



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

409 3rd Street, SW, Suite 300  
Washington, DC 20024

**NOTICE OF PROBABLE VIOLATION  
and  
PROPOSED CIVIL PENALTY**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 4, 2007

Mr. Reed D. Robinson  
Vice President, Field Services  
Columbia Gas Transmission  
P.O. Box 1273  
1700 MacCorkle Avenue, SE  
Charleston, WV 25325-1273

CPF 1-2007-1016

Dear Mr. Robinson:

During the period from April to August, 2006, State Inspectors from the West Virginia Public Service Commission (WV PSC) acting as Agents for the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your storage field facilities in West Virginia.

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

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

1A. The operator failed to conduct gas sampling at the required intervals outlined in the operator's site specific internal corrosion plan for the Glady Storage Field. The plan requires gas samples to be taken every four months not to exceed five months on the F1-(12") tie-in at Well #7477, and on the Roach property on Line F2. **The required gas sample frequency was exceeded during the period from 6/1/04 to 12/6/04 by one month and five days.**

The samples were taken at the following intervals: 4-05-2004, 6-01-2004, 12-06-2004, 4-11-2005.

1B. The operator failed to survey and patrol the shorted casings identified below with leak detection equipment at least 2 times per year not exceeding 7 ½ months. The operators O & M procedure, "External Corrosion Control 70.01.01 (section 3.2.8F, 1), states that all unfilled shorted casings must be monitored with leakage detection equipment according to Plan 220.03.01 section (3.2.4) Facility Patrol and Leakage Inspection. Plan 220.03.01 requires that Class 1 and 2 Patrols and Leakage Inspections be conducted at least 2 times per year not exceeding 7 ½ months.

**Ripley Storage X59**

**Line F-1, MAOP 1700 PSI, Class 1&2**

**The casing (equipment number 687984) is located on line F-1 at Pucket Ridge Road.**

YEAR	MONITOR DATES	FACILITY SURVEY FREQUENCY	PATROL INTERVAL
2003	3/20/03 and 9/5/03	2X/YR not to exceed 7 months	8 months-15 days <i>(interval exceeded by 1 month and 15 days)</i>
2004	3/15/04 and 9/23/04	2X/YR not to exceed 7 months	9 months-14 days <i>(interval exceeded by 2 months and 14 days)</i>
2005	9/29/05	2X/YR not to exceed 7 months	<i>Only one survey in 2005</i>
2006	3/10/06	2X/YR not to exceed 7 months	<i>Only one survey in 2006</i>

**2. §192.736 Compressor stations: Gas detection.**

**(b) Except when shutdown of the system is necessary for maintenance under paragraph (c) of this section, each gas detection and alarm system required by this section must-**

- (1) Continuously monitor the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; and**
- (2) If that concentration of gas is detected, warn persons about to enter the building and persons inside the building of the danger.**

The operator has failed to provide records to demonstrate compliance with Section 192.736 (B)(1) and B(2) of the code. The gas detection system inspection records provided by the operator indicate that the gas detectors were calibrated at 50% LEL not the required 25% LEL. Alarms to warn persons about the concentration of gas in the compressor building not greater than 25% LEL are dependent on proper gas detection system calibration.

**3. §192.736 Compressor stations: Gas detection.**

**(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.**

The operator has failed to document performance testing for the gas detection and alarm systems as required under Section 192.736(c) of the code. The inspection records provided by the operator for the period 2004 – 2006 for the Glady and Terra Alta fields only document the gas detector calibration tests.

**4. §192.745 Valve maintenance: Transmission lines.**

**(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.**

The operator failed to designate a valve (or valves) at or near each storage field wellhead as an emergency valve that could be used to isolate the well line from the wellhead during an emergency. Since each well line is operated in a bidirectional mode for storage and withdrawal, isolation of the well line is critical in the event of a well line leak or rupture. As of the date of this inspection, the operator did not have the appropriate emergency valves identified to ensure isolation of the well lines and compliance with Section 192.745 of the code.

The operator has since corrected this problem and revised their procedures. The operator has also provided records to show that valve inspections have in fact been conducted on all well head and associated valves at intervals not exceeding 15 months even though these valves have not been designated as emergency (DOT) valves in the past.

#### Proposed Civil Penalty

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. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$67,000 as follows:

<u>Item number</u>	<u>PENALTY</u>
1A	\$11,000
1B	\$32,000
2	\$12,000
3	\$12,000

#### Warning Items

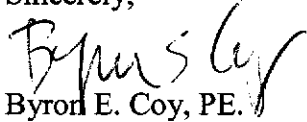
With respect to item 4 we have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to promptly correct this item. Be advised that failure to do so may result in Columbia Gas Transmission being subject to additional enforcement action.

#### Response to this Notice

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.

In your correspondence on this matter, please refer to **CPF 1-2007-1016** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron E. Coy". The signature is written in a cursive style with a large initial "B".

Byron E. Coy, PE.

Director, Eastern Region

Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

Cc: *WV PSC*