



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 29, 2008

Royce Ramsay
Northern Natural Gas Company
1111 103rd Street
Omaha, Nebraska 688124-1000

CPF No. 4-2008-1009M

Dear Mr. Ramsay,

On March 3-7, 2008, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code inspected your procedures for operations and maintenance in Omaha, Nebraska.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Northern Natural Gas Company's procedures and are described below.

1. §192.231 Protection from weather.

Northern Natural's procedures did not clearly state how welding operations would be protected from weather. This item was addressed prior to the inspection team's departure.

2. §192.605 Procedural manual for operations, maintenance, and emergencies

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

(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.

Northern Natural's procedures did not clearly state emergency rescue equipment; including a breathing apparatus and a rescue harness and line would be made available when needed at an excavation. In addition, their procedures did not clearly state how they protect personnel from the hazards of unsafe accumulations of vapor and gas. Northern Natural's procedures must be amended to address the use of emergency rescue equipment; including a breathing apparatus and a rescue harness and line would be made available when needed at an excavation and protecting personnel from hazards of unsafe accumulations of vapor and gas.

3. §192.605 Procedural manual for operations, maintenance, and emergencies

(d) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.

Northern Natural's procedures did not clearly state that employees are trained on an ongoing basis to recognize safety related conditions. This item was addressed prior to the inspection team's departure.

4. §192.612 Underwater inspection and reburial of pipelines in the Gulf of Mexico and its inlets.

a) Each operator shall prepare and follow a procedure to identify its pipelines in the Gulf of Mexico and its inlets in waters less than 15 feet (4.6 meters) deep as measured from mean low water that are at risk of being an exposed underwater pipeline or a hazard to navigation. The procedures must be in effect August 10, 2005

Northern Natural's procedures did not specify underwater inspection intervals. Northern Natural's procedures must be amended to specify underwater inspection intervals.

5. §192.612 Underwater inspection and reburial of pipelines in the Gulf of Mexico and its inlets.

(b) Each operator shall conduct appropriate periodic underwater inspections of its pipelines in the Gulf of Mexico and its inlets in waters less than 15 feet (4.6 meters) deep as measured from mean low water based on the identified risk.

Northern Natural's underwater inspection procedures were not based on identified risks. Northern Natural's procedures must be amended to address periodic underwater inspection of its pipelines based on identified risks.

6. §192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

8) Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

Northern Natural's procedures do not clearly state that they notify appropriate public of gas pipeline emergencies and that they coordinate with them both planned responses and actual

responses during an emergency. This item was addressed prior to the inspection team's departure.

7. **§192.615 Emergency plans.**
 - c) **Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:**
 - (1) **Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency**

Northern Natural's procedures do not clearly state that they will establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each others resources and capabilities in dealing with gas emergencies. This item was addressed prior to the inspection team's departure.

8. **§192.703 General.**
 - (c) **Hazardous leaks must be repaired promptly.**

Northern natural's procedures did not clearly identify classes of leaks or state that hazardous leaks must be repaired promptly. Northern Natural's procedures must be amended to identify classes of leaks and state that hazardous leaks must be repaired promptly.

9. **§192.715 Transmission lines: Permanent field repair of welds.**
 - (b) **A weld may be repaired in accordance with §192.245 while the segment of transmission line is in service if:**
 - (2) **The pressure in the segment is reduced so that it does not produce a stress that is more than 20 percent of the SMYS of the pipe;**

Northern Natural's procedures did not clearly state that if the line remains in service that the weld may be repaired in accordance with 192.245 if the pressure is reduced to produce a stress that is 20% of SMYS or less. This item was addressed prior to the inspection team's departure.

10. **§192.715 Transmission lines: Permanent field repair of welds.**
 - (b) **A weld may be repaired in accordance with §192.245 while the segment of transmission line is in service if:**
 - (3) **Grinding of the defective area can be limited so that at least 1/8-inch (3.2 millimeters) thickness in the pipe weld remains.**

Northern Natural's procedures did not clearly state that grinding is limited so that at least 1/8 inch thickness in the pipe weld remains. This item was addressed prior to the inspection team's departure.

11. **§192.719 Transmission lines: Testing of repairs.**
 - a. **Testing of repairs made by welding. Each repair made by welding in**
 - b. **accordance with §§192.713, 192.715, and 192.717 must be examined in accordance with §192.241.**

Northern Natural's procedures did not clearly state that transmission lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241 (c). This item was addressed prior to the inspection team's departure.

Northern Natural submitted amended procedures for Items 2, 4, 5, and 8 to this office April 21, 2008 (prior to the delivery of this Notice). My staff reviewed the amended procedures, and it appears that these inadequacies outlined in this Notice of Amendment have been corrected.

Items 1, 3, 6, 7, and 9-11 were adequately addressed by Northern Natural at the time of the inspection. This letter is to inform you no further action is necessary and this case is now closed. Thank you for your cooperation.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). 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, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF No 4-2008-1009M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Material Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance*