

May 15, 2014



<u>Certified Mail</u> 7011 0470 0001 4026 5857

Mr. R. M. Seeley Director, Southwest Region Pipeline and Hazardous Materials Safety Administration 8701 South Gessner, Suite 1110 Houston, Texas 77074

Re: Notice of Probable Violation & Proposed Compliance Order CPF 4-2014-5009 ONEOK NGL Pipeline, LLC

Dear Mr. Seeley:

ONEOK NGL Pipeline L.L.C. (ONEOK) submits this letter in response to the subject Notice of Probable Violation and Proposed Compliance Order.

#### NOPV Item 1 - 195.410 Line Markers Proposed Compliance Order Item 1 -

In regard to Item Number 1 of the Notice pertaining to the failure to install line markers, ONEOK must complete the installation of all required line markers on segments containing commodity, and prior to placing any additional segments of the pipeline in service, install all required markers.

# ONEOK Response to Proposed Compliance Order Item 1 -

ONEOK has completed the installation of line markers in accordance with 195.410.

# NOPV Item 2 – 195.434 Signs

## Proposed Compliance Order Item 2 -

In regard to Item Number 2 of the Notice pertaining to the failure to install signs. ONEOK must complete the installation of signs on pipeline facilities containing commodity, and prior to placing any additional pipeline facilities in service, install all required signs.

## **ONEOK Response** to Proposed Compliance Order Item 2 -

ONEOK has completed the installation of signs in accordance with 195.434

# NOPV Item 3 – 195.430 Firefighting equipment

## Proposed Compliance Order Item 3 –

In regard to Item Number 3 of the Notice pertaining to the failure to install fire extinguishers. ONEOK must complete the installation of fire extinguishers on pipeline facilities containing

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commodity, and prior to placing any additional pipeline facilities in service, install all required fire extinguishers.

#### ONEOK Response to Proposed Compliance Order Item 2 -

ONEOK has completed the installation of firefighting equipment in accordance with 195.430

#### Proposed Compliance Order Item 4 -

ONEOK must complete items 1, 2, and 3 (installation of line markers, signs, and fire extinguishers) and provide PHMSA documentation that the installations have been completed within 30 days of the Final Order.

#### ONEOK Response to Proposed Compliance Order Item 4 -

ONEOK has completed the installation of Notice Items 1, 2, and 3 as described above. Although a Final Order has not been submitted by PHMSA, ONEOK provides this letter as documentation of completion and requests that the Final Order be issued with acknowledgement that the items are completed and the Order is closed.

#### Proposed Compliance Order Item 5 -

It is requested (not mandated) that ONEOK NGL Pipeline, LLC maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.

## ONEOK Response to Proposed Compliance Order Item 5 -

ONEOK will provide the requested information in future correspondence, but does not have the total cost calculated at this time.

If additional information is needed, please contact me. Your representatives may also contact Bill Bromley at 918-588-7615, or by e-mail at <u>bill.bromley@oneok.com</u>. He will facilitate the gathering of information or discussions with the appropriate personnel as needed.

Very truly yours,

Wisley live

Wesley J. Christensen Sr. Vice President of Operations