

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 18, 1999

Mr. Keith Mitchell  
Vice President  
Ozark Gas Transmission, LLC  
515 Central Park Drive  
Suite 600  
Oklahoma City, Oklahoma 73105

CPF No. 29102W

Dear Mr. Mitchell:

On June 14 - 17, 1999, a representative of the Southern Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline records at Fayetteville, Arkansas and pipeline facilities in Arkansas and Missouri.

As a result of the inspection, it appears that you have committed probable violations as noted below of pipeline safety regulations Title 49, Code of Federal Regulations, Part 192.

The items inspected and the probable violations are:

1. **§ 192.161 (c) Supports and Anchors**  
**Each support or anchor on an exposed pipeline must be made of a durable, noncombustible material and must be designed and installed as follows:**  
**(3) Movement of the pipeline may not cause disengagement of the support equipment.**

The meter and regulator run pipe was inadequately supported at the Mountain View, Melbourne, and Calico Rock border stations, movement of the pipe would cause disengagement from the support equipment. Additionally, at the Mountain View border station, the gas line from the Arkansas Western Gas meter (downstream of the insulating flange) to the gas heater was supported from the meter and regulator run piping by metal "plumber straps"; at the Calico Rock border station wood blocks were used as shims

between the metal support posts and the meter and regulator run piping.

2. **§ 192.615 (c) Emergency Plans**

**Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials:**

Documentation could not be provided for liaison visits with fire, police, and other public officials.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violations persist up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations, we will take enforcement action when the continued violations comes to our attention.

The review also disclosed some areas that are cause for concern. We hope you find these areas worthy of your attention and take action to maintain and further improve your present level of safety.

Please consider the following:

1. **Fasteners**

The threads of the bolts on the downstream insulating flange on the outlet side of the orifice meter run tube at the Mountain Home lateral take-off do not fully engage the nuts.

2. **Operations and Maintenance Manual**

The NOARK Pipeline System, Limited Partnership - Inspection, Operating and Maintenance Plan (IOMP) has not been rewritten since the pipeline was purchased by Ozark Gas Transmission. The IOMP is presently written for operations by the NOARK Pipeline System operating as an intrastate pipeline under the Arkansas Natural Gas Pipeline Act of 1971, the IOMP does not reflect the operation of the pipeline by Ozark Gas Transmission as an interstate pipeline. Specific areas in the IOMP that need to be addressed are:

- Emergency Procedures, Section II - Ozark Gas Transmission personnel are not

included in the contact listing. The criteria and reporting requirements for telephonic and written incident reports are not in accordance with § 191.5 and § 191.15.

- Damage Prevention Program, Section VI-A-3 - the procedure states incorrectly that the program does not apply to class 1 or 2 locations or class 3 locations that are marked.
- Leak Surveys, Section VI-A-4 - the procedure requires the use of a gas detector or other equipment, Ozark Gas has deleted this requirement where not required by § 192.706.
- Line Markers, Section VI-A-8 - the procedure states incorrectly that line markers are not needed in class 3 or 4 locations where a damage prevention program is in effect.
- Testing of Repairs, Section VI-A-9 - the procedure does not state Ozark's requirements for inspecting repairs and repair welds, the procedure references Arkansas Gas Code, Section 192.241.
- Corrosion Control, Section VI-A-19 - the procedure does not state the criteria used for determining that the pipeline has adequate cathodic protection.
- Recognition of Safety Related Conditions, Section VII - the procedure does not list the time requirements for submitting reports and states that Safety Related Condition Reports will be filed with the Arkansas Public Service Commission.

You will not hear from us again with regard to this inspection. Because of the good faith that you have exhibited up to this time, we expect that you will act to bring your pipeline and operations into compliance with pipeline safety regulations.

Sincerely,

Frederick A. Joyner  
Director, Southern Region  
Office of Pipeline Safety

cc: Compliance Officer, OPS Headquarters  
file: Ozark Gas Transmission