Enterprise Products

## By Messenger and Certified Mail No. 7007 07200000 43/15024

P.O. Box 4324 Houston, Texas 77210-4324 713.880.6500 2727 North Loop West Houston, Texas 77008-1044 www.eppip.com June 8, 2007

R.M. Seeley, DirectorSouthwest RegionPipeline and Hazardous Materials Safety Administration8701 S. GessnerHouston, TX 77074

AND A AND

Re: Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order (the "Notice") CPF-4-2007-5015

Dear Mr. Seeley:

Enterprise Products Operating L.P. ("Enterprise") submits this response to the Notice received on May 10, 2007.

General Comments: Enterprise notes and objects to the extremely vague and generalized descriptions of the violations alleged in the Notice. The lack of specificity makes it very difficult to understand where fault is being found in Enterprise's compliance efforts and to formulate responses to the allegations, especially in light of the discontinuity between the allegations and the substance of the inspector's exit interviews with Enterprise personnel and the lines of questions that were raised by the inspector during the separate pipeline safety inspections of the four widely dispersed pipeline operations covering three states and offshore waters that took place more than two years ago (the "Inspections"). For clarity in formulating its responses, Enterprise construes such terms in the Notice and the Proposed Compliance Order (the "Compliance Order") as, "their pipelines," "Enterprise's pipeline system," "all of Enterprise's pipelines," and other general references to include only those specific pipelines and facilities that were observed during the Inspections.

The Notice provisions and allegations and Enterprise's responses are as follows:

1. §195.406 Maximum operating pressure: Enterprise could not show evidence that surge pressures had been considered on all of their pipelines. Enterprise should be able to show that their pipelines are adequately protected and that surge pressures have been considered on all of their pipelines.

<u>Response</u>: Enterprise disputes the alleged violation. The cited regulation clearly requires that the operator of a pipeline provide adequate controls and protective equipment to maintain pressure within the prescribed limits, and Enterprise is confident that it provides adequate controls and equipment to achieve this requirement on each of its pipelines. The inspector appears to have focused on the consideration of surge pressures as a critical indicator of the adequacy of Enterprise's

R.M. Seeley, Director June 8, 2007 Page 2 of 6

> controls and equipment on the audited pipelines. The issue of surge pressures was discussed with the inspector by Enterprise representatives in relation to Enterprise's natural gas liquids ("NGL") pipelines. The inspector was shown a specimen surge study of the type utilized by Enterprise in evaluating NGL pipelines, and he expressed no reservations about its suitability for such purpose. The inspector was told that such studies were routinely utilized when evaluating NGL pipelines, and he raised no objection. Enterprise would point out that operational experience has shown over the years that surge pressure is not a problem with relatively-light-molecular-weight NGLs and that modeling of Enterprise's NGL pipelines under transient conditions has shown no overpressure incidents. The inspector was also provided a copy of a transient model for the Cameron Highway Oil Pipeline ("CHOPS"). Moreover, in many years of operational experience on NGL pipelines, Enterprise has experienced no exceedences of the 110% operating pressure limit due to surge on any of the pipelines that were the subject of the Inspections. For the reasons stated above, Enterprise requests that this item of the Notice be withdrawn, the proposed civil penalty be stricken and paragraph 1 of the Compliance Order be deleted.

2. §195.410(a)(1) Line markers: Enterprise does not have sufficient markers to adequately mark their pipelines. When crossing cultivated agricultural fields, often the markers on the far side of the field could not be seen. From valve sites, looking in both directions, the next marker for the pipeline could not be seen. The lack of pipeline marking is a widespread problem with the Enterprise pipelines that were inspected.

Response: As stated in Enterprise's general comments, the generality and lack of specificity in this allegation make it difficult to formulate a response. Enterprise asserts that it has, in fact, more than sufficient quantities of markers to adequately mark its pipelines and has marked them adequately. As to the question of markers being in place across cultivated agricultural lands, Enterprise wishes to call the agency's attention to the Request of Waiver (the "Request") that was filed with the Administrator by letter dated July 18, 2005 (copy enclosed as Exhibit 1). In the Request Enterprise called attention to the impracticality of placing and maintaining line markers across large parcels of cultivated land -- where agricultural operations are likely to result in the removal or destruction of the markers -- and asked for a waiver of the provisions of 49 CFR §195.410 Line Markers. Concurrently with the request for the waiver, Enterprise described and asked for approval of several alternate means of compliance that would assure adequate safety for pipelines in these areas while avoiding a) the futility of erecting markers that would likely not remain in place and b) the inconvenience of the markers' presence to farmers conducting cropping operations on these tracts. As of this date, Enterprise has received no response to the Request and believes it is entitled to know whether the agency intends to act on it and the timetable for any such action. The delay in responding to the Request is all the more frustrating to Enterprise, because the Request was initiated at the suggestion of the Southwest Region inspector who recognized the widespread problem that large agricultural tracts present to pipeline operators in the region. For the reasons stated above. Enterprise requests that this item of the Notice be withdrawn and held in abeyance until such time as the PHMSA acts on the Request and that paragraph 2 of the Compliance Order be deleted.

3. §195.420 Valve maintenance: During the inspections it was noted that Enterprise uses a mixture of methods of complying with 195.420c. The CHOPS Pipeline has installed locked chain link fencing around the valves or locating the valves within secured facilities. The methods of protection used in the six Enterprise units that were inspected, range from no fencing or security, to pipe post and beam enclosures with locked valves, to cyclone fencing with barbed wire around top, to enclosing the valves in welded steel plate, and covering the entire valve with concrete.

A review of your procedures by our inspector did not reveal a plan or procedure to consistently specify the method of security for valve sites that is acceptable to you. Enterprise should review their program, procedures, and facilities to ensure they are consistent and compliant with this regulation.

Response: Enterprise disputes the alleged violation. The cited regulation requires that an operator provide protection for each valve; it specifies neither the type of protection to be provided nor that such protection be uniform across all types of pipeline systems and valve locations subject to the operator's control. Each valve in the inspected pipeline systems was protected, and Enterprise disputes the factual accuracy of the statement in the Notice that the observed methods of protection, "range from no fencing or security, to [various types of protection]," if that statement was intended to imply that no protection was provided. To the contrary, each and every one of the valves on the inspected pipelines was protected, and not a single instance where an absence of protection was observed was cited in the Notice. The fact that no fencing or "security" (meaning unclear) was provided for a given valve does not mean that the valve lacked protection by guardrails, locks or other devices or methods. It is obvious from the plain meaning of the regulation that §195.420 does not specify or contemplate that all valves, regardless of their location, surroundings or operational history be protected by identical measures or equipment. For the reasons stated above, Enterprise requests that this item of the Notice be withdrawn.

4. §195.432 Breakout tanks: Enterprise had not set up an API-653 and/or API-510 inspection program, as required by §195.432. Enterprise could not demonstrate that breakout tanks have been inspected per the regulation.

<u>Response</u>: Enterprise disputes the alleged violation. The Skellytown tanks that were observed by the inspector had been inspected by a third-party contractor according to API-510 and API-653 protocols, and the contractor's reports were provided to the inspector (copies attached as **Exhibit 2**).

For the reasons stated above, Enterprise requests that this item of the Notice be withdrawn and that paragraph 3 of the Compliance Order be deleted.

5. §195.573 What must I do to monitor external corrosion control?: Enterprise is just beginning to implement surveys that consider IR drop. There is not dedicated Cathodic Protection (CP) for tank bottoms, and the tank bottoms are not surveyed during annual Cathodic Protection survey. The first interrupted survey (to account for IR drop) was being conducted on the Four Corners Pipeline, during the 2005 DOT inspection.

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> Response: Enterprise disputes the allegation that "Enterprise is just beginning to implement surveys that consider IR drop." To the contrary, since Enterprise began operating the subject pipeline systems in 2003, the issue of IR-drop has been considered through the application of recognized sound engineering practices such as corrosion leak history analysis, visual observation and measurement of pipe-wall thickness when lines are exposed, use of internal inspection devices, measurement of voltage drops via interrupted annual or close-interval cathodic protection surveys, use of IR-free coupon test stations, at-grade versus in-the-ditch pipe-to-soil potential measurements at pipeline excavation sites, and potential measurement techniques which consider proper reference cell placement and pipeline location. In addition, in 2004 Enterprise initiated a five-year plan under which a) approximately 20% of the annual cathodic protection surveys for all jurisdictional assets are conducted in an interrupted/IR-free manner, b) each close-interval cathodic protection survey is performed in an interrupted/IR-free manner and c) IR-free coupon test stations are installed. Under this five-year plan, Enterprise has conducted the following activities in consideration of IR drop across all jurisdictional assets:

- a. More than 7,000 miles of interrupted/IR-free annual or close-interval cathodic protection surveys have been completed.
- b. Two hundred sixty-three IR-free coupon test stations have been installed.

