

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 10, 2012

Mr. Larry Conti
Vice President, Operations
Questar Pipeline Company
180 East 100 South
P.O. Box 45360
Salt Lake City, UT 84145-0360

CPF 5-2012-1007W

Dear Mr. Conti:

On April 5, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Southern Trails Pipeline in California.

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 violations are:

1. §192.709 Transmission lines: Record keeping.

Each operator shall maintain the following records for transmission line for the periods specified:

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

Questar Pipeline is not keeping a record of each inspection and test required by subparts L and M of Part 192. Questar Pipeline personnel appear to be inspecting and testing, per §192.739, two pressure control valves and associated pressure transmitters essential for proper operations. Those valves are TR 0134 at the Needles SoCal delivery, and TR 0151 at the Essex PG&E delivery. However, Questar Pipeline does not maintain records of pressure

control inspection and testing for these pressure control devices per 192.709(c). Although TR 0134 and TR 0151 primarily function as a volume control device, the control valves can control delivery pressure, and their inspection and test records must be retained for five years.

2. §192.455 External corrosion control: Buried or submerged pipelines installed after July 31, 1971.

(a) Except as provided in paragraphs (b), (c), and (f) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:

(2) It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.

Questar Pipeline Company was not providing adequate corrosion control on all segments of its buried pipeline. At the time of inspection and as revealed in the annual CP surveys, the short segment of pipe (~100-feet) between Questar's Essex meter station and PG&E's receipt point was not cathodically protected per 192.455(a)(2).

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(s) identified in this letter. Failure to do so will result in Questar Pipeline Company 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 5-2012-1007W**. 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 C. Allen (#132883)