ONEOK NGL PIPELINE, L.L.C.
A SUBSIDIARY OF ONEOK PARTNERS, L.P.

August 20, 2012

Mr. David Barrett
Director, Central Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

Reference: CPF 3-2012-5012

Dear Mr. Barrett:

By letter dated June 15, 2012, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued to ONEOK NGL Pipeline, L.P. ("ONEOK") a Notice of Probable Violation, Proposed Compliance Order ("PCO"), and Proposed Civil Penalty ("PCP"; collectively, the "NOPV"); *see* Attachment A attached hereto. By letter dated July 10, 2012, PHMSA granted an extension of time to respond to the NOPV, until not later than August 20, 2012.

The NOPV was issued following inspections conducted on July 24-29, August 15-18, and August 22-25, 2011, which involved inspection of ONEOK records for the Medford area in Medford, Oklahoma, and the facilities in Kansas and Oklahoma, as well as inspection of North System facilities and records in Des Moines and Iowa City, Iowa. *See* NOPV at 1. Subsequent to the subject inspections, PHMSA issued to ONEOK a Request for Specific Information dated October 18, 2011 (*see* Attachment B attached hereto; the "RFI"), to which ONEOK responded by letter dated November 23, 2011 (*see* Attachment C attached hereto; the "Response to RFI").

This letter and supporting documents constitute ONEOK's response to the NOPV pursuant to 49 C.F.R. §§ 190.209(a)(2) and 190.209(b)(3). ONEOK does not wish to request a hearing in this matter; however, ONEOK requests a fair and impartial evaluation of the materials submitted herein and herewith in opposition to certain of the alleged violations and in mitigation of the PCP, as well as ONEOK's stated objections to the PCO. ONEOK first addresses the substantive violations alleged in the Items of the NOPV, then, in turn, addresses the PCP and the PCO.

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In the paragraphs below, ONEOK restates each Item of the NOPV, then, following each restatement, ONEOK provides its response.

1. §195.49 Annual report

Each operator must annually complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year. An operator must submit the annual report by June 15 each year, except that for the 2010 reporting year the report must be submitted by August 15, 2011. A separate report is required for crude oil, HVL (including anhydrous ammonia), petroleum products, carbon dioxide pipelines, and fuel grade ethanol pipelines. For each state a pipeline traverses, an operator must separately complete those seetions on the form requiring information to be reported for each state.

For the North System, ONEOK NGL Pipeline L.P. (ONEOK) did not submit separate annual reports for the refined products and diesel that are transported in addition to the HVL transported. All the mileage for these pipelines has been submitted under the HVL annual report.

Since 2007, ONEOK has not been correctly submitting the annual report for the North System. ONEOK's North System transports refined products and diesel on Lines 113, 114, 119, 112, 101, and 103. However, these lines are being reported in the HVL annual report. No separate reports for the refined products are being submitted. ONEOK resubmitted the annual reports for 2010 after this was brought to their attention during PHMSA's inspection.

Response to Item 1

ONEOK does not contest the alleged violation in Item 1. ONEOK wishes to inform PHMSA that it has corrected its process for the filing of the annual report and has completed and timely submitted its DOT Form PHMSA F 7000-1.1 report for 2011 which was due on or before June 15, 2012, in which report the relevant volumes were properly classified in the appropriate commodity classifications.

2. §195.402 Procedural manual for operations, maintenance, and emergencies.

(d) Abnormal operation. The manual required by paragraph (a) of this section must include, procedures for the following to provide safety when operating design limits have been exceeded;

(1) Responding to, investigating, and correcting the cause of;

(i) Unintended closure of valves or shutdowns;
(ii) Increase or decrease in pressure or flow rate outside

normal operating limits;
(iii) Loss of communications;
(iv) Operation of any safety device;
(v) Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property.

ONEOK did not follow up and correct the cause of an abnormal operation that occurred in the Des Moines area in 2010.

ONEOK's procedures specify certain actions that must be taken when abnormal operations occur. On the North System, ONEOK personnel indicated that all abnormal operations are documented in the SHAVRs program. However, review of the records found that the recommended actions noted during the investigation were not addressed or followed up on. For example, SHAVR Report 2494 had a recommendation of investigating why a HI pressure switch remained on SCADA for more than an entire shift without being investigated. At the time of PHMSA's inspection, there was no documentation indicating that this was completed. ONEOK's response to the Letter for Request for Specific Information indicated that they did look into it, but no further action was taken to remedy the situation and to prevent this from happening again.

Response to Item 2

Notwithstanding that PHMSA has issued a warning for this Item, ONEOK wishes to establish a complete record regarding the allegation that ONEOK did not follow-up and correct the cause of an abnormal operation that occurred in the Des Moines area in 2010, specifically SHAVR Report 2494.

In the RFI, PHMSA requested that ONEOK provide "detailed reports on what was performed in response to the incident report (SHAVR #2494) and the incident report on 9/9/2010 (SHAVR #4498)." The Response to RFI (*see* Attachment 5) provided a copy of two reports describing the follow-up actions taken by ONEOK (one report for SHAVR Report 2494 Corrective Actions and one report for SHAVR Report 4498), including the closed action items as logged in the SHAVR tracking system.

ONEOK clearly demonstrated in the Response to RFI that it responded to, investigated, and corrected the cause of each of the situations involving SHAVR Report 2494 and SHAVR Report 4498. Moreover, this subject was further discussed with the PHMSA inspector in multiple telephone conversations between September 7 and 9, 2011, during which conversations ONEOK indicated that the long term corrective action was the upgrade of the SCADA system that is currently underway on the North System, and updated to PHMSA on a monthly basis, under Safety Order CPF No. 3-2011-5008S.

On the basis of the foregoing, ONEOK requests that Item 2 be withdrawn from the alleged violations, given the fact that ONEOK filed a response that indicated the completion of the

action items in its Response to RFI and further that ONEOK had communicated to the PHMSA inspector that the long term solution was the ongoing SCADA upgrades scheduled to take place over the next year.

3. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

For the Medford area and the North System, ONEOK personnel did not periodically review the work done by personnel to determine the effectiveness of their procedures.

ONEOK was not able to demonstrate that they periodically reviewed work done by personnel to determine the effectiveness of the procedures. Furthermore, ONEOK's procedures indicated that the "ONP Business manager or designee shall be responsible for conducting a review of the work done by personnel, incident, and near miss reports to determine the effectiveness of operating procedures at intervals not exceeding 15 months, but at least once each calendar year." ONEOK did not have any records that indicated that this was being completed.

Response to Item 3

ONEOK contests the violation alleged in Item 3. PHMSA alleges in the NOPV that "ONEOK was not able to demonstrate that they periodically reviewed work done by personnel to determine the effectiveness of the procedures" because "ONEOK did not have any records that indicated that this was being completed." NOPV at 3. The PHMSA Pipeline Safety Violation Report in the record reaches the same conclusion, stating that "ONEOK did not conduct any reviews of their employees [sic] work to determine the effectiveness of their procedures," on the basis that "ONEOK personnel could not provide any example or records to show that any periodic review of any procedure was done." See Pipeline Safety Violation Report CPF 3-2012-5012 at 3 (the "Violation Report"), attached hereto as Attachment D.

ONEOK did in fact follow its procedure, PRC1410.100, the relevant portions of which are stated below:

> *"The Business Manager or designee shall be responsible for conducting a review of the work done by personnel, incident and near miss reports to determine the effectiveness of operating procedures at intervals not exceeding 15 months, but at least once each calendar year.*
>
> *Suggested changes or improvement to the procedures discussed during the review shall be forwarded to NGL Business Manager or his/her designee to be considered for incorporation into the procedures."*

Two categories of information substantiate that ONEOK followed its procedure and thus complied with the relevant regulation. First, ONEOK convenes a weekly meeting of supervisors from across the operating organization to evaluate incidents and near miss events that might have occurred over the course of the prior week. The meeting is attended by company vice presidents, operations managers, control center managers, and regulatory compliance coordinators. The meetings are conducted to discuss and evaluate the events to identify any necessary changes to operations, procedures, system configuration, and similar elements of operations and so that responsibility for implementing such changes may be assigned. To the extent a procedural deficiency or an enhancement to a procedure is identified, the matter is entered into the SHAVR near-miss database and tracked through to completion. *See* the email at Attachment E attached hereto for a more detailed description of the weekly meeting. As such, as the relevant procedure directs, a review of near misses and/or incidents, and in turn evaluation of procedures with personnel, was conducted more frequently than at intervals of 15 months.

Second, ONEOK refers PHMSA to its Enforcement Guidance Manual at 49 C.F.R. § 195.402(c), Guidance Information item 26, where 49 C.F.R. § 195.402(c) is described as being directed not to employee evaluation but to refinement of procedures. The Guidance Manual indicates that documentation of the analysis to determine the adequacy of a procedure may come in many forms, including accident and near-miss data, submissions from employees, meetings to discuss procedures, and the like. At Attachment F attached hereto, ONEOK submits as examples several items of information that further substantiate that procedural reviews are undertaken. Those items of information include SHAVR Closed DOT Action Items, an Incident Action Item Tracking log, and a Weekly Event Review Report.

As described above, ONEOK prepared a procedure as required by 49 C.F.R. § 402(a), and it followed that procedure. The weekly managers' meeting includes by necessity evaluation of the effectiveness of procedures, and that meeting takes place each and every week. Further, the additional documents described above further demonstrate that the effectiveness of procedures is reviewed in other contexts as well. ONEOK acknowledges that execution of the procedure was not well-documented; however, the procedure does not require documentation, and neither does 49 C.F.R. Part 195. As such, failure to maintain documentation does not equate to failure to follow the procedure. ONEOK further acknowledges that the maintenance of documentation that a procedure was executed would avoid a similar situation in the future. As part of the annual review of its procedural manual

in 2012, the relevant procedure will be revised to provide a process for documentation of the reviews that are conducted to evaluate the effectiveness of the procedural manual.

On the basis of the foregoing, ONEOK requests withdrawal of the alleged violation in Item 3 since ONEOK did in fact follow its procedure, and ONEOK undertook additional measures to evaluate its operating procedures.

4. §195.422 Pipeline Repairs.

(a) Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

In the Medford area, ONEOK is not making repairs in a safe manner that will prevent damage to persons or property.

ONEOK utilized composite sleeves to repair crack-like indications. Review of inline inspection dig repair reports found one report where a composite sleeve was used as a temporary repair on some crack-like features in the pipe seam in 2008. Consistent with industry standards such as ASME B31.4, the composite sleeve manufacturer's technical guidance specifically states that the composite sleeve is not to be used to repair cracks without grinding out the crack defect. The use of a repair method on a defect for which its use is not permitted by the manufacturer and referenced industry standards is insufficient to safely prevent damage to persons or property.

Response to Item 4

ONEOK does not contest the alleged violation in Item 4. ONEOK has reviewed and refined its procedures to ensure that the circumstance identified in the NOPV does not occur in the future.

5. §195.406 Maximum operating pressure.

(b) No operator may permit the pressure in a pipeline during surges or other variations from normal operations to exceed 110 percent of the operating pressure limit established under paragraph (a) of this section. Each operator must provide adequate controls and protective equipment to control the pressure within this limit.

ONEOK did not provide adequate controls and protective equipment at Winterset Station on the North System to ensure that the pressure in the pipeline would not exceed the maximum operating pressure (MOP).

On May 23, 2008, a management-of-change (MOC) memorandum was issued to reduce the pressure on the Massena to Des Moines section of Line 102 because MOP-reducing anomalies were present. This line section included the Winterset pump station and required

that the over-pressure protection be reset to 1930 psig for protection a lower MOP of 1950

psig from the original 2160 psig. On June 6, 2008, a second MOC was issued on Line 102 after a failure occurred on May 31, 2008. The June 6th MOC affected the line segment from Massena to Tabor (downstream of the Massena to Des Moines section) and lowered the MOP to 1704 psig. On June 13, 2008, a third MOC was issued to reduce the maximum operating pressure for the entire Line 102 from Des Moines, Iowa, to Bushton, Kansas. The June 13th MOC was in addition to the June 6th MOC, and superseded the May 23, 2008, MOC.

The MOC issued on June 13, 2008, did not address resetting the pipeline overpressure protection at Winterset pump station. As a result, from the time of the June 13, 2008, MOC to the time of the PHMSA inspection, the set points of the over pressure protection at Winterset remained at 1930 psig, which exceeded the maximum operating pressure. Review of the discharge records during this time period found that the line did not operate at pressures above 1704 psig, but did spike above the 1704 psig MOP for short periods of time during pump start up and shut downs. The line pressures never exceeded the 1704 psig plus 10% (1874psi).

Response to Item 5

PHMSA alleges that ONEOK did not provide adequate controls and protective equipment at Winterset Station on the North System to ensure that the pressure in the pipeline would not exceed the maximum operating pressure (MOP).

ONEOK contests this violation on the grounds that the action required by the relevant regulation was executed, and documentation was provided to PHMSA.

The primary performance obligation of the relevant regulation, 49 C.F.R. § 195.406(b), is that pipeline pressure may not exceed 110% of maximum operating pressure ("MOP") during surges and other variations from normal operations. 49 C.F.R. § 195.406(b). That did not occur, as PHMSA admits in the NOPV which states at Item 5:

> Review of the discharge records during this time period found that the line did not operate at pressures above 1704 psig, but did spike above the 1704 psig MOP for short periods of time during pump start up and shut downs. The line pressures never exceeded the 1704 psig plus 10% (1874psi).

By email dated March 19, 2012, ONEOK provided to the inspector records of the pipeline control center discharge pressures over the relevant time period, which records support the conclusion that pipeline operating pressure in the subject system did not exceed the MOP (except as allowed for surges, such as during start ups and shut downs) and at no time did it exceed 110% of MOP. Based upon these records, PHMSA has concluded that the relevant regulation was not violated.

The relevant regulation provides secondarily that an operator must provide adequate controls and protective equipment to control the pressure within the 110% of MOP limit. ONEOK at all relevant times has maintained adequate controls and protective equipment in place and ONEOK endeavored to demonstrate that to the inspector. ONEOK describes and explains its controls and protective equipment in the following paragraphs.

Overpressure protection (*i.e.*, preventing pressure above 110% MOP) is provided on ONEOK Line 102 through various physical overprotection devices providing layers of protection (control valves, pressure relief devices, collectively "OPDs") that can have local settings, as well as through SCADA-controlled pressure set points (transmitters, parameter alarms, and SCADA limits to parameter alarms). In concert, those OPDs and the SCADA system provide overpressure protection to Line 102. In the case of a June 13, 2008 management of change ("MOC") directive, the MOP of Line 102 was set at 1704 psig which necessitated re-setting SCADA operating parameters. ONEOK does not argue that the Winterset pump station OPD was not reset as part of the MOC process; however, that OPD is not the only control in place to prevent an overpressure event, and was not the primary overpressure control device. The MOC process provided that the pipeline control center would, as it did, adjust programmable logic control points in the SCADA system to provide the primary pressure control at Winterset pump station.

Such administrative controls clearly are acceptable to PHMSA. Reference to the PHMSA Enforcement Guidance Manual, at the provisions relating to 49 C.F.R. § 195.406, identifies the following: "Administrative change control procedures are considered a part of the pressure control system." Enforcement Guidance Manual at 49 C.F.R. § 195.406, Guidance Information. As such, the set points established in the pipeline control center are a part of the pressure control system and qualify to satisfy the dictates of 49 C.F.R. § 195.406(b).

Finally in this regard, PHMSA is reminded that the Pipeline Safety Regulations at 49 C.F.R. Part 195 are performance-based regulations. As stated by PHMSA's predecessor agency, the Federal Railroad Administration, the regulations are intended to be "'performance' type requirements rather than detailed 'specification' type requirements...". 33 Fed.Reg. 10213, 10214 (July 17, 1968). Such performance based regulations are designed such that "the goal is the safe transportation ... through pipelines; the regulation relates to the goal, not the means used to achieve the goal." *Id.* The relevant regulation, 49 C.F.R. § 195.406(b) is directed to preventing pipeline pressures from exceeding 110% of MOP, and that did not occur. In sum, ONEOK did not violate the regulation. ONEOK requests that the alleged violation alleged in Item 5 be withdrawn.

6. §195.428 Overpressure safety devices and overfill protection systems.

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 ½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief

valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

For the Winterset pump station on the North System, ONEOK did not adequately check the overpressure protection device for reliability of operation at 1930 psig for the service in which it is used from October 2008 to the time of PHMSA's inspection.

In May of 2008, a Management of Change (MOC) was issued on the Des Moines to Massena section of Line 102 to change the over-pressure protection set points to 1930 psig. This set-point remained in effect until the PHMSA inspection in 2011. The semi-annual inspection of the transmitter utilized as the over-pressure protection of the new maximum operating pressure (MOP) simply documented that the transmitters were calibrated and spanned, but there was no indication that the device activated at the set point (1930 psig) at which the transmitters send the signals to shut down the pumps.

After PHMSA's onsite inspection, in September of 2011, ONEOK personnel reset the physical shut down switch to protect at a MOP of 1704 psig.

Response to Item 6

ONEOK contests Item 6. PHMSA alleges that, at the Winterset Pump Station on the North System, ONEOK did not "adequately check" the overpressure protection device for reliability of operation at 1930 psig on the basis that "inspection of the transmitter utilized as the over-pressure protection of the new maximum operating pressure (MOP) simply documented that the transmitters were calibrated and spanned, but there was no indication that the device activated at the set point" to send the signal to shut down the pump. NOPV at 5.

As an initial matter, ONEOK asserts the alleged violation is not supported by the proffered evidence. The NOPV states a conclusion but does not provide a statement of the evidence as directed by 49 C.F.R. § 190.207(b)(1). The alleged violation fails on that point alone.

Nonetheless, in the Response to RFI, ONEOK described the logic sequence that causes the subject pressure transmitters to serve as the OPD and effect shutdown at the necessary pressure threshold. *See* Response to RFI at Attachment 3. Following submission of the Response to RFI, the inspector inquired numerous times regarding the system configuration, the pressure transmitter, and related subjects, but never was the question asked whether or not the transmitter effected a pump shutdown at the threshold pressure. *See* emails from PHMSA inspector to ONEOK dated November 30, 2011; December 7, 2011; December 20, 2011 (two inquiries); March 12, 2012; March 13, 2012; March 14, 2012; and March 19, 2012, Attachment G. The testing of the transmitter, which occurred within the time periods prescribed by regulation without lapse throughout the period in question (*see* Response to RFI at Attachments 2 and 3), did in fact "send the signal to shut down the pump." The manner in which the signal is generated is described in the following paragraph.

At the time a technician performs the necessary inspection and test, the technician attaches a test set (an electronic instrument) to the local programmable logic controller ("PLC") and causes the transmitter electronically to detect a pressure that exceeds the maximum set point limits (HI and HIHI) during the process of checking the transmitter span. The result of that test takes two forms depending upon whether or not the pumping unit is in operation at the time of the test. (For reasons of safety, ONEOK does not effect an actual shutdown if the pump is in operation at the time of the test.) In the case of a pump that is not in operation, the test causes the PLC to issue a "HI fault" alarm and a "HI HI fault" alarm, both of which are recorded in the PLC alarm log and are uploaded to the SCADA system central alarm log. In the case of a pump that is not in operation, the technician first pushes a "bypass" button in the PLC which has the effect of diverting the shut-down signal so that the operating pump does not actually shut down. The result in this case is that the "HI fault" alarm, the "HI HI fault" alarm, and a "Bypass" indicator are recorded in the PLC alarm log and are uploaded to the SCADA system central alarm log. Attachment H attached hereto presents an email from Randy Dulaney, Lead I&E Technician, dated August 16, 2012, in which Mr. Delaney describes the testing process and the manner in which alarms are issued and logged. In addition, Attachment H presents an example of the actual alarm logs from the October 15, 2008 inspection, showing that the above-described alarms were logged at the same points in time as the transmitter was calibrated and spanned.

Moreover, again ONEOK asserts that PHMSA must compare that regulatory requirement to the action taken to fulfill that requirement. The relevant regulation, 49 C.F.R. § 195.428, provides that an operator must "inspect and test" each item of pressure control equipment (in sum, OPDs) to determine that it is "functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability" for the service in which it is applied. 49 C.F.R. § 195.428. That action was accomplished as demonstrated by the records provided at Attachment 3 to the Response to RFI and further illustrated through the example alarm logs provided in Attachment H. Finally in this regard, the generation of the pump shut-down alarms is not recorded on the manually-completed inspection records since the record of the shut-down signal is preserved in the SCADA system.

ONEOK requests that the alleged violation be withdrawn on the grounds that ONEOK performed the tests and inspections in accordance with its procedure, which tests and inspections fulfilled the regulatory obligation, and thus no violation occurred.

7. **§195.569 Do I have to examine exposed portions of buried pipelines?**

Whenever you have knowledge that any portion of a buried pipeline is exposed, you must examine the exposed portion for evidence of external corrosion if the

pipe is bare, or if the coating is deteriorated. If you find external corrosion requiring corrective action under Sec. 195.585, you must investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.

ONEOK is not inspecting their pipelines when they utilize a vacuum excavation process to expose their lines for the purposes of confirming pipeline location.

During the review of locate records and Inspect and Investigate (INI) forms, it was noted that ONEOK utilizes an excavation process that vacuums out soil to locate pipelines. This is performed to confirm the location and depth of the pipelines when a foreign utility is intended to cross ONEOK's pipelines. The pipeline does become exposed during this process; however, the exposed pipe section where the condition of the pipe is supposed to be recorded on the INI form was left blank. Further discussion with ONEOK personnel indicated that they were not doing the inspections.

Response to Item 7

PHMSA alleges that ONEOK is not inspecting its pipelines when it utilizes a vacuum excavation process to expose their lines for the purposes of confirming pipeline location. PHMSA further states that the term "exposed" includes the use of "hydro-vac" pipe location methods.

The process of hydro-vac pipe location involves the jetting of water into the soil, and vacuuming the water and soil into a truck with a hose that is approximately four to eight inches in diameter. This produces a hole, akin to a bore hole, that does not allow access by personnel to examine the pipe or coating condition. While one may identify the pipe for locating purposes, the pipe nonetheless is not accessible for purposes of inspecting the pipe or the condition of the coating. ONEOK believes that the use of hydro-vac equipment improves the safety of third party excavation near and adjacent to operating pipelines, but it is not intended to "expose" the pipe in the manner that was contemplated when the regulations were promulgated. This method of excavation employs a relatively new technology that had not been developed at the time the relevant regulation was promulgated.

The PHMSA Enforcement Guidance manual provides that the purpose of the regulation is to prevent accidents due to the existence of harmful corrosion near the area of pipe exposure. This regulation was intentionally designed to permit varying approaches to compliance because of the different conditions that are encountered at excavation sites. A hydro-vac site is not a traditional excavation site, again, a type of excavation that could not have been within the contemplation of the regulation when it was originally promulgated. *See* 33 Fed.Reg. 10213, 10223 (July 17, 1968) (49 C.F.R. § 180.416(e)).

As a result, imposing the requirement that such an examination occur under circumstances where such an examination is physically impossible is neither consistent with nor in harmony with the intent of the regulation. To allege a violation for an impossible task would appear to penalize an operator in a circumstance for which there is no defense.

ONEOK would add that hydro-vac is almost always not considered "excavation" by state one-call laws and does not require a one-call. The intent of the rule was for excavation sites

where there was access available by personnel to examine the pipe and coating surface which is not possible in a hydro-vac hole.

On the basis of the foregoing, ONEOK requests that the alleged violation be withdrawn.

Proposed Civil Penalties

Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed $100,000 for each violation for each day the violation persists up to a maximum of $1,000,000 for any related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of $78,600 as follows:

Item number	PENALTY
3	$32,100
6	$46,500

Response to Proposed Civil Penalties

ONEOK addresses, in the sections below, each of the Items of the NOPV for which PHMSA has proposed a civil penalty.

Proposed Civil Penalty for Item 3

PHMSA's proposed civil penalty for NOPV Item 3 should be withdrawn on the grounds that no violation occurred, or it should be substantially reduced on the grounds that the penalty assessment considerations of 49 C.F.R. § 129.225 are not sufficiently substantiated.

First, ONEOK asserts that it has established in this response that it did in fact fulfill its regulatory obligations under 49 C.F.R. § 195.402(c)(13) and that, as such, no civil penalty is supported. *See* discussion above in *Response to Item 3* and 49 C.F.R. § 190.221.

Second, ONEOK asserts that the penalty assessment considerations of 49 C.F.R. § 190.225 are unsubstantiated in both the NOPV and the Violation Report. The NOPV contains no discussion of the penalty assessment considerations. As to the Violation Report, the penalty assessment considerations relating to NOPV Item 3 are unsubstantiated. The factor of gravity concludes that "pipeline integrity or safe operation was potentially comprised in others [sic] areas." Violation Report at 4. Yet, no facts are alleged regarding pipeline integrity, regarding safe operation, nor regarding the meaning of "other areas." Only a broad and general statement of the overall intent of the relevant regulation is provided, but that statement is factually and analytically unsubstantiated. The factor of culpability reflects a

conclusion that the "operator failed to take any action or made a minimal attempt to comply with a regulatory requirement that was clearly applicable." Violation Report at 6. In an effort to substantiate that conclusion, the Violation Report indicates that ONEOK is "well aware" of its obligations, noting that ONEOK "specified" its obligations but failed to fulfill those obligations. Yet the Violation Report describes no facts in support of the culpability conclusion. With regard to good faith efforts to comply by ONEOK, the Violation Report essentially restates the conclusions of the culpability conclusion (*see* Violation Report at 6-7), yet again no facts are found and no analysis is presented. ONEOK asserts that PHMSA has failed to carry its burden of proof to substantiate the imposition of any penalty and thus requests that the penalty proposed for Item 3 be withdrawn.

On the grounds that ONEOK has demonstrated that no violation occurred, ONEOK requests that the proposed civil penalty be withdrawn as it is not supported by a violation as required by 49 C.F.R. § 190.221. To the extent that PHMSA disagrees and finds a violation under Item 3, ONEOK requests that the proposed civil penalty be substantially reduced on the grounds (1) that any violation was not of the alleged gravity, and (2) that ONEOK was not culpable as alleged and acted in good faith in that ONEOK has established that it took diligent efforts which were reasonably calculated to comply with the relevant regulation. No incident occurred, no harm was done, and public safety was at all times protected.

Proposed Civil Penalty for Item 6

PHMSA's proposed civil penalty for NOPV Item 6 should be withdrawn on the grounds that no violation occurred, or it should be substantially reduced on the grounds that the penalty assessment considerations of 49 C.F.R. § 129.225 are not sufficiently substantiated.

First, ONEOK asserts that it has established in this response that it did in fact fulfill its regulatory obligations under 49 C.F.R. § 195.428 and that, as such, no civil penalty is supported. *See* discussion above in *Response to Item 6* and 49 C.F.R. § 190.221.

Second, ONEOK asserts that the penalty assessment considerations of 49 C.F.R. § 190.225 are unsubstantiated in both the NOPV and the Violation Report. The NOPV contains no discussion of the penalty assessment considerations. As to the Violation Report, the penalty assessment considerations relating to NOPV Item 6 are unsubstantiated. The factor of gravity concludes that "pipeline integrity or safe operation was potentially comprised in others [sic] areas." Violation Report at 20. Yet, no facts are alleged regarding pipeline integrity, regarding safe operation, nor regarding the meaning of "other areas." Only a broad and general statement of the overall intent of the relevant regulation is provided, along with discussion of public highways and HCAs and the conclusion that an overpressure could result in harm, but those conclusions are factually and analytically unsubstantiated. The factor of culpability reflects a conclusion that the "operator failed to take any action or made a minimal attempt to comply with a regulatory requirement that was clearly applicable." Violation Report at 21. In an effort to substantiate that conclusion, the Violation Report

indicates that ONEOK "missed resetting the set point properly at this station." Violation Report at 21. If the relevant regulation was 49 C.F.R. § 406(b), relating to overpressure protection, that conclusion might carry some weight; however, the relevant regulation is 49 C.F.R. § 428, relating to inspection and testing of pressure control devices. As such, the conclusion stated is inapposite and misdirected. No evidence, no analysis, no conclusion is stated with respect to inspection of pressure control devices. This penalty assessment consideration fails in that it is wholly unsubstantiated. With regard to good faith efforts to comply by ONEOK, the Violation Report provides only the ambiguous statement that "the operator understood the requirement but failed to take the necessary steps to comply." Violation Report at 22. Consideration of the good faith factor lacks, however, any factual support, leaving the following questions unanswered: Which requirement? How did the operator fail? What are the "necessary steps" to comply? Yet again, no facts are found and no analysis is presented. ONEOK asserts that PHMSA has failed to carry its burden of proof to substantiate the imposition of any penalty and thus requests that the penalty proposed for NOPV Item 6 be withdrawn.

On the grounds that ONEOK has demonstrated that no violation occurred, ONEOK requests that the proposed civil penalty be withdrawn as it is not supported by a violation as required by 49 C.F.R. § 190.221. To the extent that PHMSA disagrees and finds a violation under NOPV Item 6, ONEOK requests that the proposed civil penalty be substantially reduced on the grounds (1) that any violation was not of the alleged gravity, and (2) that ONEOK was not culpable as alleged and acted in good faith in that ONEOK has established that it took diligent efforts which were reasonably calculated to comply with the relevant regulation. No incident occurred, no harm was done, and public safety was at all times protected.

