

Mr. Dan Tutchter
President
Mid Louisiana Gas Company
1100 Louisiana Avenue, Suite 2950
Houston, Texas 77002

Re: CPF No. 4-2001-1006-H

Dear Mr. Tutchter:

Enclosed is a Corrective Action Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It requires you to take certain corrective actions with respect to the operation of your pipeline. Service is being made by certified mail and facsimile. Your receipt of the enclosed document constitutes service of that document. The terms and conditions of this Corrective Action Order are effective upon receipt.

Sincerely,

Gwendolyn M. Hill
Pipeline Compliance Registry
Office of Pipeline Safety

cc: R.N. Lanningham, Director of Engineering

Enclosure

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED) AND TELECOPY

**DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
WASHINGTON, DC 20590**

In the Matter of)

Mid Louisiana Gas Company,)

Respondent.)

CPF No. 4-2001-1006-H

CORRECTIVE ACTION ORDER

Purpose and Background

This Corrective Action Order is being issued, under authority of 49 U.S.C. § 60112, to require Mid Louisiana Gas Pipeline Company (Midla) to take the necessary corrective action to protect the public and environment from potential hazards associated with Midla's 22-inch natural gas transmission line (22" T-ML Pipeline) near the Black Bayou in Louisiana.

On September 3, 2001, at approximately 1:00 p.m. CST, a rupture occurred near the intersection of the 22" T-ML Pipeline and the Black Bayou in Louisiana, resulting in the release of an estimated 8.00 mmcf to 13.00 mmcf of natural gas. In addition, the liquids loss is estimated to be 15,000 gallons.

Pursuant to 49 U.S.C. § 60117, the Southwest Region, OPS initiated an investigation of this failure.

Preliminary Findings

1. At approximately 1:00 p.m. CST, on September 3, 2001, a rupture occurred near the intersection of the 22" T-ML pipeline and the Black Bayou in Louisiana, resulting in the release of an estimated 8.00 mmcf to 13.00 mmcf of natural gas. In addition, the liquids loss is estimated to be 15,000 gallons. The failure occurred at approximately Mile 2 Pole 5, Station 113+19, approximately two (2) miles south of the Desiard Compressor Station.
2. The liquids released from the 22" T-ML pipeline entered a small unnamed creek which flows into the Black Bayou. However, the emergency response contractor used booms to prevent any liquids from entering Black Bayou.
3. No fatalities or injuries occurred.

4. Although the rupture occurred on September 3, 2001, Midla did not submit the telephonic report to the National Response Center until September 5, 2001.
5. The 22" T-ML pipeline is routed through predominantly rural areas of Louisiana and Mississippi. The line does pass within 3-4 miles of numerous small communities along the route as well as crossing numerous state and interstate highways, rivers, and streams. The line also passes through land owned by the State of Louisiana, Department of Wildlife and Fisheries and passes near Black Bayou.
6. The 22" T-ML pipeline originates at the Desiard Compressor Station in Quachita Parish, Louisiana moving in a southeasterly direction through Richland, Franklin, Catahoula and Concordia parishes. In Concordia Parish, the pipeline crosses the Mississippi River into the state of Mississippi just south of Natchez, MS continuing in a southerly direction through Wilkinson, County, Mississippi and back into Louisiana in West Feliciana Parish. The pipeline continues in a southerly direction through East Feliciana Parish into East Baton Rouge Parish. The failure occurred approximately two(2) miles south of the Desiard Compressor Station.
7. The 22" T-ML pipeline transports natural gas.
8. The ruptured pipeline, 22" T-ML pipeline, has a 16-inch natural gas transmission line (16" T-13LL) connected to it which loops the 22" T-ML pipeline for approximately 54 miles. The 22" T-ML pipeline was built in 1926 and the looped 16" T-13LL was built in 1929 and 1930.
9. The release occurred on a segment of 22-inch lap welded, mechanically coupled pipe with wall thickness ranging from .250-inch to .500-inch and hand applied coal tar coating. The manufacturer is unknown.
10. The 22" T-ML pipeline has a maximum allowable operating pressure of 245 psig. The operating and the discharge pressure at the Desiard Compressor Station at the time of the failure was approximately 215 psig. Desiard Compressor Station is approximately two (2) miles upstream from the failure site.
11. The preliminary investigation, initiated on September 7, 2001, points to internal corrosion as a possible contributing factor in the pipeline failure. The depression caused by the rupture was 50 feet long, 10 feet wide and 3 feet deep. The failed pipe segment, water, soil and product samples have been sent to a metallurgical laboratory for further analysis.
12. The cause of the failure is currently unknown. The investigation is ongoing and all facts have not yet been determined.

13. In 1982, Midla sent a segment of pipe, which appeared to have internal corrosion, to a metallurgical laboratory for analysis. Internal corrosion was confirmed by the report which stated “the corrosion was caused by the pitting attack experienced by concentration cells set up by the difference in oxygen concentration under and surrounding the scale deposits.”
14. As a result of the metallurgical laboratory analysis, Midla installed internal coupons in 1983, and began using corrosion inhibitors and reviewing metal loss. After monitoring the data from 1983 to 1997, Midla discontinued the injection of corrosion inhibitors and discontinued monitoring coupons for evidence of internal corrosion. Comprehensive water content testing was not conducted from 1983 to 1997.
15. Midla’s 22" T-ML pipeline cannot accommodate internal cleaning and inspection tools because of the dimensional constraints caused by the line’s 18-inch mainline valves.
16. On September 3, 2001, Midla’s personnel isolated the failed section, a 6.2 mile section of pipe. The line was isolated by closing the upstream and downstream mainline valves, Valve T-4 and Valve T-590. The line is currently out of service.

