

From: Bill Keffer
Sent: Thursday, May 19, 2011 6:04 PM
To: 'cynthia.quarterman@dot.cov'
Subject: DOT/PHMSA Pipeline Safety Conference

Administrator Quarterman –

I attended and introduced myself to you at the April 18 Pipeline Safety Conference, which I found to be a very useful and constructive first step towards bringing a greater level of scrutiny and accountability to the current conditions of our pipeline infrastructure in this country. You might recall that I'm part of a group that is investigating substandard construction practices and current deficient conditions of active pipelines across the country. We have already investigated selected pipelines being built and/or operating in Texas, Arkansas, Oklahoma, and Louisiana.

At present, we have focused our attention on an 80-mile, 36-inch high-pressure, natural-gas pipeline in East Texas that was built in 2004 by Willbros and is owned by Energy Transfer Company. It is known as the "Bossier Line". Our investigation found numerous examples of non-compliance with safety and environmental regulations during construction in 2004 and numerous current dangerous conditions, including recurring examples of inadequate cover, even exposure of the pipeline at the surface. It is a truly unacceptable situation for any active pipeline, but especially a pipeline that was built only seven years ago.

When I visited briefly with you at the Conference, I offered to provide you with a copy of a DVD we have produced that provides a summary of our investigation of the Bossier Line; and you asked if you could have two copies, so I obliged. I hope you and others in your office have had an opportunity to watch the DVD. We filed a formal complaint with the Texas Railroad Commission on this matter in February. The Commission has undertaken an investigation, but we are concerned that their response might end up being too slow and tepid. The proliferation of pipelines being built to keep pace with the rapid development of shale gas across the country demands that contractors and owners be held accountable for the quality of these pipelines. However, it is likely that demands for speed of completion are prevailing over expectations of quality and safety. It is clear from our investigation of the Bossier Line that this kind of substandard work can be done and buried, despite representations of continuous inspection during construction and subsequent inspections by the owner and the regulatory agency after completion of construction.

I would greatly appreciate any reaction or feedback you might be able to provide and any support that PHMSA might be able to provide. It is our view that, given the right opportunity, an effective message can be sent to industry regarding the urgency of requiring that their pipelines be built to the highest standards. What we have already uncovered with the Bossier Line could very well provide Secretary LaHood, DOT, PHMSA, the Texas Railroad Commission, and the public that you all are charged to protect with that opportunity.

Thanks very much for your time.

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