



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

DEC 22 2003

Mr. Robert G. Phillips
President
El Paso Field Services, L.P.
4 Greenway Plaza
Houston, TX 77046

Re: CPF No. 1-2002-5008

Dear Mr. Phillips:

Enclosed is the Final Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes a finding of violation and finds that you have completed the corrective actions proposed in the Notice. The Final Order also finds that you have addressed the inadequacies in your procedures cited in the Notice. This case is now closed. Your receipt of the Final Order constitutes service of that document under 49 C.F.R. § 190.5.

Sincerely,

James Reynolds
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590

In the Matter of)	
El Paso Field Services, L.P.,)	CPF No. 1-2002-5008
Respondent.)	
)	

FINAL ORDER

On March 25-26, 2002, pursuant to 49 U.S.C. § 60117, representatives of the Eastern and Central Regions, Office of Pipeline Safety (OPS) inspected El Paso Field Service, L.P.'s (Respondent's) integrity management program at Respondent's facility in Houston, Texas. As a result of the inspection, the Director, Eastern Region, OPS, issued to Respondent, by letter dated July 3, 2002, a Notice of Probable Violation, Proposed Compliance Order, and Notice of Amendment (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Respondent had violated 49 C.F.R. § 195.452(b)(2) and proposed that Respondent take certain measures to correct the alleged violation. The Notice also alleged inadequacies in Respondent's integrity management program and proposed to require amendment of Respondent's procedures to comply with the requirements of 49 C.F.R. § 195.452(b)(2).

Respondent responded to the Notice by letter dated July 25, 2002 (Response). Respondent did not contest the allegations of violation but provided information concerning the corrective actions it planned to take. In addition, Respondent stated that it would amend its procedures to address procedural inadequacies alleged in the Notice by October 8, 2002. Respondent did not request a hearing, and therefore has waived its right to one.

FINDING OF VIOLATION

In its Response, Respondent did not contest the alleged violations in the Notice. Accordingly, I find that Respondent violated the following section of 49 C.F.R. Part 195, as more fully described in the Notice:

49 C.F.R. § 195.452(b)(2) -- failing to complete identification of pipeline segments that could affect a high consequence area by December 31, 2001. Respondent failed to evaluate ten miles of regulated inter-plant lines near Corpus Christ, Texas.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

COMPLIANCE ORDER

The Notice proposed a compliance order with respect to the violation of 49 C.F.R. § 195.452(b)(2). Under 49 U.S.C. § 60118(a), each person who engages in the transportation of hazardous liquids or who owns or operates a pipeline facility is required to comply with the applicable safety standards established under chapter 601. The Director, Eastern Region, OPS has indicated that Respondent has taken the following action specified in the proposed compliance order:


Respondent performed a high consequence area impact analysis on the ten miles of regulated inter-plant lines near Corpus Christi, Texas.

Accordingly, since compliance has been achieved with respect to these violations, the compliance terms are not included in this Order.

AMENDMENT OF PROCEDURES

In addition to the cited violation, the Notice alleged inadequacies in Respondent's integrity management program procedures and proposed to require amendment of Respondent's procedures to comply with the requirements of 49 C.F.R. § 195.452(b)(2).

On October 4, 2002, Respondent submitted copies of its amended procedures, which the Director, Eastern Region, OPS reviewed. Accordingly, based on the results of this review, I find that Respondent's original procedures as described in the Notice were inadequate to ensure safe operation of its pipeline system, but that Respondent has corrected the identified inadequacies. Respondent need not take any further action with respect to the inadequacy cited in the Notice. No need exists to issue an order directing amendment.



Stacey Gerard
Associate Administrator
for Pipeline Safety

12/20/02
Date Issued