WTG

October 13, 2011

Via Overnight Delivery

Mr. R. M. Seeley, Director – SW Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

RECEIVED
OCT 14 2011
BY:

Re: CPF 4-2011-1008M

Dear Mr. Seeley:

This correspondence shall serve as a supplement to our earlier September 22, 2011 response to the referenced Notice of Amendment (Notice).

West Texas Gas, Inc. (WTG) has enclosed its Integrity Management Plan Revision 4 dated March 3, 2011, which has also been uploaded into PHMSA's IMDB, containing amendments or revisions to correct for those alleged inadequacies identified in the Notice dated August 22, 2011. WTG's response below provides a cross reference (bulleted text) between the inadequacies identified in the Notice and WTG's IMP Revision 4.

1A. WTG does not have language in their IM Plan that notification of use of other technology that an operator demonstrates can provide an equivalent understanding of the condition of the line pipe is made to a state or local pipeline safety authority when required. Notification to a state or local pipeline safety authority is required when either a covered segment is located in a state where PHMSA has an interstate agent agreement, or an intrastate covered segment is regulated by that state. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding of the use of other technology during the inspection.

- WTG included additional and/or revised language in Article 4.5.4 to include the requirement of notifying the appropriate state agency prior to the use of "Other Technology".

1B. WTG does not have language in its IM Plan that WTG completes a baseline assessment for newly identified HCA's within 10 years from the date the area is identified. When WTG identifies a new high consequence area, WTG must complete the baseline assessment of the line pipe in the newly identified high consequence area within ten (10) years from the date the area is identified. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding conducting baseline assessments.

- WTG included additional and/or revised language in Article 4.3 for "New or Additions to Facilities" too include baseline assessments will be completed within 10 years of construction or acquisition.
- WTG included additional and/or revised language in Article 19.2 for "New HCAs" too include baseline assessments will be completed within 10 years after identification.

2A. WTG does not have a thorough process or procedure for considering interactive threats from different categories per ASME B31.8S Section 2.2 and §192.917 (a). WTG must consider interactive threats from different categories per ASME B31.8S Section 2.2 and §192.917 (a). WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding threat identification.

- WTG included additional and/or revised language in Article 5.5.6 to address "Interactive Threats".

2B. WTG does not have a complete process that requires that records are maintained that identify how unsubstantiated data are used, so that the impact on the variability and accuracy of assessment results can be considered. WTG must consider how unsubstantiated data are used and the impact on the variability and accuracy of assessment results. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding threat identification.

- WTG included additional and/or revised language in Article 5.3 to address unsubstantiated data. Additions and/or revised language is also included in Article 13.4.3.

2C. WTG's IM plan does not include a process for revisions to the risk assessment (if new information is obtained or conditions change on the pipeline segments) does not verify that the provisions for change to the risk assessment address the following areas:

"the risk assessment plan calls for recalculating the risk for each segment to reflect the results from an integrity assessment or to account for completed prevention and mitigation actions. [ASME B31.8S-2004, Section 5.11, and ASME B31.8S-2004, Section 5.7(c)];

the operator integrates the risk assessment process into field reporting, engineering, facility mapping, and other processes as necessary to ensure regular updates. [ASME B31.8S-2004, Section 5.4];

the integrity management plan calls for revision to the risk assessment process if pipeline maintenance or other activities identify inaccuracies in the characterization of the risk for any segments. [§192.917(c) and ASME B31.8S-2004, Section 5.12];

the operator uses a feedback mechanism to ensure that the risk model is subject to continuous validation and improvement. [§192.917(c) and ASME B31.8S-2004, Section 5.7(f)]"

WTG's IM plan must include a process for revisions to the risk assessment which must verify that the provisions for change to the risk assessment address areas listed above if new information is obtained or conditions change on the pipeline segments. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding threat identification and risk assessment.

- WTG included additional and/or revised language in Article 5.3 to address a new process that obtains information from the field four (4) times per year. This information is processed using direction found in Article 8.

