

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 10, 2014

Mr. Robert B Raines Jr.
Senior Vice President
Cadeville Gas Storage, LLC
3 Riverway, Suite 1350
Houston, TX 77056

CPF 4-2014-1012W

Dear Mr. Raines:

During the month of April through May 2014, 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 inspected your Cadeville Gas Storage, LLC ("Cadeville") in West Monroe, LA.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. § 192.631 Control room management.

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers.

Cadeville failed to properly maintain a method of recording the shift-changes process between the outgoing and incoming controllers.

Cardinal Gas Storage Partners, Control Room Procedure, Section 5.1.1(Shift Turnover Meeting) states-

“The record shall identify the incoming and outgoing controllers along with the topics covered during the meeting and the date and time of the shift turnover.”

During the record review of Cadeville Control Center, PHMSA revealed that shift turnover log sheets for 2013 and 2014 do not show the actual time the shift turn over took place between the Controllers. Instead, Controllers simply noted “Days” or “Night” in the turnover logsheet.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 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(s) identified in this letter. Failure to do so will result in Cadeville 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 4-2014-1012W**. 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,

R M Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration