

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 12, 1999

Mr. Steve Mims
Vice President of Operations
Diamond KOCH
P.O. Box 2256
Wichita, KS 67201-9982

Dear Mr. Mims:

CPF No. 49508W

On November 17-21, 1997, a representative of the Southwest Region, Office of Pipeline Safety (OPS), conducted an inspection of your record and pipeline facilities for the Chaparral system.

As a result of the inspection, it appears that you have committed a probable violation as noted below of pipeline safety regulations Title 49, Code of Federal Regulations, Part 195.

§195.406(a) Except for surge pressures and other variations from normal operations, no operator may operate a pipeline at a pressure that exceeds any of the following:

(1) The internal design pressure of the pipe determined in accordance with §195.106. However, for steel pipe in pipelines being converted under §195.5, if one or more factors of the design formula (§195.106) are unknown, one of the following pressures is to be used as design pressure:

(i) Eighty percent of the first test pressure that produces yield under section N5.0 of Appendix N of ASME B31.8, reduced by the appropriate factors in §§195.106(a) and (e); or

(ii) If the pipe is 323.8 mm (12³/₄ in) or less outside diameter and is not tested to yield under this paragraph, 1379 kPa (200 psig).

- (2) The design pressure of any other component of the pipeline.**
- (3) Eighty percent of the test pressure for any part of the pipeline which has been pressure tested under Subpart E of this part.**
- (4) Eighty percent of the factory test pressure or of the prototype test pressure for any individually installed component which is excepted from testing under §195.305.**
- (5) For pipelines under §§195.302(b)(1) and (b)(2)(i), that have not been pressure tested under Subpart E of this part, 80 percent of the test pressure or highest operating pressure to which the pipeline was subjected for 4 or more continuous hours that can be demonstrated by recording charts or logs made at the time the test or operations were conducted.**

During the records review of you over pressure protection equipment it was noted that the set points for the locations listed below were set above the system's MOP. Per subsequent conversation with compliance personnel, our office has been informed that all set point have been lowered to adhere to the requirements of §195.406(a).

1. Conoco Maljimar; set at 1450
2. American Processing; set at 1450
3. Unocal Riley; set at 1450
4. GPM Zia; set at 1450
5. Mappco Hobbs; set at 1450
6. Amoco Wasson; set at 1450
7. ARCO Willard; set at 1450
8. Amerada Hess; set at 1450
9. Trident Seminole; set at 1450
10. Shell Wasson II, set at 1450
11. Seminole Booster; set at 1470
12. San Andres; set at 1470
13. Snyder Station; set at 1450
14. Merkel Station; set at 1470
15. Coleman Station; set at 1460
16. Energe Station; set at 1470
17. Calvert Station; set at 1470
18. Chaparral, Mt. Belvieu delivery station; set points varied from 1480 to 1490 for:
 - Gulf Coast Skid
 - Enterprise Skid
 - Occidental Skid

The following item of concern was also noted during the system inspection. The point to point descriptions of your patrolling documentation for the **Chaparral** system did not clearly indicate

that 100 percent of the system was being patrolled. Subsequent discussion with compliance personnel indicated that the descriptions of the patrol records have been modified to demonstrate that 100 percent of the system is being patrolled.

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 persists 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 have 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 and if the continued violations come to our attention.

Please refer to CPF No. 49508W in any correspondence or communication on this matter. If we can answer any questions or be of any help, please contact me at (713)718-3746. Thank you for the courtesies extended by your staff during these scheduled inspections.

Sincerely,

R.M. Seeley, Director
Southwest Region

cc: Bob Aebi
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