



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

901 Locust Street, Suite 480
Kansas City, MO 64106

WARNING LETTER

VIA ELECTRONIC MAIL TO: randy.lentz@oneok.com; jamie.hoskin@oneok.com;
teri.anderson@oneok.com; charles.misak@oneok.com; laurie.england@oneok.com

May 8, 2025

Randy Lentz
EVP, Chief Operating Officer
ONEOK, Inc.
100 West Fifth Street
Tulsa, Oklahoma 74103

CPF 3-2025-026-WL

Dear Mr. Lentz:

From February 27 to November 22, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted an onsite inspection of the pipelines and facilities of ONEOK, Inc. ("ONEOK") in Drumright, Oklahoma.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

- 1. § 195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) General.** Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

ONEOK failed to follow its written procedures for conducting operations and maintenance activities, per the requirements of § 195.402(a). Specifically, ONEOK failed to follow its Operations and Maintenance (O&M) Procedure 7.13-ADM-013, entitled “Risk Based Inspection Program,” section 8.1, “Dead Legs,” where the procedure mandated utilizing ultrasonic testing equipment to evaluate pipeline dead leg integrity.

During the inspection of the Drumright facility, PHMSA discovered a 16-inch diameter crude oil dead leg above ground, approximately 24 feet in length, that had been in operation since 2010. ONEOK confirmed that it had never incorporated the newly discovered dead leg into the facility risk analysis, and ONEOK had not used ultrasonic testing equipment to evaluate its wall thickness for internal corrosion. Thus, ONEOK failed to follow O&M Procedure 7.13-ADM-013 to evaluate the integrity of the pipe, as required per § 195.402(a).

ONEOK personnel, upon confirmation of the newly discovered dead leg, immediately responded by confirming the dead leg will be analyzed and added to the company database supporting procedure 7.13-ADM-013 Risk Based Inspection Program 8.1 Dead Legs for the 2025 facility risk analysis.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024 the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023 the maximum penalty may not 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.

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 item identified in this letter. Failure to do so will result in ONEOK, 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 **CPF 3-2025-026-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 A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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