Response to Proposed Compliance Order

PHMSA has proposed a compliance order with respect to NOPV Item 3 which alleges violation of 49 C.F.R. § 195.402(c)(13), relating to evaluating the effectiveness of its operating and maintenance procedures (PCO Item 1), and with respect to NOPV Item 5 which alleges violation of 49 C.F.R. § 195.406(b), relating to preventing pipeline pressure from exceeding 110% of MOP (PCO Item 3). ONEOK addresses each such item of the PCO below.

Inasmuch as ONEOK establishes herein that it did not violate, and in all respects complied with, 49 C.F.R. § 195.402(c)(13), PCO Items 1 and 2 are unsupported as required by 49 C.F.R. § 190.217 and must therefore be withdrawn.

Inasmuch as ONEOK establishes herein that it did not violate, and in all respects complied with, 49 C.F.R. § 195.406(b), PCO Item 3 is unsupported as required by 49 C.F.R. § 190.217 and must therefore be withdrawn.

Conclusion

ONEOK has established in this response that it complied with 49 C.F.R. § 195.402(c)(13), and on those grounds requests that the violation alleged at Item 3 be withdrawn, that the assessed civil penalty be withdrawn, and that PCO Items 1 and 2 be withdrawn. ONEOK has established in this response that it complied with 49 C.F.R. § 195.406(b), and on those grounds requests that the violation alleged at Item 5 be withdrawn and that PCO Item 3 be withdrawn. ONEOK has established that it complied with 49 C.F.R. § 195.428, and on those grounds requests that the alleged violation at Item 6 be withdrawn and that the assessed civil penalty be withdrawn.

ONEOK stands ready to provide any further information that PHMSA might wish to receive and/or to discuss further the alleged violations, the assessed civil penalties, and the proposed compliance order.

Sincerely,

Wesley Christensen
Senior Vice President
ONEOK NGL Pipeline, L.L.C.

Attachment A

Attachment A to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY
and
PROPOSED COMPLIANCE ORDER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 15, 2012

Mr. Wes Christensen
Sr. Vice President, Operations
ONEOK NGL Pipeline L.P.
100 West 5th Street
Tulsa, Oklahoma 74103

CPF 3-2012-5012

Dear Mr. Christensen:

On July 24-29, August 15-18, and 22-25, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your records for the Medford area in Medford, Oklahoma, and the facilities in Kansas and Oklahoma. For the North System, facilities and records were inspected in Des Moines and Iowa City, Iowa.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. **§195.49 Annual report**

   Each operator must annually complete and submit DOT Form PHMSA F 7000-1.1 for each type of hazardous liquid pipeline facility operated at the end of the previous year. An operator must submit the annual report by June 15 each year, except that for the 2010 reporting year the report must be submitted by August 15, 2011. A separate report is required for crude oil, HVL (including anhydrous ammonia), petroleum products, carbon dioxide pipelines, and fuel

grade ethanol pipelines. For each state a pipeline traverses, an operator must separately complete those sections on the form requiring information to be reported for each state.

For the North System, ONEOK NGL Pipeline L.P. (ONEOK) did not submit separate annual reports for the refined products and diesel that are transported in addition to the HVL transported. All the mileage for these pipelines has been submitted under the HVL annual report.

Since 2007, ONEOK has not been correctly submitting the annual report for the North System. ONEOK's North System transports refined products and diesel on Lines 113, 114, 119, 112, 101, and 103. However, these lines are being reported in the HVL annual report. No separate reports for the refined products are being submitted. ONEOK resubmitted the annual reports for 2010 after this was brought to their attention during PHMSA's inspection.

2. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

(d) Abnormal operation. The manual reqnired by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded;

(1) Responding to, investigating, and correcting the cause of;

(i) Unintended closure of valves or shutdowns;
(ii) Increase or decrease in pressure or flow rate outside normal operating limits;
(iii) Loss of communications;
(iv) Operation of any safety device;
(v) Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property.

ONEOK did not follow up and correct the cause of an abnormal operation that occurred in the Des Moines area in 2010.

ONEOK's procedures specify certain actions that must be taken when abnormal operations occur. On the North System, ONEOK personnel indicated that all abnormal operations are documented in the SHAVRs program. However, review of the records found that the recommended actions noted during the investigation were not addressed or followed up on. For example, SHAVR Report 2494 had a recommendation of investigating why a HI pressure switch remained on SCADA for more than an entire shift without being investigated. At the time of PHMSA's

inspection, there was no documentation indicating that this was completed. ONEOK's response to the Letter for Request for Specific Information indicated that they did look into it, but no further action was taken to remedy the situation and to prevent this from happening again.

3. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

For the Medford area and the North System, ONEOK personnel did not periodically review the work done by personnel to determine the effectiveness of their procedures.

ONEOK was not able to demonstrate that they periodically reviewed work done by personnel to determine the effectiveness of the procedures. Furthermore, ONEOK's procedures indicated that the "ONP Business manager or designee shall be responsible for conducting a review of the work done by personnel, incident, and near miss reports to determine the effectiveness of operating procedures at intervals not exceeding15 months, but at least once each calendar year." ONEOK did not have any records that indicated that this was being completed.

4. **§195.422 Pipeline Repairs.**

(a) Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

In the Medford area, ONEOK is not making repairs in a safe manner that will prevent damage to persons or property.

ONEOK utilized composite sleeves to repair crack-like indications. Review of inline inspection dig repair reports found one report where a composite sleeve was used as a temporary repair on some crack-like features in the pipe seam in 2008. Consistent with industry standards such as ASME B31.4, the composite sleeve manufacturer's technical guidance specifically states that the composite sleeve is not to be used to repair cracks without grinding out the crack defect. The use of a repair

method on a defect for which its use is not permitted by the manufacturer and referenced industry standards is insufficient to safely prevent damage to persons or property.

5. **§195.406 Maximum operating pressure.**

(b) No operator may permit the pressure in a pipeline during surges or other variations from normal operations to exceed 110 percent of the operating pressure limit established under paragraph (a) of this section. Each operator must provide adequate controls and protective equipment to control the pressure within this limit.

ONEOK did not provide adequate controls and protective equipment at Winterset Station on the North System to ensure that the pressure in the pipeline would not exceed the maximum operating pressure (MOP).

On May 23, 2008, a management-of-change (MOC) memorandum was issued to reduce the pressure on the Massena to Des Moines section of Line 102 because MOP-reducing anomalies were present. This line section included the Winterset pump station and required that the over-pressure protection be reset to 1930 psig for protection a lower MOP of 1950 psig from the original 2160 psig. On June 6, 2008, a second MOC was issued on Line 102 after a failure occurred on May 31, 2008. The June 6th MOC affected the line segment from Massena to Tabor (downstream of the Massena to Des Moines section) and lowered the MOP to 1704 psig. On June 13, 2008, a third MOC was issued to reduce the maximum operating pressure for the entire Line 102 from Des Moines, Iowa, to Bushton, Kansas. The June 13th MOC was in addition to the June 6th MOC, and superseded the May 23, 2008, MOC.

The MOC issued on June 13, 2008, did not address resetting the pipeline over-pressure protection at Winterset pump station. As a result, from the time of the June 13, 2008, MOC to the time of the PHMSA inspection, the set points of the over pressure protection at Winterset remained at 1930 psig, which exceeded the maximum operating pressure. Review of the discharge records during this time period found that the line did not operate at pressures above 1704 psig, but did spike above the 1704 psig MOP for short periods of time during pump start up and shut downs. The line pressures never exceeded the 1704 psig plus 10% (1874psi).

6. **§195.428 Overpressure safety devices and overfill protection systems.**

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each

pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

For the Winterset pump station on the North System, ONEOK did not adequately check the overpressure protection device for reliability of operation at 1930 psig for the service in which it is used from October 2008 to the time of PHMSA's inspection.

In May of 2008, a Management of Change (MOC) was issued on the Des Moines to Massena section of Line 102 to change the over-pressure protection set points to 1930 psig. This set-point remained in effect until the PHMSA inspection in 2011. The semi-annual inspection of the transmitter utilized as the over-pressure protection of the new maximum operating pressure (MOP) simply documented that the transmitters were calibrated and spanned, but there was no indication that the device activated at the set point (1930 psig) at which the transmitters send the signals to shut down the pumps.

After PHMSA's onsite inspection, in September of 2011, ONEOK personnel reset the physical shut down switch to protect at a MOP of 1704 psig.

7) **§195.569 Do I have to examine exposed portions of buried pipelines?**

Whenever you have knowledge that any portion of a buried pipeline is exposed, you must examine the exposed portion for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If you find external corrosion requiring corrective action under Sec. 195.585, you must investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.

ONEOK is not inspecting their pipelines when they utilize a vacuum excavation process to expose their lines for the purposes of confirming pipeline location.

During the review of locate records and Inspect and Investigate (INI) forms, it was noted that ONEOK utilizes an excavation process that vacuums out soil to locate pipelines. This is performed to confirm the location and depth of the pipelines when a foreign utility is intended to cross ONEOK's pipelines. The pipeline does become exposed during this process; however, the exposed pipe section where the condition of the pipe is supposed to be recorded on the INI form was left blank. Further discussion with ONEOK personnel indicated that they were not doing the inspections.

Proposed Civil Penalty

Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed $100,000 for each violation for each day the violation persists up to a maximum of $1,000,000 for any related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of $78,600 as follows:

Item number	PENALTY
3	$32,100
6	$46,500

Warning Items

With respect to items 1, 2, 4, and 7, 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. We advise you to promptly correct these items. Be advised that failure to do so may result in ONEOK NGL Pipeline L.P. being subject to additional enforcement action.

Proposed Compliance Order

With respect to items 3 and 5, pursuant to 49 United States Code §60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to ONEOK NGL Pipeline L.P. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

In your correspondence on this matter, please refer to **CPF 3-2012-5012** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Compliance Proceedings

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to ONEOK NGL Pipelines L.P. a Compliance Order incorporating the following remedial requirements to ensure the compliance of ONEOK NGL Pipelines L.P. with the pipeline safety regulations:

1. In regard to Item Number 3 of the Notice pertaining to the periodic review of employees work to determine the effectiveness of the procedures, ONEOK must revise O&M procedure PRC 1410.100 Section 3.1 to better define how ONEOK plans to review the work done by personnel. ONEOK shall submit the revised procedure within 60 days of the date of the Final Order.

2. ONEOK shall immediately begin implementation of the new procedure and submit the records verifying compliance with the procedure within one year after the effective date of the new procedure.

3. In regard to Item Number 5 of the Notice pertaining to the set point of the over-pressure protection equipment at Winterset station, ONEOK shall investigate why the set point of the shut down devices were set too high and left at that set point for multiple years. This investigation shall include the review and revision (if necessary) to the Management of Change (MOC) procedures to determine why Winterset station was missed in the MOC. The review shall also look into how ONEOK ensures that the conditions of the MOC are implemented. The results of the investigation and the revised procedure must be submitted to PHMSA Central Region within 180 days of the date of the Final Order.

4. It is requested that ONEOK NGL Pipelines L.P. maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to David Barrett, Director, Central 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.

Response Options for Pipeline Operators in Compliance Proceedings

The requirements of 49 C.F.R. Part 190, Subpart B (§§ 190.201–190.237) govern response to Notices issued by a Regional Director, Pipeline and Hazardous Materials Safety Administration (PHMSA).

Be advised that all material submitted by a respondent in response to an 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).

I. **Procedures for Responding to a NOTICE OF PROBABLE VIOLATION:**

Within 30 days of receipt of a Notice of Probable Violation, the respondent shall respond to the Regional Director who issued the Notice in the following way:

a. When the Notice contains a proposed **CIVIL PENALTY*** --

1. If you are not contesting any violations alleged in the Notice, pay the proposed civil penalty and advise the Regional Director of the payment. This authorizes PHMSA to issue an order making findings of violation and upon confirmation that the payment has been received PHMSA will close the case with prejudice to the respondent. Payment terms are outlined below;

2. If you are not contesting any violations alleged in the Notice but wish to submit written explanations, information, or other materials you believe warrant mitigation of the civil penalty, you may submit such materials. This authorizes PHMSA to make findings and to issue a Final Order assessing a penalty amount up to the amount proposed in the Notice. Refer to 49 C.F.R. § 190.225 for assessment considerations, which include the respondent's ability to pay and the effect on the respondent's ability to stay in business, upon which civil penalties are based;

3. If you are contesting one or more of the items in the Notice but are not requesting an oral hearing, submit a written response to the allegations and/or seek elimination or mitigation of the proposed civil penalty; or

4. Request a hearing as described below to contest the allegations and/or proposed assessment of a civil penalty.

b. When the Notice contains a proposed **COMPLIANCE ORDER*** --

1. If you are not contesting the compliance order, notify the Regional Director that you intend to take the steps in the proposed compliance order;

2. If you are not contesting the compliance order but wish to submit written explanations, information, or other materials you believe warrant modification of the proposed compliance order in whole or in part, or you seek clarification of the terms of the proposed compliance order, you may submit such materials. This authorizes PHMSA to make findings and issue a compliance order;

3. If you are contesting the proposed compliance order but are not requesting an oral hearing, submit written explanations, information, or other materials in answer to the allegations in the Notice and stating your reasons for objecting to the proposed compliance order items in whole or in part; or

4. Request a hearing as described below to contest the allegations and/or proposed compliance order items.

c. When the Notice contains a **WARNING ITEM** --

No written response is required. The respondent is warned that if it does not take appropriate action to correct these items, enforcement action will be taken if a subsequent inspection reveals a violation.

* Failure of the respondent to respond to the Notice within 30 days of receipt constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in the Notice without further notice to the respondent and to issue a Final Order.

II. Procedures for Responding to a NOTICE OF AMENDMENT*--

Within 30 days of receipt of a Notice of Amendment, the respondent shall respond to the Regional Director who issued the Notice in the following way:

a. If you are not contesting the Notice, notify the Regional Director of your plans to address the inadequacies identified in the Notice;

b. If you are not contesting the Notice but wish to submit written explanations, information, or other materials you believe warrant modification of the Notice of Amendment in whole or in part, or you seek clarification of the terms of the

Notice of Amendment, you may submit such materials. This authorizes PHMSA to make findings and issue an Order Directing Amendment;

c. If you are contesting the Notice of Amendment but are not requesting an oral hearing, submit written explanations, information, or other materials in answer to the allegations in the Notice and stating your reasons for objecting to the Notice of Amendment items in whole or in part; or

d. Request a hearing as described below to contest the allegations in the Notice.

* Failure of the respondent to respond to the Notice within 30 days of receipt constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in the Notice without further notice to the respondent and to issue a Final Order.

III. Procedure for Requesting a Hearing

A request for a hearing must be in writing and accompanied by a statement of the issues that the respondent intends to raise at the hearing. The issues may relate to the allegations, new information, or to the proposed compliance order or proposed civil penalty amount. Refer to 49 C.F.R. § 190.225 for assessment considerations upon which civil penalties are based. A respondent's failure to specify an issue may result in waiver of the right to raise that issue at the hearing. The respondent's request must also indicate whether or not respondent will be represented by counsel at the hearing. Failure to request a hearing in writing within 30 days of receipt of a Notice waives the right to a hearing. In addition, if the amount of the proposed civil penalty or the proposed corrective action is less than $10,000, the hearing will be held by telephone, unless the respondent submits a written request for an in-person hearing. Complete hearing procedures can be found at 49 C.F.R. § 190.211.

IV. Extensions of Time

An extension of time to prepare an appropriate response to a Notice may be granted, at the agency's discretion, following submittal of a written request to the Regional Director. The request must indicate the amount of time needed and the reasons for the extension. The request must be submitted within 30 days of receipt of the Notice.

V. Freedom of Information Act

Any material provided to PHMSA by the respondent, and materials prepared by PHMSA including the Notice and any order issued in this case, may be considered public information and subject to disclosure under the Freedom of Information Act (FOIA). If you believe the information you are providing is security sensitive, privileged, confidential or may cause your company competitive disadvantages, please clearly identify the material and provide justification why the documents, or portions of a document, should not be released under FOIA. If we receive a request for your material, we will notify you if PHMSA, after reviewing the materials and your provided justification, determines that withholding the materials does not meet any exemption

provided under the FOIA. You may appeal the agency's decision to release material under the FOIA at that time. Your appeal will stay the release of those materials until a final decision is made.

VI. **Small Business Regulatory Enforcement Fairness Act Information**

The Small Business and Agricultural Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards were established to receive comments from small businesses about federal agency enforcement actions. The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. If you wish to comment on the enforcement actions of the Pipeline and Hazardous Materials Safety Administration, call 1-888-REG-FAIR (1-888-734-3247) or go to http://www.sba.gov/ombudsman/dsp_faq.html.

VII. **Payment Instructions**

Civil Penalty Payments of Less Than $10,000

Payment of a civil penalty of less than $10,000 proposed or assessed, under Subpart B of Part 190 of the Pipeline Safety Regulations can be made by certified check, money order or wire transfer. Payment by certified check or money order (containing the CPF Number for this case) should be made payable to the "Department of Transportation" and should be sent to:

Federal Aviation Administration
Mike Monroney Aeronautical Center
Financial Operations Division (AMZ-341) P.O. Box 269039
Oklahoma City, OK 73125-4915

Wire transfer payments of less than $10,000 may be made through the Federal Reserve Communications System (Fedwire) to the account of the U.S. Treasury. Detailed instructions are provided below. Questions concerning wire transfer should be directed to the Financial Operations Division at (405) 954-8893, or at the above address.

Civil Penalty Payments of $10,000 or more

Payment of a civil penalty of $10,000 or more proposed or assessed under Subpart B of Part 190 of the Pipeline Safety Regulations must be made wire transfer (49 C.F.R. § 89.21 (b)(3)), through the Federal Reserve Communications System (Fedwire) to the account of the U.S. Treasury. Detailed instructions are provided below. Questions concerning wire transfers should be directed to the Financial Operations Division at (405) 954-8893, or at the above address.

INSTRUCTIONS FOR ELECTRONIC FUND TRANSFERS

(1) RECEIVER ABA NO. 021030004	(2) TYPE/SUB-TYPE (Provided by sending bank)
(3) SENDING BANK ABA NO. (Provided by sending bank)	(4) SENDING BANK REF NO. (Provided by sending bank)
(5) AMOUNT	(6) SENDING BANK NAME (Provided by sending bank)
(7) RECEIVER NAME TREAS NYC	(8) PRODUCT CODE (Normally CTR, or as provided by sending bank)
(9) BENEFICIAL (BNF) = AGENCY LOCATION CODE BNF = /ALC-69-14-0001	(10) REASONS FOR PAYMENT Example: PHMSA - CPF # / Ticket Number/Pipeline Assessment number

INSTRUCTIONS: You, as sender of the wire transfer, must provide the sending bank with the information for blocks (1), (5), (7), (9), and (10). The information provided in Blocks (1), (7), and (9) are constant and remain the same for all wire transfers to the Pipeline and Hazardous Materials Safety Administration, Department of Transportation.

Block #1 - RECEIVER ABA NO. - "021030004". Ensure the sending bank enters this 9-digit identification number; it represents the routing symbol for the U.S. Treasury at the Federal Reserve Bank in New York.

Block #5 - AMOUNT - You as the sender provide the amount of the transfer. Please be sure the transfer amount is punctuated with commas and a decimal point. **EXAMPLE: $10,000.00**

Block #7 - RECEIVER NAME - "TREAS NYC". Ensure the sending bank enters this abbreviation. It must be used for all wire transfers to the Treasury Department.

Block #9 - BENEFICIAL - AGENCY LOCATION CODE - "**BNF=/ALC-69-14-0001**". Ensure the sending bank enters this information. This is the Agency Location Code for the Pipeline and Hazardous Materials Safety Administration, Department of Transportation.

Block #10 - REASON FOR PAYMENT - "**AC-payment for PHMSA Case** # / To ensure your wire transfer is credited properly, enter the case number/ticket number or Pipeline Assessment number, and country."

NOTE: A wire transfer must comply with the format and instructions or the Department cannot accept the wire transfer. You as the sender can assist this process by notifying the Financial Operations Division (405) 954-8893 at the time you send the wire transfer.

February 2009

Attachment B

Attachment B to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

U.S. Department
of Transportation
**Pipeline and
Hazardous Materials Safety
Administration**

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

C - Roger Thorpe
- Bill Bromley
- Jeremy Wiese
- Molly Atkins

REQUEST FOR SPECIFIC INFORMATION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 18, 2011

Mr. Wes Christensen
Vice President of Engineering and Operations
ONEOK NGL Pipeline LP
100 West 5th Street
Tulsa, OK 74103

Dear Mr. Christensen:

On August 15-25, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted a standard inspection of your North Systems facilities located in Des Moines and Iowa City, IA. The inspection identified some issues that need further clarification and information.

Pursuant to Chapter 601 of 49 United States Code, PHMSA requests the following specific information regarding your pipeline operations and facilities to determine ONEOK North Systems' compliance with the Pipeline Safety Regulations (Title 49, Code of Federal Regulations, Part 195).

Please provide the following information:

1) At the Winterset Station, when was the MOP changed downstream of the station? Please send a copy of the management of change (MOC).

2) Copies of the inspections at Winterset station on the pressure limiting devices and over-pressure protection from that date until now.

3) Provide an explanation of how the "soft" shutdown for the pumps work and how the set point is determined. Provide all the inspection records of the "soft" shutdown from the date of the MOC to present.

4) Provide the O&M procedure(s) for checking and setting over-pressure protection set points.

5) Detailed reports on what was performed in response to the incident report (SHAVR #2494) and the incident report on 9/9/2010 (SHAVR #4498).

Please provide this information to our office within 30 days of your receipt of this letter, and for each document you submit, please provide a copy in electronic format whenever possible.

If you have any questions concerning this request, please contact our office at 816-329-3800.

Sincerely,

David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

Attachment C

Attachment C to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

ONEOK
NORTH SYSTEM
A SUBSIDIARY OF ONEOK PARTNERS

November 23, 2011

Mr. David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration (PHMSA)
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Subject: Request for Specific Information Dated October 18, 2011

Dear Mr. Barrett:

This letter is submitted in response to your subject letter which was received by ONEOK on October 24, 2011. PHMSA requested specific information following the inspection carried out by your representatives during August 15 – 25, 2011 on our North System facilities in Des Moines and Iowa City, IA.

ONEOK is providing the following information in response to your request:

1) ONEOK Intercompany Memorandum dated 6-13-2008 to MOC File (see Attachment 1).
2) Copies of the inspections at Winterset station on pressure limiting devices and relief equipment for the calendar years 2008 through 2011 (see Attachment 2).
3) Explanation of the Transmitter Pressure Fault Shutdown and associated inspection records for the calendar years 2008 through 2011 (see Attachment 3).
4) The maintenance procedure for checking and setting over-pressure protection set points (see Attachment 4).
5) Corrective Actions for SHAVR Incidents #2494 and #4498 (see Attachment 5).

If you have further questions, please contact Molly Atkins at (918) 595-1537, or by e-mail at molly.atkins@oneok.com.

Sincerely,

Wes Christensen
Senior Vice President, Operations
ONEOK North System, L. L. C.

Attachments

ONEOK NORTH SYSTEM, L.L.C.
100 West Fifth Street, Tulsa, OK 74103-4298
P.O. Box 871, Tulsa, OK 74102-0871
918-588-7594
www.oneok.com

Attachment 1

ONEOK NGL PIPELINE, L.P.

Intercompany Memorandum

Date: 6-13-2008

To: MOC File

From: Jaret Pirtle

Subject: Affected Employee Awareness for North System PL 102- Des Moines to Bushton 8" Temporary Pressure Reduction MOC 08-20067

Summary:

The North System PL102 pipeline segment from Des Moines to Bushton (flow south) is subject to a pressure reduction until further advised. The line may not be operated above 1704 psi.

Change Description

Please be aware the following will be effective 6-13-2008 upon such time when ONEOK SCADA Admin advise that changes have been made in UCOS and ONS Field Technicians advise that changes have been made locally at Des Moines, Elliott and Holmesville Stations. 102 MOP on line segment from Des Moines to Bushton will be temporarily reduced from 2160# to 1704# until further advised.

This MOC includes changes previously made on June 6, 2008 on the 102 Elliot to Tabor segment per MOC 08-20012 (pressure reduction of 1704#). This MOC supersedes changes previously made on May 23, 2008 on the 102 Des Moines to Massena segment per MOC 08-19497.

Changes made:

Des Moines Discharge Pressure:	Hi-Hi set point	1704#	
	Hi set point	1700#	
	Discharge control	1694#	
	Snap switch (field)	1789#	or 105% of MOP
Elliott Discharge Pressure: (Completed with MOC 08-20012)	Hi-Hi set point	1704#	
	Hi set point	1700#	
	Discharge control	1694#	
	Snap switch (field)	1789#	or 105% of MOP
Holmesville Discharge Pressure:	Hi-Hi set point	1704#	

Attachment 2

ONEOK PARTNERS

Inspections and Tests Performed On Pressure Limiting Devices

Pipeline No.: 101-102 P/L
Location: Winterset P/S
Year: 2008

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PRS AMP SET	ACTI-VATED @	REMARKS (recalibrated, changed out)	INIT.
PS-5	(102) #1 Mainline Seal Leak	10/15/08	>5#	25#	√OK	BG
PS-4	(102) #1 Mainline High Case Pressure	10/15/08	2150#	2160#	RECALIBRATED to 2150# ↑	BG
PS-2	(102) #2 Mainline Seal Leak	10/15/08	<5#	25# ↑	√OK	BG
PS-9	(102) #2 Mainline High case Pressure	10/15/08	2800#	2800# ↑	√OK	BG
PS-1	102 Low Suction Pressure Propane, Butane & Gas	10/15/08	110#	110# ↓	√OK	BG
PS-3	102 Low Suction Pressure Ethane	10/17/08	600#	600# ↓	√OK	BG
PS-6	102 High Line Discharge Pressure	10/17/08	2250#	2250#	√OK	BG
PCV-102	102 P/L Fisher Control Valve Operation Inspection	10/17/08			√ 0% 25% 50% 75% 100%	BG
PS-10	101 Mainline Seal Leak		<5#		Out Of Service	
PS-8	101 Mainline High case Pressure		1730#		Out Of Service	
PS-13	101 Low Suction Pressure Distillates		20#		Out Of Service	
PS-7	101 Low Suction Pressure LPG's		110#		Out Of Service	
PS-12	101 High Line Discharge Pressure		1300#		Out Of Service	
PCV-101	101 P/L Fisher Control Valve Operation Inspection				Out Of Service	

*Item number to identify repairs or unusual conditions shown on reverse side.

09 Total

ONEOK PARTNERS

Inspections and Tests Performed On Pressure Limiting Devices

Pipeline No.: 101-102 P/L
Location: Winterset P/S
Year: 2009

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PRS AMP SET	ACTI-VATED @	REMARKS (recalibrated, changed out)	INIT.
PS-5	(102) #1 Mainline Seal Leak	4/15/09	<5#	< 5# ↑	√OK	BG
PS-4	(102) #1 Mainline High Case Pressure	4/15/09	2150#	2150# ↑	√OK	BG
PS-2	(102) #2 Mainline Seal Leak	4/15/09	<5#	< 5# ↑	√OK	BG
PS-9	(102) #2 Mainline High case Pressure	4/15/09	2800#	2800# ↑	√OK	BG
PS-1	102 Low Suction Pressure Propane, Butane & Gas	4/15/09	110#	100 # ↓	Recalibrate to 110# ↓	BG
PS-3	102 Low Suction Pressure Ethane	4/15/09	600#	590# ↓	Recalibrate to 600# ↓	BG
PS-6	102 High Line Discharge Pressure	4/15/09	2250#	2250# ↑	√0 + Span OK	BG
PCV-102	102 P/L Fisher Control Valve Operation Inspection	4/15/09			√0 + Span OK	BG
PS-10	101 Mainline Seal Leak		<5#		Out Of Service	
PS-8	101 Mainline High case Pressure		1730#		Out Of Service	
PS-13	101 Low Suction Pressure Distillates		20#		Out Of Service	
PS-7	101 Low Suction Pressure LPG's		110#		Out Of Service	
PS-12	101 High Line Discharge Pressure		1300#		Out Of Service	
PCV-101	101 P/L Fisher Control Valve Operation Inspection				Out Of Service	

*Item number to identify repairs or unusual conditions shown on reverse side.