Moreover, prior to institution of the five-year plan, Enterprise conducted 396 miles of interrupted/IR-free annual or close-interval cathodic protection surveys across all jurisdictional assets in 2003.

Enterprise disputes that the allegation, "There is not dedicated Cathodic Protection (CP) for the tank bottoms, and the tank bottoms are not surveyed during annual Cathodic Protection Surveys" states a violation of PHMSA regulations or any industry standard. None of 49 CFR Part 195, NACE Standard RP0169-2002 Control of External Corrosion on Underground or Submerged Metallic Piping Systems, or API Recommended Practice 651 - Cathodic Protection (CP) for tank bottoms." Enterprise's cathodic protection system that protects the breakout aboveground storage tank at Skellytown Station is a deepwell-impressed-current cathodic protection system that protects the tank bottom as well as the below-grade station piping. Cathodic protection potentials are measured at the four compass bearing locations (North, South, East and West) around the perimeter of the tank and are recorded during the annual cathodic protection survey of the station. The inspector reviewed records of these surveys (copies enclosed as Exhibit 3) during the Inspections.

Enterprise disputes the allegation that, "The first interrupted survey (to account for IR drop) was being conducted on the Four Corners Pipeline, during the 2005 DOT inspection." Enterprise had conducted 65 miles of interrupted close-interval cathodic protection survey in 2004 on the Four Corners Pipeline system utilizing the services of a third-party contractor (documentation of this activity enclosed as **Exhibit 4**).

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For the reasons stated above, Enterprise requests that this item of the Notice be withdrawn and that paragraph 4 of the Compliance Order be deleted.

6. §195.579 What must I do to mitigate internal corrosion?: Enterprise has not done investigations to determine whether there is internal corrosion or the potential for internal corrosion. Enterprise has performed little monitoring, and has not done inspections to investigate whether there could be internal corrosion. The investigation of internal corrosion appears to be based upon internal coupons, which are improperly located on pipelines, and no other evidence could be produced. No records of internal inspection of removed pipe could be located.

<u>Response</u>: Enterprise disputes the allegations that, "Enterprise has not done investigations to determine whether there is internal corrosion or the potential for internal corrosion. Enterprise has performed little monitoring, and has not done inspections to investigate whether there could be internal corrosion." Enterprise employs two separate and extensive avenues to investigate, prevent, detect and mitigate internal corrosion: first, the company's pipeline integrity program and, second, its pipeline operations and maintenance programs. Enterprise conducts ILI tool runs that can identify various pipe-wall anomalies including internal corrosion and performs in-the-ditch investigations of such anomalies that meet established remediation criteria. Results of all in-the-ditch investigations are recorded on the Maintenance Report form. Representative samples of these forms (copies enclosed as **Exhibit 5**) were provided to the inspector for review during the Inspections.

Enterprise also disputes that the allegation, "The investigation of internal corrosion appears to be based upon internal coupons, which are improperly located on pipelines, and no other evidence could be produced," states a violation. Contrary to the allegation's implication, Enterprise investigates internal corrosion on the basis of much more than the examination of internal coupons of which approximately 30 are in use throughout the subject pipeline systems and which, Enterprise notes, are not even required by PHMSA's regulations to be used for internal-corrosion monitoring or much less installed at a particular location. Use of these coupons for investigation of internal corrosion has given Enterprise confidence that they yield valid data, because these data correspond with results of in-the-ditch investigations of pipe-wall anomalies that are identified via ILI tool runs and visual inspections of the internal surfaces of the pipelines as recorded on the Maintenance Report form. Some coupons are inserted through the top of the line but the coupon is positioned at the bottom of the line, into the zone were it is most likely that water will drop out. In Enterprise's experience, such a configuration does not affect the reliability of the data that is produced. Some of these devices are mounted on the bottom of the line of aboveground piping and as such create a water drop-out point which simulates areas that are most susceptible to corrosion (e.g., low areas/sags under rivers, creeks, roadways, Since it is impractical to locate internal-corrosion monitoring devices in etc.). sections of pipelines that are under rivers, creeks and roadways, Enterprise must rely on devices that are installed at accessible locations and that are mounted on the bottom of the lines and that create water drop-out points that simulate areas that are most susceptible to internal corrosion. As a point of information and without admitting any prior deficiency in its methods of investigating internal corrosion, Enterprise wishes to advise PHMSA that it is presently replacing internal coupons R.M. Seeley, Director June 8, 2007 Page 6 of 6

that are inserted through the top of the line with devices that are mounted on the bottom of the line.

Enterprise also disputes the allegation in the Notice that, "No records of internal inspection of removed pipe could be located." The inspector was shown a specimen report by Keifner & Associates on the internal inspection of removed pipe from a segment of the Rocky Mountain Pipeline (Red System) near Edgewood, NM (copy enclosed as **Exhibit 6**).

For the reasons stated above, Enterprise requests that this item of the Notice be withdrawn and that paragraph 5 of the Compliance Order be deleted.

Enterprise appreciates having the opportunity to respond to the Notice. Please contact me at 713/381-8298 or Joel E. Kohler at 225/675-2507 if you have any questions.

Sincerely yours, 6(8/07 Terry L. Hurlburt

Senior Vice President Operations

Enclosures

cc: Joel Kohler w/encls.

Enterprise Products Operating L.P.

CPF-4-2007-5015

# **EXHIBIT 1**

Request for Waiver Dated July 18, 2005



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Enterprise

Skellytown, TX

4-27-2004

**B-Scan Examination** 

Tank No.: VST-2030 Tank Name: Natural Gas Storage Tank



DBI Incorporated Lincoln Nebraska 4223 Progressive Avenue.Lincoln NE 68504.Telephone: 402-467-1818 Fax: 402-467-1766 Omaha Nebraska 2211 S. 156<sup>th</sup> Circle.Omaha NE 68130.Telephone:402-330-9612.Fax: 402-330-9640 Overland Park Kansas 11660 West 90th.Overland Park KS 66214.Telephone: 913-888-2321 Fax: 913-888-2351



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## Summary Report

Report Reviewed By: Kut Hains

Client: Enterprise Location: Skellytown, TX

Tank No.: VST-2030 Tank Name: Natural Gas Storage Tank

Inspection Date: 4-27-2004

Type of Inspection: B-Scan

Note: A B-Scan baseline inspection was performed on the VST-2030. The VST-2030 meets the minimum required thickness at this time.

NEXT UT INSPECTION:	4/25/2014
NEXT VISUAL INSPECTION:	4/26/2009

				Rema	ining Life	<b>Corrosion Rate</b>
		T-MIN.	T-NOM.	()	(ears)	(Per Year)
Shell Course No. 1		0.448	0.465		20+	Less than 1 mil
Shell Course No. 2		0.381	0.406		20+	0.001
Shell Course No. 3		0.331	0.356		20+	0.001
Shell Course No. 4		0.306	0.315		20+	Less than 1 mil
Shell Course No. 5		0.265	0.273		20+	Less than 1 mil
Shell Course No. 6		0.256	0.273		20+	Less than 1 mil
				Re	pad	<b>Corrosion Rate</b>
		T-MIN.	T-NOM.	T-MIN	T-NOM	(Per Year)
Nozzle No. 1	10"	0.490	0.506	0.580	0.588	Less than 1 mil
Nozzle No. 2	26"	0.630	0.638	0.668	0.674	Less than 1 mil
Nozzle No. 3	2"	0.260	0.268	0.540	0.548	Less than 1 mil
Nozzle No. 4	8"	0.350	0.358	0.432	0.440	Less than 1 mil
Nozzle No. 5	12"	0.398	0.406	0.450	0.458	Less than 1 mil
Nozzle No. 6	26"	0.618	0.624	0.685	0.693	Less than 1 mil
Nozzle No. 7	6"	0.290	0.298	0.430	0.438	Less than 1 mil
Nozzle No. 8	2"	0.188	0.196	N/A	N/A	Less than 1 mil



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Client: Enterprise Location: Skellytown, TX

