

WARNING LETTER

VIA ELECTRONIC MAIL TO: shawn.patterson@southernstar.com;
Craig.Thomas@southernstar.com

November 29, 2023

Shawn Patterson
President and CEO
Southern Star Central Gas Pipeline, Inc.
4700 State Route 56
Owensboro, KY 42301

CPF No. 3-2023-034-WL

Dear Mr. Patterson:

On September 28, 2022, of the on-site investigation, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Southern Star Central Gas Pipeline, Inc.'s (Southern Star) Nash Compressor Station in Nash, Oklahoma.

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

- 1. § 192.161 Supports and anchors.**
 - (a)**
 - (d) Each support on an exposed pipeline operated at a stress level of 50 percent or more of SMYS must comply with the following:**
 - (1)**
 - (2) The support must be provided by a member that completely encircles the pipe.**

Southern Star failed to provide supports that completely encircle the pipeline on an exposed pipeline. During a field inspection conducted in Nash, Oklahoma on September

28, 2022, PHMSA observed that the above ground piping between the compressor station suction block valve and the compressor filter did not have supports that fully encircle the pipe.

Southern Star confirmed, via email on September 28, 2023, that the pipeline supports would be replaced.

2. § 192.317 Protection from hazards.

(a) The operator must take all practicable steps to protect each transmission line or main from washouts, floods, unstable soil, landslides, or other hazards that may cause the pipeline to move or to sustain abnormal loads. In addition, the operator must take all practicable steps to protect offshore pipelines from damage by mud slides, water currents, hurricanes, ship anchors, and fishing operations.

Southern Star failed to take all practicable steps to protect its transmission line from a hazard that could cause the pipeline to move or sustain an abnormal load. During a field inspection conducted in Nash, Oklahoma on September 28, 2022, PHMSA observed that the above ground piping between the compressor station suction block valve and the compressor filter was supported by foundations that did not extend below the surface grade. Nash, Oklahoma is located in a temperate climate where the soil may freeze and cause the soil to expand. This expansion causes an abnormal load on the pipe it supports.

Southern Star confirmed, via email on September 28, 2023, that the pipeline supports would be replaced with supports that extend below the surface grade.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not 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 items identified in this letter. Failure to do so will result in Southern Star Central Gas Pipeline, Inc. being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **3-2023-034-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,

Gregory Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Craig Thomas (Craig.Thomas@southernstar.com)