



September 19, 2024

Via Electronic Mail to: Gregory.Ochs@dot.gov

Mr. Gregory A. Ochs, Director
Central Region, Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Ste. 480
Kansas City, MO 64106

Re: CPF 3-2024-063-NOA

Dear Mr. Ochs,

Viking Gas Transmission Company (VGT), a subsidiary of ONEOK, Inc., received the above-mentioned Notice of Amendments dated August 20, 2024. VGT appreciates the opportunity to respond. VGT does not contest Items 1-3. Regarding Item 4, VGT agrees that guidance concerning time frames for physical examination of anomalies is important and contends that such guidance is already contained in Section 9 of its NG IMP. Accordingly, VGT requests a hearing on this matter and will be represented by counsel. VGT also requests an informal settlement conference as it believes that this matter should be fully resolved prior to a hearing. VGT appreciates the opportunity to work with PHMSA toward resolving Item 4. More detailed responses are below.

Item 1. §192.605 Procedural manual for operations, maintenance, and emergencies.

Each operator shall include the following in its operating and maintenance plan:

(a)...

(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.

VGT's procedural manual for operations, maintenance, and emergencies was inadequate as it did not include adequate procedures for "[c]ontrolling corrosion in accordance with the operations and maintenance requirements of subpart 1, per §§192.605(a) and (b)(2). Subpart I

“Requirements for Corrosion Control,” includes §192.469 “External corrosion control: Test station.” Specifically, VGT’s procedure, entitled “Corrosion Control Standard,” was inadequate because it failed to identify criteria to determine if a sufficient number of test stations currently existed for electrical measurement to determine the adequate cathodic protection, as required by §192.469. VGT’s Corrosion Control Standard Appendix D failed to (1) identify a method for determining sufficient number of test points, and (2) prescribe when additional cathodic protection surveys are required to determine the adequacy of the cathodic protection. The procedure must be amended to provide criteria for identifying if a sufficient number of test stations are available and to clarify when additional cathodic protection surveys are required.

VGT RESPONSE:

VGT does not contest this item and will make appropriate amendments to its procedures and submit to PHMSA in a timely manner.

Item 2. §192.907 What must an operator do to implement this subpart?

(a) General. No later than December 17, 2004, an operator of a covered pipeline segment must develop and follow a written integrity management program that contains all the elements described in §192.911 and that addresses the risks on each covered transmission pipeline segment. The initial integrity management program must consist, at a minimum, of a framework that describes the process for implementing each program element, how relevant decisions will be made and by whom, a timeline for completing the work to implement the program element, and how information gained from experience will be continuously incorporated into the program. The framework will evolve into a more detailed and comprehensive program. An operator must make continual improvements to the program.

VGT’s Natural Gas Integrity Management Plan Appendix – Procedures” (NG IMP Appendix) was inadequate because it failed to include timelines for completing the work to implement the required program element, per the requirements of §192.907(a). Specifically, NG IMP Appendix Procedure 63, entitled “Data Integration,” section 5 failed to identify when a pre-assessment evaluation must be conducted or when a post-assessment evaluation must be completed. By not establishing a time frame or trigger condition to conduct or complete either the pre-assessment evaluation or post-assessment evaluation, VGT personnel will not know when these processes must be conducted. The procedure must be amended to include a time frame or trigger to conduct and complete the pre-assessment evaluation and post-assessment evaluation.

VGT RESPONSE:

VGT does not contest this item and will make appropriate amendments to its procedures and submit to PHMSA in a timely manner.

Item 3. §192.907 What must an operator do to implement this subpart?

(a) General. No later than December 17, 2004, an operator of a covered pipeline segment must develop and follow a written integrity management program that contains all the elements described in §192.911 and that addresses the risks on each covered transmission pipeline segment. The initial integrity management program must consist, at a minimum, of a framework that describes the process for implementing each program element, how relevant decisions will be made and by whom, a timeline for completing the work to implement the program element, and how information gained from experience will be continuously incorporated into the program. The framework will evolve into a more detailed and comprehensive program. An operator must make continual improvements to the program.

VGT's NG IMP Appendix was inadequate because it did not include all of the elements described in §192.911, per the requirements of §192.907(a). Section 192.911(c), "What are the elements of an integrity management program?" requires operators to use threat identification and risk assessment, per §192.917. VGT's NG IMP Appendix failed to address the threat of lamination (mid wall indications), as required by §192.917. Lamination is an identified threat under ASME B31.85 (incorporated by reference), as it is a "manufacturing related defect." Specifically, VGT's NG IMP Appendix Procedure 53 failed to include an evaluation method or repair criteria for the threat of lamination. The procedure must be amended to include an evaluation method and repair criteria for the threat of lamination.

VGT RESPONSE:

VGT does not contest this item and will make appropriate amendments to its procedures and submit to PHMSA in a timely manner.

Item 4. §192.907 What must an operator do to implement this subpart?

(a)...

(b) Implementation Standards. In carrying out this subpart, an operator must follow the requirements of this subpart and of ASME B31.8S (incorporated by reference, see §192.7) and its appendices, where specified. An operator may follow an equivalent standard or practice only when the operator demonstrates the alternative standard or practice only when the operator demonstrates the alternative standard or practice provides an equivalent level of safety to the public and property. In the event of a conflict between this subpart and ASME B31.8S, the requirements in this subpart control.

VGT's NG IMP Appendix was found to be inadequate because it failed to define when and how a "response plan shall be developed," as required by §§192.907(a) and (b), and ASME B31.8S (incorporated by reference in §192.7). Specifically, VGT's NG IMP Appendix Procedure 53 referenced a remediation plan, but failed to prescribe plan requirements. Additionally, VGT's NG IMP App Procedure 63 referenced a remediation schedule, but failed to prescribe schedule

requirements. Thus, VGT's NG IMP Appendix failed to provide adequate guidance concerning time frames for physical examination of anomalies. The procedures must be modified to include a response plan and schedule for anomalous conditions identified during the assessment.

VGT RESPONSE:

VGT respectfully contests this item. VGT agrees that guidance concerning time frames for physical examination of anomalies is important. VGT NG IMP Section 9 already includes tables outlining scheduling for anomalous conditions identified during assessments. These tables were recently updated to meet the new requirements of 192.714 and 192.933. The updated tables (section 9.1.2.1 - Table 4 and section 9.1.2.2 - Table 5) of the NG IMP Section 9 are included with this response as Attachment 1.

VGT respects PHMSA's commitment toward pipeline safety and shares that goal. VGT looks forward to the opportunity to work with you toward resolving Item 4.

Sincerely,



Jason Smith
Vice President Asset Integrity

cc: Charles Misak, Director Integrated Operations Services
James Akingbola, VP Natural Gas Pipeline Operations
Adam Theis, Regulatory Compliance Coordinator Senior
DOTCompliance@oneok.com