Tank No.: VST-2030 Tank Name: Natural Gas Storage Tank

Tank Data

Construction Date:	1969	Tank Configuration:	Vertical
In-Service Date:	1969	Shell Diameter:	30' Assumed
Manufacturer:	Horton	Shell Height:	48'
Mfg. Serial #:	Unknown	Max. Design Liquid Level:	48'
Issue Date of API-650:	Unknown	Product:	Natural Gas
Tank Insulated:	No	Specific Gravity:	.70
Openings in Insulation:	N/A	Capacity:	20000 BBL
Design Temperature:	Ambient	Operating Temperature:	Unknown
No. of Shell Courses:	6	No. of Nozzles:	8
Type of Roof:	Domed	Coating Thickness:	10 mils
Name Plate Condition:	Good	-	

	Materials	Joint Eff.
Roof:	Unknown	Unknown
Shell:	Unknown	Unknown
Floor:	Unknown	Unknown
Annular Ring:	Unknown	Unknown



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## STORAGE TANK EXTERNAL INSPECTION

Client:EnterpriseLocation:Skellytown, TXTank No.VST-2030Tank Name:Natural Gas Storage Tank

Date Inspected: Inspector(s): 4-27-2004 Greg Wiebelhaus Josh Vinzant

Signature:



#### NAME PLATE

Item Inspected Yes No NA = Not Applicable	Yes	No	N\A	Comments:
Name Plate present & legible	$\boxtimes$			Yes
API Code Stamp #			X	Unknown
Manufacturer	X			Horton Hemispheroid
Serial # & Year Built	$\boxtimes$			1969

#### **FOUNDATION**

Concrete condition (spalling, cracks)			Steel ring sitting on rock
Levelness	$\square$		Good
Coating condition	$\square$		Good
Drain openings in ring		$\square$	N/A
Signs of settlement around tank	$\square$		Rock and dirt eroding and washing away
			from tank on southwest side. See picture 2
Dike walls / Containment		$\square$	N/A

#### SHELL

Paint condition	$\square$		Good
Corrosion / Pitting (describe)	$\square$		None noted
Bulges / Blisters / Deformations	$\boxtimes$		Top two shell courses has dents and flat
			spots on north side. See picture 1
Weld condition	$\square$		Appear good
Attachments (supports, brackets)	$\square$		Appear good
Insulation deterioration		$\square$	N/A
Signs of "chime" thinning	$\square$		None noted
Overflow vents / piping		$\square$	N/A
UT measurements		$\square$	N/A

#### **CATHODIC PROTECTION**

Galvanic anode system		$\square$	N/A	
Impressed current system		$\square$	N/A	



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#### MANWAYS & NOZZLES

Item Inspected Yes No NA = Not Applicable	Yes	No	N\A	Comments:
Paint condition	$\square$			Good
Corrosion, pitting (describe)	$\square$			None noted
Weld condition				Appear good
Flange condition	$\square$			Appear good
Bolting condition	$\square$			Appear good
Repad condition	$\square$			Appear good
Insulation deterioration			$\square$	N/A
UT measurements				See cad drawing

#### ROOF

Rool				
Paint Condition			Good	
Corrosion, pitting (describe)			None noted	
Weld condition			Appear good	
Proper drainage			Yes	
Insulation deterioration		$\square$	N/A	
UT measurements			See cad drawing	

#### **ROOF APPURTENANCES**

Condition of hatch(s), manway(s)	$\square$		Appear good
Condition of pressure/vacuum vent	$\square$		Appear good
Condition of screens on vents	$\square$		Appear good
Bolting condition	$\square$		Appear good
Insulation seal condition			N/A

#### **APPURTENANCES**

Grounding (tightness & corrosion)	$\square$		Ground good
Gauges, Sight glass (damage)		$\square$	N/A

#### HANDRAILS

Paint condition	$\square$		Good
Corrosion, pitting (describe)	$\square$		None noted
Attachment welds	$\square$		Appear good
Safety drop bar (chain) condition		$\square$	N/A



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#### PLATFORMS / STAIRS / LADDERS

Item Inspected Yes No NA = Not Applicable	Yes	No	N\A	Comments:
Paint condition	$\boxtimes$			Good
Corrosion, pitting (describe)	$\boxtimes$			None noted
Attachment weld condition				Appear good
Bolting condition	$\square$			Appear good
Cage condition			$\square$	N/A
Rung condition	$\square$			Appear good
Stairway tread condition	$\square$			Appear good
Concrete base condition				Good

#### GRATING

Paint condition	$\square$		Good
Thinning on grating bars			None noted
Condition of grating welds			Appear good
Tie down clips		$\square$	N/A

#### **ADDITIONAL COMMENTS:**









Picture 1: Dents and flat spots on North side.





Picture 2: Rock and dirt eroding and washing away from Southwest side of tank.



Enterprise Products Operating L.P.

CPF-4-2007-5015

## **EXHIBIT 2**

**Breakout Tank Inspections** 



DBI, Inc. Quality Inspection and Consulting Services Reliable...Responsive...Resourceful...Proactive

Enterprise Skellytown, TX Tanks

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DBI, Inc **Mechanical Integrity Inspection** 

		Next UT	Next Visual	
Tank No.	<u>Tank Name</u>	Inspections	Inspections	Non-Conformities
VST-2030	Natural Gas Storage Tank	04/25/2014	04/26/2009	Top 2 shell courses have dents on north side. Rock & dirt washing away for sw side
#2 North	Inhibitor Tank	04/25/2014	04/25/2014	
#1 South	Inhibitor Tank	04/25/2014	04/25/2014	
#1	Methanol Tank	04/25/2014	04/25/2014	



<u>DBI, Inc. Quality Inspection and Consulting Services</u> Reliable...Responsive...Resourceful...Proactive

Enterprise Skellytown, TX Vessels

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DBI, Inc Mechanical Integrity Inspection

		Next UT	Next Visual	
Vessel No.	Vessel Name	Inspections	Inspections	Non-Conformities
MR-9130	South Red Scraper Trap Filter	02/23/2011	04/19/2009	
MR-9200-B	Blue Pump Header Filter	12/30/2011	04/19/2009	
VKO-2000	Flare Knockout	07/16/2012	04/19/2009	
EM-1000	Mainline Motor Filter	04/18/2014	04/19/2009	
EM-1020	EM-1020 Motor Filter	04/18/2014	04/19/2009	
MR-9200-A	South Skelly Meter Run Filter	04/18/2014	04/19/2009	
TR-9010	Emerald A Meter Run Filter	04/18/2014	04/19/2009	
TR-9020	Pampa Lateral Scraper Trap Filter	04/18/2014	04/19/2009	
TR-9030	Fritch Lateral Scraper Trap Filter	04/18/2014	04/19/2009	
VSP-2010	C-Grade Sphere	04/18/2014	04/19/2009	Heavy laminations found on top of the sphere
VSP-2020	C-Grade Sphere	04/18/2014	04/19/2009	

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Enterprise

Skellytown, TX

4-20-2004

**B-Scan** Examination

Vessel No.: VSP-2010 Vessel Name: C-Grade Sphere

P&ID No: SK-063



DBI Incorporated Lincoln Nebraska 4223 Progressive Avenue.Lincoln NE 68504.Telephone: 402-467-1818 Fax: 402-467-1766 Omaha Nebraska 2211 S. 156<sup>th</sup> Circle.Omaha NE 68130.Telephone:402-330-9612.Fax: 402-330-9640 Overland Park Kansas 11660 West 90th.Overland Park KS 66214.Telephone: 913-888-2321 Fax: 913-888-2351



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## Summary Report

Report Reviewed By: Knit Storing

Client: Enterprise Location: Skellytown, TX

Vessel No.: VSP-2010 Vessel Name: C-Grade Sphere

Inspection Date: 4-20-2004

Type of Inspection: B-Scan

Note: A B-Scan baseline inspection was performed on the VSP-2010. The VSP-2010 meets MAWP of 60 psi with remaining service life of 20+ years.

Note: The B-Scan inspection found heavy laminations on top of the sphere.

