

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: shawn.patterson@southernstar.com;
craig.thomas@southernstar.com

February 2, 2024

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

CPF No. 3-2024-013-NOA

Dear Mr. Patterson:

From March 2 through September 30, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted on-site inspections of Southern Star Central Gas Pipeline, Inc.'s (Southern Star) natural gas transmission pipelines and facilities located in the states of Oklahoma, Missouri, Kansas, Texas, Nebraska, Colorado, and Wyoming.

As a result of the inspection, PHMSA has identified the apparent inadequacy found within Southern Star's plans or procedures. The item inspected and the inadequacy is described below:

- 1. § 192.739 Pressure limiting and regulating stations: Inspection and testing.**
 - (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—**
 - (1)**
 - (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;**

Southern Star Procedure 60.02.02, entitled “Testing and Maintaining Overpressure Protection Devices Procedure,” was inadequate to ensure the reliable operation of overpressure protection devices. Specifically, Procedure 60.02.02 did not provide clear requirements for the evaluation of mechanical overpressure protection device inspections. The process detailed in Procedure 60.02.02 did not require evaluation of major adjustments from the perspective of reliability after devices failed to actuate at the proper set point.

Mechanical overpressure protection devices that require major adjustments often malfunction again shortly after adjustments. Malfunctions cause the devices to fail to relieve at the proper pressure. Additionally, Procedure 60.02.02 failed to (1) outline testing parameters or results that may indicate a reliability problem with mechanical devices; and (2) prescribe a process to follow up on reliability issues when needed.

Southern Star revised its procedures on June 29, 2023, including additional requirements for follow-up inspections when set point drift indicated a reliability issue with an overpressure device. Therefore, no further action or response is required.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

Please refer to this document and note the response options. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. As mentioned above, Southern has already submitted its amended procedures to PHMSA, including additional requirements for follow-up inspections when set point drift indicated a reliability issue with an overpressure device, which reflect the amendments required by this Notice. These amended procedures were reviewed and found to be adequate by PHMSA; therefore, no further action or response is required. If no additional response is received within 30 days of receipt of this Notice, this enforcement will be automatically closed.

It is requested that Southern Star Central Gas Pipeline, Inc. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory Ochs, Director, Central, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2024-013-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central, OPS
Pipeline and Hazardous Materials Safety Administration

cc: Craig Thomas, Manager Integrity Management & PHMSA Compliance,
craig.thomas@southernstar.com

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*