



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 22, 2008

Ms. Gina Dickerson
Project Manager
Golden Pass Pipeline LP
17001 Northchase Drive, Suite 686
Houston, Texas 77060

CPF 4-2008-1016W

Dear Ms. Dickerson:

During June 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Sheehan Pipe Line Construction portion (MP16.5 – 69.0) of your Golden Pass Pipeline in Orangefield, TX.

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

§192.225 Welding Procedures

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

The operator presented Repair Welding Inspection Records (from 02/11/08-05/03/08) showing that a majority of these repair welds had not been completed within the parameters required by the operator's welding procedures. The nonconformities included API 1104 "essential variables" (weld travel speeds, welding rod classifications, etc.) and other non-procedural issues.

The operator also presented records that welding inspectors were present during welding repairs. Those records were incomplete in some areas. A field review of welding inspector performance was also conducted, determining that the welding inspectors did not question welding repair procedures.

It is understood that Golden Pass Pipe Line has since reviewed its welding repair procedure records and its welding procedures and has taken the following actions.

- Reviewed its welding procedures for repairs and the related Procedure Qualification Records (PQR's). Based on examining the PQR's, welding parameters have been expanded to cover a majority of those factors that had exceeded the original procedures' allowances in order to qualify those repairs.
- The nonconforming repairs that could not be qualified under the revised procedures have either been cut out or re-repaired and successfully non-destructively examined.

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. 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 correct the item identified in this letter. Failure to do so will result in Golden Pass Pipeline LP being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2008-1016W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,



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