

Mr. John W. Somerhalder, II  
President  
El Paso Energy Pipeline Group  
1101 Louisiana  
Houston, Texas 77002

Re: CPF No. 4-2001-1005-H

Dear Mr. Somerhalder:

Enclosed is an edited version of the Corrective Action Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case on August 14, 2001. This edited version of the Corrective Action Order is to replace your file copy received and served by fax on August 14, 2001. The initial copy served on El Paso contained minor inaccuracies based upon information available at the time the Order was issued.

Sincerely,

Gwendolyn M. Hill  
Pipeline Compliance Registry  
Office of Pipeline Safety

cc: Arizona Corporation Commission

Enclosure

**VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED) AND TELECOPY**

**DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
WASHINGTON, DC 20590**

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In the Matter of )

El Paso Natural Gas Company, )

Respondent. )  
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CPF No. 4-2001-1005-H

**CORRECTIVE ACTION ORDER  
(EDITED VERSION)**

**Purpose and Background**

This Corrective Action Order is being issued, under authority of 49 U.S.C. § 60112, to require El Paso Energy Pipeline Group/ El Paso Natural Gas Company (El Paso) to take the necessary corrective action to protect the public and environment from potential hazards associated with El Paso Natural Gas Line 1200 (Line 1200) near Williams, Arizona. This edited version of the Corrective Action Order is to replace your file copy received and served by fax on August 14, 2001. The initial copy served on El Paso contained minor inaccuracies based upon information available at the time the Order was issued. The corrections, indicated in *italics*, in no way change the substance, outcome or original date of service.

On August 11, 2001, Line 1200 failed near Williams, AZ, resulting in the release of natural gas which ignited.

Pursuant to 49 U.S.C. § 60117, the Arizona Public Corporation Commission (the Commission), acting as OPS's interstate agent, responded to the incident. The Southwest Region, OPS, and the Commission initiated an investigation of this failure.

**Preliminary Findings**

1. At approximately 5:05 a.m. MST, on August 11, 2001, Line 1200 failed near Williams, AZ, resulting in the release of natural gas. The natural gas continued to discharge for *about* an hour before igniting. The failure occurred at approximately Mile Post 287 (MP 287).
2. No fatalities or injuries occurred. The fire was visible to residents located approximately 3 (three) miles away from the failure site, who voluntarily evacuated as a precautionary measure.

3. Line 1200 is routed through predominantly rural areas of Arizona. The line does pass within 3-4 miles of numerous small communities along the route as well as crossing numerous state and interstate highways, rivers, and streams. The pipeline also passes a golf course.
4. Line 1200 originates in New Mexico and enters Arizona south of Window Rock, AZ then moves westerly towards Flagstaff, AZ continuing into Williams, AZ. The failure occurred *near* Williams, AZ, approximately 36 miles west Flagstaff.
5. Line 1200 transports natural gas and is *operated by El Paso Natural Gas Company*.
6. The release occurred on a segment of pipe *constructed of Double Submerged Arc Welded 24-inch pipe with 0.271-inch wall thickness, manufactured by Republic Steel*.
7. The maximum allowable operating pressure at the Williams Compressor Station (MP275) is 845 psig. The discharge pressure at Williams Compressor Station at the time of the failure was approximately 817 psig. Williams Compressor Station is approximately 11 miles from the failure site.
8. The preliminary investigation, initiated on August 11, 2001, was inconclusive. The length of the fracture was approximately 11 feet. *El Paso replaced fifty-six (56) feet of pipe*. The failed pipe segment has been sent to a metallurgical laboratory for further analysis.
9. The cause of the failure could not be determined by examination at the site. The investigation is ongoing.
10. El Paso has not internally inspected this line section.
11. Following the August 11, 2001 accident, El Paso's personnel isolated and repaired the failed section. The line was isolated by closing the upstream and downstream mainline valves.
12. On August 12, 2001, El Paso restarted Line 1200. El Paso isolated the line segment between Valve 34 (MP280) and Valve 35 (MP290) from regular operation and are maintaining a pressure on this segment of 50 psig.

