

## **WARNING LETTER**

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 20, 2014

Richard Keyser  
Sr. Vice President of Operations  
Gulf South Pipeline, LP  
9 Greenway Plaza, Suite 2800  
Houston, Texas 77046

**CPF 4-2014-1003W**

Dear Mr. Keyser:

Between September 4, 2013 and February 28, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to chapter 601 of 49 United States Code, investigated a natural gas incident that occurred on March 3, 2013, at the Hall Summit Compressor Station near Ringgold, Louisiana.

As a result of the review of the information provided, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

**1. §191.5 Immediate notice of certain incidents.**

**(a) At the earliest practicable moment following discovery, each operator shall give notice in accordance with paragraph (b) of this section of each incident as defined in §191.3.**

Gulf South failed to make telephonic notification as soon as practical following the unintentional release of 23.79 MMCF of natural gas at the Hall Summit compressor station near Ringgold, Louisiana that occurred on March 3, 2013. The release met the definition of a reportable incident

according to §191.3, and a telephonic notification was required as guided in Gulf South Procedures (BWP-0009 (Part I), Event Notification Report.)

The release occurred due to a failed electrical wiring connection on the valve actuator controls causing a coil to drop out which resulted in the valve opening to the fail safe open position. The incident was confirmed by Gulf South at 12:37 a.m. on March 3, 2013, and the incident was not reported to the National Response Center until 8:35 a.m., 8 hours after confirmed discovery.

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.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2014-1003W**. 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).

Sincerely,

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration