



U.S. Department of Transportation

**Pipeline and Hazardous Materials
Safety Administration**

8701 S. Gessner, Suite 630
Houston TX 77074

**NOTICE OF PROBABLE VIOLATION
AND
PROPOSED CIVIL PENALTY**

VIA ELECTRONIC MAIL TO: pierce.norton@oneok.com

February 3, 2026

Pierce Norton
President and Chief Executive Officer
ONEOK NGL Pipeline, LLC
100 West Fifth Street
Tulsa, OK 74103

CPF 4-2026-027-NOPV

Dear Mr. Norton:

From January 19, 2023 through December 11, 2025, 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 (U.S.C.) conducted an accident investigation and review of the work practices used in the activities associated with two accidents (National Response Center Report # 1358064 and # 1400727) in Howard and Reeves Counties in Texas.

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

(b)

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1)

(11) Minimizing the likelihood of accidental ignition of vapors in areas near facilities identified under paragraph (c)(4) of this section where the potential exists for the presence of flammable liquids or gases.

ONEOK failed to follow its manual of written procedures for conducting normal operations and maintenance activities in accordance with § 195.402(a). Specifically, ONEOK failed to follow its hot work¹ procedures for minimizing the likelihood of accidental ignition of vapors in areas where the potential exists for the presence of flammable liquids or gasses, as required by § 195.402(c)(11), in two instances which resulted in the ignition of flammable vapors, one of which resulted in injuries.

The first incident occurred on January 19, 2023 on South McGregor Road in Howard County, Texas. On January 17, 2023, ONEOK created a repair plan to replace approximately 78-feet of pipeline on the West Texas #1, 10” natural gas liquid pipeline. The work plan included two tie-in welds after the pipeline was isolated and purged with nitrogen. ONEOK issued a hot work permit for the scope of the repair work, including two tie-in welds.

ONEOK’s *Hot Work Standard, SAF2.65.1200* (rev. 3, 06/13/22), Section 4.8 requires atmospheric monitoring of oxygen and LEL levels during hot work activities. In addition, Section 4.8.3 requires continuous monitoring of nearby valve openings during hot work. ONEOK’s *Vapor Barrier Standard, OPS3.200.6012* (rev. 4, 05/15/22), Section 4.6, requires the use of vapor barriers during certain hot work activities, including pipe replacement with welding work. The repair plan also included environmental testing for flammable vapors.

On January 19, 2023, ONEOK’s contractor issued a separate hot work permit for nondestructive testing (NDT) and coating application. During the NDT inspection, the westernmost tie-in weld

¹ ONEOK defines “hot work” as work activities in which the heat used or generated by the work is of such intensity to cause the ignition of any flammable liquids, gases, or any other combustible matter.

was found to require repair before the pipeline could be returned to service. Contractor personnel began a weld repair, which was not included as an activity in its hot work permit. Due to incomplete purging or a leaking mainline valve, vapors accumulated near the weld repair cite. LEL checks for flammable vapors at the weld repair were not made immediately prior to welding, no LEL monitoring was performed at the nearby closed 2-inch vent valve, and no vapor barriers were used.

At approximately 10:02 am, the welding arc being used for the repair ignited flammable vapors, resulting in a small fire. On February 17, 2023, ONEOK submitted a PHMSA F7000-1 accident reporting form which acknowledged that the incident was caused by a failure to follow adequately follow its hot work standards.

The second accident occurred on June 3, 2024 at Orla Injection Site 1210 in Reeves County, Texas during the preparation of a cleaning pig activity. Prior to beginning the cleaning pig run, and in accordance with its *Pigging of Pipelines Procedure, PS3.200.7102* (rev. 19), Section 4.5(e), ONEOK reviewed its written work plan and completed a safety pre-inspection for cleaning runs designed to mitigate risks prior to loading the cleaning pig. In addition, Section 4.5(d) requires obtaining written approval or a work permit prior to beginning work. ONEOK's *Work Permit Standard (SAF2.650.1490)* (rev. 4, 05/24/2021), Section 4 requires the performance of a hazard assessment and completion of a hazard identification risk assessment (HIRA) or similar assessment. ONEOK prepared a HIRA checklist which included a set of hazard controls, including the use of only intrinsically safe tools and equipment. After the valves in the pig launcher were lined, the 12-inch kicker and the 16-inch barrel valves leaked due to mechanical damage to the seals. This leakage resulted in accumulation of flammable vapors inside the pig launcher. ONEOK personnel recorded a lower explosive limit (LEL) reading of 0 percent approximately 10 minutes prior to the incident, but failed to subsequently continuously monitor atmospheric conditions. In addition, ONEOK's contractor crew proceeded to use an electric grease gun, which was not intrinsically safe, in the work area.

At approximately 11:50 a.m., during the application of grease to the O-ring inside the pig launcher using the grease gun, the accumulated vapors ignited, producing a flash fire reportedly reaching a maximum size of 20-feet by 10-feet. As a result of the flash fire, two ONEOK contractors suffered burn injuries. The incident also caused the unintentional release of approximately 0.6 bbls of natural gas liquids. On July 2, 2024, ONEOK submitted a PHMSA F7000-1 accident reporting form which acknowledged the failure to follow its hot work standard as a contributing factor to the incident.

Therefore, ONEOK failed to follow its manual of written procedures for conducting normal operations and maintenance activities in accordance with § 195.402(a).

Proposed Civil Penalty

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 \$2,391,412 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 documentation involved for the above probable violation and recommend that you be preliminarily assessed a civil penalty of \$515,328 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$ 515,328

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be 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 your receipt of this Notice, you have 30 days to respond as described in the enclosed *Response Options*. 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 a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. The Region Director may extend the period for responding upon a written request timely submitted demonstrating good cause for an extension. In your correspondence on this matter, please refer to **CPF 4-2026-027-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Response Options for Pipeline Operators in Enforcement Proceedings*

cc: Randy Lentz, EVP / Chief Operating Officer, ONEOK NGL Pipeline, LLC,,
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