### **Determination of Necessity for Corrective Action Order and Right to Hearing**

Section 60112 of Title 49, United States Code, provides for the issuance of a Corrective Action Order, after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action as appropriate. The basis for making the determination that a pipeline facility is hazardous, requiring corrective action, is set forth both in the above referenced statute and 49 C.F.R. §190.233, a copy of which is enclosed.

Section 60112, and the regulations promulgated thereunder, provide for the issuance of a Corrective Action Order without prior opportunity for notice and hearing upon a finding that failure to issue the Order expeditiously will result in likely serious harm to life, property or the environment. In such cases, an opportunity for a hearing will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing preliminary findings of fact, I find that the continued operation of this pipeline without corrective measures would be hazardous to life, property and the environment. Additionally, after considering the circumstances surrounding this failure, the proximity of the pipeline to areas in which people may gather, the highly *combustible product* the pipeline facility transports, the pressure required for transporting the material, and the uncertainties as to the cause of the failure, I find that a failure to issue expeditiously this Order, requiring immediate corrective action, would result in likely serious harm to life, property, and the environment.

Accordingly, this Corrective Action Order mandating needed immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Order are effective upon receipt.

Within 10 days of receipt of this Order, El Paso may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, delivered personally, by mail or by telecopy at (202) 366-4566. The hearing will be held in Houston, Texas or Washington, D.C. on a date that is mutually convenient to OPS and Respondent.

After receiving and analyzing additional data in the course of this investigation, OPS may identify other longer term measures that need to be taken. El Paso will be notified of any additional measures required and amendment of this Order will be considered. To the extent consistent with safety, El Paso will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

### **Required Corrective Action**

Pursuant to 49 U.S.C. § 60112, I hereby order El Paso to immediately take the following corrective actions with respect to the failed segment between Valve 34 (MP280) and Valve 35 (MP290) of Line 1200:

1. The line segment, between Valve 34 (MP280) and Valve 35 (MP290), is to remain isolated from regular operation. Pressure within this segment is not to exceed 50 psig. This restriction shall remain in place until written approval, pursuant to item 5, is obtained from the Regional Director, Southwest Region.
2. Conduct a detailed metallurgical analysis of the pipe that failed on August 11, 2001 to determine the cause and contributing factors for the failure. Submit the testing protocol for the failed pipe

to Regional Director as soon as it is developed. Submit all reports of the failure analysis to the Regional Director, Southwest Region, OPS, within one week of receiving it.

3. Submit a written plan, to verify the integrity of the line from the Williams Compressor Station (*MP 275*) to the Seligman Compressor Station (*MP317*) based upon the results of Item 2. The plan must provide integrity testing that addresses all known or suspected factors in the failure.
4. Each element of the plan must be approved by the Southwest Regional Director, who may provide approvals incrementally. Implement the plan as approved.
5. Respondent may request approval from the Regional Director, to remove or modify the pressure restriction of the line segment between Valve 34 and Valve 35 based on a showing that the hazard has been abated or that a higher pressure is justified based on an analysis showing that the pressure increase is safe considering all known defects, anomalies and operating parameters of the pipeline. The request should include a return to service plan with the final results of all testing and activities conducted pursuant to Items 2 through 4 of this Order. The Regional Director's determination will be based on satisfactory completion of these requirements and evidence that mitigative actions taken by the operator provide for the safe operation of the pipeline.
6. The Southwest Regional Director may grant an extension of time for compliance with any of the terms of this order for good cause. A request for an extension must be in writing.
7. Respondent may appeal any decision of the Regional Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.

The procedures for the issuance of this Order are described in Part 190, Title 49, Code of Federal Regulations, § 190.233, a copy of which is enclosed, is made part of this Order and describes the Respondents' procedural rights relative to this Order.

Failure to comply with this Order may result in the assessment of civil penalties of not more than \$25,000 per day and in referral to the Attorney General for appropriate relief in United States District Court.

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Stacey Gerard  
Associate Administrator  
for Pipeline Safety

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Date Issued