Next UT Inspection:	04/18/14 API 510 para. 6.4
Next Visual Inspection:	04/19/09

	2004	2004	<b>Remaining Life</b>	<b>Corrosion Rate</b>
	T-Min.	T-Nom.	(Years)	Per Year
Shell 1	0.965	0.973	20+	Less than 1 mil
Shell 2	0.948	0.965	20+	Less than 1 mil
Shell 3	0.923	0.965	20+	0.001
Shell 4	0.923	0.965	20+	0.001
Shell 5	0.958	0.966	20+	Less than 1 mil
Shell 6	0.940	0.956	20+	Less than 1 mil
Shell 7	0.940	0.956	20+	Less than 1 mil
Shell 8	0.923	0.948	20+	0.001
Shell 9	0.940	0.956	20+	Less than 1 mil
Shell 10	0.956	0.973	20+	Less than 1 mil
Shell 11	0.940	0.956	20+	Less than 1 mil
Shell 12	0.873	0.890	20+	Less than 1 mil
Shell 13	0.881	0.898	20+	Less than 1 mil
Shell 14	0.873	0.906	20+	0.001
Shell 15	0.881	0.898	20+	Less than 1 mil

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0.001	20+	0.898	0.865	Shell 16
0.001	20+	0.898	0.873	Shell 17
0.001	20+	0.898	0.865	Shell 18
Less than 1 mil	20+	0.806	0.790	Shell 19
0.001	20+	0.815	0.781	Shell 20
0.001	20+	0.806	0.756	Shell 21
0.001	20+	0.815	0.773	Shell 22
Less than 1 mil	20+	0.806	0.781	Shell 23
Less than 1 mil	20+	0.781	0.748	Shell 24

	2004	2004	Repad			<b>Corrosion Rate</b>
	T-Min.	T-Nom.	T-Min.	T-Nom.	Size	Per Year
Nozzle No. 1	0.910	0.918	0.960	0.968	26"	Less than 1 mil
Nozzle No. 2	0.290	0.298	N/A	N/A	2"	Less than 1 mil
Nozzle No. 3	0.520	0.528	0.960	0.968	10"	Less than 1 mil
Nozzle No. 4	0.440	0.448	0.789	0.796	6"	Less than 1 mil
Nozzle No. 5	0.360	0.368	N/A	N/A	2"	Less than 1 mil
Nozzle No. 6	0.250	0.258	N/A	N/A	2"	Less than 1 mil
Nozzle No. 7	0.240	0.248	N/A	N/A	2"	Less than 1 mil
Nozzle No. 8	0.360	0.368	0.810	0.818	4"	Less than 1 mil
Nozzle No. 9	0.430	0.438	0.800	0.808	6"	Less than 1 mil
Nozzle No. 10	0.260	0.268	N/A	N/A	2"	Less than 1 mil
Nozzle No. 11	0.890	0.898	0.960	0.968	26"	Less than 1 mil
Nozzle No. 12	0.340	0.348	0.880	0.888	6"	Less than 1 mil
Nozzle No. 13	0.520	0.528	0.800	0.808	6"	Less than 1 mil
Nozzle No. 14	0.430	0.438	0.810	0.816	8"	Less than 1 mil



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DBI, Inc. Quality Inspection and Consulting Services

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Client: Enterprise Location: Skellytown, TX

Vessel No.: VSP-2010 Vessel Name: C-Grade Sphere

## **Vessel Parameters**

Design Pressure (MAWP):	60 psi	Head Material:	N/A
Design Temperature:	450 F	Head Type:	N/A
Operating Pressure:	50 psi	Allowable Stress:	N/A
Operating Temperature:	80 F	Joint Efficiency:	N/A
Diameter: I.D or O.D	69' 0" OD	Head Material	N/A
Length S/S:	N/A	Head Type:	N/A
Shell Material:	Case 1280 Gr. 70	Allowable Stress:	N/A
Allowable Stress:	17500	Joint Efficiency:	N/A
Joint Efficiency:	1.0	Date Manufactured:	1961
Corrosion Allowance:	0	In Service Date:	1961

#### ASME CODE EDITION USED FOR CALCULATIONS ASME Section VIII, Division 1. 1998 Edition

## Paint Information

Average paint coating the Paint Multiplier:	nickness:	10 mils 1	s Thickness measured with paint: Thickness measured without paint:		.791 .781	
		Name Plat	e Information			
U1A Available:	No	ASME st	amp present on vessel?	No		
Name Plate present ?	Yes	Rubbing	taken?	Picture		



Reliable...Responsive...Resourceful...Proactive

Client: Enterprise Location: Skellytown, TX

Vessel No.: VSP-2010 Vessel Name: C-Grade Sphere

Vessel Data

Vessel Class:	2	Date Manufactured:	1961
Manufactures Serial #:	4009	In Service Date:	1961
Product in Vessel:	C-Grade	Date of ASME VIII Vessel	N/A
		Mfg. under:	
P&ID Drawing #:	SK-063	Code Cases:	N/A
P&ID Prepared By:	Mid-America	Addenda:	N/A
Manufacturer:	Chicago Bridge &	National Board Number:	None
	Iron Co.		
Vessel Length S/S	N/A	Vessel Insulated:	No
Diameter I.D or O.D:	69' 0" OD	Describe openings (if any):	N/A
No. of Shell Sections:	5	ANSI Flange Rating:	150 #
No. of Nozzles:	14	Vessel Orientation:	Vertical
Design Pressure (MAWP):	60 psi	Operating Pressure:	50 psi
Design Temperature:	450 F	Operating Temperature:	80 F
Head Type:	N/A	Head Type:	N/A
Head Material:	N/A	Head Material:	N/A
Head Weld Type:	N/A	Head Weld Type:	N/A
Shell Material:	Case 1280 Gr. 70	Shell Weld Type	WDB Assumed
Radiography:	Unknown	Hydrostatic:	Unknown

## Relief Valve Information

Relief Valve Tag Number:	2010	Relief Valve Pressure Setting:	60 psi
Relief Valve Test Date:	1999	Relief Valve Size:	6" x 8"



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## PRESSURE VESSEL EXTERNAL INSPECTION

Client:EnterpriseLocation:Skellytown, TXVessel No.VSP-2010Vessel Name:C-Grade Sphere

Date Inspected: Inspector(s): 4-20-2004 Greg Wiebelhaus Josh Vinzant

Signature:

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#### NAME PLATE

Item Inspected Yes No NA = Not Applicable	Yes	No	N\A	Comments:
Name Plate present & legible	$\boxtimes$			Good
National Board #			$\square$	
Manufacturer	$\square$			Chicago Bridge & Iron
Serial # & Year Built				4009/ 1961
Repair or Rerate Name Plate			$\square$	

#### **FOUNDATION**

Concrete condition (spalling, cracks)	$\boxtimes$		None noted
Foundation settling	$\square$		None noted
Coating condition		$\square$	
Cradle supports (moisture, cracks)		$\boxtimes$	

#### **SUPPORTS**

Describe type (legs, saddle, etc.)	$\square$		Legs good
Corrosion, pitting (describe)	$\boxtimes$		None noted
Weld condition	$\boxtimes$		Appear good
Paint condition	$\boxtimes$		Appear good
Anchor bolts (tightness &	$\square$		Appear good
corrosion			
Insulation deterioration		$\square$	

#### SHELL

Corrosion, pitting (describe)	$\square$		None noted
Bulges / Blisters / Deformations	$\square$		None noted
Weld condition	$\square$		Appear good
Paint condition	$\square$		Good
Insulation deterioration		$\boxtimes$	
UT Measurements	$\boxtimes$		See drawing



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#### HEADS

Yes	No	N\A	Comments:
$\square$			None noted
			None noted
$\square$			Appear good
$\square$			Good
		$\square$	
			See drawing
	Yes	Yes No	Yes     No     N\A       Image: Second state states

#### MANWAYS & NOZZLES

Corrosion, pitting (describe)			None noted
Weld condition	$\square$		Appear good
Flange condition			Appear good
Bolting condition	$\square$		Appear good
Repad condition	$\square$		Appear good
Insulation deterioration		$\square$	
UT Measurements	$\square$		See drawing

#### APPURTENANCES

Grounding (tightness & corrosion)	$\square$		Ground good
Gauges, Sight glass (damage)		$\square$	
Relief Valve # / Size / Set Pressure			2010/ 6" x 8"/ 60 psi

#### LADDERS, STAIRS, PLATFORMS

Corroded, Broken Parts	$\square$		None noted
Paint condition			Good
Wear (ladder rungs, stair treads)			Appear good
Handrails secure	$\square$		Good
Flooring condition			Appear good
Tightness (bolts, tie down clips)	$\square$		Appear good
Attachment welds			Appear good
Corrosion, pitting (describe)			Appear good

#### **ADDITIONAL COMMENTS:**

1) B-Scan found heavy laminations on the top of sphere.









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Enterprise

Skellytown, TX

4-20-2004

**B-Scan** Examination

Vessel No.: VSP-2020 Vessel Name: C-Grade Sphere

P&ID No: SK-063



DBI Incorporated Lincoln Nebraska 4223 Progressive Avenue.Lincoln NE 68504.Telephone: 402-467-1818 Fax: 402-467-1766 Omaha Nebraska 2211 S. 156<sup>th</sup> Circle.Omaha NE 68130.Telephone:402-330-9612.Fax: 402-330-9640 Overland Park Kansas 11660 West 90th.Overland Park KS 66214.Telephone: 913-888-2321 Fax: 913-888-2351



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## Summary Report

Report Reviewed By: Knit Soins

Client: Enterprise Location: Skellytown, TX

Vessel No.: VSP-2020 Vessel Name: C-Grade Sphere

Inspection Date: 4-20-2004

Type of Inspection: B-Scan

Note: A B-Scan baseline inspection was performed on the VSP-2020. The VSP-2020 meets MAWP of 50 psi with remaining service life of 20+ years.