ONEOK PARTNERS

Inspections and Tests Performed On Pressure Limiting Devices

Pipeline No.: 101-102 P/L
Location: Winterset P/S
Year: 2009 WO# 09-1050357

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PRS AMP SET	ACTI-VATED @	REMARKS (recalibrated, changed out)	INIT.
PS-5	(102) #1 Mainline Seal Leak	10/23/09	>5#	<5#	Tested Good WO# 09-1050357	BG
PS-4	(102) #1 Mainline High Case Pressure	10/23/09	2150#	2150#	Tested Good WO# 09-1050359	BG
PS-2	(102) #2 Mainline Seal Leak	10/23/09	<5#	<5#	Tested Good WO# 09-1050357	BG
PS-9	(102) #2 Mainline High case Pressure	10/23/09	2800#	2800#	Tested Good WO# 09-1050360	BG
PS-1	102 Low Suction Pressure Propane, Butane & Gas	10/23/09	110#	110#	Tested Good WO# 09-1050357	BG
PS-3	102 Low Suction Pressure Ethane	10/23/09	60#	60#	Tested Good WO# 09-1050357	BG
PS-6	102 High Line Discharge Pressure	10/23/09	2250#	2250#	Tested Good WO# 09-1050358	BG
PCV-102	102 P/L Fisher Control Valve Operation Inspection	10/23/09	2160#	2160#	Check 0 and span WO# 09-1050362	BG
PS-10	101 Mainline Seal Leak		<5#		Out Of Service	
PS-8	101 Mainline High case Pressure		1730#		Out Of Service	
PS-13	101 Low Suction Pressure Distillates		20#		Out Of Service	
PS-7	101 Low Suction Pressure LPG's		110#		Out Of Service	
PS-12	101 High Line Discharge Pressure		1300#		Out Of Service	
PCV-101	101 P/L Fisher Control Valve Operation Inspection				Out Of Service	

*Item number to identify repairs or unusual conditions shown on reverse side.

Page _1 of _1

COMPLETED

DOT-16 (3/99)

ONEOK PARTNERS

Inspections and Tests Performed On Pressure Limiting Devices

Pipeline No.: 101-102 P/L
Location: Winterset P/S
Year: 2010

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PRS AMP SET	ACTI-VATED @	REMARKS (recalibrated, changed out)	INIT.
PS-5	WO# - 10 - 158 1163 (102) #1 Mainline Seal Leak	10/7/10	45# 65#	<5# ↑	✓OK	BG
PS-4	(102) #1 Mainline High Case Pressure	10/7/10	2150#	2150# ↑	✓OK	BG
PS-2	WO# 10 - 158 1163 (102) #2 Mainline Seal Leak	10/7/10	<5#	<5# ↑	✓OK	BG
PS-9	(102) #2 Mainline High case Pressure	10/7/10	2800#	2800# ↑	✓OK	BG
PS-1	WO# 10 - 158 1163 102 Low Suction Pressure Propane, Butane & Gas	10/7/10	110#	110# ↓	✓OK	BG
PS-3	WO# 10 158 1163 102 Low Suction Pressure Ethane	10/7/10	60# ~~600#~~	60# ↓	✓OK	BG
PS-6	102 High Line Discharge Pressure	10/7/10	2250#	2250# ↑	✓OK	BG
PCV-102	102 P/L Fisher Control Valve Operation Inspection	10/7/10	2160#	2160# ↑	✓OK	BG
PS-10	101 Mainline Seal Leak		<5#		Out Of Service	BG
PS-8	101 Mainline High case Pressure		1730#		Out Of Service	BG
PS-13	101 Low Suction Pressure Distillates		20#		Out Of Service	BG
PS-7	101 Low Suction Pressure LPG's		110#		Out Of Service	BG
PS-12	101 High Line Discharge Pressure		1300#		Out Of Service	BG
PCV-101	101 P/L Fisher Control Valve Operation Inspection				Out Of Service	BG

*Item number to identify repairs or unusual conditions shown on reverse side.

COMPLETED

ONEOK PARTNERS

Inspections and Tests Performed On Pressure Limiting Devices

Pipeline No.: 101-102 P/L

Location: Winterset P/S (821)

Year: 2011

Due : Semi-Annually

Maximo WO# 11-112.0082 DOT
11 111 2621 NON D

ITEM *	LOCATION IDENTIFICATION	DATE	PRS AMP SET	ACTI-VATED @	REMARKS (recalibrated, changed out)	INIT.
PS-5	(102) #1 Mainline Seal Leak	4/13/11	>5#	#5#↑	WO# 11-112621	BG
PS-4	(102) #1 Mainline High Case Pressure	4/13/11	2150#	2150#↑	WO# 11-120097	BG
PS-2	(102) #2 Mainline Seal Leak	4/13/11	<5#	5#↑	WO#. 11-112621	BG
PS-9	(102) #2 Mainline High case Pressure 11-112011O	4/13/11	2800#	2760#↑	RECALIBRATED to 2800#↑	BG
PS-1	102 Low Suction Pressure Propane, Butane & Gas	4/13/11	110#	110#↓	WO# 11-111262l	BG
PS-3	102 Low Suction Pressure Ethane	4/13/11	60#	60#↓	WO# 11-111262l	BG
PS-6	102 High Line Discharge Pressure	4/13/11	2250#	2250#↑	WO# 11-112000B4	BG
PCV-102	102 P/L Fisher Control Valve Operation Inspection	4/13/11	2160#	2160#	WO# 11-112 0139	BG
PS-10	101 Mainline Seal Leak		<5#		Out Of Service	
PS-8	101 Mainline High case Pressure		1730#		Out Of Service	
PS-13	101 Low Suction Pressure Distillates		20#		Out Of Service	
PS-7	101 Low Suction Pressure LPG's		110#		Out Of Service	
PS-12	101 High Line Discharge Pressure		1300#		Out Of Service	
PCV-101	101 P/L Fisher Control Valve Operation Inspection				Out Of Service	

*Item number to identify repairs or unusual conditions shown on reverse side.

Page 1 of 1

COMPLETED

DOT-16 (3/99)

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Inspections and Tests Performed On Pressure Limiting Devices

Pipeline No.: 101-102 P/L
Location: Winterset P/S (821)
Year: 2011 WO# 11-1269550

Due : Semi-Annual

ITEM *	ASSET #	LOCATION IDENTIFICATION	DATE	PRS AMP SET	ACTI-VATED @	REMARKS (recalibrated, changed out)	INIT.
PS-5	107241	(102) #1 Mainline Seal Leak	9/20/2011	>5#	14#	REPLACE + CALIBRATE 685#	BG
PS-4	108903	(102) #1 Mainline High Case Pressure	9/20/2011	2150#	2150#	√OK	BG
PS-2	107242	(102) #2 Mainline Seal Leak	9/20/2011	<5#	<5#	√OK	BG
PS-9	108904	(102) #2 Mainline High case Pressure	9/20/2011	2800#	2800#	√OK	BG
PS-1	108901	102 Low Suction Pressure Propane, Butane & Gas	9/20/2011	110#	112#↓	RECALIBRATE to 110#↓	BG
PS-3	108900	102 Low Suction Pressure Ethane	9/20/2011	60#	60#	√OK	BG
PS-6	108902	102 High Line Discharge Pressure	9/20/2011	1789 ~~2250#~~	2250	NEW SETPOINT CALIBRATED	BG
PCV-102	116054	102 P/L Fisher Control Valve Operation Inspection	9/20/2011	1694	1694#	√ OT SOAK OK	BG
PS-10	132296	101 Mainline Seal Leak		<5#		Out Of Service	
PS-8	132297	101 Mainline High case Pressure		1730#		Out Of Service	
PS-13	132298	101 Low Suction Pressure Distillates		20#		Out Of Service	
PS-7	132299	101 Low Suction Pressure LPG's		110#		Out Of Service	
PS-12	132300	101 High Line Discharge Pressure		1300#		Out Of Service	
PCV-101	132301	101 P/L Fisher Control Valve Operation Inspection				Out Of Service	

*Item number to identify repairs or unusual conditions shown on reverse side.

COMPLETED

DOT-16 (3/11)

ONEOK PARTNERS

Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L

Location: Winterset P/S

Year: 2008

Due: Semi-Annually

ITEM	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction 71-6248	9/30/08	2350	2350	NONE	KH
	#1 Discharge 71-6249	9/30/08	2250	2250	Reset to 2250	KH
	#2 Discharge 71-4631	9/30/08	2900	2900	NONE	KH
	Station Discharge Before PCV 71-6250	9/30/08	2900	2895	NONE	KH
	Station Discharge After PCV 71-6251	9/30/08	2350	2300	Reset to 2350	KH
			✓			

*Item number to identify repairs or unusual conditions shown on reverse side.

Page _____ of _____

DOT-16 (1/98)

ONEOK PARTNERS

Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L
Location: Winterset P/S
Year: 2009

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction 71-6248	4/3/09	2350	2295	Reset to 2350	KH
	#1 Discharge 71-6249	4/3/09	2250	2240	None	KH
	#2 Discharge 71-4631	4/3/09	2900	2900	None	KH
	Station Discharge Before PCV 71-6250	4/3/09	2900	2910	Reset to 2900	KH
	Station Discharge After PCV 71-6251	4/3/09	2350	2340	None	KH

*Item number to identify repairs or unusual conditions shown on reverse side.

Page _____ of _____

DOT-15 (1/98)

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Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L

Location: Winterset P/S

Year: 2009

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction 71-6248	9/10/09	2350	2400	Reset to 2350	KH
	#1 Discharge 71-6249		2250	2300	Reset to 2250	KH
9/10/09	#2 Discharge 71-4631		2900	2900	None	KH
9/10/09	Station Discharge Before PCV 71-6250		2900	2875	None	KH
9/10/09	Station Discharge After PCV 71-6251	9/10/09	2350	2350	None	KH

*Item number to identify repairs or unusual conditions shown on reverse side.

DOT-15 (1/98)

ONEOK PARTNERS

Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L

Location: Winterset P/S

Year:

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction 71-6248	3-5-10	2250 ~~2350~~	2200	adjusted to 2250	JM/JS
	#1 Discharge ~~71-6249~~ A74660	3-5-10	2250	2280	adjusted to 2250	JM/JS
	#2 Discharge ~~74-4684~~ A74659	3-5-10	2900	2910	adjusted to 2900	JM/JS
	Station Discharge Before PCV 71-6250	3-5-10	2900	2890	none	JM/JS
	Station Discharge After PCV 71-6251	3-5-10	2350	2360	adjusted to 2350	JM/JS

*Item number to identify repairs or unusual conditions shown on reverse side.

Page _____ of _____

DOT-15 (1/98)

ONEOK PARTNERS

Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L

Location: Winterset P/S

Year: 2010

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction ~~71-6248~~ A74661	9-7-10	2350	2340		VS
	#1 Discharge ~~71-6249~~ A74660	9-7-10	2250	2250		VS
	#2 Discharge ~~71-6251~~ A74659	9-7-10	2900	2885		VS
	Station Discharge Before PCV 71-6250	9-7-10	2900	2880		VS
	Station Discharge After PCV 71-6251	9-7-10	2350	2340		VS

*Item number to identify repairs or unusual conditions shown on reverse side.

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DOT-15 (1/98)

Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L
Location: Winterset P/S
Year: 2011

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction A74661	3-8-11	2350	2350		JS/PP
	#1 Discharge A74660	3-8-11	2250	2240		JS/PP
	#2 Discharge A74659	3-8-11	2900	2900		JS/PP
	Station Discharge Before PCV 71-6250	3-8-11	2900	2870		JS/PP
	Station Discharge After PCV 71-6251	3-8-11	2350	2350		JS/PP

*Item number to identify repairs or unusual conditions shown on reverse side.

ONEOK PARTNERS

Inspections and Tests Performed On Relief Equipment

Pipeline No.: 101-102 P/L

Location: Winterset P/S

Year: 2011

Due : Semi-Annually

ITEM *	LOCATION IDENTIFICATION	DATE	PSR SET @	PSR RLVD @	REMARKS (recalibrated, changed out)	INIT.
	102 Station Suction 71-6248	9-9-11	2350	2360	Reset to 2350	TP KH
	#1 Discharge 71-6249	9-9-11	2250	2250		TP KH
	#2 Discharge 71-4631	9-9-11	2900	2920	Reset to 2900	TP KH
	Station Discharge Before PCV 71-6250	9-9-11	2900	2890		TP KH
	Station Discharge After PCV 71-6251	9-9-11	2350	2340		TP KH

*Item number to identify repairs or unusual conditions shown on reverse side.

Page _____ of _____

DOT-15 (1/98)

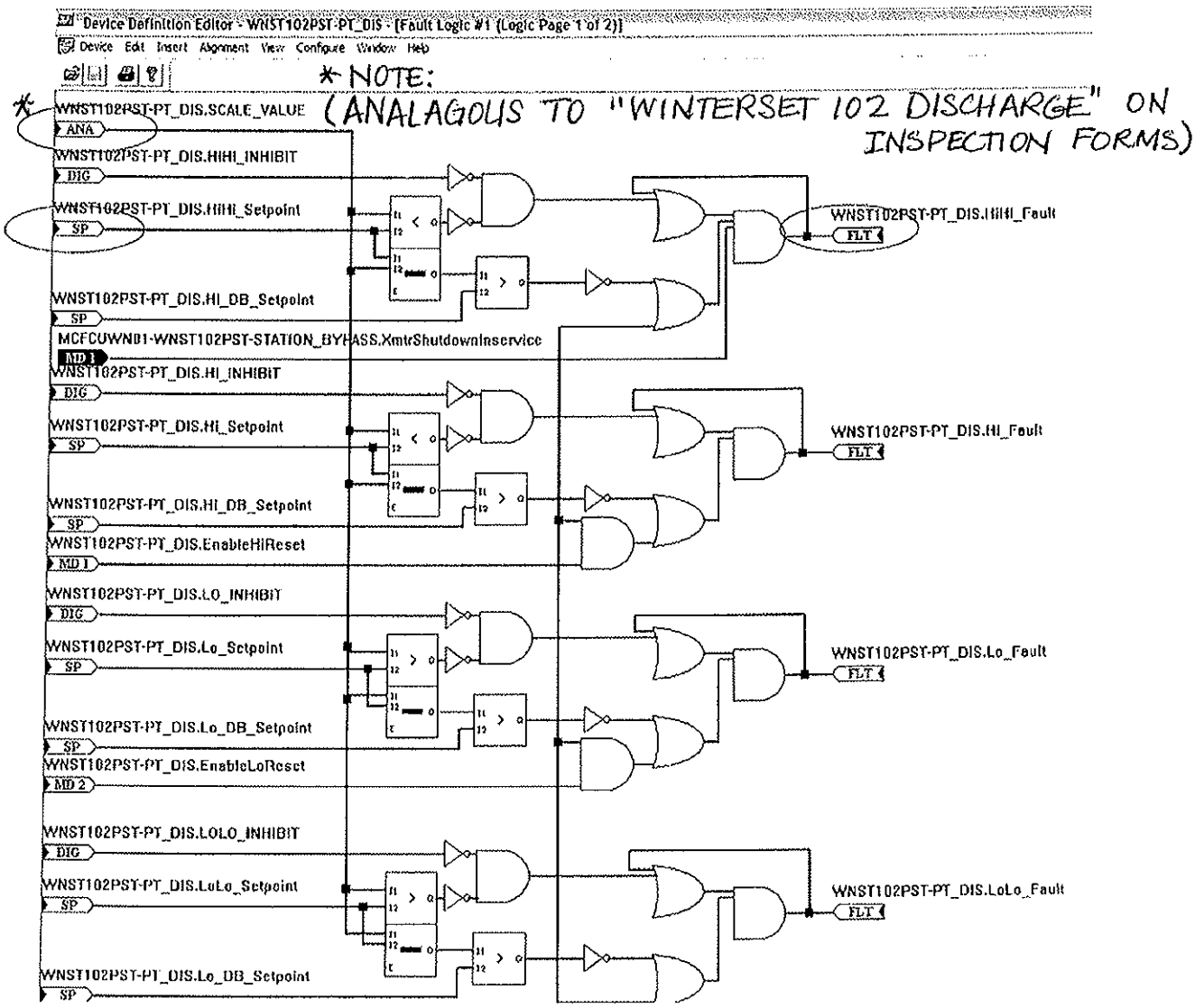
Attachment 3

Transmitter High Pressure Fault Shutdown

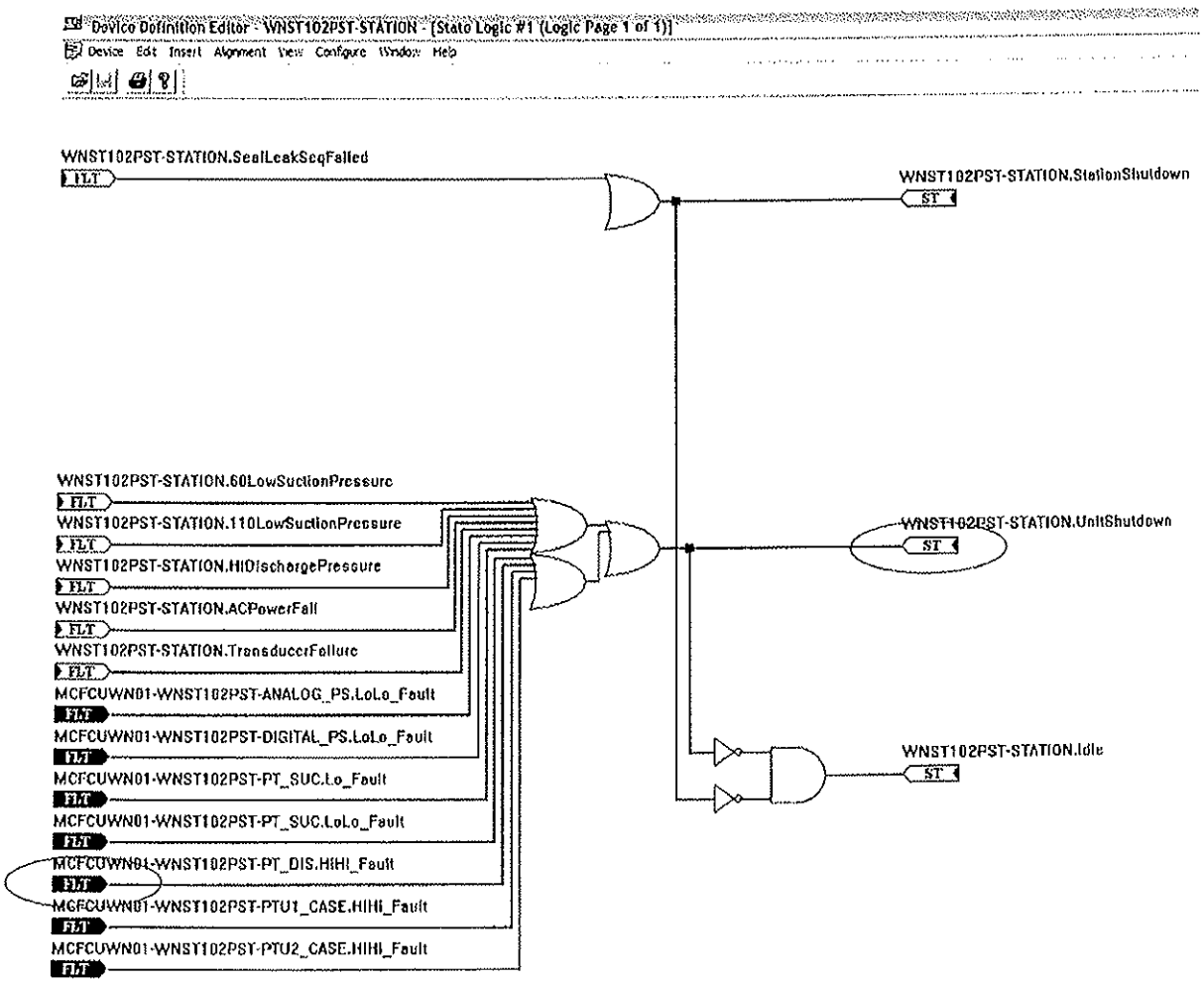
The pressure transmitters are calibrated at definite intervals along with local readout verification. This indirectly serves as our verification of the soft shutdowns as a soft shutdown is then simply a comparison of two numbers within the computer logic. Referring to page 2, the scale value from the pressure transmitter is read by the control unit and is compared to the Hi-HI set point (these are outlined in red). If the scale value read is greater than the set point, the HI-HI fault logic latches setting off a chain of events. The only inherent delay would be the reaction times of the logic solve time within the controller which is a matter of milliseconds. On page 3 the fault status bit goes into the station device which then triggers a unit shutdown to both units. Either unit that is running will be shut down— on page 4 the unit shutdown bit goes into the station device where the two group manager shutdown tags for both units on the 102 pipeline at Winterset reside. The two shutdown tags go into (page 5 and 6) both group manager devices for either unit to initiate a sequenced (suction and discharge valve go closed, motors are shutdown) shut down for either unit that is running.

We made the pressure transmitters the primary pressure shutdown device in this case as it was thought to be a temporary reduction in operating pressure rather than to readjust our mechanical switches.

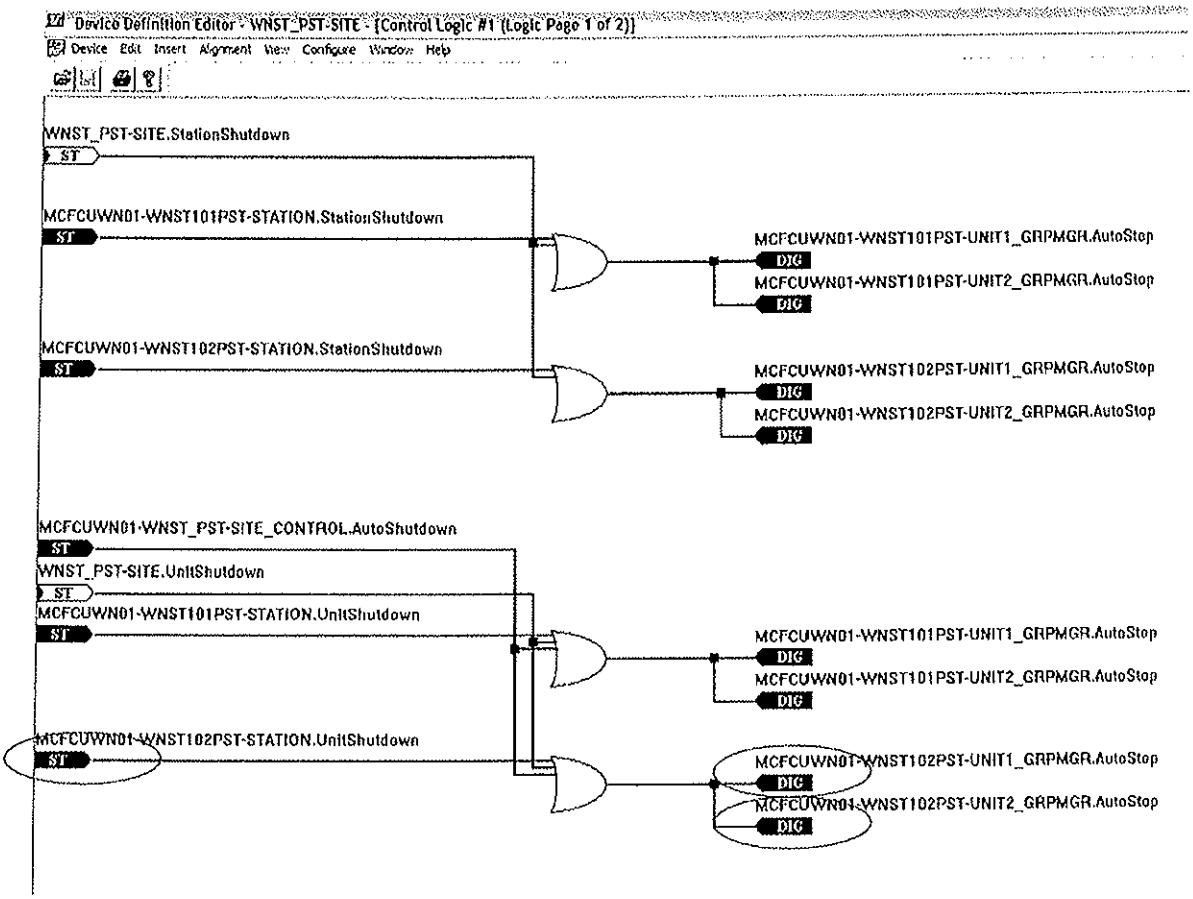
Transmitter High Pressure Fault Shutdown



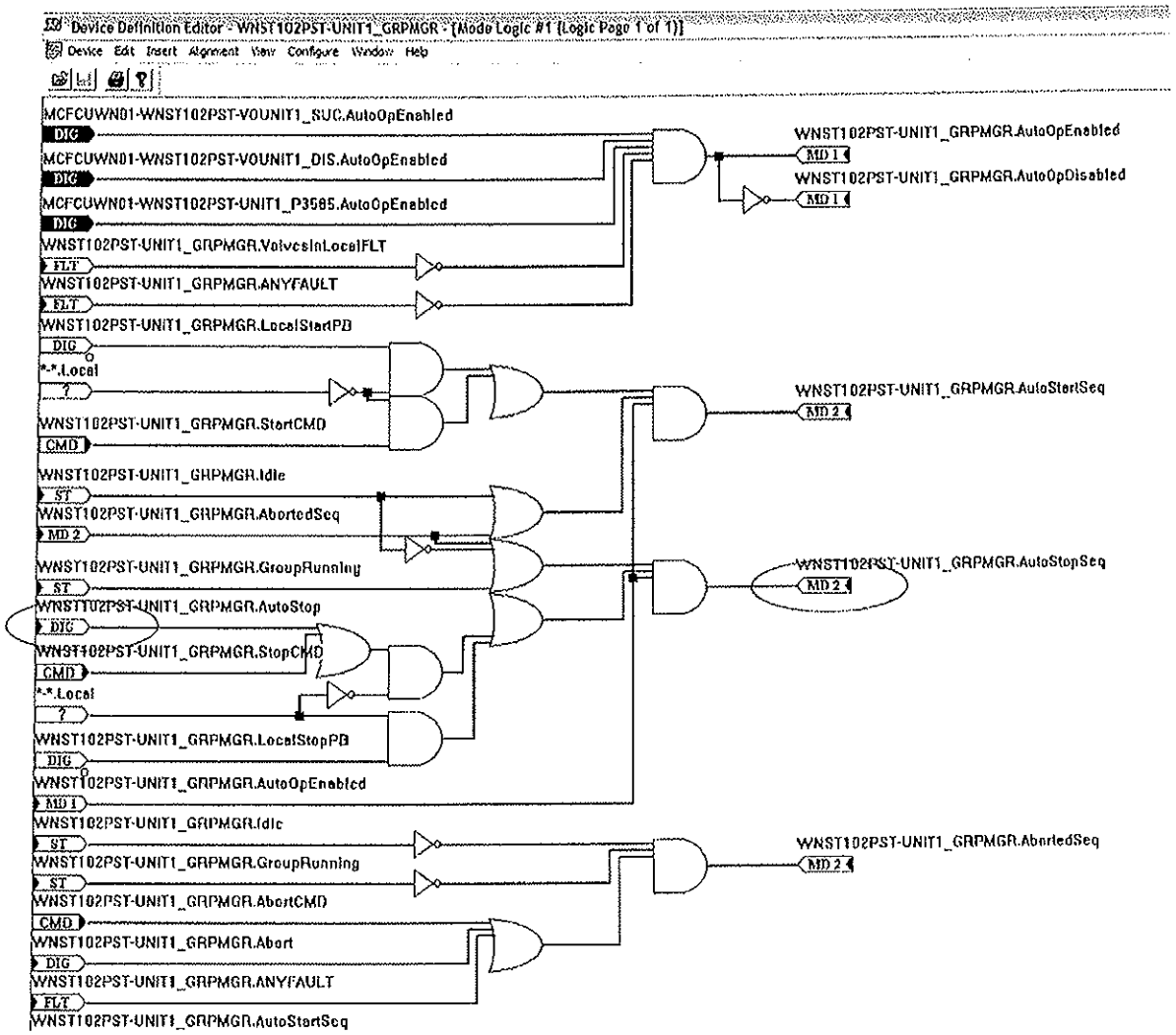
Transmitter High Pressure Fault Shutdown



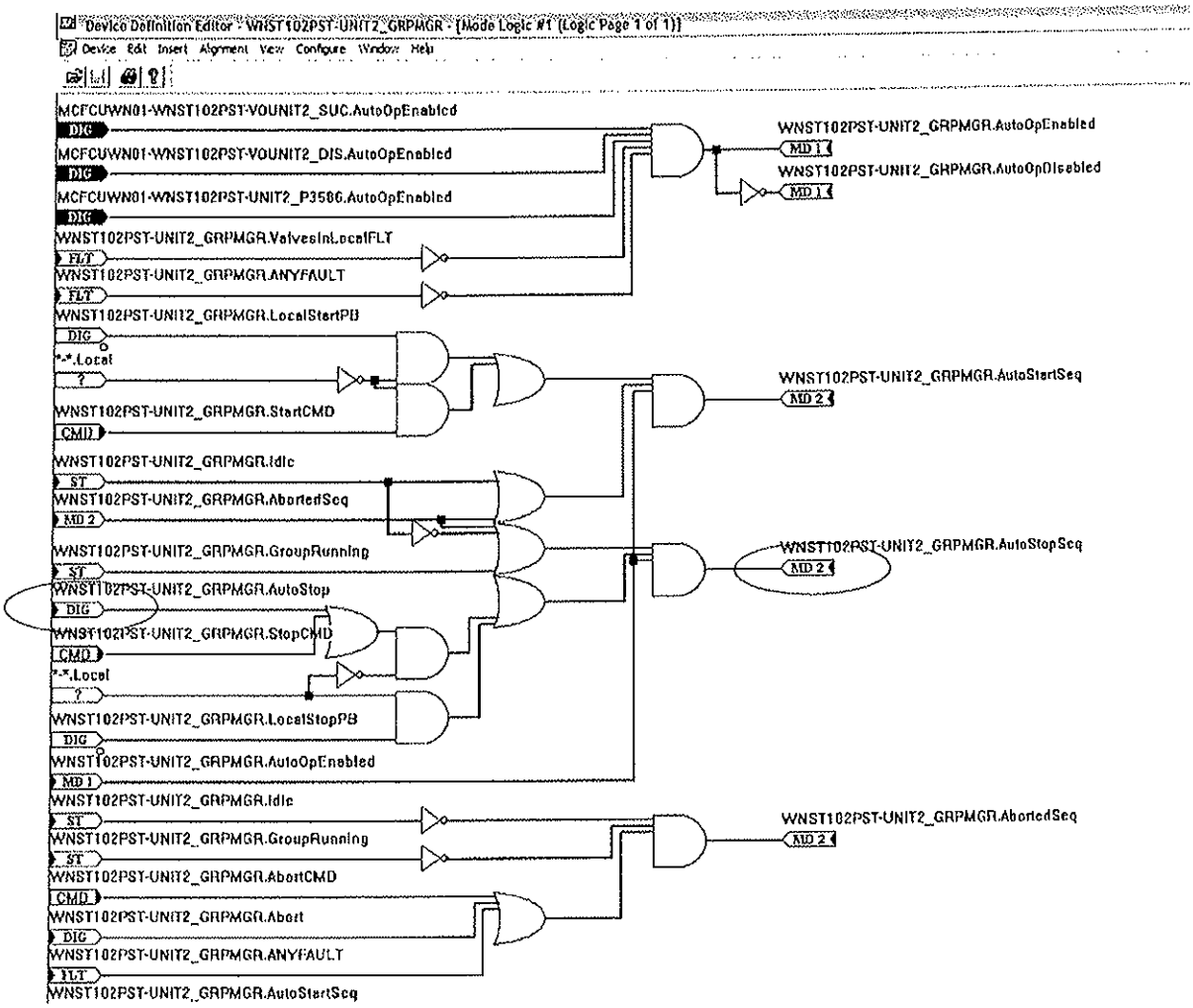
Transmitter High Pressure Fault Shutdown



Transmitter High Pressure Fault Shutdown



Transmitter High Pressure Fault Shutdown



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Recorder / Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset Pump Station (821)
Year: 2011 W.O.# 11-1268981

Due : Semi-Annual

ASSET #	RECORDER/ TRANSMITTER	RANGE	VOLTS/ AMPS	REMARKS	DATE	INIT
110041	102 Suction	0-2000 #	1-5 VDC	VOK	9/20/11	BG
110042	102 Discharge	0-3000#	1-5 VDC	Replace + Calibrate For Bear iGP10-TX2F1F-M2 V3	9/20/11	BG
110043	102 Case	0-3000#	1-5 VDC	VOK	9/20/11	BG

COMPLETED

*Item number to identify repairs or unusual conditions shown on reverse side.