2D. WTG does not have complete processes or procedures to verify that the validation process includes a check that the risk results are logical and consistent with the operator's and other industry experience as per ASME B31.8S-2004, Section 5.12. WTG must include a check in the validation process to verify that the risk results are logical and consistent with the operator's and other industry experience as per ASME B31.8S-2004, Section 5.12. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding threat identification and risk assessment.

- WTG included additional and/or revised language in Article 11 to address that risk results are logical and consistent with operators and other industry experience.

3A. WTG's documented approach for establishing reassessment intervals for covered segments on which a baseline assessment was conducted is unclear. It indicates reassessment in 5 years (IMP Plan 8.6.3), or 7 years (IMP Plan 8.6.2) or between 15 and 20 years (IMP Plan 8.6.4). WTG needs to determine what the correct interval is and remove contradictory guidance. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding Continual Evaluation and Assessment Process

- WTG included additional and/or revised language in Article 8.6.2 and 8.6.3 to establish the reassessment intervals for reassessment.

4A. In WTG's IM plan, none of WTG's pipeline segments were considered for identifying additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area, as specified in §192.935(a). This was due to WTG's Threat Severity Index (TSI) approach results that prevented any segment from being considered for Preventive & Mitigative Measures, as per WTG IMP 5.4.1. WTG must adjust the process to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area. WTG's IM plan was reviewed *during the inspection and this omission was noted in the procedure regarding Threat Identification Plan.*

- WTG included additional and/or revised language in Article 13.4.3 to lower the TSI to >67%.

4B. In WTG's IM plan, WTG has not implemented preventive & mitigative measures to address the threat of 3rd-party damage and outside force damage as identified by results of the WTG data integration processes. This was due to WTG's Threat Severity Index (TSI) approach results that prevented any segment from being considered for Preventive & Mitigative Measures, as per WTG IMP 5.4.1. WTG should adjust the process to identify preventive & mitigative measures to address the threat of 3rd-party damage and outside force damage. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding Threat Identification Plan.

- WTG included additional and/or revised language in Article 13.4.3 to lower the TSI to >67%.

4C. In WTG's IM plan, additional preventive and mitigative measures were excluded from consideration without adequate justification. WTG does not have a P&M measures decision- making process that considers the consequences of pipeline failures. WTG should adjust the process to consider additional preventive & mitigative measures and the consequences of pipeline failures. WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding Threat Identification Plan and Natural Gas Integrity Management Preventative and Mitigative Measures.

- WTG included additional and/or revised language in Article 5 and Article 13 to correct the P&M issues.

5A. WTG needs to ensure that the Baseline Assessment Plan will be kept up-to-date (revised and documented) with respect to newly arising information, applicable threats, and risks that may require periodic changes to the segment prioritization or assessment method.

- WTG included additional and/or revised language in Article 5.3 to address a new process that obtains information from the field four times per year.

6A. WTG needs to ensure that it's quality assurance process formally defines responsibilities and authorities for its IM program per the requirements of ASME B31.8S-2001, Section 12.2(b)(2) as specified in §192.911(1). WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding Quality Assurance Plan.

- WTG included additional and/or revised language in Article 12.

6B. WTG needs to augment its documented quality assurance process that specifies that reviews of the integrity management program and the quality assurance program will be performed on regular intervals, making recommendations for improvement per the requirements of ASME B31.8S-2001, Section 12.2(b)(3) as specified in §192.911(1). WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding Quality Assurance Plan.

- WTG included additional and/or revised language in Article 17.2 and Article 8.5.

6C. WTG needs to augment its documented quality assurance process to assure that corrective actions to improve the integrity management program and the quality assurance process have been documented and are monitored for effectiveness per the requirements of ASME B31.8S-2001, Section 12.2(b)(7) as specified in §192.911(1). WTG's IM plan was reviewed during the inspection and this omission was noted in the procedure regarding Quality Assurance Plan.

- WTG included additional and/or revised language in Article 16 and Article 17.8.

Should you have any questions or require additional information concerning this supplemental response, please contact WTG's Director of Integrity Management, Mr. Ray Reed, at (620) 544-8581 extension 115.

Very truly yours,

RD Hatchett

Richard D. Hatchett
Vice President

cc: Mr. Ray Reed