



Southern Star Central Gas Pipeline, Inc.
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Phone 270/852-5000

May 27, 2022

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Central Region Office
901 Locust Street, Suite 480
Kansas City, Missouri 64106

Mr. Greg Ochs,

RE: Response to Notice of Probable Violation and Proposed Civil Penalty (CPF 3-2022-045-NOPV)

On April 28, 2022, you issued a letter to Southern Star Central Gas Pipeline, Inc (Southern Star) outlining a Notice of Probable Violation (NOPV) and Proposed Civil Penalty based upon an inspection, which was performed pursuant to Chapter 601 of 49 United States Code. In the Notice of Probable Violation, PHMSA alleged that Southern Star has committed probable violations of the Pipeline Safety Regulations:

- Item 1 – Violation of §192.631 Control Room Management – Southern Star failed to follow their procedure with training controllers and others on the policy of disallowing others who have authority to direct or supersede the specific technical actions of a controller.
- Item 2 – Violation of §192.631 Control Room Management – Southern Star failed to verify they implemented the required sections of API RP 1165 in their SCADA system.
- Item 3 – Violation of §192.631 Control Room Management - Southern Star failed to review false alarms for the years 2019 and 2020. Assessed civil penalty totaling \$27,900.
- Item 4 – Violation of §192.631 Control Room Management – Southern Star's Team Training OPR054 failed to include at least one controller or control room representative during 6 training sessions in 2018 and 2019. Assessed civil penalty totaling \$27,900.
- Item 5 - Violation of §192.631 Control Room Management – Southern Star's records failed to demonstrate compliance with the control room management regulation. Southern Star did not produce training records for one controller trainee.

Southern Star's responses are below to the proposed violation items:

Item 1 – Violation of §192.631 Control Room Management (Compliance Order)

Southern Star does not contest the enforcement action for item 1. Southern Star's Gas Control Team has completed updated training in March 2022 with remaining Team Resource Management (TRM) Collaborator's training in process with a completion by the end of May. Southern Star will be providing documentation to illustrate the Compliance Order associated with item 1 is completed within 90 days of receipt of the Final Order.

Item 2 – Violation of §192.631 Control Room Management (Compliance Order)

Southern Star does not contest the enforcement action for item 2. The API 1165 audit and SCADA markup are complete and implementation underway with an estimated completion of July 2022. Southern Star will be providing documentation to illustrate the Compliance Order associated with item 2 is completed within 90 days of receipt of the Final Order.

Item 3 – Violation of §192.631 Control Room Management (\$27,900 Civil Penalty)

Southern Star does not contest the enforcement action for item 3. Southern Star has remediated this process to ensure compliance with monthly reviews going forward.

Item 4 – Violation of §192.631 Control Room Management (\$27,900 Civil Penalty)

Based upon additional support discovered following the audit, Southern Star contests the enforcement action for item 4 and elects to not have a hearing. Please see additional support summarized below and contained in the attachments.

NOPV 2018-2019 Training Dates	Response Attachment	Attachment Comments
5/21/2018	N/A	No TRM Training was conducted on this date.
7/24/2018	1	The recording of this training illustrates Gas Controller Personnel (Dustin Burch and Bill Dechman) hosting the training. Dustin Burch – Manager, Gas Control Bill, Dechman – Lead Gas Controller
9/25/2018	2	Survey Document illustrating Bill Dechman was the Gas Control Representative for the training on this date (Page 2, item #65).
10/22/2018	3	Company-wide TRM communication illustrating Gas Control Representatives are conducting the training.
10/21/2019	4	Page 1, 2, and 3 of the attachment with sections highlighted in yellow illustrate that Gas Control was part of this training.
11/1/2019	5	Page 1 and 2 with sections highlighted in yellow illustrate that Gas Control was part of this training.

Item 5 – Violation of §192.631 Control Room Management (Warning Item)

Southern Star does not contest the enforcement action for item 5. The expectation was set to sign off on the actual day of training, current records will be submitted for long term storage. See attached procedure 40.14.01 (Response Attachment 6) section 5.1.3 documentation requirements under Gas Controller Trainee Binder.

Southern Star is committed to operating a safe and reliable pipeline and will continue to take measures daily to protect those individuals who live and work along our system.

Sincerely,

/s/ 

V.P. & Chief Operations Officer