Next UT Inspection:		04/18/14 API 510 para 6.4		
Next Visual Inspection:		04/19/09		
	2004	2004	Remaining Life	<b>Corrosion Rate</b>
	T-Min.	T-Nom.	(Years)	Per Year
Shell 1	0.856	0.881	20+	0.001
Shell 2	0.856	0.890	20+	0.001
Shell 3	0.848	0.865	20+	Less than 1 mil
Shell 4	0.840	0.856	20+	Less than 1 mil
Shell 5	0.856	0.890	20+	0.001
Shell 6	0.848	0.865	20+	Less than 1 mil
Shell 7	0.848	0.856	20+	Less than 1 mil
Shell 8	0.848	0.873	20+	0.001
Shell 9	0.865	0.873	20+	Less than '1 mil
Shell 10	0.823	0.831	20+	Less than 1 mil
Shell 11	0.831	0.848	20+	Less than 1 mil
Shell 12	0.833	0.841	20+	Less than 1 mil
Shell 13	0.833	0.840	20+	Less than 1 mil
Shell 14	0.831	0.856	20+	0.001
Shell 15	0.815	0.840	20+	0.001
Shell 16	0.831	0.848	20+	Less than 1 mil
Shell 17	0.715	0.731	20+	Less than 1 mil



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Shell 18	0.665	0.690		20	0+	0.001
Shell 19	0.631	0.648		20	0+	Less than 1 mil
Shell 20	0.656	0.681		20	0+	0.001
Shell 21	0.698	0.715		20	0+	Less than 1 mil
Shell 22	0.673	0.690		20	0+	Less than 1 mil
Shell 23	0.681	0.706		20	0+	0.001
	2004	2004		Re	pad	<b>Corrosion</b> Rate
	T-Min.	T-Nom.	Size	T-Min.	TNom.	Per Year
Nozzle No. 1	0.750	0.758	12"	0.870	0.878	Less than 1 mil
Nozzle No. 2	0.950	0.968	26"	1.071	1.090	Less than 1 mil
Nozzle No. 3	0.835	0.843	26"	0.874	0.880	Less than 1 mil
Nozzle No. 4	0.430	0.438	6"	0.870	0.877	Less than 1 mil
Nozzle No. 5	0.230	0.238	2"	N/A	N/A	Less than 1 mil
Nozzle No. 6	0.450	0.458	6"	0.870	0.878	Less than 1 mil
Nozzle No. 7	0.360	0.368	4"	0.898	0.906	Less than 1 mil
Nozzle No. 8	0.420	0.438	6"	0.885	0.894	Less than 1 mil
Nozzle No. 9	0.350	0.358	4"	0.870	0.878	Less than 1 mil
Nozzle No. 10	0.250	0.258	2"	N/A	N/A	Less than 1 mil
Nozzle No. 11	N/A	N/A	2"	N/A	N/A	Less than 1 mil

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Client: Enterprise Location: Skellytown, TX

Name Plate present?

Yes

Vessel No.: VSP-2020 Vessel Name: C-Grade Sphere

## **Vessel Parameters**

Design Pressure (MAWP):	50 psi	Head Material:	N/A
Design Temperature:	Ambient	Head Type:	N/A
Operating Pressure:	40 psi	Allowable Stress:	N/A
Operating Temperature:	Ambient	Joint Efficiency:	N/A
Diameter: I.D or O.D	69' 0" OD	Head Material	N/A
Length S/S:	N/A	Head Type:	N/A
Shell Material:	Case 1280 Gr. 70	Allowable Stress:	N/A
Allowable Stress:	17500	Joint Efficiency:	N/A
Joint Efficiency:	1.0	Date Manufactured:	1967
Corrosion Allowance:	0	In Service Date:	1967

#### ASME CODE EDITION USED FOR CALCULATIONS ASME Section VIII, Division 1. 1998 Edition

#### Paint Information

Average paint coating thick Paint Multiplier:	kness:	10 mils 1	Thickness measured w Thickness measured w	Thickness measured with paint: Thickness measured without paint:		
		Name Plate	e Information			
U1A Available:	No	ASME sta	amp present on vessel?	No		

Rubbing taken?

Picture



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DBI, Inc. Quality Inspection and Consulting Services

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Client: Enterprise Location: Skellytown, TX

Vessel No.: VSP-2020 Vessel Name: C-Grade Sphere

## Vessel Data

Vessel Class:	2	Date Manufactured:	1967
Manufactures Serial #:	9-7396	In Service Date:	1967
Product in Vessel:	C Grade	Date of ASME VIII Vessel	N/A
		Mfg. under:	
P&ID Drawing #:	SK-063	Code Cases:	N/A
P&ID Prepared By:	Mid-America	Addenda:	N/A
Manufacturer:	Chicago Bridge &	National Board Number:	None
	Iron		
Vessel Length S/S	N/A	Vessel Insulated:	No
Diameter I.D or O.D:	69' 0"	Describe openings (if any):	N/A
No. of Shell Sections:	5	ANSI Flange Rating:	150 #
No. of Nozzles:	11	Vessel Orientation:	Vertical
Design Pressure (MAWP):	50 psi	Operating Pressure:	40 psi
Design Temperature:	Ambient	Operating Temperature:	Ambient
Head Type:	N/A	Head Type:	N/A
Head Material:	N/A	Head Material:	N/A
Head Weld Type:	N/A	Head Weld Type:	N/A
Shell Material:	Case 1280 Gr. 70	Shell Weld Type	WDB Assumed
Radiography:	N/A	Hydrostatic:	N/A

## **Relief Valve Information**

Relief Valve Tag Number:	2020	Relief Valve Pressure Setting:	50 psi
Relief Valve Test Date:	8-2000	Relief Valve Size:	8" x 10"



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## PRESSURE VESSEL EXTERNAL INSPECTION

Client:EnterpriseLocation:Skellytown, TXVessel No.VSP-2020Vessel Name:C-Grade Sphere

Date Inspected: Inspector(s): 4-20-2004 Greg Wiebelhaus Josh Vinzant

Signature:

#### NAME PLATE

Item Inspected Yes No NA = Not Applicable	Yes	No	N\A	Comments:
Name Plate present & legible	$\square$			Good
National Board #			$\boxtimes$	
Manufacturer	$\square$			Chicago Bridge & Iron Co,
Serial # & Year Built				9-7396/ 1967
Repair or Rerate Name Plate			$\boxtimes$	

#### **FOUNDATION**

Concrete condition (spalling, cracks)	$\boxtimes$		None noted
Foundation settling	$\boxtimes$		None noted
Coating condition		$\square$	
Cradle supports (moisture, cracks)			

#### **SUPPORTS**

Describe type (legs, saddle, etc.)	$\square$		Legs good
Corrosion, pitting (describe)	$\square$		None noted
Weld condition	$\square$		Appear good
Paint condition	$\square$		Appear good
Anchor bolts (tightness &	$\square$		Appear good
corrosion			_
Insulation deterioration		$\square$	

#### SHELL

Corrosion, pitting (describe)	$\boxtimes$		None noted
Bulges / Blisters / Deformations	$\boxtimes$		None noted
Weld condition	$\mathbb{N}$		Appear good
Paint condition	$\boxtimes$		Appear good
Insulation deterioration		$\boxtimes$	-
UT Measurements	$\boxtimes$		See drawing



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#### HEADS

Item Inspected Yes No NA = Not Applicable	Yes	No	N\A	Comments:
Corrosion, pitting (describe)	$\square$			None noted
Bulges / Blisters / Deformations	$\square$			None noted
Weld condition	$\square$			Appear good
Paint condition	$\square$			Appear good
Insulation deterioration				
UT Measurements	$\square$			See drawing

#### MANWAYS & NOZZLES

Corrosion, pitting (describe)			None noted
Weld condition	$\square$		Appear good
Flange condition	$\square$		Appear good
Bolting condition	$\square$		Appear good
Repad condition	$\square$		Appear good
Insulation deterioration		$\square$	
UT Measurements			See drawing

#### APPURTENANCES

Grounding (tightness & corrosion)			Ground good
Gauges, Sight glass (damage)		$\square$	
Relief Valve # / Size / Set Pressure	$\square$		2020/ 8" x 10"/ 50 psi

#### LADDERS, STAIRS, PLATFORMS

Corroded, Broken Parts		None noted
Paint condition	$\square$	Good
Wear (ladder rungs, stair treads)	$\square$	Appear good
Handrails secure	$\square$	Good
Flooring condition	$\square$	Appear good
Tightness (bolts, tie down clips)	$\square$	Appear good
Attachment welds	$\square$	Appear good
Corrosion, pitting (describe)	$\square$	None noted

#### **ADDITIONAL COMMENTS:**









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Enterprise Products Operating L.P.

