

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 10, 2012

Mr. Lyle Fedje
Director-Pipeline Operations
CPN Pipeline Company
4160 Dublin Blvd., Suite 100
Dublin Alameda, CA 94568

CPF 5-2012-0011W

Dear Mr. Fedje:

On April 6, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected CPN Pipeline Company's Operations and Maintenance Procedural Manuals and supporting records for your fuel gas transmission pipeline facilities in San Diego, California. Field inspection of these facilities was also conducted.

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 is:

1. **§192.161 Supports and anchors.**
 - (a) **Each pipeline and its associated equipment must have enough anchors or supports to:**
 - (1) **Prevent undue strain on connected equipment;**
 - (2) **Resist longitudinal forces caused by a bend or offset in the pipe; and,**
 - (3) **Prevent or damp out excessive vibration.**

(b) Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents.

(c) Each support or anchor on an exposed pipeline must be made of durable, noncombustible material and must be designed and installed as follows:

(1) Free expansion and contraction of the pipeline between supports or anchors may not be restricted.

(2) Provision must be made for the service conditions involved.

(3) Movement of the pipeline may not cause disengagement of the support equipment.

(d) Each support on an exposed pipeline operated at a stress level of 50 percent or more of SMYS must comply with the following:

(1) A structural support may not be welded directly to the pipe.

(2) The support must be provided by a member that completely encircles the pipe.

(3) If an encircling member is welded to a pipe, the weld must be continuous and cover the entire circumference.

(e) Each underground pipeline that is connected to a relatively unyielding line or other fixed object must have enough flexibility to provide for possible movement, or it must have an anchor that will limit the movement of the pipeline.

The Otay Mesa pipeline facility does not appear to be designed for adequate support with respect to its remote pig launcher facility at the San Diego Gas & Electric tie-in. At the pig launcher and receiver stations, there is a 40 ft "T" shaped 24-inch pipe and a 24-inch block valve (from end of the launcher/receiver back to main line and a bypass in-between) without adequate support. The 24-inch valves at each end have welded manufactured supports, but are unsupported. The pipeline facility is required to have adequate support per §192.161.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any 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 CPN Pipeline Company being subject to additional enforcement.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2012-0011W**. 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,

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 H. Monfared (#132898)