DOT-19 (6/11)

ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2011
Maximo WO#: 2011 - 112 0082

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	✓ Ø + SPAN - OK WO# 11-1112621	4/13/11	BG ✓
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ Ø + SPAN - ADJ Ø WO# 11-1120131 SD 2250#	4/13/11	BG ✓
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ Ø + SPAN - ADJ SPAN WO# 11-1120123 SD 1950#	4/13/11	BG ✓

COMPLETED

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 102 P/L

Location: Winterset

Year: 2011

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	VERIFY Ø + SPAN	2/15/11	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	VERIFY Ø + SPAN	2/15/11	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	VERIFY Ø + SPAN	2/15/11	BG
			BACKED UP DOT FILES TO THUMB DRIVE		

COMPLETED

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 102 P/L
Location: Winterset
WO# 10 - 1602333
Year: 2010

Due: Semi-annual

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√OK	11/24/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	√OK	11/24/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√OK	11/24/10	BG
			- BACKED UP DOT FILES ON COMPUTER		
			COMPLETED		

DOT-19 (1/98)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2010

Due: Semi-annual

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction WO# 10-1581163	0 - # 2000	1 - 5 Volts DC	√ok	10/7/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	ADJUST Ø + SPAN	10/7/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√ok	10/7/10	BG
		COMPLETED			

DOT-19 (1/98)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2010

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	✓ Ø + SPAN - OK	8/30/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ Ø + SPAN - ADJUST Ø	8/30/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ Ø + SPN	8/30/10	BG
			COMPLETED		

DOT-19 (1/98)

ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2009
Maximo WO#: 09 - 1050358

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	J Ø + SPAN Maximo WO# 09-1049177	10/23/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	J Ø + SPAN Maximo WO# 09-1050361	10/23/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	J Ø + SPAN Maximo WO# 09-1042576	10/23/09	BG

COMPLETED

ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2009
Maximo WO#: 0926011

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√ Ø + SPN - OK	8/13/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	√ Ø + SPAN - OK	8/13/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√ Ø + SPAN - OK	8/13/09	BG

COMPLETED

ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2009
Maximo WO#: 09-13183

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	✓ Ø+ SPAN - OK	2/27/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ Ø+ SPAN - OK	2/27/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ Ø+ SPAN - ADJUST Ø+ SPAN OK	2/27/09	BG
			COMPLETED		

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L

Location: Winterset

Year: 2010

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	CHECKED Ø & SPAN - OK VERIFIED WITH RECORDER.	2/10/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	CHECKED Ø & SPAN - ADJUST SPAN VERIFIED WITH RECORDER	2/10/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	CHECKED Ø & SPAN - OK VERIFIED WITH RECORDER	2/10/10	BG
			COMPLETED		

DOT-19 (1/98)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L
Location: Winterset
Year: 2010

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	Adjust Ø & Span	5/18/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ Ø + Span	5/18/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ 0 + Span	5/18/10	BG
			COMPLETED		

DOT-19 (1/98)

ONEOK

ONEOK

10-1455176: DOT19 RECORDER CALIBRATIONS FOR WINTERSET P/S - DES MOINES - QUARTERLY

SUMMARY: CODEREF:

Asset:

Location: PS-821 NS IA - WINTERSET PUMP STATION (821)

CI:

Sched Start:	
Sched Finish:	
Target Start:	5/1/10
Target Finish:	5/31/10
Actual Start:	5/18/10
Actual Finish:	5/18/10
Report Date:	5/1/10
Reported By:	MAXADMIN

Site:	TRANPROC
Priority:	4
Work Type:	CO
Status:	COMP
Parent:	
Failure Class:	
Problem Code:	
GL Account:	
AFE Prj Num:	
Drawing Ref Num:	

Job Plan:	10666
Vendor:	
Owner:	Layman, Chad
Supervisor:	
Lead:	Gudenkauf, Brian J.
Owner Group:	
Service:	
Service Group:	
Classification:	

Task IDs

Task ID	Description	Further Instructions	Circle One	Pass?	Status	Inspection Result	Date
200	Establishes guidelines for the recording and retention of operating records in accordance with	DOT 49 CFR 195	Y / N / DNA		COMP		
400	1. Each pump station shall be equippd w/ pressure recorders to record suction & discharge pressures		Y / N / DNA		COMP		
420	2. When installd, new charts shall be dated & placed in service accordng to the correct time of day		Y / N / DNA		COMP		
440	3. When an old chart is removed, the install & removal dates shall be noted on the chart & carton		Y / N / DNA		COMP		
460	4. For those installations where data is recorded on diskettes, diskette installation and removal	dates and times shall be noted on the diskette label. Retention diskettes shall be three years plus current year.	Y / N / DNA		COMP		
475	5. Recorders shall be checked weekly for proper operation and repaired as soon as possible.	In addition to the weekly check, they should be visually inspected each time the station is visited.	Y / N / DNA		COMP		
485	6. All recorders shall be calibrtd on a quarterly basis.This calib. shall be		Y / N / DNA		COMP		

COMPLETED

ONEOK

10-1455176: DOT19 RECORDER CALIBRATIONS FOR WINTERSET P/S - DES MOINES - QUARTERLY

SUMMARY: CODEREF:

Task ID:

Task ID	Description	Further Instructions	Circle One	Pass?	Status	Inspection Result	Date
	recorded on Form DOT19						
508	7. Out of service time shall be recorded on the chart referencing the malfunction; the chart	shall be reset to the correct time of day.	Y / N / DNA		COMP		
520	8. All charts shall be maintained for a period of three years plus current year at the Team Office	responsible for the Pump Station.	Y / N / DNA		COMP		
535	9. These charts are to be filed with reference information indicating the pipeline, pump station	pump and date.	Y / N / DNA		COMP		
545	10. All unusual operations shall be noted on the daily operating log and retained for a minimum of	three years plus current year.	Y / N / DNA		COMP		
555	11. As backup to these records, the Control Center printout sheets shall be maintained for a	period of three years plus current year.	Y / N / DNA		COMP		
565	12. Other information regarding pump station operation and condition will be logged on Pump	Station Checklist Form 01-93 (Pump Station Checklist) or equivalent.	Y / N / DNA		COMP		
575	13. ONEOK Management shall notify the respective Team Offices of any possible litigation	that may necessitate retention of these records beyond the normal three years.	Y / N / DNA		COMP		
585	14. All records that pertain to an accident involving ONEOK facilities or where ONEOK is involved	in litigation shall be permanently retained until the responsible Team Member is notified in writing by ONEOK management to destroy them.	Y / N / DNA		COMP		
600	15. Other special requests for retention of these records shall be done in accordance	with paragraph 12 above.	Y / N / DNA		COMP		
610	16. Any questions regarding the retention or destruction of records shall be directed to the	Vice President, Operations.	Y / N / DNA		COMP		

Log:

Date	Class	Created By	Subject	Description	Long Description
5/1/10		MAXADMIN	Work Order 10-1455176 has been changed to APPR	Work Order Number 10-1455176 has been changed to APPR by MAXADMIN. It is now possible for you to begin working on the workorder. If you have any questions regarding this workorder,	

ONEOK

10-1455176: DOT19 RECORDER CALIBRATIONS FOR WINTERSET P/S - DES MOINES - QUARTERLY

SUMMARY: CODEREF:

Log Date	Class	Created By	Subject	Description	Long Description
				please contact MAXADMIN. *Note: If your Work Order is changed by user, "MAXADMIN", this indicates that the record is a Maximo Preventive Maintenance(PM) Work Order.	
5/1/10		MAXADMIN	Work order #10-1455176	Compliance Work Order # 10-1455176, that is described as DOT19 RECORDER CALIBRATIONS FOR WINTERSET P/S - DES MOINES - QUARTERLY was reported on 5/1/10 1:28 AM is scheduled to be completed by 5/31/10 12:00 AM. The work order is assigned to Gudenkauf, Brian J. as the work order lead and is supervised by .	
5/24/10		MAXADMIN	Work order #10-1455176	Compliance Work Order # 10-1455176, that is described as DOT19 RECORDER CALIBRATIONS FOR WINTERSET P/S - DES MOINES - QUARTERLY was reported on 5/1/10 1:28 AM is scheduled to be completed by 5/31/10 12:00 AM. The work order is assigned to Gudenkauf, Brian J. as the work order lead and is supervised by .	

Entire 5/26/09 DT

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	4/13/2009
Tenant		Request Time	10:19:51
Assigned By	006-FREDRIK	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	4/13/2009 10:19:51	Extension	
Scheduled Finish Date	8/14/2009	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	5/4/09
Priority	3.00	Completion Time	
Expense Class	O&M		

COMPLETED

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No.	Equipment Description	Location	Sub-location 1	Sub-location 2	Sub-location 3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES		

Item No.	Equipment No.	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

Employee Code	Equipment No.	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		5/4/09	BRIAN	GUDENKAUF		

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:
A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.
DP Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.
DP Operator (initials) BG Work Rep. (initials)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L

Location: Winterset

Year: 2009

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√OK	5/11/09	BC
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	√OK	5/11/09	BC
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√OK	5/11/09	BC
			COMPLETED		

ENTERED 5/20/09 JA

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	1/12/2009
Tenant		Request Time	06:30:20
Assigned By	006-FREDRIK	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	1/12/2009 06:30:20	Extension	
Scheduled Finish Date	5/15/2009	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	4/15/09
Priority	3.00	Completion Time	
Expense Class	O&M		

COMPLETED

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No.	Equipment Description	Location	Sub-location 1	Sub-location 2	Sub-location 3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES		

Item No.	Equipment No.	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

TRANSMITTERS & RECORDERS OK

Employee Code	Equipment No.	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		4/15/09	BRIAN	GUDENKAUF	2.0	

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:

A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.

DP Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.

DP Operator (initials) BG Work Rep. (initials)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L

Location: Winterset

Year: 2009

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	∅ & Span - OK	4/15/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	∅ & Span - Adjust ∅	4/15/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	∅ & Span - OK	4/15/09	BG

ENTERED 8/20/08 DF

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	7/14/2008
Tenant		Request Time	20:43:57
Assigned By	006-FREDRIK	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	7/14/2008 00:00:00	Extension	
Scheduled Finish Date	11/14/2008	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	8/4/08
Priority	3.00	Completion Time	
Expense Class	O&M		

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No.	Equipment Description	Location	Sub-location 1	Sub-location 2	Sub-location 3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES		

Item No.	Equipment No.	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

ALL INSPECTIONS CHECK OK

Employee Code	Equipment No.	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		8/4/08	BRIAN	GUDENKNUF	2.0	

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:
A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.
DP Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.
DP Operator (initials) BG Work Rep. (initials)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L

Location: Winterset

Year: 2008

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√OK	8/4/08	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	√OK	8/4/08	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√OK ADJUST ZERO	8/4/08	BG
			COMPLETED		

DOT-19 (1/98)

ENTERED 10/24 DT

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	10/13/2008
Tenant		Request Time	07:04:56
Assigned By	006-FREDRIK	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	10/13/2008 00:00:00	Extension	
Scheduled Finish Date	2/13/2009	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	10/15/08
Priority	3.00	Completion Time	
Expense Class	O&M		

COMPLETED

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No.	Equipment Description	Location	Sub-location 1	Sub-location 2	Sub-location 3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES	-	-

Item No.	Equipment No.	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

LOOKS GOOD

Employee Code	Equipment No.	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		10/15/08	BRIAN	GUDENKAUF	2.0	

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:
A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.
DP Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.
DP Operator (initials) BG Work Rep. (initials)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L

Location: Winterset

Year: 2008

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√OK	10/15/08	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	CALIBRATED Ø AND SPAN	10/15/08	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√OK	10/15/08	BG
			COMPLETED		

DOT-19 (1/88)

ENTER 4/16/08

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	4/14/2008
Tenant		Request Time	01:01:33
Assigned By	006-FREDRIK	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	4/14/2008 00:00:00	Extension	
Scheduled Finish Date	8/15/2008	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	4/15/08
Priority	3.00	Completion Time	
Expense Class	O&M		

COMPLETED

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No	Equipment Desonption	Location	Sub-location 1	Sub-location 2	Sub-location 3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES		

Item No	Equipment No	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

ALL TRAPS WITHEPS + RECORDERS OK

Employee Code	Equipment No	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		4/15/08	BRIAN	GUDENKAUF	2.0	

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:

A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.
DP Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.
DP Operator (initials) BG Work Rep. (initials)

KINDER MORGAN
ENERGY PARTNERS, L.P.

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L
Location: Winterset
Year: 2008

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	1Ø + SPAN - OK	4/15/08	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	CHECK Ø + SPAN -OK	4/15/08	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	CHECK Ø + SPAN - OK	4/15/08	BG
			COMPLETED		

DOT-19 (1/98)

ENT 2/26/08

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	1/14/2008
Tenant		Request Time	07:37:41
Assigned By	007-HUNT-K	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	1/14/2008 00:00:00	Extension	
Scheduled Finish Date	5/16/2008	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	7-18-08
Priority	3.00	Completion Time	
Expense Class	O&M		

COMPLETED

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No.	Equipment Description	Location	Sub-location-1	Sub-location-2	Sub-location-3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES	-	-

Item No.	Equipment No.	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

BACKED UP RECORDED FILES

Employee Code	Equipment No.	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		2/18/08	BRIAN	GUDENKNUF	1	

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:
A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.
DP Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.
DP Operator (initials) BG Work Rep. (initials)

KINDER MORGAN
ENERGY PARTNERS L.P.

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L
Location: Winterset
Year: 2008

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	ADJUST RECORDER ZERO	2/18/08	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	ADJUST ZERO ON TRANSMITTER ADJUST BERO ON RECORDER	2/18/08	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	ADJUST RECORDER ZERO	2/18/08	BG
			COMPLETED		

Attachment 4

ONEOK NORTH SYSTEM A SUBSIDIARY OF ONEOK PARTNERS	**Maintenance Procedure** **Relief Valve Testing**	
Des Moines Terminal Facility	Procedure # DM-A-020	Date Issued: 12/31/99
	Written by: B. Cozzi	Revision Date: 05/12/11
		Page: 1 of 3

REFERENCE INFORMATION

Scope of Work:
This procedure provides the general guidelines for the safe, efficient method for performing preventative maintenance. This procedure does not supersede, nor does it relieve responsibility for compliance with any other procedure(s) that may be required. This procedure is used in conjunction with the latest P&ID's and vendor equipment drawings, which will be referenced as appropriate. The purpose of this procedure is to ensure relief valves are in good physical condition and operate at predetermined settings.

Procedures/Safety Regulations:

The Oneok EH&S work permitting policy must be followed. Reference the EH&S work permit form and the daily excavation checklist for specific guidelines.

P&ID's	**ALL**	

Safety Equipment:
Plant Minimum Standards
PPE

Equipment/Tools/Supplies
Hand tools, regulated pressure source, calibrated pressure gauge, pipe plug, thread scalant, methanol and nitrogen

MSDS:
Located in Terminal Office
Propane
Methanol
Nitrogen

Quality:

ONEOK NORTH SYSTEM A SUBSIDIARY OF ONEOK PARTNERS	**Maintenance Procedure Relief Valve Testing**	
Des Moines Terminal Facility	Procedure # DM-A-020	Date Issued: 12/31/99
	Written by: B. Cozzi	Revision Date: 05/12/11
		Page: 2 of 3

TASKS	STEPS	INFORMATION	Audit
Valve Relief			
Terminal Operator Mechanic	1. Open work order		
	2. Close isolation valve upstream of relief valve	Refer to Oneok lockout/tagout procedure	
	3. Bleed pressure upstream of relief valve by slowly removing plug in isolation valve test port if available, or remove relief valve from service location	Caution: Position yourself upwind when bleeding pressure.	
	4. For isolation valves with test ports, connect a calibrated, regulated pressure source to the test port		
	5. For isolation valves without test ports, remove the relief valve from service location, install a pipe plug in place of the relief valve, secure the relief valve in a vise for bench testing and connect a calibrated, regulated pressure source to the relief valve		
	6. Pressurize the relief valve beyond relief pressure to flush with methanol or nitrogen		
	7. Apply pressure with calibrated, regulated pressure source and note the pressure at which the relief valve lifts		
	8. Depressure the relief valve and remove test apparatus or pipe plug from isolation valve		

	9. Apply thread sealant to test port plug or relief valve threads		
	10. Install test port plug or relief valve in service location and securely tighten		
	11. Open isolation valve to relief valve and check for leaks		
	12. Safety seal isolation valve open		
	13. Document any/all deviations	All repairs must be done by a certified repairman	
	14. Close work order		

END OF PROCEDURE

Auditor Review Approval:
Operations

Date:

Area Supervisor Approval:
Operations

Date:

Attachment 5

SHAVR REPORT 2494 Corrective Actions:

ID #	*Action*	*Responsibility*	*Target Date*
SVR-2494-01	Communicate to all Des Moines employees that when "An alarm and/or a safety device is engaged we will not override that device, but will engage the right people to understand what is wrong with the safety device and attempt to correct it".	Chad Layman	4/13/10 Completed 4/13/10
SVR-2494-02	Investigate how the Hi pressure switch for the VO-132 Pipeline remained on SCADA for more than an entire shift without being investigated. • Did the alarm make it to a work station? • Was it ever acknowledged? Yes, it was acknowledged locally. • J. Pirtle to work with CSI and ONEOK SCADA Admin. On why alarm was not seen by Tulsa OWS. Check possible acknowledgement of alarm in Des Moines between 10 scan rates in Tulsa. It was determined that the alarm was acknowledged locally and was not seen in Tulsa due to the alarm annunciation and acknowledgement happened within seconds and between Master Stations scans in Tulsa.	J. Pirtle / R. Dulaney	6/15/10 Completed 6/7/10

SHAVR REPORT 4498 Corrective Actions:

ID #	*Action*	*Responsibility*	*Target Date*
SVR-4498-01	Do a communication meeting will all PCC Controllers to Re-emphasize: ▪ Pump shutdown responsibility to help avert any line overpressure conditions (repeat). ▪ Confirm PCC Controllers communicate all pipeline start-ups and re-start-ups to Field Operators confirming product flow path and direction.	Jaret Pirtle	Sept. 10, 2010 Completed 9/9/10 J. P.
SVR-4498-02	Consider implementing an ACA system function (Automatic Control Action) for this segment of the 313 Pipeline to shut down the station pump upon detection of a high line pressure situation.	Jaret Pirtle	October 31, 2010 First Task Team meeting 9/14/10 Follow-up meetings scheduled.
SVR-4498-03	Improve the timeliness of distributing updated printed Pipe line movement schedules to PCC and local Operations.	Danny Mills	Sept. 30, 2010 Completed 11/30/10 D.M.
SVR-4498-04	Investigate the completion of Corrective Action # 2313-06 from SHAVER # 2313.	Alan Buckman	Sept. 30, 2010 Completed 9/30/10 AB

Attachment D

Attachment D to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

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PART A - OPERATOR INFORMATION

Pipeline operator/owner:	**OPID #:**
ONEOK NGL Pipeline L.P.	32109

Company Official name, title, telephone, FAX #:	**Mailing address of Company Official:**
Mr. Wes Christensen Vice President, NGL Operations Phone: 918-588-7600 Fax: 918-588-7072	ONEOK NGL Pipeline L.P. 100 West Fifth Street Tulsa, OK 74102

Nature and size of operator's system (system identification, total miles, and products transported):
ONEOK's natural gas liquids (NGL) system includes regulated NGL pipelines, refined products pipelines, and NGL storage/terminal facilities throughout the Midwest. The pipelines deliver products to the NGL market hubs in Conway, Kansas, and Mont Belvieu, Texas, and the upper-Midwest markets near Chicago, Illinois.

ONEOK's operations include approximately 3,500 miles of FERC-regulated natural gas liquids and distribution pipelines in Oklahoma, Kansas, Nebraska, Missouri, Iowa, Illinois and Texas. ONEOK also operate eight NGL product terminals Missouri, Nebraska, Iowa, and Illinois that allows for the storage of approximately 978,000 barrels of natural gas liquids used for efficiency in our operations.

The ONEOK North System, L.L.C. consists of approximately 1,585 miles and has a capacity to transport up to 134,000 barrels per day, with additional capacity under lease. The pipeline transports NGL and various refined products, including unleaded gasoline and diesel fuel throughout the Midwest markets, particularly near Chicago, Illinois. This system includes approximately 978,000 barrels of storage capacity, both cavern and above-ground tanks, and eight NGL terminals. The Des Moines unit consist of the lines from aerial patrol line marker 283 (East Adair county line) to the Des Moines station and from the Des Moines station to the Ewart station. The Iowa City unit consists of the lines from Ewart station to the IA/IL border. (See Exhibit A for Map of the North System)

The ONEOK Medford and Eldorado unit consists of approximately 768 miles of pipeline transporting NGL products to/from Medford, OK to Conway, KS and Bushton, KS. The system also includes pipelines from El Dorado, KS to Conway, KS. (See Exhibit A for the map of the Medford and El Dorado Units.

PART B - INSPECTION RESULTS

Date of Inspection:		**Unit #(s):**
7/24-29/2011; 8/15-18/2011; 8/22-25/2011	☒ **Gas** ☒ **LNG** **X Hazardous Liquid**	3673; 18013; 16283; 16303

PHMSA/State Inspector name and organization:
Hans Shieh; Central Region Office

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Inspection location(s) and facilities inspected:

For the Medford and El Dorado units, the records review part was done at their offices in Medford, OK. The field review for the Medford unit consisted of driving the lines from Medford, OK to Hutchinson, KS, and then following the lines that circle Hutchinson on the east side to Conway, KS. We then followed the lines for the El Dorado unit that go from Conway, KS down to El Dorado, KS. Additionally, the storage fields at Hutchinson and Conway were evaluated.

For the North System units (Des Moines and Iowa City), the records review part was done at their offices in Des Moines and Iowa City, IA. The field review for the Des Moines unit consisted of driving the lines from Winterset Station to Des Moines and then from Des Moines to Ewert Station. Lines 203, 102, 101, 105, 201, 203, and 114 were looked at. The HVL storage field in Des Moines was also evaluated. For the Iowa City unit, the lines from Ewert to the IA/IL border were driven. Lines 304, 203, 202, 201, 102, 101, and 105 were evaluated.

PART C – VIOLATION and CIVIL PENALTY INFORMATION

Information shown in Part C of this Pipeline Safety Violation Report relates to probable violations, proposed compliance orders, and proposed civil penalties

VIOLATION NUMBER 3

Section C1 – Description of Violation

Identify the regulation violated with the part, section, and most specific paragraph of Title 49. Enter only one regulation:

§195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Is this a violation of a condition in a Special Permit (Waiver)?

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X No | | **Yes - identify permit and describe violation:** click here to enter
Describe the operator's conduct that violated the regulation: ONEOK did not conduct any reviews of their employees work to determine the effectiveness of their procedures. ONEOK's O&M Procedure PRC1410.100 Page 3-2 defines what is to be done to meet the requirements of of 195.402(c)(13). The procedure specifically states that the ONP business manager or designee will be responsible for conducting the review of work done, incidents, and near miss reports to determine the effectiveness of the operating procedures. This is to be done once a year with intervals not to exceed 15 months. During the records review in both the Medford areas and North System areas, there were no annual records to verify that a review of work done by personnel to determine the effectiveness of the procedures was done. Furthermore, ONEOK personnel could not provide any example or records to show that <u>any</u> periodic review of any procedure was done.
Describe the evidence: Exhibit B - Procedure PRC1410.100
Person(s) interviewed (include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation): Molly Atkins – Manager, Dot Compliance – Was part of the inspection.
Comments of person(s) interviewed regarding the violation (include names of any witnesses to the conversation): Molly Atkins – Indicated that they did not have any records per their O&M for this section. She commented about the annual review of the O&M, and indicated that they reviewed all near miss reports, but could not produce any records for the periodic review of any procedure.
NATURE
Check and describe the nature of the violation in terms of: records (identify the missing or incomplete records or the records that were reviewed); performance of activities (specifically the conduct of activities such as inspections, tests, preparing procedures, not following procedures, maintenance, meetings, notifications, reports); or equipment/facilities (such as safety equipment not installed, missing, defective or inoperative);

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[redacted] **RECORDS:** Describe: X **ACTIVITIES:** Describe: Did not conduct the review as required by the O&M. [ ] **EQUIPMENT/FACILITES:** Describe: click here to enter
CIRCUMSTANCES
Describe who discovered the violation (operator, PHMSA, public): [redacted] **Operator:** [redacted] **XPHMSA:** This was identified during the inspection of the units. [redacted] **Public:** [redacted]
Date the non compliance started: Unknown....they did not have any records from 2008 to 2011.
Duration of the violation in days: Approximately 1301 days.
GRAVITY *Gravity relates to the seriousness of the probable violation, and includes consideration of whether it posed a significant threat to public safety and protection of the environment and where this threat occurred.*
Enter the number of instances of the violation: 4

Non-IM Violation Only *Select only one*	1	[redacted] **Pipeline integrity or safe operation was significantly compromised in a populated area, an HCA, an HCA "could affect" segment, road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
	2	[redacted] **Pipeline integrity or safe operation was potentially compromised in a populated area, an HCA, an HCA "could affect" segment, a road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
	3	[redacted] **Pipeline integrity or safe operation significantly compromised in other areas;**
	4	**X Pipeline integrity or safe operation potentially compromised in others areas;**
	5	[redacted] **Pipeline integrity or safe operation minimally affected;**
	6	[redacted] **The non-compliance was a causal factor in an accident/incident;** [redacted] **The non-compliance contributed to the cause of an accident/incident or increasing the severity of the consequences of an accident/incident;**

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	For any of the items selected above describe the potential impact, or in the event of an accident/incident the actual impact, of this violation on public safety, operator safety, and/or the environment (including animals and wildlife.) **For Items 6 and 7 provide further information to support the selection regarding the causal factor or the contributing cause or increasing the severity of the accident/incident.** Following the O&M manual is essential to maintaining the integrity of the pipeline. In this case, the procedures specifically spell out how the company is to meet the requirements of periodically reviewing the procedures by evaluating the work done by personnel. This requirement helps the operator identify any potential deficiencies within the procedure that might only evident through doing the actual procedure. Failure to meet this requirement that refines and improves the procedure can lead to consequences that endanger the lives of the public and company personnel.
IM Violation only	**Enter the Area Finding & Risk Category data:** • **Area Finding:** click here to enter • **Risk Category (A-E):** click here to enter • **Miles of HCA:** click here to enter

Section C2 – Consequences of an Accident/Incident

Select all that apply	X	
	X	**There was no accident/incident (continue to Section C3)**
	[redacted]	**The event was reportable (§ 191.3 or § 195.50) regardless of whether it was reported by the operator.**
	[redacted]	**One or more persons were evacuated. How many?:** [redacted]
	[redacted]	**Amount of product spilled.** click here to enter bbl or gal
	[redacted]	**Was product spilled outside a tank dike?** click here to enter bbl or gal
	[redacted]	**Product reached a stream, river, or other body of water.**
	[redacted]	**One or more persons were injured and required hospitalization. How many?:** [redacted]
	[redacted]	**One or more fatalities. How many?:** [redacted]
	[redacted]	**Other:** Describe: [redacted]

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Section C3 – Additional Considerations

	[redacted]	**A civil penalty is not proposed for this violation (continue to Section C4).**

CULPABILITY

This civil penalty assessment consideration is based on how culpable - or blameworthy – the operator is for the non-compliance.
Culpability does not consider actions taken by the Operator after PHMSA has discovered the noncompliance.

