0.679
TL at N/S Fence on East ROW Lakin Ln	03/02/2020	-0.904	-0.785	-0.687

In each instance above, WTG failed to perform analysis of the reading, report the deficiency, or take any corrective action.



- b) WTG-Hugoton is not contesting the second noted violation but would like to provide additional relevant information, option 2.
- c) WTG-Hugoton admits that afore noted CP test readings did not meet criteria established in WTG's O&M Procedure P-192.465(a). Which is based on CFR 192 Appendix D. For each of the documented CP test locations; WTG-Hugoton did preform analysis of the readings, did report the deficiencies, and took corrective action. What WTG-Hugoton failed to complete was the documentation of these actions. The following is a brief description of our actions for each of the deficient readings. In support WTG Hugoton is providing the following year(s) annual CP surveys which clearly shows remedial action had take place as these reading clearly met criteria.

The first four documented test stations (Drip #5, Rmillo Farm Tap, SV Wilson F#3, TL & Sec Ln Road) are all on the same pipeline segment (KSG 43001) in rural Haskell and Seward County KS. The cathodic protection for this segment of the pipeline is supplied by another pipeline operator (Oneok), as an agreement from a previous Purchase Sale Agreement (PSA). When the low readings were identified during the March 2019 survey was conducted, WTG-Hugoton's technician contacted his counterpart with Oneok and verbally requested the CP current to be increased. This request was met and the Oneok rectifier output was increased. At later date the technician re-tested the test stations, and the remediation was deemed to be effective. This information is supported by the 2020 and 2021 surveys as these test station meets established criteria. The following is a table containing the data from these two surveys for these specific points (the complete surveys are attached to this response):

Segment Name	CP Test Station	TEST Date	Instant			Δ mV
			Energized CP Potential	Off Potential	Depolarized Potential	
KSG 43001	Drip #5	3/25/2019	-0.818	-0.715	-0.670	-0.045
		4/16/2020	-0.969	-0.917	-0.621	-0.296
		4/14/2021	-0.842	-0.764	-0.606	-0.158
KSG 43001	Rmillo Farm Tap	3/25/2019	-0.880	-0.669	-0.631	-0.038
		4/16/2020	-1.003	-0.828	-0.574	-0.254
		4/14/2021	-0.916	-0.758	-0.569	-0.189
KSG 43001	SV Wilson F #3	3/25/2019	-0.993	-0.727	-0.660	-0.067
		4/16/2020	-1.060	-0.826	-0.579	-0.247
		4/14/2021	-0.995	-0.765	-0.420	-0.345
KSG 43001	TL & Sec Ln Road	3/25/2019	-0.971	-0.665	-0.601	-0.064
		4/16/2020	-1.300	-1.119	-0.555	-0.564
		4/14/2021	-0.940	-0.751	-0.556	-0.195



The fifth documented test station (SV to KB608 – BV to KNE) is on the KSB60801 in rural Finney County KS. This pipeline's cathodic protection system is erratic. A project is being proposed to management to improve cathodic protection for this pipeline.

Segment Name	CP Test Station	TEST Date	Energized CP Potential	Instant		Δ mV
				Off Potential	Depolarized Potential	
KSC390	SV to KB608 - BV to KNE	3/13/2020	-0.850	-0.712	-0.679	-0.033
		3/2/2021	-0.994	-0.802	-0.700	-0.102

The sixth documented test station (TL N/S Fence E. ROW Lakin lane) is on the KSM11601 in rural Kearny County KS. During the review of the 2020 CP survey on the KSM11601, the discovery of this reading not meeting criteria; WTG-Hugoton's technician remembered a Non-critical bond with a gathering pipeline close to this test station. This Non-critical bond was not interrupted during the depolarization of the pipeline which continued to allow the gathering companies cathodic protection system to influence the KSM11601 and the pipeline did not completely depolarize. A second depolarization of this segment was completed including the isolation of the Non-critical bond and this test station meet criteria at that time. Again, this second depolarization process was not documented. A note was found in the technician's documentation that the Non-critical bond needs to be isolated during the depolarization process. This information is supported by the 2021 survey as this test station meets established criteria. The following is a table containing the data from these two surveys for these specific points (the complete surveys are attached to this response):

Segment Name	CP Test Station	TEST Date	Energized CP Potential	Instant		Δ mV
				Off Potential	Depolarized Potential	
KSM116	TL N/S Fence E. ROW Lakin Lane	3/2/2020	-0.904	-0.785	-0.687	-0.098
		3/2/2021	-0.898	-0.730	-0.480	-0.250



In closing WTG-Hugoton respectfully request PHMSA to take into consideration our responses to these alleged violations and the civil penalty. Corrective action was taken to mitigate the cathodic protection defiance's in a timely manner. Where we failed, was in our documentation process.

Respectfully submitted,

A handwritten signature in black ink that reads "Ray Reed".

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