CPF-4-2007-5015

# **EXHIBIT 3**

**Cathodic Protection Surveys** 

#### Enterprise

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#### Compliance Survey Report SOUTH LEG; SKELLYTOWN STA.; 220; SKELLYTOWN STATION Filters: 1. Survey = 2003 Annual Survey

Relative	•	Survey	Structure	
Milepos	t Location	Date	P/S	Survey Remarks
System:	SOUTH LEG			
Asset	Gr: SKELLYTOWN STA.			
As	sset Id: 220			
	Segment Code: SKELLYTOWN STA	ΓΙΟΝ	Segment	Name:
0.000	Station Piping: 8" Red Pump	07/30/2003	-1.028	
1.000	Manifold Station Piping: 10" Blue Pump Manifold #1	07/30/2003	-1.092	
2.000	Station Piping: 10" Blue Pump Manifold #2	07/30/2003	-1.061	
3.000	Station Piping: 10" Blue Check Valve	07/30/2003	-1.316	
4.000	Station Piping: Pumps To Spheres	07/30/2003	-1.011	
5.000	Station Piping: North Sphere	07/30/2003	-1.176	
6.000	Station Piping: Middle Sphere	07/30/2003	-1.134	
7.000	Station Piping: South Sphere	07/30/2003	-1.163	
8.000	Station Piping: Pump To Tank	07/30/2003	-1.038	
9.000	Station Piping: North Tank Quadrant	07/30/2003	-1.010	
10.000	Station Piping: East Tank Quadrant	07/30/2003	-1.038	
11.000	Station Piping: South Tank Quadrant	07/30/2003	-1.013	
12.000	Station Piping: West Tank Quadrant	07/30/2003	-1.014	
13.000	Station Piping: Meters Conway (red Reversal)	07/30/2003	-1.083	
14.000	Station Piping: Flare	07/30/2003	-1.821	
15.000	Station Piping: Methanol Tank	07/30/2003	-1.055	

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#### Compliance Survey Report SOUTH LEG; SKELLYTOWN STA.; 220; SKELLYTOWN STATION Filters: 1. Survey = 2003 Annual Survey

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Relative		Survey	Structure	
Milepost	Location	Date	P/S	Survey Remarks
16.000	Station Piping: Celanese (c)	07/30/2003	-0.991	
	Pump			
17.000	Station Piping: Tank Injection Booster	07/30/2003	-1.086	
18.000	Station Piping: Tank Injection Pump	07/30/2003	-1.001	
19.000	8-inch Diamond Shamrock - I.f.: Mid-america Side	07/30/2003	-1.213	
20.000	8-inch Phillips Connection #1 - I.f.: Mid-america Side	07/30/2003	-1.261	
21.000	6-inch Phillips Connection #2 - I.f.: Mid-america Side	07/30/2003	-1.323	
22.000	6-inch Phillips Connection #3: Mid-america Side	07/30/2003	-1.251	
23.000	8-inch Phillips Connection #4 - I.f.: Mid-america Side	07/30/2003	-1.263	

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#### Enterprise

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Compliance Survey Report SOUTH LEG; SKELLYTOWN STA.; 220; SKELLYTOWN STATION Filters: 1. Survey = 2004 Annual Survey

Relative	9		Survey	Structure	
Milepos	st	Location	Date	P/S	Survey Remarks
System:	SOUTH	LEG			
Asset	Gr: SK	ELLYTOWN STA.			
A	sset Id:	220			
	Segm	ent Code: SKELLYTOWN STA1	ION	Segment	Name:
0.000		Station Piping: 8" Red Pump Manifold	08/25/2004	-1.018	
1.000		Station Piping: 10" Blue Pump Manifold #1	08/25/2004	-1.011	
2.000		Station Piping: 10" Blue Pump Manifold #2	08/25/2004	-0.997	
3.000		Station Piping: 10" Blue Check Valve	08/25/2004	-1.301	
4.000		Station Piping: Pumps To Spheres	08/25/2004	-1.075	
5.000		Station Piping: North Sphere	08/25/2004	-1.031	
6.000		Station Piping: Middle Sphere	08/25/2004	-1.056	
7.000		Station Piping: South Sphere	08/25/2004	-1.124	
8.000		Station Piping: Pump To Tank	08/25/2004	-1.053	
9.000		Station Piping: North Tank Quadrant	08/25/2004	-1.032	
10.000	)	Station Piping: East Tank Quadrant	08/25/2004	-1.046	
11.000	)	Station Piping: South Tank Quadrant	08/25/2004	-1.043	
12.000	•	Station Piping: West Tank Quadrant	08/25/2004	-1.021	
13.000	)	Station Piping: Meters Conway (red Reversal)	08/25/2004	-1.026	
14.000		Station Piping: Flare	08/25/2004	-1.806	
15.000		Station Piping: Methanol Tank	08/25/2004	-1.051	

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#### Compliance Survey Report SOUTH LEG; SKELLYTOWN STA.; 220; SKELLYTOWN STATION Filters: 1. Survey = 2004 Annual Survey

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Relative		Survey	Structure	
Milepost	Location	Date	P/S	Survey Remarks
16.000	Station Piping: Celanese (c)	08/25/2004	-0.897	
	Pump			
17.000	Station Piping: Tank Injection	08/25/2004	-1.107	
	Booster			
18.000	Station Piping: Tank Injection	08/25/2004	-1.031	
	Pump			
19.000	8-inch Diamond Shamrock -	08/25/2004	-1.253	
	I.f.: Mid-america Side			
20.000	8-inch Phillips Connection #1	08/25/2004	-1.267	
	- I.f.: Mid-america Side			
21.000	6-inch Phillips Connection #2	08/25/2004	-1.511	
	- I.f.: Mid-america Side			
22.000	6-inch Phillips Connection #3:	08/25/2004	-1.366	
	Mid-america Side			
23.000	8-inch Phillips Connection #4	08/25/2004	-1.333	
	<ul> <li>I.f.: Mid-america Side</li> </ul>			

#### Enterprise

Compliance Survey Report SOUTH LEG; SKELLYTOWN STA.; 220; SKELLYTOWN STATION Filters: 1. Survey = 2005 Annual Survey

Relative		Survey	Structure	
<u>Milepost</u>	Location	Date	P/S	Survey Remarks
System: S	OUTH LEG			
Asset G	Sr: SKELLYTOWN STA.			
Ass	et Id: 220			
	Segment Code: SKELLYTOWN STAT	TION	Segment	Name:
0.000	Station Piping: 8" Red Pump Manifold	09/03/2005	-1.099	
1.000	Station Piping: 10" Blue Pump Manifold #1	09/03/2005	-1.078	
2.000	Station Piping: 10" Blue Pump Manifold #2	09/03/2005	-1.002	
3.000	Station Piping: 10" Blue Check Valve	09/03/2005	<del>-</del> 1.284	
4.000	Station Piping: Pumps To Spheres	09/03/2005	-1.001	
5.000	Station Piping: North Sphere	09/03/2005	-1.093	
6.000	Station Piping: Middle Sphere	09/03/2005	-1.066	
7.000	Station Piping: South Sphere	09/03/2005	-1.102	
8.000	Station Piping: Pump To Tank	09/03/2005	-1.005	
9.000	Station Piping: North Tank Quadrant	09/03/2005	-1.143	
10.000	Station Piping: East Tank Quadrant	09/03/2005	-1.009	
11.000	Station Piping: South Tank Quadrant	09/03/2005	-1.105	
12.000	Station Piping: West Tank Quadrant	09/03/2005	-0.998	
13.000	Station Piping: Meters Conway (red Reversal)	09/03/2005	-1.111	
14.000	Station Piping: Flare	09/03/2005	-1.794	
15.000	Station Piping: Methanol Tank	09/03/2005	-1.127	

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#### Compliance Survey Report SOUTH LEG; SKELLYTOWN STA.; 220; SKELLYTOWN STATION Filters: 1. Survey = 2005 Annual Survey

Relative Milepost	Location	Survey Date	Structure P/S	Survey Remarks
16.000	Station Piping: Celanese (c)	09/03/2005	-0.969	<b>_</b>
	Pump			
17.000	Station Piping: Tank Injection	09/03/2005	-1.112	
	Booster			
18.000	Station Piping: Tank Injection	09/03/2005	-1.031	
	Pump			
19.000	8-inch Diamond Shamrock -	09/03/2005	-1.282	
	I.f.: Mid-america Side			
20.000	8-inch Phillips Connection #1	09/03/2005	-1.259	
	- I.f.: Mid-america Side			
21.000	6-inch Phillips Connection #2	09/03/2005	-1.483	
	- I.f.: Mid-america Side			
22.000	6-inch Phillips Connection #3:	09/03/2005	-1.351	
	Mid-america Side			
23.000	8-inch Phillips Connection #4	09/03/2005	-1.307	
	- I.f.: Mid-america Side			

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Enterprise Products Operating L.P.

