



U S Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave S E
Washington DC 20590

MAY 28 2008

Mr. Perry Richards
Vice President
Questar Gas Management Company
Questar Corporation
1050 17th Street, Suite 500
Denver, CO 80120

Re: CPF No. 5-2005-5030

Dear Mr. Richards:

Enclosed is the Final Order issued in the above-referenced case. It makes a finding of violation and finds that you have completed the actions specified in the Notice that were needed to bring question into compliance with the pipeline safety regulations, as set forth in the Proposed Compliance Order. The Order also makes findings of certain other probable violations for which you must take appropriate action to address, or be subject to future enforcement action. This case is now closed. Your receipt of this Final Order constitutes service of that document under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Jeffrey D. Wiese
Associate Administrator
for Pipeline Safety

Enclosure

cc: Mr. Chris Hoidal, P.E., Director, Western Region, PHMSA

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590**

_____)	
In the Matter of)	
)	
Questar Gas Management Company,)	CPF No. 5-2005-5030
)	
Respondent.)	
_____)	

FINAL ORDER

On July 13 and 14, 2005, pursuant to 49 U.S.C. § 60117, a representative of the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Office of Pipeline Safety conducted an on-site pipeline safety inspection of the highly volatile liquid (HVL) pipeline facilities and records of Questar Gas Management Company, a subsidiary of Questar Corporation (Questar or Respondent), in Granger, Wyoming. As a result of the inspection, the Director, Western Region, PHMSA (Director) issued to Respondent, by letter dated October 25, 2005, a Notice of Probable Violation and Proposed Compliance Order (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Respondent had committed violations of 49 C.F.R. Part 195 and ordering Respondent to take certain measures to correct the alleged violations. The Notice also proposed finding that Respondent had committed certain other probable violations of 49 C.F.R. Part 195 and warning Respondent to take appropriate corrective action to address them or be subject to future enforcement action.

Respondent responded to the Notice by letter dated January 24, 2006 (Response). Respondent did not contest the allegation of violation in Notice Item 8 nor did it address Notice Item 9, but indicated that it planned on making modifications to its Liquid Pipeline Integrity Management Plan to address Warning Items 1 through 7. 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 allegation in the Notice as follows:

Item 8:

116 STAT. 2985 PUBLIC LAW 107-355—DEC. 17, 2002
SEC. 15. NATIONAL PIPELINE MAPPING SYSTEM.

49 U.S.C. § 60132. National pipeline mapping system.

(a) INFORMATION TO BE PROVIDED—Not later than 6 months after the date of enactment of this section, the operator of a pipeline facility (except distribution lines and gathering lines) shall provide to the Secretary of Transportation the following information with respect to the facility:

(1) Geospatial data appropriate for use in the National Pipeline Mapping System or data in a format that can be readily converted to geospatial data.

(2) The name and address of the person with primary operational control to be identified as its operator for purposes of this chapter.

(3) A means for a member of the public to contact the operator for additional information about the pipeline facilities it operates.

(b) UPDATES—A person providing information under subsection (a) shall provide to the Secretary updates of the information to reflect changes in the pipeline facility owned or operated by the person and as otherwise required by the Secretary.

The Notice alleged that Questar failed to submit the geospatial data required under 49 U.S.C. § 60132 for its HVL pipelines to the National Pipeline Mapping System by the statutory deadline of June 17, 2003. Accordingly, I find that Respondent violated 49 U.S.C. § 60132 by not submitting said data by the June 17, 2003 statutory deadline.

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 Item 8 in the Notice for violation of 49 U.S.C. § 60132. Under 49 U.S.C. § 60118(a), each person who engages in the transportation of gas, 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 has indicated that Respondent has satisfied the requirement identified in the Notice and made a submission to NPMS. Accordingly, since compliance has been achieved with respect to said violation, it is unnecessary to include compliance terms in this Order.

WARNING ITEMS

With respect to Items 1a-c, 2, 3a-c, 4a-e, 5a-b, 6a-b, 7a-i, and 9, the Notice alleged probable violations of various sections of Part 195 but did not propose a civil penalty or compliance order for these items. Therefore, these are considered to be warning items. The warnings, as more fully described in the Notice, were as follows:

49 C.F.R. § 195.452 (f)(1):

Notice Item 1a – Respondent’s failure to have a documented process in its Integrity Management Program (IMP) for collecting and using field input to incorporate local knowledge in the ongoing upkeep of its “Segment Identification” process, as well as for assigning which personnel would be responsible for providing information to the IMP team and how it would be communicated.

Notice Item 1b – Respondent’s failure to have a Segment Identification process adequate to ensure that all “could affect” segments were covered in its IMP.

Notice Item 1c – Respondent’s failure to have a process for adding and removing assets in its IMP.

49 C.F.R. § 195.452(b)(3) (Notice Item 2) - Respondent’s failure to properly document a process for revising its baseline assessment plan.