Select one	X	**The operator failed to take any action or made a minimal attempt to comply with a regulatory requirement that was clearly applicable.** Describe: ONEOK is well aware of the requirements to follow the O&M procedures. In this case, they specified what they would do to meet the requirements of 195.402(c)(13) and they did not follow that for several years.
	[redacted]	**The operator was cognizant of the regulatory requirement and took some steps to address the issue, but did not achieve compliance.** Describe: [redacted]
	[redacted]	**The operator was cognizant of the regulatory requirement and took significant steps to address the issue, but had some degree of justification for not taking all practicable steps to achieve compliance at its facility.** Describe: [redacted]
	[redacted]	**The operator was diligent in taking all practicable steps to comply but failed to achieve full compliance for reasons such as unforeseeable events/conditions that were partly or wholly outside its control; or the operator is a small or new operator in the process of building and strengthening its compliance program, or similar reasons.** Describe: [redacted]

GOOD FAITH

This civil penalty assessment consideration is based on the reasonableness of an operator's understanding of the cited regulatory requirement

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Select one	[redacted]	GOOD FAITH exists if the operator's interpretation of the requirement was reasonable and the operator had a credible belief that its approach to achieving compliance was faithful to its duty to meet the regulatory obligation. Describe: [redacted]
	X	GOOD FAITH does not exist if the operator's interpretation of the requirement was not reasonable, the operator failed to follow publicly available guidance, or the operator did not act in accordance with its duty to meet the regulatory obligation. Describe: ONEOK did not follow the requirements of their own O&M manual. ONEOK is fully aware that following the O&M is a requirement and necessary for the safe operation of their system.

Additional Comments applicable to civil penalty (Optional)
(including other matters as justice may require and economic benefit gained from noncompliance)

	Describe: [redacted]

Section C4 – Proposed Action

Select one	[redacted]	**Civil penalty**	X	**Civil penalty and compliance order**
	[redacted]	**Compliance order**	[redacted]	***Other-describe:** [redacted]

*The enforcement procedures only require use of the Violation Report for civil penalty or compliance order items; however individual regions may require the use of the Violation Report for other enforcement actions.

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VIOLATION NUMBER 4

Section C1 – Description of Violation

Identify the regulation violated with the part, section, and most specific paragraph of Title 49. Enter only one regulation:

§195.422 Pipeline Repairs.

(a)Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

Is this a violation of a condition in a Special Permit (Waiver)?

X No ☐ **Yes - identify permit and describe violation:** [redacted]

Describe the operator's conduct that violated the regulation:

In the Medford area, ONEOK is not making repairs in a safe manner that will prevent damage to persons or property.

ONEOK utilized the Clockspring composite sleeves to repair crack-like indications. Review of the ILI dig repair reports found one report outside a high consequence area where a Clock Spring was used as a temporary repair on some crack like features in the seam. The temporary repair has been on the line since 2008.

Clockspring's own literature indicates that their composite sleeves used to repair crack features should only be used in accordance with industry standards and the appropriate regulations for Canada and the United States (US). In the US, Clockspring specifically states that operators should follow the standard B31.4 regarding composite sleeves for crack repair as the standard is referenced in Part 195.

B31.4, as well as the PHMSA PRCI repair manual, requires that the crack be completely removed and meet the minimum wall thickness before a composite sleeve is to be installed.

ONEOK did not grind out the crack like feature before they installed the composite sleeve.

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Describe the evidence:

Exhibit C – Clock Spring's literature regarding the use of composite sleeves on cracks.

- Excerpts ASME B31.4 Section 451.6 regarding the use of composite sleeves.
- Exerpts from the PHMSA PRCI pipeline repair manual.

Person(s) interviewed (include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation):

Scott Henderson – Supervisor, Integrity – Was part of the inspection.

Comments of person(s) interviewed regarding the violation (include names of any witnesses to the conversation):

Scott Henderson – Indicated that this was done as a temporary measure. However, it somehow was missed and the repair did not get addressed as it should have. Later correspondence with ONEOK indicated that they planned to go out to the repair and cut the clock spring off and evaluate the defect before a permanent repair was put in place.

NATURE

Check and describe the nature of the violation in terms of: records (identify the missing or incomplete records or the records that were reviewed); performance of activities (specifically the conduct of activities such as inspections, tests, preparing procedures, not following procedures, maintenance, meetings, notifications, reports); or equipment/facilities (such as safety equipment not installed, missing, defective or inoperative);

[ ] **RECORDS:** Describe:
X **ACTIVITIES:** Describe: Did not make a repair per manufacturer's specifications.
[ ] **EQUIPMENT/FACILITES:** Describe: click here to enter

CIRCUMSTANCES

Describe who discovered the violation (operator, PHMSA, public):

[ ] **Operator:** click here to enter
X **PHMSA:** This was identified during the inspection of the units.
[ ] **Public:** click here to enter

Date the non compliance started: 2008

Duration of the violation in days: Approximately 1300 days.

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GRAVITY

Gravity relates to the seriousness of the probable violation, and includes consideration of whether it posed a significant threat to public safety and protection of the environment and where this threat occurred.

Enter the number of instances of the violation:
1

Non-IM Violation Only *Select only one*	1	☒ **Pipeline integrity or safe operation was significantly compromised in a populated area, an HCA, an HCA "could affect" segment, road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
	2	☐ **Pipeline integrity or safe operation was potentially compromised in a populated area, an HCA, an HCA "could affect" segment, a road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
	3	☐ **Pipeline integrity or safe operation significantly compromised in other areas;**
	4	**X Pipeline integrity or safe operation potentially compromised in others areas;**
	5	☐ **Pipeline integrity or safe operation minimally affected;**
	6	☐ **The non-compliance was a causal factor in an accident/incident;** ☐ **The non-compliance contributed to the cause of an accident/incident or increasing the severity of the consequences of an accident/incident;**

For any of the items selected above describe the potential impact, or in the event of an accident/incident the actual impact, of this violation on <u>public safety, operator safety, and/or the environment (including animals and wildlife.)</u>

<u>For Items 6 and 7 provide further information to support the selection regarding the causal factor or the contributing cause or increasing the severity of the accident/incident.</u>

Following the repair specifications of the manufacturer is essential to ensuring the integrity of the repair. By not following the manufacturer and industry standards regarding the use of composite sleeves, can endanger the public and property in the future.

IM Violation only

Enter the Area Finding & Risk Category data:

- **Area Finding:** click here to enter
- **Risk Category (A-E):** click here to enter
- **Miles of HCA:** click here to enter

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Section C2 – Consequences of an Accident/Incident

Select all that apply	X	**There was no accident/incident (continue to Section C3)**
	[redacted]	**The event was reportable (§ 191.3 or § 195.50) regardless of whether it was reported by the operator.**
	[redacted]	**One or more persons were evacuated. How many?:** [redacted]
	[redacted]	**Amount of product spilled.** click here to enter bbl or gal
	[redacted]	**Was product spilled outside a tank dike?** click here to enter bbl or gal
	[redacted]	**Product reached a stream, river, or other body of water.**
	[redacted]	**One or more persons were injured and required hospitalization. How many?:** [redacted]
	[redacted]	**One or more fatalities. How many?:** [redacted]
	[redacted]	**Other:** Describe: [redacted]

Section C3 – Additional Considerations

	[redacted]	**A civil penalty is not proposed for this violation (continue to Section C4).**

CULPABILITY

This civil penalty assessment consideration is based on how culpable - or blameworthy – the operator is for the non-compliance.
Culpability does not consider actions taken by the Operator after PHMSA has discovered the noncompliance.

Select one	X	**The operator failed to take any action or made a minimal attempt to comply with a regulatory requirement that was clearly applicable.** Describe: ONEOK is well aware of what needs to be done when using a composite sleeve to repair a crack. However, in this case, they did not do what was required under the premise that the clock spring was a temporary repair. Three years is not considered a temporary repair and should have been addressed appropriately.
	[redacted]	**The operator was cognizant of the regulatory requirement and took some steps to address the issue, but did not achieve compliance.** Describe: [redacted]
	[redacted]	**The operator was cognizant of the regulatory requirement and took significant steps**

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		to address the issue, hut had some degree of justification for not taking all practicable steps to achieve compliance at its facility. Describe: [redacted]
	☒	**The operator was diligent in taking all practicable steps to comply but failed to achieve full compliance for reasons such as unforeseeable events/conditions that were partly or wholly outside its control; or the operator is a small or new operator in the process of building and strengthening its compliance program, or similar reasons.** Describe: [redacted]

GOOD FAITH

This civil penalty assessment consideration is based on the reasonableness of an operator's understanding of the cited regulatory requirement

Select one	☒	GOOD FAITH exists if the operator's interpretation of the requirement was reasonable and the operator had a credible belief that its approach to achieving compliance was faithful to its duty to meet the regulatory obligation. Describe: [redacted]
	X	GOOD FAITH does not exist if the operator's interpretation of the requirement was not reasonable, the operator failed to follow publicly available guidance, or the operator did not act in accordance with its duty to meet the regulatory obligation. Describe: ONEOK failed to follow the manufacturer's requirements, as well as publicly available industry standards and guidance.

Additional Comments applicable to civil penalty (Optional)

(including other matters as justice may require and economic benefit gained from noncompliance)

	Describe: [redacted]

Section C4 – Proposed Action

Select one	☒ ☒	**Civil penalty** **Compliance order**	☒ **X**	**Civil penalty and compliance order** ***Other-describe:** Warning Letter

*The enforcement procedures only require use of the Violation Report for civil penalty or compliance order items; however individual regions may require the use of the Violation Report for other enforcement actions.

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VIOLATION NUMBER 5

Section C1 – Description of Violation

Identify the regulation violated with the part, section, and most specific paragraph of Title 49. Enter only one regulation:

§195.406 Maximum operating pressure.

(b) No operator may permit the pressure in a pipeline during surges or other variations from normal operations to exceed 110 percent of the operating pressure limit established under paragraph (a) of this section. Each operator must provide adequate controls and protective equipment to control the pressure within this limit.

Is this a violation of a condition in a Special Permit (Waiver)?

X No **Yes - identify permit and describe violation:** click here to enter

Describe the operator's conduct that violated the regulation:

ONEOK did not provide adequate controls and protective equipment at Winterset Station on the North System to ensure that the pressure in the pipeline would not exceed the maximum operating pressure.

In May of 2008, a management of change (MOC) was issued on the Massena to Des Moines line section of Line 102. This line section included the Winterset station and required that the over-pressure protection be reset to 1930 psig to protect a lower MOP of 1950 psig from 2160 psig. On June 6, 2008, a second MOC was issued on Line 102 after a failure on the line on May 31, 2008. This MOC affected the line segment from Massena to Tabor (downstream of the Massena to Des Moines section) and lowered the MOP to 1704 psig. On June 13, 2008, a third MOC was issued to reduce the maximum operating pressure for the entire 102 line from Des Moines to Bushton. This MOC was in addition to the June 6 MOC, and superseded the May 2008 MOC. However, the June 13 MOC did not address resetting the over-pressure protection for Winterset. As a result, from the time of the June 13, 2008 MOC to the time of the PHMSA inspection, the set points of the over pressure protection at Winterset were still set at 1930 psig, which exceeded the maximum allowable operating pressure.

Because the soft shutdown was set at 1930 psig in the software, the local personnel were unable to print out the set point of the soft shut down at the time of my inspection. Since the PHMSA inspection, the

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pump station hard shutdown switch set point was reset to protect the new 1704 psig MOP.

Describe the evidence:

1) MOC Documents – Exhibit D
2) Explanation to make transmitter the primary over-pressure protection

Person(s) interviewed (include each person's name, title, and an explanation of why this person's knowledge is important in establishing tbe violation):

Molly Atkins – Manager of Compliance

Comments of person(s) interviewed regarding the violation (include names of any witnesses to the conversation):

Ms Atkins agreed that the shut downs set points at Winterset should have been lowered from 1930 psig to protect the new MOP of 1704 psig. She indicated that it seemed that it was over-looked.

NATURE

Check and describe the nature of the violation in terms of: records (identify the missing or incomplete records or the records that were reviewed); performance of activities (specifically the conduct of activities such as inspections, tests, preparing procedures, not following procedures, maintenance, meetings, notifications, reports); or cquipment/facilities (such as safety equipment not installed, missing, defective or inoperative);

[ ] **RECORDS:** Describe: click here to enter
[X] **ACTIVITIES:** Describe: Over-pressure protection set points were not set to protect the new lowered MOP.
[ ] **EQUIPMENT/FACILITES:** Describe: click here to enter

CIRCUMSTANCES

Describe who discovered the violation (operator, PHMSA, public):

[ ] **Operator:** click here to enter
XPHMSA: This was identified during the inspection of the units.
[ ] **Public:** click here to enter

Date the non compliance started: June 2008

Duration of the violation in days: Approximately 1156 days.

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GRAVITY

Gravity relates to the seriousness of the probable violation, and includes consideration of whether it posed a significant threat to public safety and protection of the environment and where this threat occurred.

Enter the number of instances of the violation:
8

Non-IM Violation Only	1	X	**Pipeline integrity or safe operation was significantly compromised in a populated area, an HCA, an HCA "could affect" segment, road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
	2		**Pipeline integrity or safe operation was potentially compromised in a populated area, an HCA, an HCA "could affect" segment, a road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
Select only one	3	X	**Pipeline integrity or safe operation significantly compromised in other areas;**
	4		**Pipeline integrity or safe operation potentially compromised in others areas;**
	5		**Pipeline integrity or safe operation minimally affected;**
	6		**The non-compliance was a causal factor in an accident/incident;**
			The non-compliance contributed to the cause of an accident/incident or increasing the severity of the consequences of an accident/incident;

For any of the items selected above describe the potential impact, or in the event of an accident/incident the actual impact, of this violation on public safety, operator safety, and/or the environment (including animals and wildlife.)

For Items 6 and 7 provide further information to support the selection regarding the causal factor or the contributing cause or increasing the severity of the accident/incident.

The reason for the new MOCs was because of a defect in the pipeline that caused a release. In order to ensure that it did not happen at another location, ONEOK lowered the MOP of the entire line. Failing to protect the new MOP could create another situation where a failure results putting the population in danger and damaging property.

IM Violation only

Enter the Area Finding & Risk Category data:

- **Area Finding:** click here to enter
- **Risk Category (A-E):** click here to enter
- **Miles of HCA:** click here to enter

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Section C2 – Consequences of an Accident/Incident

Select all that apply	X	There was no accident/incident (continue to Section C3)
		The event was reportable (§ 191.3 or § 195.50) regardless of whether it was reported by the operator.
		One or more persons were evacuated. How many?: click here to enter
		Amount of product spilled: click here to enter bbl or gal
		Was product spilled outside a tank dike? click here to enter bbl or gal
		Product reached a stream, river, or other body of water.
		One or more persons were injured and required hospitalization. How many?: click here to enter
		One or more fatalities. How many?: click here to enter
		Other: Describe: click here to enter

Section C3 – Additional Considerations

	X	A civil penalty is not proposed for this violation (continue to Section C4).

CULPABILITY

This civil penalty assessment consideration is based on how culpable - or blameworthy – the operator is for the non-compliance.
Culpability does not consider actions taken by the Operator after PHMSA has discovered the noncompliance.

Select one		The operator failed to take any action or made a minimal attempt to comply with a regulatory requirement that was clearly applicable. Describe:
		The operator was cognizant of the regulatory requirement and took some steps to address the issue, but did not achieve compliance. Describe: click here to enter
		The operator was cognizant of the regulatory requirement and took significant steps to address the issue, but had some degree of justification for not taking all practicable steps to achieve compliance at its facility.

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		Describe: click here to enter
	☐	**The operator was diligent in taking all practicable steps to comply but failed to achieve full compliance for reasons such as unforeseeable events/conditions that were partly or wholly outside its control; or the operator is a small or new operator in the process of building and strengthening its compliance program, or similar reasons.** Describe:

GOOD FAITH

This civil penalty assessment consideration is based on the reasonableness of an operator's understanding of the cited regulatory requirement

Select one	☐	GOOD FAITH exists if the operator's interpretation of the requirement was reasonable and the operator had a credible belief that its approach to achieving compliance was faithful to its duty to meet the regulatory obligation. Describe:
	☐	GOOD FAITH does not exist if the operator's interpretation of the requirement was not reasonable, the operator failed to follow publicly available guidance, or the operator did not act in accordance with its duty to meet the regulatory obligation. Describe:

Additional Comments applicable to civil penalty (Optional)

(including other matters as justice may require and economic benefit gained from noncompliance)

	Describe:

Section C4 – Proposed Action

Select one	☐ X	**Civil penalty** **Compliance order**	☐ ☐	**Civil penalty and compliance order** ***Other-describe:**

*The enforcement procedures only require use of the Violation Report for civil penalty or compliance order items; however individual regions may require the use of the Violation Report for other enforcement actions.

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VIOLATION NUMBER 6

Section C1 – Description of Violation

Identify the regulation violated with the part, section, and most specific paragraph of Title 49. Enter only one regulation:

§195.428 Overpressure safety devices and overfill protection systems.

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

Is this a violation of a condition in a Special Permit (Waiver)?

X No ☐ **Yes - identify permit and describe violation:** Click here to enter

Describe the operator's conduct that violated the regulation:

In the North System, ONEOK did not inspect their over-pressure protection device at Winterset stations for proper set point and proper operation.

At the Winterset station, the over-pressure protection is provided by a pressure switch set at 2250 psig to protect the MOP of 2160 psig. There is also a "soft" backup where programmable logic control will shut the pumps down in the event that the pressure switch fails to activate. In May of 2008, a Management of Change (MOC 08-19497) was issued to lower the set point of the Winterset "soft" shutdown to 1930 psig, due to lowering the maximum operating pressure to 1950 psig because of some anomalies found. This was now considered the primary over-pressure protection for this temporary reduction. The hard switch shutdowns were left at 2250 psig and were considered the secondary over pressure protection device. From May 2008, until the PHMSA inspection in August 2011, the only record for checking this new shut down set point was the semiannual inspection of the transmitter. However, the records only showed that the transmitter was spanned and checked for calibration and the set point check was not done. Also, the actual check for the device shutting down the pumps at the set point through the SCADA system was not done.

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Describe the evidence:

1) The MOCs – Exhibit D
2) The 2008-2011 inspection of the transmitters used for the "soft" shut-down. Note: the transmitters were checked more than semi annually – Exhibit F
3) Explanation to make transmitter the primary over-pressure protection. – Exhibit E

Person(s) interviewed (include each person's name, title, and an explanation of why this person's knowledge is important in establishing the violation):

Molly Atkins – Compliance Manager for ONEOK

Jon Sauer – Operations Supervisor for the North System

Comments of person(s) interviewed regarding the violation (include names of any witnesses to the conversation):

Ms. Atkins agreed that the set points for a primary over pressure protection device should be checked to see if it operated at the set point.

NATURE

Check and describe the nature of the violation in terms of: records (identify the missing or incomplete records or the records that were reviewed); performance of activities (specifically the conduct of activities such as inspections, tests, preparing procedures, not following procedures, maintenance, meetings, notifications, reports); or equipment/facilities (such as safety equipment not installed, missing, defective or inoperative);

[ ] **RECORDS:** Describe:
X **ACTIVITIES:** Describe: Did not lower the set point, as this station was missed in the MOC. Also, the records did not reflect the set point at which the device operated.
[ ] **EQUIPMENT/FACILITES:** Describe: click here to enter

CIRCUMSTANCES

Describe who discovered the violation (operator, PHMSA, public):

[ ] **Operator:** click here to enter
XPHMSA: This was identified during the inspection of the units.
[ ] **Public:** click here to enter

Date the non compliance started: June 2008

Duration of the violation in days: Approximately 1156 days.

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GRAVITY

Gravity relates to the seriousness of the probable violation, and includes consideration of whether it posed a significant threat to public safety and protection of the environment and where this threat occurred.

Enter the number of instances of the violation:
4

Non-IM Violation Only	1		**Pipeline integrity or safe operation was significantly compromised in a populated area, an HCA, an HCA "could affect" segment, road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
	2	X	**Pipeline integrity or safe operation was potentially compromised in a populated area, an HCA, an HCA "could affect" segment, a road or railroad crossing, a plant/station/storage field/tankage, or a similar area;**
Select only one	3		**Pipeline integrity or safe operation significantly compromised in other areas;**
	4		**Pipeline integrity or safe operation potentially compromised in others areas;**
	5		**Pipeline integrity or safe operation minimally affected;**
	6		**The non-compliance was a causal factor in an accident/incident;**
			The non-compliance contributed to the cause of an accident/incident or increasing the severity of the consequences of an accident/incident;

For any of the items selected above describe the potential impact, or in the event of an accident/incident the actual impact, of this violation on <u>public safety, operator safety, and/or the environment (including animals and wildlife.)</u>

<u>For Items 6 and 7 provide further information to support the selection regarding the causal factor or the contributing cause or increasing the severity of the accident/incident.</u>

Checking the set points of the over pressure protection equipment is essential to ensuring the integrity of the line. The line from Winterset to Des Moines is pretty rural for the most part, but does cross several public highways and HCAs. Over-pressuring the line could result in harm to the public and result in significant damage to property.

IM Violation only

Enter the Area Finding & Risk Category data:

- **Area Finding:** click here to enter
- **Risk Category (A-E):** click here to enter
- **Miles of HCA:** click here to enter

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Section C2 – Consequences of an Accident/Incident

Select all that apply	X	**There was no accident/incident (continue to Section C3)**
	[ ]	**The event was reportable (§ 191.3 or § 195.50) regardless of whether it was reported by the operator.**
	[ ]	**One or more persons were evacuated. How many?:** click here to enter
	[ ]	**Amount of product spilled.** click here to enter bbl or gal
	[ ]	**Was product spilled outside a tank dike?** click here to enter bbl or gal
	[ ]	**Product reached a stream, river, or other body of water.**
	[ ]	**One or more persons were injured and required hospitalization. How many?:** click here to enter
	[ ]	**One or more fatalities. How many?:** click here to enter
	[ ]	**Other:** Describe: click here to enter

Section C3 – Additional Considerations

	[X]	**A civil penalty is not proposed for this violation (continue to Section C4).**

CULPABILITY

This civil penalty assessment consideration is based on how culpable - or blameworthy – the operator is for the non-compliance.
Culpability does not consider actions taken by the Operator after PHMSA has discovered the noncompliance.

Select one	X	**The operator failed to take any action or made a minimal attempt to comply with a regulatory requirement that was clearly applicable.** Describe: The operator missed resetting the set point properly at this station.
	[ ]	**The operator was cognizant of the regulatory requirement and took some steps to address the issue, but did not achieve compliance.** Describe: click here to enter
	[ ]	**Tbe operator was cognizant of the regulatory requirement and took significant steps to address the issue, but had some degree of justification for not taking all practicable steps to achieve compliance at its facility.**

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		Describe: click here to enter
	☐	**The operator was diligent in taking all practicable steps to comply but failed to achieve full compliance for reasons such as unforeseeable events/conditions that were partly or wholly outside its control; or the operator is a small or new operator in the process of building and strengthening its compliance program, or similar reasons.** Describe: click here to enter

GOOD FAITH

This civil penalty assessment consideration is based on the reasonableness of an operator's understanding of the cited regulatory requirement

Select one	☐	GOOD FAITH exists if the operator's interpretation of the requirement was reasonable and the operator had a credible belief that its approach to achieving compliance was faithful to its duty to meet the regulatory obligation. Describe: click here to enter
	X	GOOD FAITH does not exist if the operator's interpretation of the requirement was not reasonable, the operator failed to follow publicly available guidance, or the operator did not act in accordance with its duty to meet the regulatory obligation. Describe: The operator understood the requirement but failed to take the necessary steps to comply.

Additional Comments applicable to civil penalty (Optional)

(including other matters as justice may require and economic benefit gained from noncompliance)

	Describe: click here to enter

Section C4 – Proposed Action

Select one	X	**Civil penalty**	☐	**Civil penalty and compliance order**
	☐	**Compliance order**	☐	***Other-describe:** click here to enter*

*The enforcement procedures only require use of the Violation Report for civil penalty or compliance order items; however individual regions may require the use of the Violation Report for other enforcement actions.