CPF-4-2007-5015

# **EXHIBIT 4**

**Close Interval Survey – Four Corners - 2004** 



## Close Interval Survey Report Red Pipeline Four Corners Area, New Mexico

Customer Name: Customer Address: Customer Contact: Customer Purchase Order No.: CCC Job No.:

Pipeline Description: Pipeline Location: Date Survey Was Performed: Pipeline Section Surveyed: Total Distance Surveyed: Type Right Of Way: Equipment Required to Transverse R.O.W.:

Type Survey Performed: Interruption Cycle: Current Sources Interrupted: Depth Of Cover Survey Performed: Global Positioning Data Provided:

Instrumentation: Data Collection: Calibration Date: Reference Electrode: Calibration Date: Pipeline Locator/DOC: Global Positioning Equipment: Current Interrupters: Relay Type:

Electronic Data: CIS Data: GPS/DOC Data:

**Cathodic Protection Related Deficiencies:** 

Enterprise Products Operating L.P. 836 Highway 516, Flora Vista, NM 87454 Mr. Joe McReynolds AFE & Sun Code # PO4535-987 S2093

10" Dia. Red Pipeline Four Corners Area, New Mexico October 24-31 & November 1-5, 2004 Sta. No.12471+57 to Sta. No. 14170+38 169,881' / 32.17 mi. Wooded, Pasture, Cultivated, Open Range & Rural ATV

Interrupted 7 Seconds on, 3 Seconds Off See Current Source Data Sheet Attached N/A N/A

Bass-Trigon Allegro CX January 2004 Copper Copper Sulfate Daily Radiodetection RD 4000 N/A GPS Synchronized/ Hanson AC/ Mercury

Bass-Trigon Close Interval Survey Manager (CISM) N/A

See Attached Sheet

10172 Mammoth Avenue + Baton Rouge, Louisiana 70814 + (225) 275-6131 + Fax (225) 928-7238 Email: bud@coastalcorrosion.com + <u>www.coastalcorrosion.com</u>



## Close Interval Survey Report Blue Pipeline Four Corners Area, New Mexico

Customer Name: Customer Address: Customer Contact: Customer Purchase Order No.: CCC Job No.:

Pipeline Description: Pipeline Location: Date Sarvey Was Performed: Pipeline Section Surveyed: Total Distance Surveyed: Type Right Of Way: Equipment Required to Transverse R.O.W.:

Type Survey Performed: Interruption Cycle: Current Sources Interrupted: Depth Of Cover Survey Performed: Global Positioning Data Provided:

Instrumentation: Data Collection: Calibration Date: Reference Electrode: Calibration Date: Pipeline Locator/DOC: Global Positioning Equipment: Current Interrupters: Relay Type:

Electronic Data: CIS Data: GPS/DOC Data:

**Cathodic Protection Related Deficiencies:** 

Enterprise Products Operating L.P. 836 Highway 516, Flora Vista, NM 87454 Mr. Joe McReynolds AFE & Sun Code # PO4535-987 S2093

8" Dia. Blue Pipeline Four Corners Area, New Mexico October 24-31 & November 1-5, 2004 Sta. No. 12470+67 to Sta. No. 14170+91 170,024' / 32.2 mi. Wooded, Pasture, Cultivated, Open Range & Rural ATV

Interrupted 7 Seconds on, 3 Seconds Off See Current Source Data Sheet Attached N/A N/A

Bass-Trigon Allegro CX January 2004 Copper Copper Sulfate Daily Radiodetection RD 4000 N/A GPS Synchronized/ Hanson AC/ Mercury

Bass-Trigon Close Interval Survey Manager (CISM) N/A

See Attached Sheet

10172 Mammoth Avenue + Baton Rouge, Louislana 70814 + (225) 275-6131 + Fax (225) 926-7238 Email: bud@coastalcorrosion.com + <u>www.coastalcorrosion.com</u>



## Close Interval Survey Report Brown Pipeline Four Corners Area, New Mexico

Customer Name: Customer Address: Customer Contact: Customer Purchase Order No.: CCC Job No.:

Pipeline Description: Pipeline Location: Date Survey Was Performed: Pipeline Section Surveyed: Total Distance Surveyed: Type Right Of Way: Equipment Required to Transverse R.O.W.:

Type Survey Performed: Interruption Cycle: Current Sources Interrupted: Depth Of Cover Survey Performed: Global Positioning Data Provided:

Instrumentation: Data Collection: Calibration Date: Reference Electrode: Calibration Date: Pipeline Locator/DOC: Global Positioning Equipment: Current Interrupters: Relay Type:

Electronic Data: CIS Data: GPS/DOC Data:

**Cathodic Protection Related Deficiencies:** 

Enterprise Products Operating L.P. 836 Highway 516, Flora Vista, NM 87454 Mr. Joe McReynolds AFE & Sun Code # PO4535-987 S2093

12" Dia. Brown Pipeline Four Corners Area, New Mexico November 5, 2004 Sta. No. 0+00 to Sta. No. 1+42 142' Rural N/A

#### Interrupted

7 Seconds on, 3 Seconds Off See Current Source Data Sheet Attached Electronic DGPS

Bass-Trigon Allegro CX January 2004 Copper Copper Sulfate Daily Radiodetection RD 4000 N/A GPS Synchronized/ Hanson AC/ Mercury

Bass-Trigon Close Interval Survey Manager (CISM) N/A

See Attached Sheet

10172 Mammoth Avenue + Baton Rouge, Louisiana 70814 + (225) 275-6131 + Fax (225) 928-7238 Email: bud@coastalcorrosion.com + <u>www.coastalcorrosion.com</u> Enterprise Products Operating L.P.

CPF-4-2007-5015

# **EXHIBIT 5**

**Maintenance Reports** 



## MAINTENANCE REPORT

. . . .