49 C.F.R. § 195.452(f)(8) (Notice Item 3):

Notice Item 3a – Respondent’s failure to delineate the qualifications for its integrity results reviewers.

Notice Item 3b – Respondent’s failure to include the means to ensure that its process for reviewing integrity assessment results was adequate.

Notice Item 3c – Respondent’s failure to define assessment result distribution and review requirements in its IMP with sufficient detail that qualified individuals could produce consistent results.

49 C.F.R. § 195.452(e)(1):

Notice Item 4a – Respondent’s failure to provide a formal risk model or documentation of the risk analysis that it used in its IMP.

Notice Item 4b – Respondent’s failure to include in its IMP a process for analyzing the risk of pipeline facilities.

Notice Item 4c – Respondent’s failure to have a review process for populating its risk model data fields using available records and input from company subject-matter experts.

Notice Item 4d – Respondent’s failure to have documentation of any changes to its risk model and/or risk evaluation process.

Notice Item 4e – Respondent’s failure to perform a “Quality Control” check of the input in its risk assessment model database to ensure that it matched the input provided by regional field operations.

49 C.F.R. § 195.452(i)(1):

Notice Item 5a – Respondent’s failure to have in its IMP a “Preventive and Mitigative” (P&M) process of determining whether and when additional activities could reduce the probabilities or consequences of a failure in a High Consequence Area (HCA).

Notice Item 5b – Respondent’s failure to provide a detailed description of how it used specific risk factors to determine the need for improvements in leak detection and when emergency flow restricting devices were needed. In addition, Respondent’s P&M process failed to identify HCA-specific risk drivers.

49 C.F.R. § 195.452(f)(5):

Notice Item 6a – Respondent’s failure to include a timeframe, after completing an assessment, in which to determine when the next reassessment needed to be performed.

Notice Item 6b – Respondent’s failure to implement a continual process of evaluation and assessment.

49 C.F.R. § 195.452(f):

Notice Item 7a – Respondent’s failure to document a process for integrating all available information about the integrity of its entire pipeline and the consequences of failures.

Notice Item 7b – Respondent’s failure to document any training requirements for individuals with key risk analysis responsibilities.

Notice Item 7c – Respondent’s failure to have a process for reviewing and updating assumptions that were being used in risk analysis.

Notice Item 7d – Respondent’s failure to have a process for integrating other information with assessment results when formulating remediation plans.

Notice Item 7e – Respondent’s failure to contain in its procedures a requirement to determine and document the cause of all hydrostatic test failures and the appropriate corrective actions to be taken in order to mitigate failure defects of a similar nature.

Notice Item 7f – Respondent’s failure to have an IMP that included how pressure reductions were to be determined for corrosion and non-corrosion related anomalies.

Notice Item 7g – Respondent’s failure to implement and document its IMP evaluation.

Notice Item 7h – Respondent’s failure to develop a process for communicating the results of performance evaluations within the company.

Notice Item 7i – Respondent’s failure to have an IMP that includes a process by which data from inspections and tests required by Part 195 are integrated in order to establish appropriate hydrostatic testing intervals.

49 C.F.R. § 195.452 (b)(1) (Notice Item 9) – Respondent’s failure to develop a written IMP within the statutory deadline.

Respondent indicated in its Response that it planned to make modifications to its Liquid Pipeline IMP to address Notice Items 1 through 7 and their subparts. Having considered such information, I find, pursuant to 49 C.F.R. § 190.205, that probable violations of 49 C.F.R. § 195.452 (f)(1) (Notice Item 1a-c), 49 C.F.R. § 195.452(b)(3) (Notice Item 2), 49 C.F.R. § 195.452(f)(8) (Notice Item 3a-c), 49 C.F.R. § 195.452(e)(1) (Notice Item 4a-e), 49 C.F.R. § 195.452(i)(1) (Notice Item 5a-b), 49 C.F.R. § 195.452(f)(5) (Notice Item 6a-b), 49 C.F.R. § 195.452(f) (Notice Item 7a-i), and 49 C.F.R. § 195.452 (b)(1) (Notice Item 9) have occurred and Respondent is hereby advised to correct such conditions. In the event that PHMSA finds a violation for any of these items in a subsequent inspection, Respondent may be subject to future enforcement action.

Under 49 C.F.R. § 190.215, Respondent has a right to submit a Petition for Reconsideration of this Final Order. The petition must be received within 20 days of Respondent’s receipt of this Final Order and must contain a brief statement of the issue(s). The terms of this Order, including any required corrective action, remain in full effect unless the Associate Administrator, upon request, grants a stay.

The terms and conditions of this Final Order shall be effective upon receipt.

William H. Giese

for

Jeffrey D. Wiese
Associate Administrator
for Pipeline Safety

MAY 28 2008

Date Issued