Determination of Necessity for Corrective Action Order and Right to Hearing

Section 60112 of Title 49, United States Code, provides for the issuance of a Corrective Action Order, after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action as appropriate. The basis for making the determination that a pipeline facility is hazardous, requiring corrective action, is set forth both in the above referenced statute and 49 C.F.R. §190.233, a copy of which is enclosed.

Section 60112, and the regulations promulgated thereunder, provide for the issuance of a Corrective Action Order without prior opportunity for notice and hearing upon a finding that failure to issue the Order expeditiously will result in likely serious harm to life, property or the environment. In such cases, an opportunity for a hearing will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing preliminary findings of fact, I find that the continued operation of this pipeline without corrective measures would be hazardous to life, property and the environment. Additionally, after considering the circumstances surrounding this failure, the volume of liquids released from the pipeline, the proximity of the pipeline to land owned by the State of Louisiana, Department of Wildlife and Fisheries and Black Bayou, the nature of the product the pipeline facility transports, the pressure required for transporting the material, and the uncertainties as to the cause of the failure, I find that a failure to issue expeditiously this Order, requiring immediate corrective action, would result in likely serious harm to life, property, and the environment.

Accordingly, this Corrective Action Order mandating needed immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Order are effective upon receipt.

Within 10 days of receipt of this Order, Mid Louisiana may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, delivered personally, by mail or by telecopy at (202) 366-4566. The hearing will be held in Houston, Texas or Washington, D.C. on a date that is mutually convenient to OPS and Respondent.

After receiving and analyzing additional data in the course of this investigation, OPS may identify other longer term measures that need to be taken. Mid Louisiana will be notified of any additional measures required and amendment of this Order will be considered. To the extent consistent with safety, Mid Louisiana will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

Required Corrective Action

Pursuant to 49 U.S.C. § 60112, I hereby order Mid Louisiana to immediately take the following corrective actions with respect to its 22" T-ML pipeline:

1. Do not operate this segment until Items 2 through 5 are completed and determined acceptable by the Regional Director, Southwest Region. The line segment, between Valve T-4 and Valve T-590, is to remain isolated from regular operation. This restriction shall remain in place until written approval, pursuant to Item 7, is obtained from the Regional Director, Southwest Region.
2. Conduct a detailed metallurgical analysis of the pipe that failed on September 3, 2001, to determine the cause and contributing factors for the failure. Submit the testing protocol for the failed pipe to Regional Director as soon as it is developed. Submit each report of the failure analysis to the Regional Director, Southwest Region, OPS, within one week of receiving it.
3. Assess the integrity of the 22" T-ML pipeline including loop lines at all low points, pig traps, dead end stub lines, and crossover piping that may have a no flow condition, and any other section of piping that liquids might settle in, and implement any needed corrective action. The direct assessment must include both x-ray and ultrasonic examinations to determine possible metal loss.
4. To confirm the integrity and the strength of the line constrain and hydrostatically test the line segment between Valve T-4 and Valve T-590 on the 22" T-ML pipeline to a test pressure equal to 110 % of the maximum allowable operating pressure.
5. Develop internal corrosion policies and procedures that are detailed and include guidelines and numerical thresholds to prompt remedial attention and subsequent action. Submit the internal

corrosion policies and procedures for approval by the Region Director, Southwest Region. The internal corrosion policies and procedures must include at least the following:

- a. location of drips, low areas, separators and filters and the placement of corrosion monitoring coupons or other devices used for monitoring internal corrosion
 - b. a description of the operating data that must be monitored for contaminants
 - c. delineation of the responsibilities of personnel for monitoring the operating data and sampling removed liquids and solids from the pipeline
 - d. a description of critical levels of contaminants, such as, bacteria and gas contaminants
 - e. the corrective actions to be taken if a threshold level is reached
 - f. steps to be taken based upon coupon metal loss rate
 - g. description of the treatment or systems that are being used, such as Batch, direct injection, de-aeration systems, oxygen scavenging chemicals (alkaline sulfites), etc.
 - h. the type(s) of corrosion biocides and/or inhibitors to be used to control and prevent internal corrosion
6. Each element of the policies and procedures must be approved by the Southwest Regional Director, who may provide approvals incrementally. Implement the policies and procedures as approved.
 7. Respondent may request a return to service plan by submitting a return to service plan that includes the final results of all testing and activities conducted. The Regional Director's determination will be based on satisfactory completion of Items 2 through 5 of this Order. After written approval from Southwest Regional Director to resume operation, restrict the maximum allowable operating pressure to 80 percent (80%) of the operating pressure of 22" T-ML Pipeline at the time of failure.
 8. Respondent may request approval from the Regional Director, to remove or modify the pressure restriction of the line segment between Valve T-4 and Valve T-590 based on a showing that the hazard has been abated.
 9. The Southwest Regional Director may grant an extension of time for compliance with any of the terms of this order for good cause. A request for an extension must be in writing.
 10. Respondent may appeal any decision of the Regional Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.

The procedures for the issuance of this Order are described in Part 190, Title 49, Code of Federal Regulations, §190.233, a copy of which is enclosed, is made part of this Order and describes the Respondents' procedural rights relative to this Order.

Failure to comply with this Order may result in the assessment of civil penalties of not more than \$25,000 per day and in referral to the Attorney General for appropriate relief in United States District Court.

Stacey Gerard
Associate Administrator
for Pipeline Safety

Date Issued