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PART D HISTORY of PRIOR OFFENSES
(complete this section only if at least one of the violations in this case has a proposed civil penalty)) *Cut and paste the information from SMART reports into this section*

(Prior offenses for the 5 year period prior to the estimated date of this Violation Report's Notice letter

Date of Final Order	CPF #	What type of enforcement action(s) (CO, CP) are in the Final Order ?	Number of offenses in Final Order	Identify the regulation(s) violated (Part, Section, and specific Paragraph)
8/6/2010	3-2009-5019	CO	1	195.412(a)

Press TAB in the cell above to add rows

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Inspector's signature & organization **Date:**

Hans Shiel — 6/15/2012

CR-PHMSA

PHMSA Region Director's signature **Date:**

David Barrett — 6/15/2012

(Rev. 5/2011)

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Evidence Exhibit A			
Name of Operator: [redacted]			
Violation number(s) supported by the evidence	**Evidence (attached)**	**Evidence provided by:**	
		Name of person	**Name of Company (or other organization) this person represents**
N/A	Map – North System	PHMSA	PHMSA
N/A	Map – Medford	Neal Jones	ONEOK
N/A	Map – El Dorado Unit	Neal Jones	ONEOK

Press TAB in above cell for more rows

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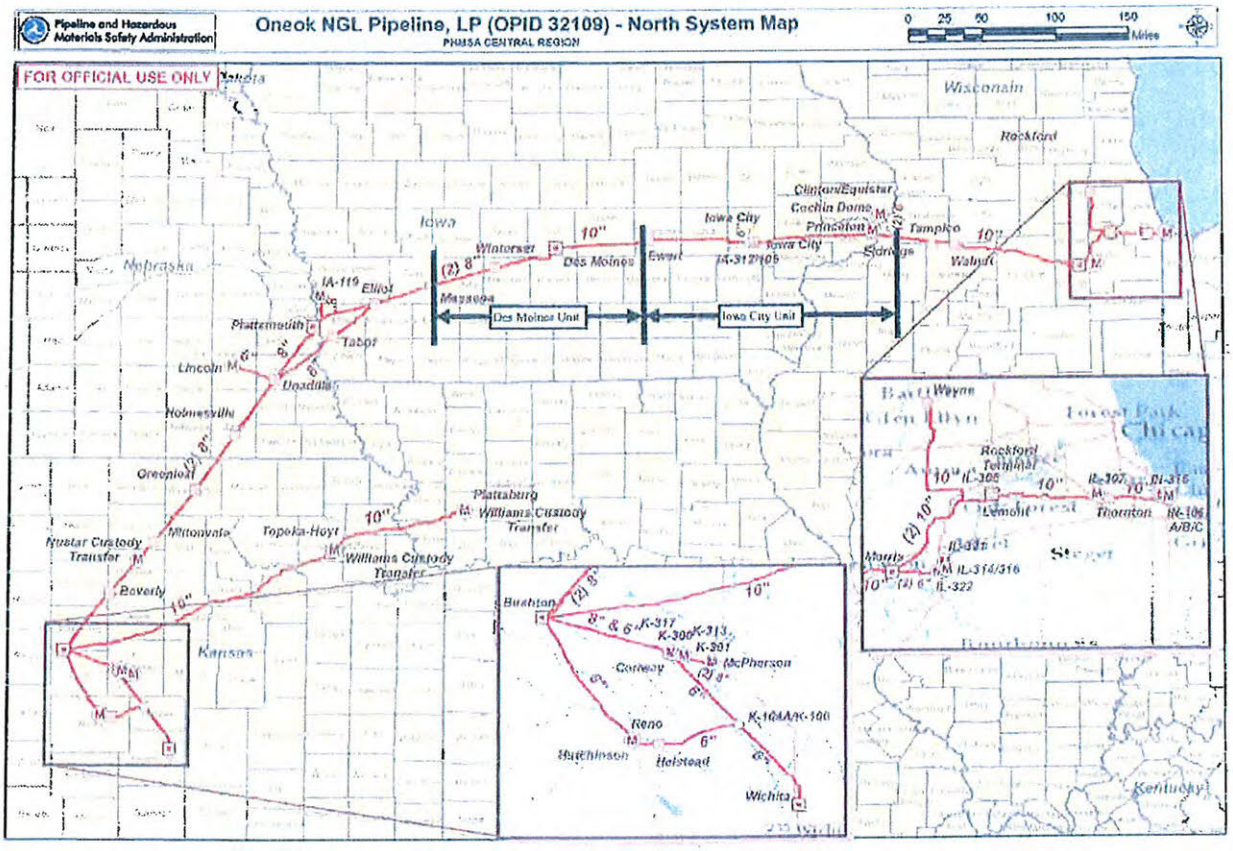

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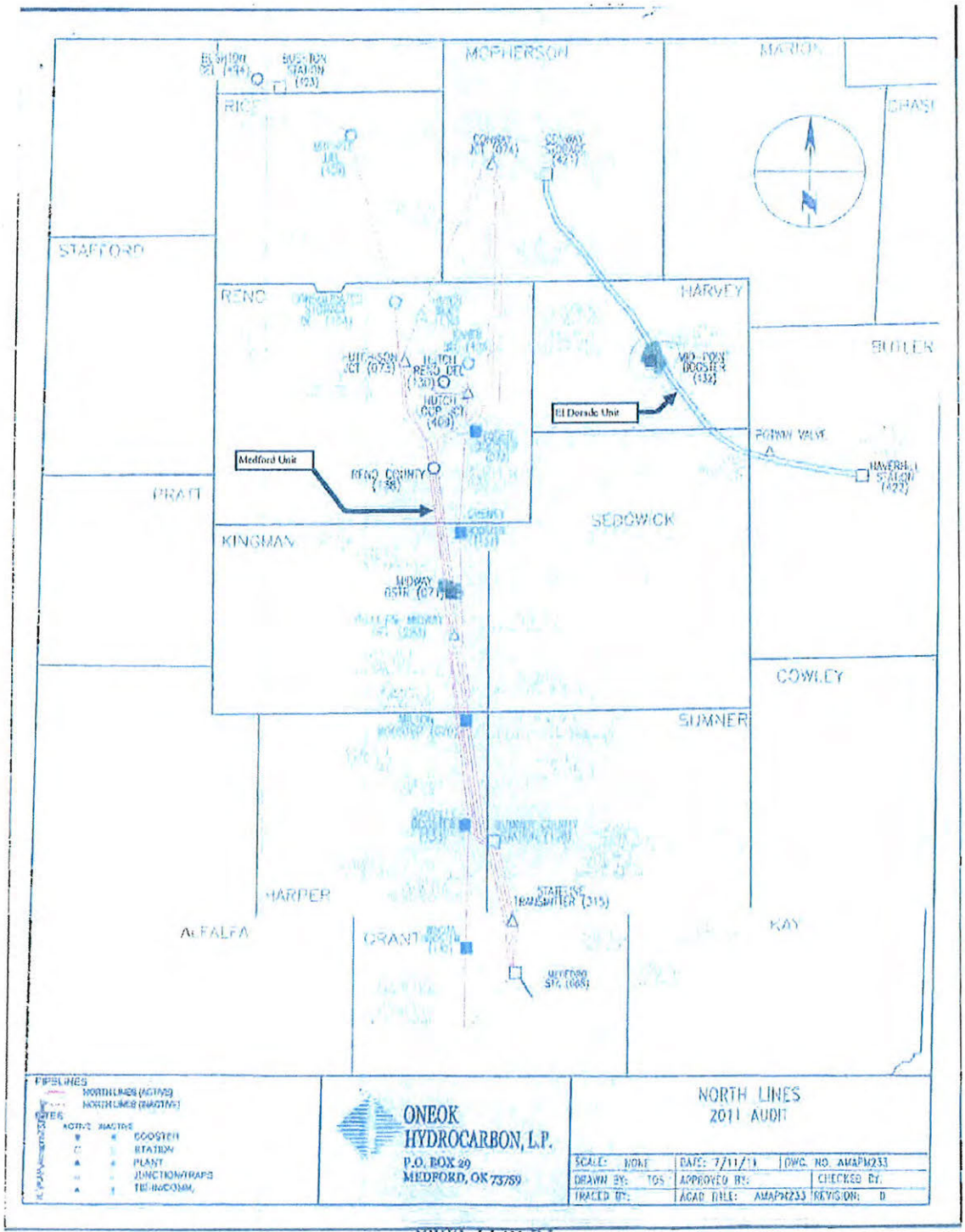

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Evidence Exhibit B

Name of Operator: ONEOK NGL Pipeline L.P.

Violation number(s) supported by the evidence	Evidence (attached)	Evidence provided by:	
		Name of person	Name of Company (or other organization) this person represents
4	ClockSpring's Crack Repair recommendations	N/A – From Internet on 6/14/2012	
4	ASME B31.4 Section 451.6	FedStar	click here
4	PHMSA/PRCI P/L Repair Manual		

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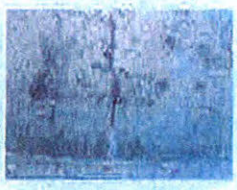
Clock Spring's Crack Repair Literature

Clock Spring®

Cracks

Cracks have been repaired with Clock Spring sleeves. A prudent pipeline integrity professional may need to understand the metallurgy, fatigue issues, and cyclical environment associated with the specific pipe segment.



Download PDF report:

- Repair Cracks, Gouges, Etc.

Clock Spring® sleeves have also been extensively tested as a crack arrestor system.

Watch this video from our channel

Search ClockSpring.com

Repair Types

- Bend
- Complex Geometry
- Cracks
- Dents
- Dent Repair
- External Corrosion
- Flanges
- Girth Welds
- Hard Spots
- Internal Corrosion
- Laminations
- Leaks
- Manufacturing Defects
- Mechanical Damage
- Stress Corrosion Cracking (SCC)
- T Repairs
- Underwater
- Vessels

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CLOCK SPRING®

Application Note
Repair of Cracks, Gouges, Grooves and Arc Burns

The Canadian pipeline code, Z662 and the US pipeline code ASME B31.4 require that cracks, gouges, grooves and arc burns be repaired. Both codes allow these defects to be repaired by grinding them out of the pipe. Both codes provide equations to assess the grind depth and length to determine if the grind can remain in the pipe at the design pressure of the pipeline. If the grind depth and length are greater than allowed by the code then the grind defect is assessed the same way one would assess external corrosion. The repair alternatives allowed for external corrosion are allowed for the repair of the grind defect. Clock Spring® is an approved repair alternative for these defects.

Pipeline Operators in the United States and Canada have used the provisions of the respective codes to repair cracks (including stress corrosion cracking), gouges, grooves and arc burns with Clock Spring® composite repair sleeves. It is a common repair alternative for these defects and is approved by code.

Following is a summary of the applicable codes.

Z662 Canadian Standards Association "Oil and Gas Pipeline Systems"

"10.8.5.2 Grinding Repairs

10.8.5.2.1
Grinding in accordance with the requirements of Clauses 10.8.5.2.2 to 10.8.5.2.5 inclusive shall be permissible as a permanent repair of steel pipe.

10.8.5.2.2
Grinding repair procedures shall include
(a) for arc burns, confirming complete removal of the altered metallurgical structure by etching the ground area with a 10% solution of ammonium persulphate or a 5% solution of nital;

Note: The effectiveness of the etchant should be periodically tested by obtaining a positive indication from an arc burn, since lower metal temperatures and the age of the etchant may adversely affect the results obtained.

(b) for gouges, grooves and cracks, confirming complete removal of the defect by using dye penetrant or magnetic particle inspection; and

1

(c) measuring the wall thickness in the ground area using mechanical or ultrasonic techniques, or both, to determine that the metal loss is in accordance with the requirements of Clause 10.8.5.2.3

10.8.5.2.3
The following shall apply to ground repairs:
(a) Areas to be repaired by grinding shall be thoroughly cleaned before grinding is initiated. Grinding shall be performed to produce a smooth transition between the surface contour of the repaired area and the surrounding pipe surface.

(b) External metal loss resulting from grinding to a depth of 40% of the nominal wall thickness shall be permitted, provided that the longitudinal length of the ground area does not exceed L, as determined by the following equation:

$$L = 1.12 B_1 \sqrt{Dt}$$

where
L = maximum allowable longitudinal length of the metal loss area resulting from a grinding repair, mm
D = nominal outside diameter of the pipe, mm
t = nominal wall thickness of pipe, mm
B_1 = a value equal to 4.0 for maximum depth up to and including 13% of the nominal wall thickness
a value determined from the following equation for maximum depths greater than 13% up to and including 40% of the nominal wall thickness:

$$B_1 = \sqrt{\left(\frac{c/t}{1.1\,c/t - 0.11}\right)^2 - 1}$$

where
c = maximum depth of the ground area, mm

Note: The relationship between B_1 and c/t is shown in Figure 10.2.

10.8.5.2.4
Pipe with areas of external metal loss that do not exceed the length limits specified in Clause 10.8.5.2.3 shall be permitted for continued service.

10.8.5.2.5
Areas of external metal loss resulting from grinding beyond the depth or length limits specified in Clause 10.8.5.2.3 shall be considered to be grind defects. Pipe containing such defects shall be repaired using one or more of the acceptable repair methods given in Table 10.1"

2

From Table 10.1
Grind Defects (See Clause 10.8.5.2.5.) Fiberglass Reinforcement Sleeves are approved if the defect is less than 80% of nominal wall in depth.

Composite sleeves are approved for repairing cracks, gouges, grooves or arc burns in the body of the pipe if the crack, gouge, groove or arc burn is removed by grinding and assessed as a grind repair (Table 10.1).

ASME B31.4 Pipeline Transportation Systems for Liquid Hydrocarbons and Other Liquids

ASME B31.4 is similar to Z662.
"451.6.2 Disposition of Defects
(a) Limits and Dispositions of Imperfections
(1) Gouges and grooves shall be removed or repaired in accordance with para. 451.6.2(b).
(2) ...
(3) All arc burns shall be removed or repaired.
(4) All cracks shall be removed or repaired.
(5) ...
(6) ...
(7) ...
(8) Areas where grinding has reduced the remaining wall thickness to less than the design thickness calculated in accordance with para. 404.1.2 decreased by an amount equal to the manufacturing tolerance applicable to the pipe or component, may be analyzed the same as localized corrosion pitting [see para. 451.6.2(a)(7)] to determine if ground areas need to be replaced, repaired, or the operating pressure reduced (see para. 451.7). ASME B31G may be used for guidance."

Paragraph 451.6.2(a)(7) gives the equations to assess the depth and length of the corrosion or grind to determine if it is acceptable or requires further repair. These equations are very similar to the equations in Z662 discussed previously.

"451.6.2(a)(7) Localized Corrosion Pitting (or ground metal loss)
Pipe shall be repaired, replaced, or operated at a reduced pressure (see para. 451.7) if localized corrosion pitting (or grind metal loss) has reduced the wall thickness to less than the design thickness calculated in accordance with para. 404.1.2, decreased by an amount equal to the manufacturing tolerance applicable to the pipe or component. This applies if the length of the pitted area (or grind metal loss) is greater than permitted by the equations shown below. The following method applies only when the depth of the corrosion pit is less than 80% of the nominal wall thickness of the pipe. This method shall not be used to evaluate corrosion concentrated in electric resistance welded seams (ERW), electric induction welded seams or electric flash-welded seams, nor shall it be used to evaluate corrosion-caused metal loss which is circumferentially oriented

3

along or in a girth weld or its heat-affected zone. The method may be used, however, to evaluate the longitudinal profile of corrosion-caused metal loss which crosses a girth weld or impinges on a submerged arc welded seam. The corroded area must be clean to bare metal. Care shall be taken in cleaning corroded areas of a pressurized pipeline when the degree of corrosion is significant."

$$L = 1.12B\sqrt{Dt}$$

Where

$$B = \sqrt{\left(\frac{0.893}{1.1\,\frac{d}{t_n} - 0.15}\right)^2 - 1}$$

L = maximum allowable longitudinal extent of the corroded area as shown in Figure 451.6.2(a)(7), in mm.

B = a value not to exceed 4.0 which may be determined from the above equation or Fig. 451.6.2(a)(7)

D = nominal outside diameter of the pipe, in mm

t_n = nominal wall thickness of the pipe, in mm

d = maximum depth of corroded area, in mm"

451.6.2(b) Allowable Pipeline Repairs,

451.6.2(b)(3) If not practical to take the pipeline out of service, defects may be removed by grinding or hot tapping. Sharp imperfections may be rendered blunt by grinding, but the absence of a sharp imperfection must be verified by visual and nondestructive examination. When grinding, the ground area shall be smoothly contoured and be in accordance with para. 451.6.2(a)(8)

451.6.2(b)(7) If not practical to take the pipeline out of service, nonleaking corroded areas may be repaired by installation of a mechanically applied composite material wrap used to reinforce the pipeline in accordance with para. 451.6.2(c)(14)

451.6.2(c) Repair Methods

451.6.2(c)(14) Mechanically applied composite material wrap may be used to reinforce the pipeline provided that design and installation methods are proven for the intended service prior to application. The user is cautioned that a qualified written procedure performed by trained personnel is a requirement and records shall be retained in accordance with para. 455.

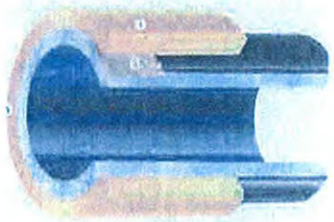
Note that the two codes (Z662, B31.4) allow assessment of the grind defect as metal loss. B31.4 uses the term 0.15 in the denominator of the "B" equation while Z662 uses the term 0.11 when assessing grind defects.

4

Both codes use the 0.15 term when assessing corrosion defects. In Z662, the value of "B" is slightly different for assessing corrosion than for grind defects. For corrosion defects, the limit of B=4 applies to defects with a depth up to and including 17.5% of nominal wall as opposed to 13% for grind defects.

Code of Federal Regulations 49 CFR Parts 192 and 195

Federal regulations governing gas and liquid pipelines in the United States changed form prescriptive language to performance based language. Federal regulation allow an operator flexibility in the method of repair but stipulate that whatever method is used must be appropriate for the defect being repaired and that the repair method must be assessed using proper engineering testing and analyses. Federal regulations also incorporate the ASME B31 codes by reference. In the US, operators will follow the guidelines outlined in the previous discussion.



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Excerpts from ASME B31.4 Section 451.6

(09)

Table 451.6.2.9-1 Acceptable Pipeline Repair Methods (Nonindented, Nonwrinkled, and Nonbuckled Pipe)

	Repair Methods								
Type of Defect	1 Replace as Cylinder	2 Removal by Grinding	3 Deposition of Weld Metal	4a Reinforcing Full Encirclement Sleeve (Type A)	4b Pressure Containing Full Encirclement Sleeve (Type B)	5 Composite Sleeve	6 Mechanical Bolt-On Clamps	7 Hot Tap	8 Fittings
External corrosion ≤ 80% t (excluding grooving, selective, or preferential corrosion of ERW, EFW seams)	Yes [Note (1)]	No	Limited [Note (2)]	Limited [Note (5)]	Yes	Yes [Note (5)]	Yes	Limited [Note (3)]	Limited [Note (8)]
External corrosion > 80% t	Yes [Note (1)]	No	No	No	Yes	No	Yes	Limited [Note (3)]	Limited [Note (8)]
Internal corrosion ≤ 80% t	Yes [Note (1)]	No	No	Limited [Note (4)]	Yes	Limited [Note (4)]	Yes	Limited [Note (3)]	No
Internal corrosion > 80% t	Yes [Note (1)]	No	No	No	Yes	No	Yes	Limited [Note (3)]	No
Grooving, selective or preferential corrosion of ERW, EFW seam	Yes [Note (1)]	No	No	No	Yes	No	Yes	Limited [Note (3)]	No
Gouge, groove, or arc burn	Yes [Note (1)]	Limited [Note (7)]	No	Limited [Notes (5),(6)]	Yes	Limited [Notes (5),(6)]	Yes	Limited [Note (3)]	Limited [Notes (6),(8)]
Crack	Yes [Note (1)]	Limited [Note (7)]	No	Limited [Note (7)]	Yes	Limited [Note (7)]	Yes	Limited [Note (3)]	No
Hard spot	Yes [Note (1)]	No	No	Limited [Note (5)]	Yes	No	Yes	Limited [Note (3)]	No
Blisters	Yes [Note (1)]	No	No	No	Yes	No	Yes	Limited [Note (3)]	No
Defective girth weld	Yes [Note (1)]	No	Limited [Note (2)]	No	Yes	No	Yes	No	No
Lamination	Yes [Note (1)]	No	No	No	Yes	No	Yes	No	No

ASME B31.4-2009

(09)

Table 451.6.2.9-1 Acceptable Pipeline Repair Methods (Cont'd)
(Nonindented, Nonwrinkled, and Nonbuckled Pipe)

NOTES:

(1) Replacement pipe should have a minimum length of one-half of its diameter or 3 in. (76.2 mm), whichever is greater, and shall meet or exceed the same design requirements as those of the carrier pipe.

(2) The welding-procedure specification shall define minimum remaining wall thickness in the area to be repaired and maximum level of internal pressure during repair. Low-hydrogen welding process must be used.

(3) Defect must be contained entirely within the area of the largest possible coupon of material that can be removed through the hot-tap fitting.

(4) May be used only if internal corrosion is successfully mitigated.

(5) Tight-fitting sleeve at area of defect must be assured or a hardenable filler such as epoxy or polyester resin shall be used to fill the void or annular space between the pipe and the repair sleeve.

(6) May be used only if gouge, groove, arc burn, or crack is entirely removed and removal is verified by visual and magnetic-particle or dye-penetrant inspection (plus etchant in the case of arc burns).

(7) Gouge, groove, arc burn, or crack must be entirely removed without penetrating more than 40% of the wall thickness. The allowable length of metal removal is to be determined by para. 451.6.2.2(a). Removal of gouge, groove, arc burn, or crack must be verified by visual and magnetic-particle or dye-penetrant inspection (plus etchant in the case of arc burns).

(8) The defect shall be contained entirely within the fitting and the fitting size shall not exceed NPS 1.

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pipe diameter apart if joined by a welded bridging sleeve or made continuous by butt-welding them together. When installed at a nonleaking defect, a Type B sleeve may be installed in a manner that reduces the hoop stress in the carrier pipe. Methods for accomplishing this include lowering the pressure before the sleeve is installed, applying external mechanical force, or preheating the sleeve to facilitate a "shrink-fit."

(e) Composite Sleeve. Nonleaking corroded areas and certain other types of defects may be repaired by the installation of a composite sleeve provided that design and installation methods are proven for the intended service prior to application. A qualified written procedure performed by trained personnel is required and records shall be retained in accordance with section 455. A composite sleeve must have been tested to determine if it is compatible with cathodic protection and the product in the carrier pipe. The composite sleeve must also retain its essential properties in a moist environment at temperatures within the operational temperature range of the pipe. The load carrying capacity of the remaining pipe and the composite sleeve shall be at a minimum equal to the nominal load carrying capacity of the pipe. Composite sleeves should be marked and/or documented as to location so that it will be evident that a repair has been made at the specific location.

Composite sleeves shall not be used to repair leaks, metal loss with a depth greater than 80% of the nominal wall thickness, cracks, or circumferentially oriented defects.

Composite sleeves may be used to repair defects that have been removed by grinding.

(f) Mechanical Bolt-on Clamp. Repairs may be made to both leaking and nonleaking defects by the installation of a mechanically applied clamp. A mechanical clamp shall have a design pressure of not less than that of the pipe being repaired. Mechanical clamps shall not be used to repair circumferentially oriented defects unless designed to withstand the axial load. A mechanical clamp may be fully welded, both circumferentially and longitudinally and seal welded at the bolts. The clamp ends shall extend past the edges of the defect for a minimum of 2 in. (50 mm). Mechanically applied full encirclement repair fittings shall meet the design requirements of para. 401.2.

(g) Hot Tapping. Defects may be removed by hot tapping. When hot tapping is used as a means of repair, the portion of piping containing the defect shall be completely removed. Hot tap fittings larger than 2 in. (50 mm) that have integral material sufficient to satisfy the area replacement requirements of para. 404.3.1(d) may not have adequate resistance to external forces and moments if used without full-encirclement reinforcement.

(h) Fittings. Minor leaks resulting from external corrosion and small externally corroded areas may be repaired by the installation of a welded fitting. Welded fittings used to cover pipeline defects shall not exceed NPS 3 and shall have a design pressure of not less than the pipe being repaired. Pipe containing arc burns, grooves, and gouges may be repaired with a welded fitting if the arc burn or stress riser associated with the gouge or groove is removed by grinding. No crack shall be repaired by this method.

(i) Patches and Half Soles. Neither patches nor half soles shall be installed on pipelines.

451.6.2.10 Temporary Repairs. Temporary repairs may be necessitated for operating purposes. Such temporary repairs shall be made in a safe manner and in accordance with sound engineering principles. Temporary repairs shall be made permanent or replaced in a permanent manner as soon as practical in accordance with this Code.

451.6.3 Testing Repairs to Pipelines Operating at a Hoop Stress of More Than 20% of the Specified Minimum Yield Strength of the Pipe. When a scheduled repair to a pipeline is made by cutting out a section of the pipe as a cylinder and replacing it with another section of pipe, the replacement section of pipe shall be subjected to a pressure test. The replacement section of pipe shall be tested as required for a new pipeline in accordance with para. 437.4.1. The tests may be made on the pipe prior to installation provided radiographic or other acceptable nondestructive tests (visual inspection excepted) are made on all tie-in butt welds after installation.

451.8 Valve Maintenance

Pipeline block valves shall be inspected, serviced where necessary, and partially operated at least once each year to assure proper operating conditions.

451.9 Railroads and Highways Crossing Existing Pipelines

(a) When an existing pipeline is to be crossed by a new road or railroad, the operating company shall analyze the pipeline in the area to be crossed in terms of the new anticipated external loads. If the sum of the circumferential stresses caused by internal pressure and newly imposed external loads (including both live and dead loads) exceeds 0.90 SMYS (specified minimum yield strength), the operating company shall install mechanical reinforcement, structural protection, or suitable pipe to reduce the stress to 0.90 SMYS or less, or redistribute the external loads acting on the pipeline. API RP 1102 provides methods that may be used to determine the total stress caused by internal pressure and external loads. API RP 1102 also provides methods to check cyclic stress components for fatigue. (09)

(b) Installation of uncased carrier pipe is preferred. Adjustments of existing pipelines in service at a proposed railroad or highway crossing shall conform to

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Excerpt from the PHMSA PRCI Repair Manual

Table 1. Summary of repair options for various types of defects.

Type of Defect (a)	Grinding	Type A Sleeve	Compression Sleeve	Type B Sleeve	Composite Sleeve	Weld Deposition	Bolt-On Clamp and Sleeve	Bolt or Screw Leak Clamp	Welded Patch or Half Sole	Hot Tapping (b)
1. Leak (from any cause) of defect > 0.8t	No	No	No	Permanent	No	No	Permanent	Temporary (c)	No	Permanent
2. External Corrosion										
2a. Shallow to Moderate Pitting < 0.8t	No	Permanent	Permanent	Permanent	Permanent	Permanent	Permanent	No	Temporary	Permanent
2b. Deep Pitting > 0.8t	No	No	No	Permanent	No	No	Permanent	No	No	Permanent
2c. Selective Seam Attack	No	No	Permanent	Permanent (d)	No	No	Permanent (d)	No	Temporary	No
3. Internal Defect or Corrosion	No	Permanent (e)	Permanent (e)	Permanent	Permanent (e)	No	Permanent (e)	No	No	No
4. Gouge or Other Metal Loss on Pipe Body	Permanent (f)	Permanent (g)	Permanent (g)	Permanent (h)	Permanent (g)	Permanent (g)	Permanent (h)	No	No	Permanent
5. Arc Burn, Inclusion, or Lamination	Permanent (f)	Permanent	Permanent	Permanent	Permanent (g)	Permanent (g)	Permanent	No	No	Permanent
6. Hard Spot	No	Permanent	Permanent	Permanent	No	No	Permanent	No	No	Permanent
7. Dent										
7a. Smooth Dent	No	Permanent (i)	Permanent (i)	Permanent	Permanent (i)	No	Permanent	No	No	No
7b. Dent With Stress Concentrator on Seam Weld or Pipe Body	Permanent (k)	Permanent (g) (i) (j)	Permanent (g) (i) (j)	Permanent	Permanent (g) (i) (j)	No	Permanent	No	No	Permanent
7c. Dent With Stress Concentrator on Girth Weld	Permanent (k)	No	Permanent (g) (i) (j)	Permanent	No	No	Permanent (l)	No	No	No
8. Crack or Cracking										
8a. Shallow Crack < 0.4t	Permanent (f)	Permanent (g)	Permanent	Permanent (d)	Permanent (g)	Permanent (g)	Permanent (d)	No	Temporary	Permanent
8b. Deep Crack > 0.4t and not more than 0.8t	No	Permanent (g)	Permanent	Permanent (d)	Permanent (g)	Permanent (g)	Permanent (d)	No	No	Permanent
9. Seam Weld Defect										
9a. Volumetric Defect	Permanent (f)	Permanent (g)	Permanent	Permanent	Permanent (g)	No	Permanent	No	No	Permanent
9b. Linear Defect	Permanent (f)	Permanent (g)	Permanent	Permanent (g)	Permanent (g)	No	Permanent (d)	No	No	Permanent
9c. Defect in or Near an ERW Seam	No	No	Permanent	Permanent (g)	No	No	Permanent (d)	No	No	No
10. Girth Weld Defect	Permanent (f)	No	No	Permanent	No	Permanent (m)	Permanent (l)	No	No	No
11. Wrinkle Bend, Buckle, or Coupling	No	No	No	Permanent (n)	No	No	No	No	No	No
12. Blisters HIC	No	Permanent	Permanent	Permanent	No	No	Permanent	No	No	No

(a) Replacement of the affected pipeline section can be used to repair any defect
(b) Hot tapping can be applied only to defects that are small enough to be removed by the hot tap
(c) A bolt screw leak clamp can be applied only to small leaks that can be sealed by such a clamp
(d) Make sure defect length is [illegible] or pressurize sleeve
(e) Make sure that internal defect or corrosion does not continue to grow beyond acceptable limits
(f) Grinding alone up to 0.4t depth may be used provided that defect and defective metal are removed and the local wall loss is acceptable
(g) Repair may be used for defects less than 0.8t deep, provided that damaged material has been removed by grinding and removal has been verified by inspection
(h) It is recommended that the damaged material be removed with removal verified by inspection or that the carrier pipe be tapped for the repair
(i) Use of filler material in dent and engineering assessment of fatigue are recommended
(j) Code and regulatory restrictions on maximum dent size should be followed
(k) Code and regulatory limits on amount of permitted grinding should be followed
(l) The split sleeve clamp should be the type that transfers axial loads and provides full structural integrity
(m) Defect should be removed by grinding and area inspected before and after welding
(n) Sleeve should be designed and fabricated to special "pumpkin" configuration

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Evidence Exhibit C			
Name of Operator: ONEOK NGL Pipeline L.P.			
Violation number(s) supported by the evidence	**Evidence (attached)**	**Evidence provided by:**	
		Name of person	**Name of Company (or other organization) this person represents**
3	Procedures for 195.402(c)(13)	M. Atkins	ONEOK
click here	click here	click here	click here

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ONEOK PARTNERS

3.1 General Procedures

Documentation

- *Inspection & Investigation (I&I) Report*
- *ROW Patrol Report Pipeline Defect Evaluation and Repair Form*
- *Post-Accident Review Form*
- *MAXIMO® Job Plans*

Normal Operating Procedures Review 195.402(c)(13)

The normal operations section of the Company procedures is reviewed annually, with two objectives:

- To ensure all employees are familiar with established procedures.
- To critique the existing procedures.

Note: All inspections and tests required by **Subpart F** are maintained for a minimum of two years, or until the next inspection or test is performed, whichever is longer.

Suggested changes or improvements to the procedures discussed during the review shall be forwarded to the ONP Business Manager or designee to be considered for incorporation in the procedures.

