



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 S. Gessner, Suite 630
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 10, 2017

Wesley Dunbar
Vice President – NGP Operations
OkTex Pipeline Company, LLC
100 West Fifth Street
Tulsa, OK 74103

CPF4-2017-1005M

Dear Mr. Dunbar:

During the period of May 2016 to October 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected OkTex Pipeline Company, LLC (OkTex), at which time the ONEOK procedures for Operator Qualification and Integrity Management were reviewed in Oklahoma.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within ONEOK's plans or procedures, as described below:

1. §192.801 Scope.

- (a) This subpart prescribes the minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility.**
- (b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:**
 - (1) Is performed on a pipeline facility;**
 - (2) Is an operations or maintenance task;**
 - (3) Is performed as a requirement of this part; and**

(4) Affects the operation or integrity of the pipeline.

OkTex Pipeline Company LLC's (ONEOK) written Operator Qualification Plan does not adequately define the task for "tie-in" of a new pipeline segment to an existing pipeline in the Program Section of the Plan. This section states that the *"Tie-ins of new construction/fabrication to existing pipelines or pipeline systems may be operations and maintenance tasks."* However, in the definition section of the written ONEOK OQ Plan, Operations or Maintenance Tasks are defined as *"Activities performed on an existing pipeline facility to maintain the integrity of the facility; "new construction task" changes to an operations or maintenance task when the pipeline facility is being commissioned or during the act of connecting to an active pipeline facility."*

ONEOK must amend their written Operator Qualification procedure to provide consistent language for the definition of the tie-in task.

2. §192.7 What documents are incorporated by reference partly or wholly in this part?

(c) ASME International (ASME), Three Park Avenue, New York, NY 10016, 800-843-2763 (U.S./Canada), <http://www.asme.org/>.

(5) ASME/ANSI B31.8S-2004, "Supplement to B31.8 on Managing System Integrity of Gas Pipelines," 2004, (ASME/ANSI B31.8S-2004), IBR approved for §§192.903 note to *Potential impact radius*; 192.907 introductory text, (b); 192.911 introductory text, (i), (k), (l), (m); 192.913(a), (b), (c); 192.917 (a), (b), (c), (d), (e); 192.921(a); 192.923(b); 192.925(b); 192.927(b), (c); 192.929(b); 192.933(c), (d); 192.935 (a), (b); 192.937(c); 192.939(a); and 192.945(a).

OkTex Pipeline (ONEOK) failed to incorporate standards as outlined in §192.7. ONEOK's written Integrity Management Plan pages 5 and 159 reference ASME B31.8S-2001 rather than the incorporated standard; ASME/ANSI B31S-2004-Supplement to B31.8 on Managing System Integrity of Gas Pipelines (see 192.7).

ONEOK must amend the procedure to reference the standard incorporated by reference.

3. §192.7 What documents are incorporated by reference partly or wholly in this part?

(g) NACE International (NACE), 1440 South Creek Drive, Houston, TX 77084: phone: 281-228-6223 or 800-797-6223, Web site: <http://www.nace.org/Publications/>.

(1) ANSI/NACE SP0502-2010, Standard Practice, "Pipeline External Corrosion Direct Assessment Methodology," revised June 24, 2010, (NACE SP0502), IBR approved for §§192.923(b); 192.925(b); 192.931(d); 192.935(b) and 192.939(a).

OkTex Pipeline (ONEOK) failed to incorporate standards as outlined in §192.7. ONEOK's written Integrity Management Plan pages 5, 101, and 159 references NACE RP0502-2002 while

the regulation incorporates standard; NACE SP0502-2010-Standard Practice, Pipeline External Corrosion Direct Assessment Methodology (revised in 2010).

ONEOK must amend this procedure to reference the incorporated standard.

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 Compliance 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. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that ONEOK maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2017-1005M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



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

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