The ONP Business Manager or designee shall be responsible for conducting a review of the work done by personnel, incident and near miss reports to determine the effectiveness of operating procedures at intervals not exceeding 15 months, but at least once each calendar year. Suggested changes or improvement to the procedures discussed during the review shall be forwarded to ONP Business Manager or his/her designee to be

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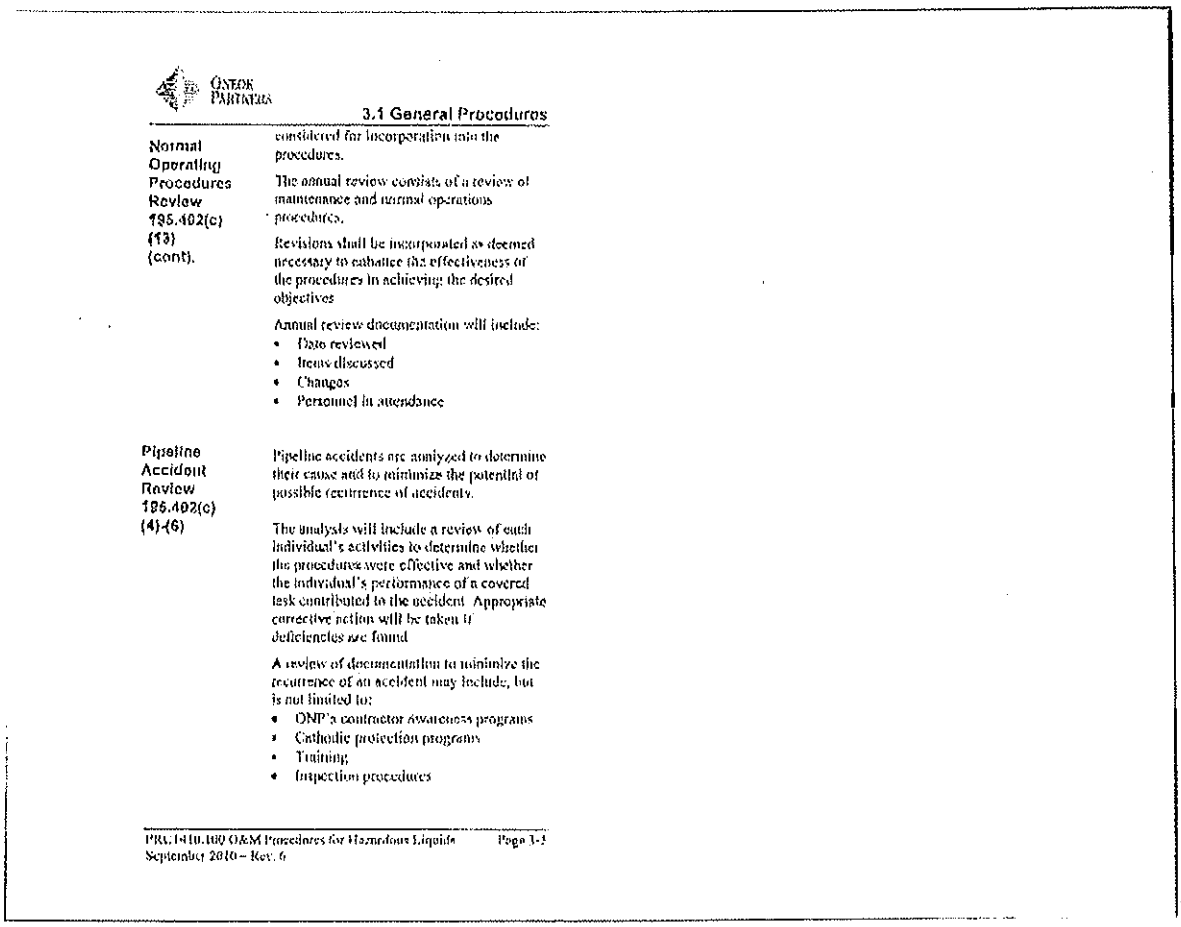

ONEOK PARTNERS

3.1 General Procedures

Normal Operating Procedures Review 195.402(c) (13) (cont).	considered for incorporation into the procedures. The annual review consists of a review of maintenance and normal operations procedures. Revisions shall be incorporated as deemed necessary to enhance the effectiveness of the procedures in achieving the desired objectives Annual review documentation will include: • Date reviewed • Items discussed • Changes • Personnel in attendance
Pipeline Accident Review 195.402(c) (4)-(6)	Pipeline accidents are analyzed to determine their cause and to minimize the potential of possible recurrence of accidents. The analysis will include a review of each individual's activities to determine whether the procedures were effective and whether the individual's performance of a covered task contributed to the accident. Appropriate corrective action will be taken if deficiencies are found. A review of documentation to minimize the recurrence of an accident may include, but is not limited to: • ONP's contractor awareness programs • Cathodic protection programs • Training; • Inspection procedures

PRC-1410.100 O&M Procedures for Hazardous Liquids Page 3-5
September 2010 – Rev. 6

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Evidence Exhibit D

Name of Operator: ONEOK NGL Pipeline L.P.

Violation number(s) supported by the evidence	Evidence (attached)	Evidence provided by:	
		Name of person	Name of Company (or other organization) this person represents
5	MOC dated May 23, 2008	M. Atkins	ONEOK
5	MOC dated June 13, 2008	M. Atkins	ONEOK

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ONEOK NGL PIPELINE, L.P.

Intercompany Memorandum

Date: 5-23-2008

To: MOC File

From: Jaret Pirtle

Subject: Affected Employee Awareness for North System PL 102- Des Moines to Massena 8" Temporary Pressure Reduction MOC 08-19497

Summary:
The North System PL102 pipeline segment from Des Moines to Massena is subject to a temporary pressure reduction until further field evaluations are completed of anomalies identified by the July 19, 2007 in-line inspection. The line may not be operated above 1950 psi until members of the MOC team for this project initiate the change.

Background:
The in-line inspection final report (received November 26, 2007) identified anomalies with predicted remaining strengths (LAPA R-STRENG) less than the 2160 psi MOP of the subject pipeline segment. The locations were prioritized and scheduled for field evaluation. As digs have been completed, the "actual" data has been correlated to the predicted data.

Because some anomalies with predicted remaining strengths less than the 2160 psi MOP will not be evaluated by the 180-day regulatory target (May 24, 2008), the line operating pressure must be reduced and maintained below the predicted remaining strength of the remaining anomalies until the correlation of data indicates that all anomalies with the potential to affect the MOP have been evaluated.

Change Description
Please be aware the following will be effective 5-23-2008 upon such time when ONEOK SCADA Admin advise that changes have been made in UCOS. 102 MOP on line segment from Massena pump station to Des Moines will be temporarily reduced to 1950# ufa

Changes made

Massena Suction Pressure	**HiHi (existing 2250#) changed to 1950#**
	Hi (existing 3000#) changed to 1930#
Massena Discharge Pressure	**HiHi (existing 2250#) changed to 1950#**
	Hi (existing 3000# changed to 1930#
Winterset Suction Pressure	**HiHi (existing 2250#) changed to 1950#**
	Hi (existing 3000#)changed to 1930#
Winterset Discharge Pressure	**HiHi (existing 2250#) changed to 1950#**
	Hi (existing 3000#)changed to 1930#

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Des Moines 105 pump DP — HiHi (existing 2250#) changed to 1950#
Hi (existing 3000#)changed to 1930#

Des Moines 102 Line Pressure HiHi (existing 2250#) changed to 1950#
Hi (existing 3000#) changed to 1930#

Name	Signature	Date
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
RUTH CARR	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
RANDY SWORDS	[illegible]	[illegible]
PAT HELENTHOUSE	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]

ONEOK NGL PIPELINE, L.P.

Intercompany Memorandum

Date: 6-6-2008

To: MOC File

From: Jaret Pirtle

Subject: Affected Employee Awareness for North System PL 102- Elliott to Tabor 8" Temporary Pressure Reduction MOC 08-20012

Summary:
The North System PL102 pipeline segment from Elliott to Tabor is subject to a temporary pressure reduction until further advised. The line may not be operated above 1704 psi.

Background:
5-31-08 release on the Bushton side of Elliott Station. Discharge psig at Elliott Station at time of release reached 2130 psig (mop 2160 psig), the line operating pressure must be reduced and maintained below 80% of 2130 psig or 1704 psig until further advised.

Change Description
Please be aware the following will be effective 6-6-2008 upon such time when ONEOK SCADA Admin advise that changes have been made in UCOS and ONS Field Technicians advise that changes have been made locally at Elliott and Tabor Stations. 102 MOP on line segment from Elliott pump station to Tabor pump station will be temporarily reduced from 2160# to 1704# ufa.

Changes made:

Elliott Discharge Pressure	HiHi set point	1704#
	Hi set point	1700#
	Discharge control	1694#
	Snap switch (field)	1789# or 105% of mop
Tabor Discharge Pressure	HiHi set point	1704#
	Hi set point	1700#
	Discharge control	1694#
	Snap switch (field)	1789# or 105% of mop

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Name	Signature	Date
Jon Sauer	JON SAUER	6/7/08
[illegible]	[illegible]	6-6-08
[illegible]	[illegible]	6-7-08
[illegible]	[illegible]	6-9-08
[illegible]	[illegible]	7-11-08
[illegible]	[illegible]	7-11-08
[illegible]	[illegible]	07/11/08
[illegible]	[illegible]	9-30-08
[illegible]	[illegible]	10-2-08
[illegible]	[illegible]	10-2-08
[illegible]	[illegible]	10-14-08
[illegible]	[illegible]	10/14/08

ONEOK NGL PIPELINE, L.P.

Intercompany Memorandum

Date: 6-13-2008

To: MOC File

From: Janet Pirtle

Subject: Affected Employee Awareness for North System PL 102- Des Moines to Bushton 8" Temporary Pressure Reduction MOC 08-20057

Summary:
The North System PL102 pipeline segment from Des Moines to Bushton (flow south) is subject to a pressure reduction until further advised. The line may not be operated above 1704 psi.

Change Description
Please be aware the following will be effective 6-13-2008 upon which time when ONEOK SCADA Admin advise that changes have been made in UCOS and ONS Field Technicians advise that changes have been made locally at Des Moines, Elliott and Holmesville Stations. 102 MOP on line segment from Des Moines to Bushton will be temporarily reduced from 2180# to 1704# until further advised.

This MOC includes change previously made on June 6, 2008 on the 102 Elliot to Tabor segment per MOC 08-20012 (pressure reduction of 1704#). This MOC supersedes changes previously made on May 23, 2008 on the 102 Des Moines to Mnarena segment per MOC 08-19497.

Changes made:

Des Moines Discharge Pressure:	Hi-Hi set point	1704#	
	Hi set point	1700#	
	Discharge control	1694#	
	Snap switch (field)	1769#	or 105% of MOP
Elliott Discharge Pressure: (Completed with MOC 08-20012)	Hi-Hi set point	1704#	
	Hi set point	1700#	
	Discharge control	1694#	
	Snap switch (field)	1769#	or 105% of MOP
Holmesville Discharge Pressure:	Hi-Hi set point	1704#	

PIPELINE SAFETY VIOLATION REPORT

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Evidence Exhibit E

Name of Operator: ONEOK NGL Pipelines L.P.

Violation number(s) supported by the evidence	Evidence (attached)	Evidence provided by:	
		Name of person	Name of Company (or other organization) this person represents
5,6	Explanation for making the pressure transmitter's primary from 11/23/2011 RFI response.	M. Atkins	ONEOK
click here	click here	click here	click here

Press TAB in above cell for more rows

Transmitter High Pressure Fault Shutdown

The pressure transmitters are calibrated at definite intervals along with local readout verification. This indirectly serves as our verification of the soft shutdowns as a soft shutdown is then simply a comparison of two numbers within the computer logic. Referring to page 2, the scale value from the pressure transmitter is read by the control unit and is compared to the HI-HI set point (these are outlined in red). If the scale value read is greater than the set point, the HI-HI fault logic latches setting off a chain of events. The only inherent delay would be the reaction times of the logic solve time within the controller which is a matter of milliseconds. On page 3 the fault status bit goes into the station device which then triggers a unit shutdown to both units. Either unit that is running will be shut down— on page 4 the unit shutdown bit goes into the station device where the two group manager shutdown tags for both units on the 102 pipeline at Winterset reside. The two shutdown tags go into (page 5 and 6) both group manager devices for either unit to initiate a sequenced (suction and discharge valve go closed, motors are shutdown) shut down for either unit that is running.

We made the pressure transmitters the primary pressure shutdown device in this case as it was thought to be a temporary reduction in operating pressure rather than to readjust our mechanical switches.

PIPELINE SAFETY VIOLATION REPORT

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Evidence Exhibit F

Name of Operator: ONEOK NGL Pipelines L.P.

Violation number(s) supported by the evidence	Evidence (attached)	Evidence provided by:	
		Name of person	Name of Company (or other organization) this person represents
6	Transmitter Inspection Records 2008-2011	M. Atkins	ONEOK
click here	click here	click here	click here

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ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L
Location: Wintersel
Year: 2008

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Wintersel 102 Suction	0 - # 2000	1 - 5 Volts DC	JOE	10/15/08	BG
Wintersel 102 Discharge	0 - # 3000	1 - 5 Volts DC	CALIBRATED @ AND SPAN	10/15/08	BG
Wintersel 102 Case	0 - # 3000	1 - 5 Volts DC	JOE	10/15/08	BG
			COMPLETED		

BOT-19 (1/89)

ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2009
Maximo WO#: 09-15185

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	✓ @ + Span - OK	2/27/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ @ + Span - OK	2/27/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ @ + Span - Adjust @ + Span OK	2/27/09	BG
			COMPLETED		

ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2009
Maximo WO#: 0428011

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√ Ø + Span - OK	8/13/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	√ Ø + Span - OK	8/13/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√ Ø + Span - OK	8/13/09	BG
			COMPLETED		

OT-19 (1/98)

PIPELINE SAFETY VIOLATION REPORT

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ONEOK PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No. 102 P/L
Location: Winterset
Year: 2009
Maximo WO#: CA - 1050568

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	VØ + Span Maximo WO# 09-1049177	10/23/09	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	VØ + Span Maximo WO# 09-1050361	10/23/09	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	VØ + Span Maximo WO# 09-1042576	10/23/09	BG

COMPLETED

DOT 19 (1A92)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L
Location: Winterset
Year: 2010

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	CHECKED Ø & SPAN - OK VERIFIED WITH RECORDER	2/10/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	CHECKED Ø & SPAN - ABOUT SPAN VERIFIED WITH RECORDER	2/10/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	CHECKED Ø & SPAN - OK VERIFIED WITH RECORDER	2/10/10	BG
			COMPLETED		

DOT-19 (1/93)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L
Location: Winterset
Year: 2010

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000.	1 - 5 Volts DC	Never Ø + Span	5/10/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ Ø + Span	5/10/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ Ø + Span	5/10/10	BG

COMPLETED

DOT-19 (1/09)

CENTEX PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2010

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	✓ @ + SPAN - OK	8/30/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ @ + SPAN - ADJUST @	8/30/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ @ + SPN	8/30/10	BG
			COMPLETED		

BCT-10 (1/06)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 102 P/L
Location: Winterset
Year: 2010

Due: Semi-annual

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction WCR to ISBIICS	0 - # 2000	1 - 5 Volts DC	VOK	10/7/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	Adjust @ + SPAN	10/7/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	VOK	10/7/10	BG
		COMPLETED			

OGT-10 (1/06)

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No: 102 P/L
Location: Watonset
eSOR: 10 - 1602383
Year: 2010

Due: Semi-annual

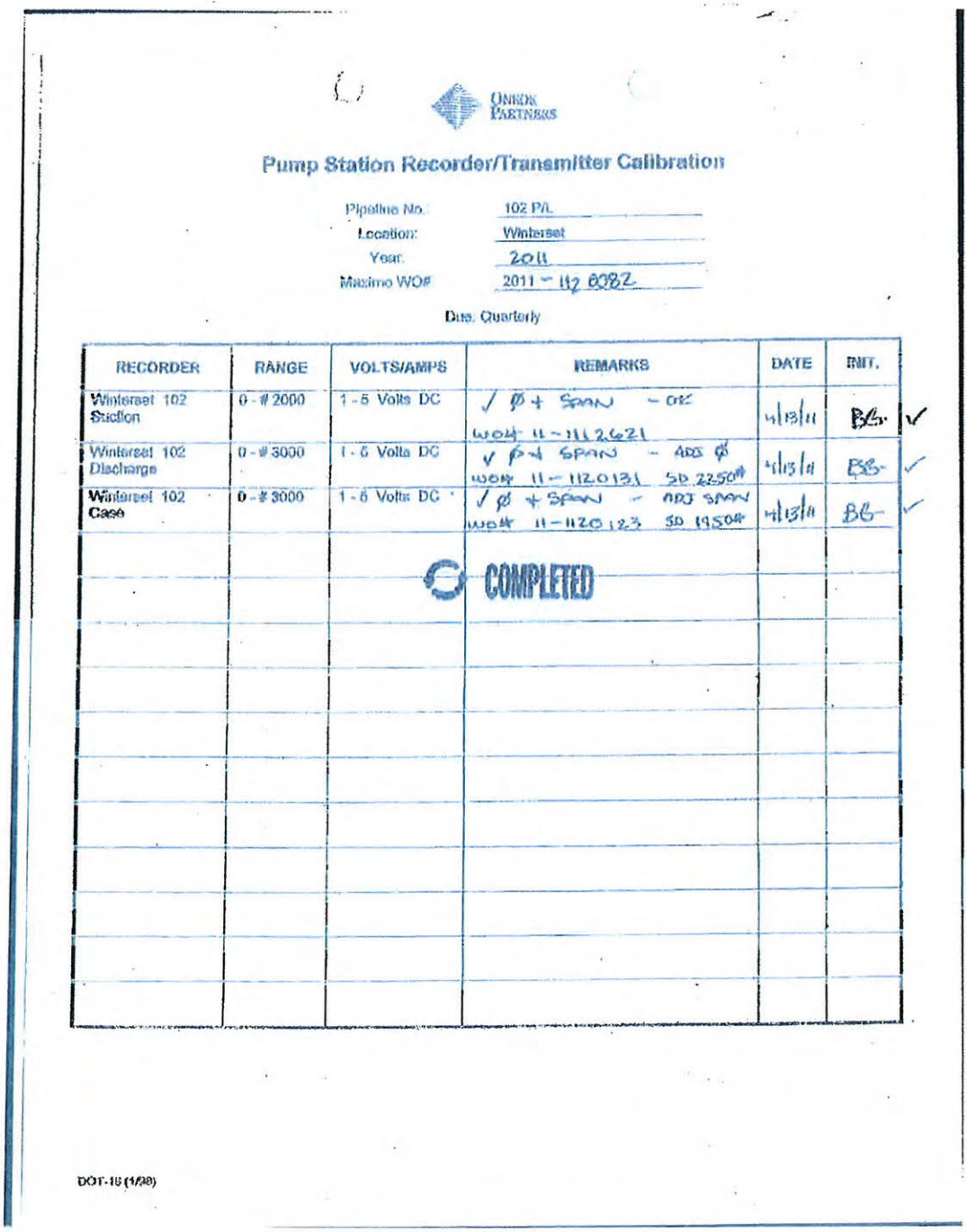
RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	✓ok	6/24/10	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓OK	6/24/10	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ok	6/24/10	BG
			Sent to Dot Files as Complete		
			COMPLETED		

DOT-19 (1/98)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

CPF 3-2012-5012



UNEVX PARTNERS

Pump Station Recorder/Transmitter Calibration

Pipeline No. 102 P/L
Location: Winterset
Year: 2011
Maximo WO# 2011 - 112 8082

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Station	0 - # 2000	1 - 5 Volts DC	✓ Ø + SPAN - OK WO# 11-112621	4/13/11	BG ✓
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	✓ Ø + SPAN - ADJ Ø WO# 11-112013 SD 2250#	4/13/11	BG ✓
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	✓ Ø + SPAN - ADJ SPAN WO# 11-112013 SD 1950#	4/13/11	BG ✓

COMPLETED

DOT-15 (1/88)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

CPF 3-2012-5012

ONEOK
NORTH SYSTEM
A SUBSIDIARY OF ONEOK PARTNERS

Recorder / Transmitter Calibration

Pipeline No.: 102 P/L
Location: Wintersel Pump Station (821)
Year: 2011 W.O.# 11-1268981

Due : Semi-Annual

ASSET #	RECORDER/ TRANSMITTER	RANGE	VOLTS/ AMPS	REMARKS	DATE	INIT
110011	102 Suction	0-2000 #	1-5 VDC	✓OK	9/20/11	BG
110042	102 Discharge	0-3000#	1-5 VDC	Replaced & Calibrated Gauge 16-P10 TXZF1F-MZ	9/20/11	BG
110045	102 Case	0-3000#	1-5 VDC	✓OK	9/20/11	BG
				COMPLETED		

*Item number to identify repairs or unusual conditions shown on reverse side.

PAGE 1 of 1
DOT-19 (9/11)

PIPELINE SAFETY VIOLATION REPORT

United States Department Of Transportation
Pipeline and Hazardous Materials Safety Administration

CPF 3-2012-5012

Oneok Partners

Pump Station Recorder Calibration

Pipeline No.: 102 PL
Location: Winterset

Year: 2011

Due: Quarterly

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0-#2000	1-5 Volts DC	Verified @ 4 Spans	2/15/11	BG
Winterset 102 Discharge	0-#3000	1-5 Volts DC	Verified @ 4 Spans	2/15/11	BG
Winterset 102 Case	0-#3000	1-5 Volts DC	Verified @ 4 Spans	2/15/11	BG
			Backed up DOT Files to "Humps Drive"		
		COMPLETED			

Attachment E

Attachment E to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

Weekly Event Review Report

8/1/2010 to 8/31/2010

Company:	ONEOK NGL PIPELINE, LLC
Region:	NGL - Ops Tech Support
Location:	, KS ,

Event ID:	3967	**Status:**	Complete
Event Type:	Security	**Event Cause:**	THEFT/ VANDALISM
Date Reported:	8/3/2010	**Event Date:**	7/21/2010
Reported By:	Ennis, Benjamin - OKE10125	**Supervisor:**	Grippando, Gregory
Safety Coordinator:		**Contractor:**	
Description:		**Axiom:**	

A ONEOK leased storage facility in Haven, KS was vandalized and ONEOK equipment was stolen. Stolen items include a Weed Eater, a Line Locator, a Pelican Storage Case, and two tool boxes containing various fittings and hand tools. A report was filed with the Haven, KS Police Department.

Action Item(s)

Action Id:	**Person Responsible:**
Target Date:	**Complete Date:**
Action Item:	

Location:	, OK ,

Event ID:	3976	**Status:**	Complete
Event Type:	Near Miss	**Event Cause:**	Struck By
Date Reported:	8/3/2010	**Event Date:**	8/2/2010
Reported By:	Wright, Steven - OKE10211	**Supervisor:**	Tingley, Charles
Safety Coordinator:		**Contractor:**	
Description:		**Axiom:**	

An Inspector was watching a Contract Employee buff a weld on the Cana Construction Project and was struck in the ear by a wire from the buffing wheel. The Inspector was wearing the proper PPE and was standing approximately 12 feet away from the buffing activity. There was no injury.

Action Item(s)

Action Id:	**Person Responsible:**
Target Date:	**Complete Date:**
Action Item:	

Region:	NGL - Pipeline (Distribution)
Location:	, KS ,

Event ID:	3957	**Status:**	Complete
Event Type:	Near Miss	**Event Cause:**	Third Party
Date Reported:	8/2/2010	**Event Date:**	7/14/2010
Reported By:	Thompson, Travis - OKE12027	**Supervisor:**	Buckman, Alan
Safety Coordinator:		**Contractor:**	
Description:		**Axiom:**	

A third party (Housley Communications) did not contact a ONEOK Area Representative before excavating and crossing the Conway Pipelines in McPherson County, KS. A telephone line was installed at a depth of approximately 6 inches. A One-Call was made and cleared.

Action Item(s)

Action Id:	**Person Responsible:**
Target Date:	**Complete Date:**

INVESTIGATION REPORT

This Form must be completed for all Near-Misses and Incidents. Notify your Supervisor immediately of any injury, damage, or release.

Location at the Facility:	System Name:
Date of Incident:	Time Occurred:
Person Reporting:	Date Reported:
☐ Incident (something is injured, damaged, or released)	☐ Near Miss (no injury, damage or release occurred)

Weather Conditions	Temperature:	Wind Speed/Direction:	Any Precipitation? ☐ Yes ☐ No
Contractor Name and Company (if involved):			
For Releases	Product:	Duration (min):	Volume:
For Vehicle Incidents	Unit No:	Odometer Reading:	
Did event occur while completing an OQ Covered Task?	☐ No	☐ Yes, List Task: Switches and Transmitters Tasks 25,30 and 31	
Did event result in an abnormal operating condition?	☐ No	☐ Yes	

Return this completed form to your Supervisor

Below to be completed by the Incident Investigator.

Name:	Date Received:	Date Investigation Started:	LITMUS #:

Classification

☐ Medical Care Required	☐ Release	☐ Transportation	☐ PSM
☐ Injury ☐ Illness	☐ Non-reportable	☐ DOT Recordable	☐ PSM Incident
☐ Non-recordable ☐ Restricted Workdays	☐ Reportable	☐ Not DOT Recordable	☐ Non-PSM Incident
☐ Recordable ☐ Lost Time	☐ Air ☐ Soil ☐ Water/HCA		

☐ Security ☐ Prop Dam ☐ Econ Loss ☐ Fire/Expl ☐ Other:

☐ Further Root Cause Analysis Needed | Team Leader: | Target Date:

RCA Team Members (Last Name): | RCA Date:

Root Cause Analysis

Equipment Difficulty
- ☐ No PM system
- ☐ Repeat failure
- ☐ Design
- ☐ Equipment defect

Procedures
- ☐ Not used or followed
- ☐ Not available or written
- ☐ Followed incorrectly
- ☐ Wrong procedures

Management System
- ☐ Standards not used or need improvement
- ☐ Change Management
- ☐ Audits/Inspections need improvement
- ☐ Corrective action not taken

Immediate Supervision
- ☐ Poor job preparation
- ☐ Selection of worker
- ☐ Enforcement of policy or procedure
- ☐ Supervision during work

Training
- ☐ No training provided
- ☐ Training not understood
- ☐ Training materials need improvement

Communications
- ☐ No communication
- ☐ Communication not timely
- ☐ Communication handoff needs improvement
- ☐ Misunderstood verbal communication

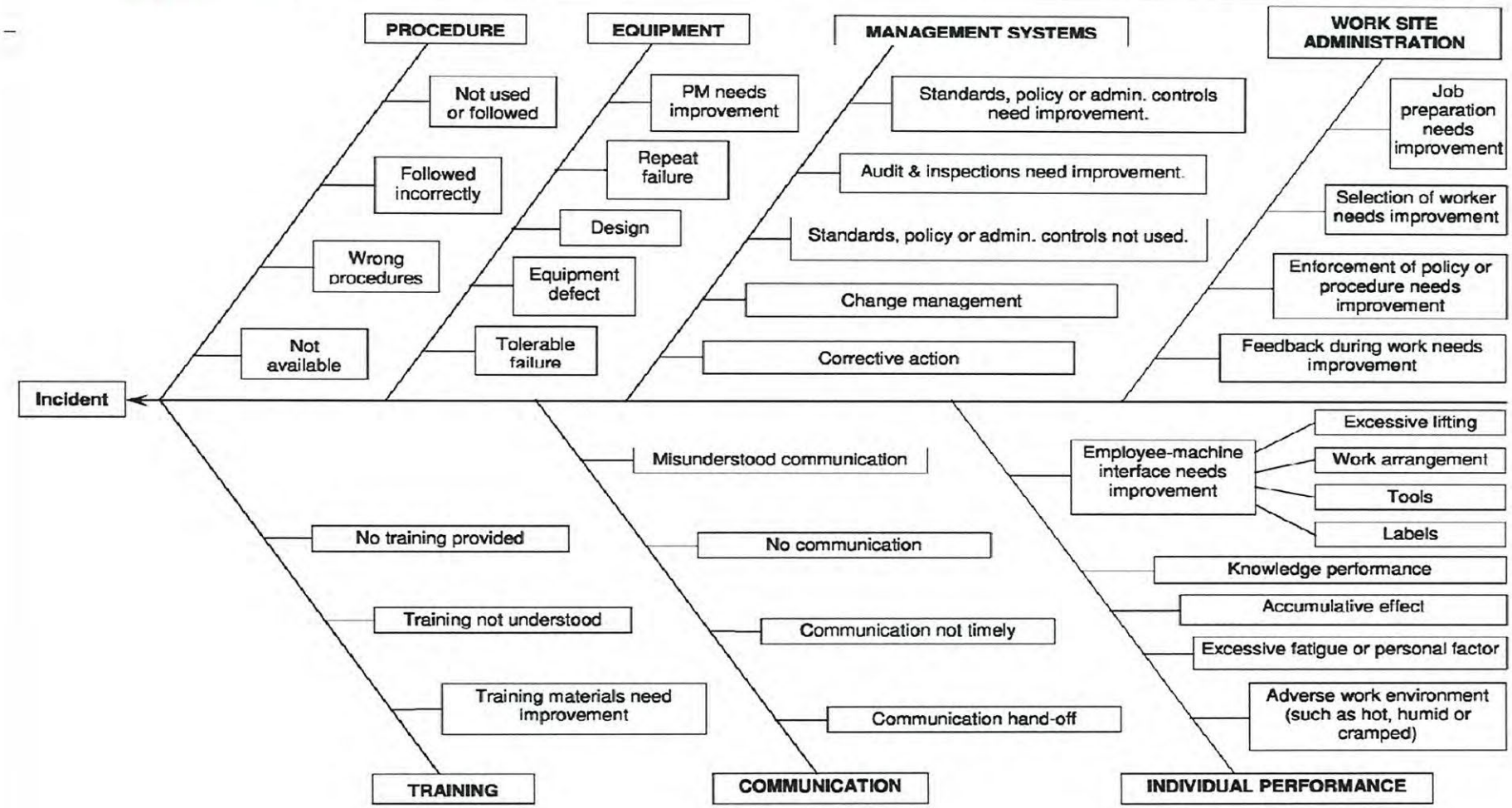
Individual Performance
- ☐ Employee-machine interface
- ☐ Excessive fatigue or personal problem
- ☐ Adverse work environment
- ☐ Knowledge performance

Primary Root Cause(s):

Action Items	Person Responsible	Target Date	Completed Date

Incident Closure	Signature:	Date:

Date Posted:	Date Removed:



Fishbone RCA Directions: Use the "fishbone" to identify 1st level factors by asking "Did ***Training, Communication, etc.*** contribute to the incident?" Move down each "Rib" to identify the Root Cause(s). Mark the appropriate root cause on the investigation sheet. Look at each root cause, review the list of symptoms in the Problem Solving section and select all the symptoms that,. Note which symptoms best describe the root cause. Generate action items and responsibility to correct root causes.

ONEOK online **NORTH SYSTEM EHS** All Sites Advanced Search

NGL OPS MAIN SITE > NGL EHS > NORTH SYSTEM EHS > Incident Action Item Tracking

Incident Action Item Tracking

Tracks Near Miss and Incidents to closure

Actions 1 - 100 View: **All Items**

Edit		LITMUS / SHAVR#	Site	State	Status	Event	Action Item	Assigned to	Target Date	Closed Date	Closure Comments
		Count = 393									
		SVR-11878	Lemont	Illinois	Closed	N/A	Replace or repair damaged windshield on vehicle.	McNally, Daniel P.	8/15/2012	7/31/2012	Windshield replaced. D. McNally.
		SVR-11877	Rockford	Illinois	Closed	N/A	Talk with Trade partners (contractor) about the importance of operating a vehicle safely while on ONEOK property.	Tasharski, Daniel G.	7/26/2012	7/26/2012	Completed. D. Tasharski
		SVR-11712	Des Moines	Iowa	Closed	N/A	Follow-up on primary electrical feed power failure by Mid-American Energy.	Dulaney, Randy E.	7/31/2012	7/31/2012	Primary power feed to Des Moines facility repaired and put back on line on 7/31/12. R. Dulaney.
		SVR-11641	Bushton	Kansas	Closed	N/A	Replace vehicle windshield.	Koehn, Ernest L.	7/24/2012	7/18/2012	Windshield replaced 7-18-12
		SVR-11624	Tampico	Illinois	Closed	N/A	Follow-up with the owner of Gonzales to make sure he communicates heat related stress safetyto his employees.	McCormack, Donald	7/9/2012	7/9/2012	Completed. See attached e-mail from D. McCormack.
		SVR-11596	Morris	Illinois	Closed	N/A	1. Have Jeff Newman send Rail Works a letter regarding One-Call and post damage. 2. Contact CSX Railraod regarding One-Call and post damage.	McCormack, Donald	6/26/2012	7/10/2012	1. Completed. 2. Completed.
		SVR-11583	Lemont Storage	Illinois	Closed	N/A	Have windshield repaired.	Shafer, Jeffrey D.	7/20/2012	7/3/2012	Windshield has been repaired.
		SVR-11541	Bushton Pump Station	Kansas	Closed	N/A	Send out a letter of notice to contractor regarding OneCall violation.	Newman, Jeff N.	7/26/2012	7/10/2012	Letter sent.
		SVR-11540	Lemont Terminal	Illinois	Closed	N/A	Repair or abandon pipeline section not in use.	Shafer, Jeffrey D.	7/30/2012	6/29/2012	Repairs completed.

SHAVR #	SITE	STATE	STATUS	JUR	ACTION ITEM	ASSIGNED	TARGET	CLOSED	CLOSURE COMMENTS
SVR 8483	Lemont - Smith Road	Illinois	Closed	DOT	Complete incident investigation for Lemont - Smith Road fire and pipeline hit.	Newman, Jeff N.	9/8/2011	9/8/2011	Completed 9/8/11 by J. Newman on a conference call.
SVR 7530	Romeoville	Illinois	Closed	DOT	Write a MOC for start-up and de-rating of the 106 West pipeline per Corporate and DOT start-up requirements.	Pirtle, Jaret M.	5/24/2011	5/24/2011	MOC-NS-11-147 has been written to address approvals for line de-rating and 106 Weat pipeline start-up.
SVR 7530	Romeoville	Illinois	Closed	DOT	Complete an incident investigation	Newman, Jeff N.	6/14/2011	6/13/2011	Incident investigation completed.
SVR 4976	Walnut	Illinois	Closed	DOT	1. A letter to sent to Lee Excavation and Tiling Co. as a follow-up to this incident. 3. Consider utilizing a "Excavation Site Inspection" sign-off form for all One-Call tickets.	Newman, Jeff N.	12/31/2010	4/14/2011	1. Letter has been sent to Lee Excavation. 3. "Excavation Site Inspection" sign-off sheets being utilized in Illinois.
SVR 4976	Walnut	Illinois	Closed	DOT	2. Review Pipeline Operator Locate Procedures and Operator training. Include: ☐ Proper closing of One-Call tickets ☐ Address underground power line issues ☐ Determine if texting contractor is appropriate for verification / communication. ☐ Determine if additional Pipeline Operator Training is required.	Sauer, Jon M.	12/30/2010	11/17/2010	2. Pipeline Operators have been retrained on proper pipeline locate procedures, including the identification of underground power lines, the proper closing of One-Call tickets, and the use of a renewed contractor sign-off sheet for locating.
SVR 4976	Walnut	Illinois	Closed	DOT	4. Review B. Weltmeyer phone type and Walnut area cell coverage to better receive / place calls.	Shafer, Jeffrey D.	10/30/2010	10/30/2010	New phone given to B. Weltmeyer. She reports bettter cell coverage in Walnut area.
SVR 4498	313 Junction/212 Run	Kansas	Closed	DOT	1. Do a communication meeting will all PCC Controllers to Re-emphasize: A. Pump shutdown responsibility to help avert any line overpressure conditions (repeat). B. Confirm PCC Controllers communicate all pipeline start-ups and re-start-ups to Field Operators confirming product flow path and direction.	Pirtle, Jaret M.	9/10/2010	9/9/2010	1. Completed by J. Pirtle in a Team Safety meeting with all PCC Controllers.
SVR 4498	312 Junction.212 Ru	Kansas	Closed	DOT	2. Consider implementing an ACA system function (Automatic Control Action) for this segment of the 313 Pipeline to shut down the station pump upon detection of a high line pressure situation.	Pirtle, Jaret M.	10/31/2010	9/14/2010	2. First Task Team meeting 9/14/10. Follow-up meetings scheduled.
SVR 4498	312 Junction/212 Run	Kansas	Closed	DOT	3. Improve the timeless of distributing updated printed Pipe line movement schedules to PCC and local Operations.	Mills, Danny	9/30/2010	11/16/2010	3. Printed pipeline movement schedules are now being printed and communicated several times/day to PCC and local Operations.
SVR 4498	312 Junction/212 Run	Kansas	Closed	DOT	4. Investigate the completion of Corrective Action # 2313-06 from SHAVER # 2313.	Buckman, Alan G.	9/30/2010	9/30/2010	4. Corrective Action Item SHAVR # 2313-06 completed.
SVR 2838	Reno County	Kansas	Closed	DOT	1. Investigate why the One-Call ticket was not received.	Buckman, Alan G.	5/17/2010	5/13/2010	This 11302 section of the pipeline was abandoned and was removed from the One-Call list by Kinder Morgan. This section of the pipeline has now been placed back on the One-Call list.

Attachment F

Attachment F to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

From: Jones, Neal F.
To: Atkins, Molly J.
Subject: RE: Question
Date: Friday, August 10, 2012 7:54:09 PM

ONEOK NGL conducts a weekly Supervisors' meeting every Monday morning at 8:00 AM.
All ONEOK NGL Supervisors are required to attend these meetings; also in attendance are the NGL Vice Presidents, Department Managers, Pipeline Control Center Managers, and DOT Compliance Coordinators. As part of DOT Compliance I attend this meetings and participate in the discussions.

This meeting is held to discuss Near-Miss events and incidents that have occurred during the past week, including DOT and non-DOT assets, and whether these incidents are related to pipeline safety, process safety, or personnel safety. The meeting is also used to communicate, among the different groups, lessons learned and areas where short comings or improvements have been identified. It is an expectation of the participants attending this meeting if a problem has been identified or an improvement to a process has been developed to share their findings with the group so others may learn.

It is not uncommon during these meetings for deficiencies or improvements to procedures to be discussed.

The entire NGL Operations team, along with the Compliance, Safety and Environmental groups, is involved with the discussions. As a result of these discussions if further investigation is required, a smaller group of subject matter experts will work on the item to come up with a resolution.

In the event a defect in a procedure is identified as a contributing factor to a Near-Miss incident, the investigation and resolution is tracked using ONEOK's Near-Miss database (SHAVR).

My participation in this meeting is to watch for items that could directly or indirectly affect compliance, training or procedures. I use this meeting to request feedback on improvements or changes to procedures for our periodic review, of the procedures, prior to the annual review of the ONEOK NGL Pipeline O & M manual.

While a written transcript of this meeting is not kept,(Near-Miss action steps and resolution are tracked in the SHAVER data), I believe we meet the requirements of the ONEOK NGL O & M manual regarding the review of the work done by personnel and the effectiveness of operating procedures through these discussions.
This meeting is utilized as the conduit that allows discussion around procedures and changes to procedures to be incorporated within ONEOK NGL Pipeline.

Neal

From: Atkins, Molly J.
Sent: Friday, August 10, 2012 6:10 PM
To: Jones, Neal F.
Subject: Question

Neal:

Could you provide me with a description of the process that has been used to review procedures as part of the Monday morning Supervisors meeting?

Thank you,

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

Attachment G

Attachment G to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Wednesday, November 30, 2011 10:31 AM
To: Atkins, Molly J.
Subject: RE: Response to RFI - North System Inspection 8-15-2011

Molly,

The MOC indicates what the Elliott Discharge pressures should be. Where is Elliot? Is that the Winterset station? If they are not the same, why was Winterset not included in the MOC?

Thanks

From: Atkins, Molly J. [mailto:Molly.Atkins@oneok.com]
Sent: Wednesday, November 23, 2011 10:30 AM
To: Barrett, David (PHMSA)
Cc: Shieh, Hans (PHMSA); Christensen, Wesley J.; Hale, Vicky C.
Subject: Response to RFI - North System Inspection 8-15-2011

Mr. Barrett;

Attached please find a scanned copy of the letter that was mailed to your office, today.

If you have any questions or need additional information, please contact me. ONEOK offices will be closed Thanksgiving and the Friday after, returning to normal hours on Monday, November 28, 2011. Have a safe and pleasant holiday.

Best Regards,

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Wednesday, December 07, 2011 8:48 AM
To: Atkins, Molly J.
Cc: Layman, Chad
Subject: RE: Response to RFI - North System Inspection 8-15-2011

Can you send a copy of the "other" MOC??

From: Atkins, Molly J. [mailto:Molly.Atkins@oneok.com]
Sent: Wednesday, December 07, 2011 8:26 AM
To: Shieh, Hans (PHMSA)
Cc: Layman, Chad
Subject: RE: Response to RFI - North System Inspection 8-15-2011

My apologies for the delayed response, I have been traveling with work for a few days.

The Initial pressure reduction on the 102 pipeline was isolated to the line segment between Elliot and Massena due to integrity digs and was covered under the other MOC referenced in the MOC we provided in the letter. (The other MOC subjected the entire 102 line from Bushton to Des Moines to the pressure reduction).

As far as the configuration of the pump stations: the pump stations from North to South, spaced roughly 40 – 50 miles apart are:

Des Moines Heartland
Winterset Pump Station
Massena Booster Station
Elliot Booster Station

The reason there is no reduction in pressure for Winterset at the time of the original MOC writing is that it only has pumping capabilities flowing from South to North. During the times that we flow North to South (reverse flow) the product passes through Winterset via a bypass segment.

Hopefully, this will answer your question. If not, please let me know.

Thank you,
Molly

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Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Tuesday, December 20, 2011 11:06 AM
To: Atkins, Molly J.
Cc: Layman, Chad
Subject: RE: Response to RFI - North System Inspection 8-15-2011

I guess I don't understand what is going on here. It appears to me that the 6-6-2008 MOC was for the section downstream of the Elliot station (Elliot to Tabor), and therefore did not even include the Winterset station. The 5-23-2008 MOC is for Des Moines to Messena. These two MOCs do not appear to have anything to do with each other.

The MOC I am interested in is the 5-23-2008 for right now.

How long was the 5-23-2008 MOC in effect? Was it ever retracted to go back to the original set points? Do you have the MOC to go back to the original set points that I can see? The Oct 2008 inspections show that the set points were not changed.

From: Atkins, Molly J. [mailto:Molly.Atkins@oneok.com]
Sent: Wednesday, December 07, 2011 8:26 AM
To: Shieh, Hans (PHMSA)
Cc: Layman, Chad
Subject: RE: Response to RFI - North System Inspection 8-15-2011

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Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Tuesday, December 20, 2011 2:04 PM
To: Atkins, Molly J.
Cc: Layman, Chad
Subject: RE: Response to RFI - North System Inspection 8-15-2011

One more question….

In attachment three….the explanation states the following, "….*the scale value from the pressure transmitter is read by the control unit and is compared to the HI-HI set point (these are outlined in red). If the scale value read is greater than the set point, HI-HI fault logic latches setting of a chain of events….*".

The explanation does not mention anything about the "HI" level set point. How does that play into this? If I missed that, please show me where that is.

From: Shieh, Hans (PHMSA)
Sent: Tuesday, December 20, 2011 11:06 AM
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Cc: Layman, Chad
Subject: RE: Response to RFI - North System Inspection 8-15-2011

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Molly

From: hans.shieh@dot.gov [mailto:hans.shieh@dot.gov]
Sent: Wednesday, November 30, 2011 10:31 AM
To: Atkins, Molly J.
Subject: RE: Response to RFI - North System Inspection 8-15-2011

Molly,

The MOC indicates what the Elliott Discharge pressures should be. Where is Elliot? Is that the Winterset station? If they are not the same, why was Winterset not included in the MOC?

Thanks

From: Atkins, Molly J. [mailto:Molly.Atkins@oneok.com]
Sent: Wednesday, November 23, 2011 10:30 AM
To: Barrett, David (PHMSA)
Cc: Shieh, Hans (PHMSA); Christensen, Wesley J.; Hale, Vicky C.
Subject: Response to RFI - North System Inspection 8-15-2011

Mr. Barrett;

Attached please find a scanned copy of the letter that was mailed to your office, today.

If you have any questions or need additional information, please contact me. ONEOK offices will be closed Thanksgiving and the Friday after, returning to normal hours on Monday, November 28, 2011. Have a safe and pleasant holiday.

Best Regards,

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Monday, March 12, 2012 3:08 PM
To: Atkins, Molly J.
Cc: Sauer, Jon M.; Jones, Neal F.
Subject: MOC 08-20012

Molly,

Back when you responded to our RFSI regarding the MOC for Winterset station, I remember that I had some concerns about the MOC that was in the response. I believe I asked for the MOC 08-20012 because the MOC in this response did not address the set points for Winterset station. I believe you sent me that MOC, but I since lost it when my computer crashed and I lost all my emails. Apparently, I didn't print it out.

Can you please send me that MOC 08-20012. I think it is dated 6-6-2008.

Hans

Atkins, Molly J.

From: Atkins, Molly J.
Sent: Monday, March 12, 2012 3:42 PM
To: 'hans.shieh@dot.gov'
Subject: FW: North System RFI Follow -up
Attachments: AEA 6.6.08 TEMP PSI Reduction MOC 08-20012 102 Elliott to Tabor.pdf; AEA 102 MOP Reduction 5.23.08 MOC 08-19497.pdf

Hans;

This is the response I provided earlier – I am not sure it answered all of your questions, so you may have more questions once you review – let me know.

Sorry about your computer crash – that's no fun.

From: Atkins, Molly J.
Sent: Wednesday, December 07, 2011 12:54 PM
To: hans.shieh@dot.gov
Cc: Sauer, Jon M.; Layman, Chad; Jones, Neal F.
Subject: FW: North System RFI Follow -up

Attached are the two Internal Memorandums communicating the pressure reductions – the one that was sent to you as Attachment 1 in our recent letter responding to your RFI (MOC 08-20012), and the one that is referenced in that Attachment (MOC 08-19497).

Please let me know if you have further questions.

Best Regards,

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

Atkins, Molly J.

From: Atkins, Molly J.
Sent: Tuesday, March 13, 2012 11:13 AM
To: 'hans.shieh@dot.gov'
Subject: RE: North System RFI Follow -up

Hans;

This was the previous response to you on this question – let me know how I can further help with the question after you read this.

The Initial pressure reduction on the 102 pipeline was isolated to the line segment between Elliot and Massena due to integrity digs and was covered under the other MOC referenced in the MOC we provided in the letter. (The other MOC subjected the entire 102 line from Bushton to Des Moines to the pressure reduction).

As far as the configuration of the pump stations: the pump stations from North to South, spaced roughly 40 – 50 miles apart are:

Des Moines Heartland
Winterset Pump Station
Massena Booster Station
Elliot Booster Station

The reason there is no reduction in pressure for Winterset at the time of the original MOC writing is that it only has pumping capabilities flowing from South to North. During the times that we flow North to South (reverse flow) the product passes through Winterset via a bypass segment.

Hopefully, this will answer your question. If not, please let me know.

Thank you,
Molly

From: hans.shieh@dot.gov [mailto:hans.shieh@dot.gov]
Sent: Tuesday, March 13, 2012 11:00 AM
To: Atkins, Molly J.
Subject: RE: North System RFI Follow -up

Molly,

Sorry about this, but I got a couple more questions. Does Winterset pump on Line 102 from Des Moines to Bushton? The reason I am asking is that the May 2008 MOC designates the set points for the over-pressure protection for Winterset. However, the June 2008 does not identify what Winterset should be. The June MOC also states that it supersedes any previous MOC. But it doesn't state anything about Winterset. This is confusing because the June MOC says that MOP will be reduced to 1704 from 2160 from Des Moines to Bushton. Why would Winterset not be mentioned in this MOC? When I was there, it looks like the guys were able to pull up a screen shot of what the over pressure protection was set at, and it was still set at the May 2008 MOC specifications.

Thanks

Hans

From: Atkins, Molly J. [mailto:Molly.Atkins@oneok.com]
Sent: Monday, March 12, 2012 3:42 PM
To: Shieh, Hans (PHMSA)
Subject: FW: North System RFI Follow -up

Hans;

This is the response I provided earlier – I am not sure it answered all of your questions, so you may have more questions once you review – let me know.

Sorry about your computer crash – that's no fun.

From: Atkins, Molly J.
Sent: Wednesday, December 07, 2011 12:54 PM
To: hans.shieh@dot.gov
Cc: Sauer, Jon M.; Layman, Chad; Jones, Neal F.
Subject: FW: North System RFI Follow -up

Attached are the two Internal Memorandums communicating the pressure reductions – the one that was sent to you as Attachment 1 in our recent letter responding to your RFI (MOC 08-20012), and the one that is referenced in that Attachment (MOC 08-19497).

Please let me know if you have further questions.

Best Regards,

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Wednesday, March 14, 2012 9:20 AM
To: Atkins, Molly J.
Cc: Jones, Neal F.; Sauer, Jon M.
Subject: Request

Molly,

I have talked with some of our people and I need to talk with you and those familiar with these MOCs. There is a concern about why Winterset wasn't addressed in the June MOC. I know what you told me about it being bypassed, but there are questions about putting a higher pressure on the line going north, when it is restricted from going to that pressure going south. Anyway, I don't want to have to write up a bunch of stuff if you all can provide, or answer questions that we have about these MOC's.

I think you may be out, so can you set aside some time so we can do a conference call? I will be here tomorrow, and all of next week.

Hans

Atkins, Molly J.

From: hans.shieh@dot.gov
Sent: Monday, March 19, 2012 1:56 PM
To: Atkins, Molly J.
Cc: Jones, Neal F.; Hale, Vicky C.
Subject: RE: Winterset Discharge Pressures

Got it. Thanks for the additional information.

Hans

From: Atkins, Molly J. [mailto:Molly.Atkins@oneok.com]
Sent: Monday, March 19, 2012 1:50 PM
To: Shieh, Hans (PHMSA)
Cc: Jones, Neal F.; Hale, Vicky C.
Subject: Winterset Discharge Pressures

Hans;

The Pipeline Control Center pulled the discharge pressures for the Winterset 102 Pipeline discharge pressures for the timeframe of 6/6/2008 to 9/20/2011. There are two data formats because of the change of the SCADA systems that occurred between those start and end dates. The data shows that the pipeline was not operated above the MOP, and the excursions above MOP were during pressure surges that lasted between 1 and 3 minutes total on 17 times during the 3 years and 3 months that were reviewed, all of which were well below the 110% max for surge pressures. [MOP was 1704, 110% MOP 1874].

The first set of data is an Excel spreadsheet that shows the daily peek discharge pressures, sorted from high to low. The ten (10) values that were above MOP were for a short duration during start-up or shutdowns, lasted from 1 to 3 minutes, and did not exceed 110% of MOP. (6/6/2008 to 3/10/2010)

The second set of data is on a graph showing the pressures that were above 1704 psi. The seven (7) values shown on this chart that were above 1704 psi did not reach 110% MOP, and lasted for a duration of 1 to 3 minutes during start-up or shutdowns. The individual durations are graphed on the following pages for each event. This data is shown for the dates between 3/10/2012 and 9/20/2011.

Please let me know if you have any further questions.

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

Attachment H

Attachment H to

ONEOK's Response to PHMSA CPF 3-2012-5012

Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV)

Dated 20 August 2012

From: Dulaney, Randy E.
To: Atkins, Molly J.
Subject: RE: Transmitter Checks
Date: Thursday, August 16, 2012 7:53:25 AM

Molly: (I hope I'm not too wordy)

The basic procedure for the discharge pressure transmitter calibration/check at Winterset is:

1.) Complete a safe work permit, log in the local log book and notify TCC of your intent to do work. Request to take local control of the station if possible.
2.) Two options are available at this point based on whether or not the pump is running.
   a.) If the pump is running the shutdown for high discharge pressure can be bypassed. You must have control to bypass. This is really not recommended as this doesn't inhibit the control valve operation which would attempt to control at a false pressure. The bypass will log to the log file both locally and remotely.
   b.) If the pumps are not running you can proceed without the bypasses.
3.) Attach a hydraulic pressure test set and current meter to the pressure transmitter. At this point we can check the zero reading of the pressure transmitter. It should read 0 psi with 4 Ma signal output.
4.) Apply pressure to the pressure transmitter at 25%, 50%,75% and 100% pressure intervals and monitor the analog current value of the pressure transmitter to the controller I/O. The analog signal should be in proportion to the pressure.
5.) The chart recorder will record the pressure and the alarm and log files will reflect the corresponding faults for the transmitter as it is spanned: lo-lo, lo, hi and hi-hi. The hi-hi fault is the one to that shuts the pumps down.
6.) Make any necessary adjustments or repairs necessary based on observations. Remove the test equipment and restore transmitter to normal operation.
7.) Check the alarm and chart recorder for operation of the transmitter and verify set point operation. Reset any outstanding alarms/faults on the control system. Remove the pressure bypass if used.
8.) Document operation and any changes made on the proper form.
9.) Verify operation with TCC, give control back if in local control. Close out the work permit. Complete the entry started in the local log book.

The set points are checked during the test. Since there is only one person typically doing this, verification of the set points is simply to check that the proper set point is in the fault logic. If the control loop verifies as done above, we are assured that the digital set points for the various shutdowns will work as designed. These have been verified time and again for proper control actions.

Randy E. Dulaney
Lead I&E Technician
ONEOK Partners

4401 Vandalia Road
Pleasant Hill, Iowa 50327
www.oneokpartners.com

Phone: 515-262-3186 x618 | Cell: 515-490-5576
Fax: 515-265-5812
E-mail: rdulaney@oneok.com

From: Atkins, Molly J.
Sent: Wednesday, August 15, 2012 5:21 PM
To: Dulaney, Randy E.
Subject: Transmitter Checks

Randy:

Can you describe the steps for checking the Winterset Pump Station Discharge Pressure Transmitters, and how we record the data from those checks?

I understand that some of the data is logged in SCADA, and some of the data is filled out on the inspection forms. Can you tell me what is logged in SCADA?

Thank you,

Molly Atkins
Manager, DOT Compliance
Oneok NGL Pipeline
Office 918-595-1537
Cell 832-794-3633

SCADA Data for DOT Check of Pressure Transmitters - 10/15/2008 Inspection Winterset Station Pump Discharge to Line 102

Spanning Transmitter

GAS_DATE_CALC	DEVICE_NAME	TAG_NAME	MAX_TAG_VALUE
10/15/2008	WNST102PST-PT_DIS	SCALE_VALUE	3000.7331S4

WINTERSET LOGGING+ OPCNSOWS01PTUL

Date_Time	Event_Type	Sub_Event_Type	Tag	Description1	User	OWS
10/15/2008 14:17	Alarm	Into Fault	WNST102PST-PT_DIS.HiHi_Fault	WNST-102 HIHI DSCH PSI		
10/15/2008 14:17	Alarm	Alarm Acknowledge	WNST102PST-PT_DIS.HiHi_Fault	WNST-102 HIHI DSCH PSI	mctul	MCOWSTU2
10/15/2008 14:17	Alarm	Fault Acknowledged	WNST102PST-PT_DIS.HiHi_Fault	WNST-102 HIHI DSCH PSI	mctul	MCOWSTU2
10/15/2008 15:15	Alarm	Into Fault	WNST102PST-STATION.HiDischargePressure	WNST-102 HI DSCH PSI SW		
10/15/2008 15:15	Alarm	Alarm Acknowledge	WNST102PST-STATION.HiDischargePressure	WNST-102 HI DSCH PSI SW	mctul	MCOWSTU2
10/15/2008 1S:16	Alarm	Fault Acknowledged	WNST102PST-STATION.HiDischargePressure	WNST-102 HI DSCH PSI SW	mctul	MCOWSTU2
10/15/2008 1S:38	Alarm	Out Of Fault	WNST102PST-STATION.HiDischargePressure	WNST-102 HI DSCH PSI SW		
10/15/2008 1S:39	Alarm	Out Of Fault	WNST102PST-PT_DIS.HiHi_Fault	WNST-102 HIHI DSCH PSI		

ONEOK PARTNERS

Pump Station Recorder Calibration

Pipeline No.: 101-102 P/L

Location: Winterset

Year: 2008

Due: ANNUALLY

RECORDER	RANGE	VOLTS/AMPS	REMARKS	DATE	INIT.
Winterset 102 Suction	0 - # 2000	1 - 5 Volts DC	√OK	10/15/08	BG
Winterset 102 Discharge	0 - # 3000	1 - 5 Volts DC	CALIBRATED Ø AND SPAN	10/15/08	BG
Winterset 102 Case	0 - # 3000	1 - 5 Volts DC	√OK	10/15/08	BG
			COMPLETED		

DOT-19 (1/98)

ENTERED 10/24 DF

RECORDER / CALIBRATIONS FOR WINTERSET PUMP STATION

Task No.	D19-REC-CAL-3MO	Request Date	10/13/2008
Tenant		Request Time	07:04:56
Assigned By	006-FREDRIK	Originator	
Assigned To	019-TECHS	Telephone No.	
Scheduled Start Date	10/13/2008 00:00:00	Extension	
Scheduled Finish Date	2/13/2009	WO Type	DOT-PM
Perform by Warranty	No	Completion Date	10/15/08
Priority	3.00	Completion Time	
Expense Class	O&M		

COMPLETED

Craft	Crew Size	Estimated Labor Hours
INSTECH	1.00	8.00

Equipment No.	Equipment Description	Location	Sub-location 1	Sub-location 2	Sub-location 3
RECORDER-CALIBTATIONS-01	ALL RECORDERS PUMP STATIONS-STORAGE	DESMOINES	ALL PIPELINES	-	-

Item No.	Equipment No.	Description	Qty Required	Date Used	Qty Used

List extra parts and comments here

LOOKS GOOD

Employee Code	Equipment No.	Work Date	First Name	Last Name	Regular Hours	Overtime Hours
		10/15/08	BRIAN	GUDENKAUF	2.0	

Safety Notes

Equipment No. RECORDER-CALIBTATIONS-01

Task Instructions

1. Scope: Establishes guidelines for the recording and retention of operating records (i.e. recorders/transmitters) in accordance with DOT 49 CFR 195.
2. Reference KMEP DOT Procedures DOT-19-03 for specific information.
3. This task requires a SAFE Work Permit; to satisfy a SAFE permit:

A. Notify operator on duty and communicate work to be done.
B. Ensure area is free of know, general hazards and safe to conduct work.
C. Consider PPE and LOCK AND TAG safegaurds.
DF Operator (initials) BG Work Rep. (initials)

D. Notify operator on duty when work is complete.
DF Operator (initials) BG Work Rep. (initials)