and the strange				GENERAL	DATA			
MAINLINE			FACILITY	Ťr	ect Number			At Mile Post/Aerial Marker
Send Original to Records/GIS 800 S. Baltimore Ave. 3 <sup>rd</sup> Pinor	Tudsa, OK 74119	(Ongu	nal Stays et Location	<u> </u>	101-0-1	A . 23		AM 50
Ipeline Name / Facility Name	مدد <b>ا</b> مد	لا- مار	1. r. 2. 1 4	ier-1 U	ne Section Number / Fa	cility Number		Line ID# (From Pipe Data)
Timmunin Pi	Sheet OR Engin	eeting Dwg	No.	<u></u>	c 11	AFE Number		
		1 144	U I P	· Mr 18	<u>1,5                                    </u>			
OK Pr.	OK PLUMER NE 14 SG 17 922 NK4E							
				LEAK D	АТА			
Dete Discovered	Time		Date Stopped		ime 🔲	Product		Barrels / MNCF Out of Line
	1	님:		1				
Barraia Bacovarad	Ramala Lost					Third Dark Dawara		Equipment Failure
				m Failure		Contractor Error	Frostheav	e Natural Forces
ļ				uhovn 🗌		Pressure Testing	Ovenflow (	Rain) 🔲 Intentional Blow Down
				datrsm	Unknown	Water Freeze	Cither (Sp	ecily)
Leak Reported By						-		
Name			Address			Pb	one	
_			WO	RK DONE A	ND REMARKS			
Data Work Started (M/D/Y)		Date Work	Completed (M/D/Y)		Ditch Was Open to	From (M/D/Y) To (M/D	m	
Tune of Banair Tank Line		11	ank Shell	Expansion Joint	Other			
- Alka of Loakers, [77] rank Flue								
Location of Repair	bove Ground	Below	Ground					
Description of Work Done	Exect	sate.	I value	setting	, displa	und oral	س ال	ith nitroyen
			+				τ.	and and
cul aut	ville	ايدر	ing.	NEINE	in pir	- 130NE	2 1 5	re- umi
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Oumer			Address	FROPERIN	DAMAGE		Ph/	
Tenant			Address				Ph	one
Description of Damage							<b>I</b>	
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1								
			<del></del> *			· · ·		
Check Written To					Dete	Check No.	A	nount
		LINE	CONDITION	AND CATH	ODIC PROTE	CTION STATI	JS	
External Pipe Condition (De	nacribe)				Existing Coating		Prin	- 903-15T
	Surface Rust		Severe Pittin	9	Type Puly	Ken 919	Thickness	
Munor Priting	Moderate Pitt	ing	Cither		Condition W	ell Bonded P	artially Bonded	Totally Disbonded
I Internet Pipe Condition (De	Scribe, if Cul)				# Kectilier/ Ground B	eas are damaged, recor	d damage here	and report to Eng. Corrosion Contr
	Moderate Pit	ing	Seven Pittin		{			
Corrosion Description (/ C	omosion Present)	<u> </u>	Part Corere and		P/S Reading			
Max. Pit Size L" x W	"xD	-			(Ground Level)	Batore F (in Diltch	(epair )	After Repair (In Ditch)
Pit Orientation (Downstream	n - Clock Position	4:_ 4 D==#:	— ,		VDC	V	DC	VDC
	winsuream Cio	a Possion)	<u> </u>					
			· · · · · · · · · · · · · · · · · · ·	LINE WEL	DING DATA			
		Neiders			No. New Girth Webla	No. New Maint, Welds		Date of Weld
	<u>^</u>			No. Welds	3		7	
Frank	VIVAre	<u> </u>		No. NDT	3		<u>-                                    </u>	11-03
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				No. NDT	1	1		
		NON	DESTRUCT	VE TESTING	AND PRESS	URE TEST D	ATA	
The following	Information mus	be docume	nted and the original	ecords submitted w	th the Maintance Res	Ion to comply with DOT	195 266 195 3	0 192 517 and 192 243
					T			
I Pressure Chart	Dune Mail Celibra	oon Certificat	te 1	Contractor	Test Medium	Date/Time of Test (5	Start & Finish)	NDT Inspection Report
	- Pipe Mill Ce		Li⊦acalatyi		cievation Proble	Exp. Of Preusure Di	scontinuities (	NDT Qualification Sheet
1								
Submitted By (Print Name)	)			Dete	Approved By (Supe	rvisor or Project Manage	r) (Print Name)	Date
Pick L	Korco	· n 5		3-18-02				
(Signature)	1 12				(Signature)			
Levia_	C Mrr				_L			
	JANENT				DISTRIBUTION	SEE "GENERAL	DATA" ABO	WE



#### **MAINTENANCE REPORT (Pg. 2)** FORM REV. 05/01

MINIMUM INFORMATION REQUIRED

re shall be drawn on pipe detail below with ESHs and AHSI rating shown for each. Valves, R es, stopples and other Riti afacturer and pipe specifi

vide ESHs for all welds and changes in pipe well thickness, pipe grade, pipe seem, pipe man Provide ESNs for changes in coating and note type and manufacturer of coating, except for coating lass than 5 lost in length.

ent sleeves, patches, etc., on pipe detail. Provide ESHs for all repairs made to pipe, i.e., full encircle

ntify pipeline name, line number, line I.D., etc.



Enterprise Products Company	Line ID#
	Date 5/28/2004
MAINTENANCE REPORT	OQ Verification
(Check appropriate box)	
X MANILINE Pipeline Name 4" PL Plains Union Texas Wellman	Line Section Number AFE No
FACILITY Facility Name	Facility Number
Reference Drawings (Alignment Sheet OR Engineering Dwg. No.)	6742 AL 1 of 10 Tract Number 100-T-YO-3
GPS (DD.MM.mmm) Lat Long	At Mile Post/Aerial Marker
County / Parish State	Legal Description
State Type of Work to be Done Pipeline Cutout to allow El Paso to lo	ver their lines
Date Work Started Date Work Completed	Ditch Was Open From (M/D/Y) To (M/D/Y)
1/21/2004 1/26/2004	
Was Control Center Notified of pending excavation?	No Was Line Probing Conducted? X Yes No
Tune of Renair or Installation	
	Evonansion, joint Other (Specify)
Location of Installation or Repair Above Ground Were	permanent or temporary line markers installed?
Below Ground	
Description of Work Done	
Displaced line with notrogen, cut out section, welded in new pipe section	n.
	Eviating
External Pipe Condition (Describe)	Existing Costing
	Condition
	Will Rooded Rodel Totally Disbonded
Internal Pipe Condition (Describe, if Cut)	If Rectifier / Ground Beds are damaged, record damage here and report to
X Like New Surface Scale	Corrosion Prevention Dept.
Minor Pitting Moderate Pitting Severe Pitting	
Corrosion Description (If Corrosion Present)	P/S Reading - Collect before & after PSP Readings with Rectifier Energized.
Max. Pit Size L * x W * x D *	Before Repair Before Repair After Repair
Pitting, Clock Position (Facing Increasing Stationing)	(Ground Level) (in Ditch) (In Ditch)
Long Seam, Clock Position (Facing Increasing Stationing)	VDCVDCVDC
State Type of Activity: Tie-In X Pipe Replaceme	nt Replace other component
Weiders No. New	Girth Welds No. New Maint, Welds Date of Weld
Gene Hopkins No. Welds	3 1/24/2004
No. NOT	3
No. Welds	
No. Weids	
No. NDT	
No. Welds	
No. ND3	
Were Arc Burns Repaired?	
Were defective welds replaced or repaired?	xplain: N/A
Submitted by: Date:	Approved by: Date:
Dest / Kom 5/28/2004	Nant / 1/2 5/28/2004
Signature	Supervisor or Project Manager
Dick Kovarna	Dick Kovarna Print Name

, **•** 

Enterprise Pr MAINTENAN (back of form)	oducts Compan	00 Ve	Line ID# OQ Task(s) Date prification			
Velves, flanges, stopples and othe Provide ESNs for ell welds and ch Provide ESNs for changes in cost Provide ESNs for all repairs made identify pipeline name, line number if more spece is needed, attach el	r fittings shall be drawn or anges in pipe well thicknei ing and note type and mar to pipe, i.e., full encircien r, line I.D., etc. retches as necessary.	n pipe detail belo as, pipe grade, p rufacturer of cos rent sleaves, psi	wwith ESNs and AN ipe seam, pipe manu- ting, except for coati- ches, stc., on pipe di	SI rating shown for facturer and pipe a ng less than 5 feet stail.	each. pecification on in length.	pipe detail.
Total Feet of Pipe Added (Tie-in V	Vaid to Tie-in Weld)	PIPE ING 	Bize	4 1/8 "	Well Thicknes	a <u>0,188</u>
Grede X42	Seam Type	ERW	Manufacturer	LTV Steel		
Fusion Bond Epoxy	Polyken 1027 Prim	er	Polyken 930-	50 Tape (Innerwra)	D)	
Polyken 945-15 Tape (Oute	rwrap) X Other (	Specify) <u>Taper</u>	coat Gray			
	and the second states of the second secon	PIPE R	ETIRED	- 1,5% , 1 ** 		
Total Feet of Pipe Retired Grade B	53' Seam Type	Size	<u>4 1/2"</u> Wa Manufacturer	Republic Ste	0.125	
		FABRICAT	ED BENDS			
Total Feet of Bends Added	Size		Wall Thickness		Send Radius	
Grade	Seam Type		Manufacturer			
Fusion Bond Epoxy	Polyken 1027 Prim	er	Polyken 930	-50 Tape (Innerwra	p)	
Polyken 945-15 Tape (Oute	nwrap) Other (	(Specify)				
		PIPEC	DETAIL			
Reference Point Description (Ne	arest Road, Fence, Valve,	etc., from Align	ment Sheet) Road			
Engineering Station Number (ES	N) of Reference Point		52	+		90
Distance from Ref. Pt. To nearest en (tie-in	d of <u>480</u> ft. . coating, split tee, sleeve, etc.)		Direction from Ref	. Pt. (Along Pipelir	NG) KEast	West
	STATION O	Ther pipe inform		DISTANC DISTANC DISTANC 9 9 9 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	ESN + + + + + + + + + + + + + + + + + + +	
Fusion B	29 3 5 5 5 5 5 5 5 5 5 5	THER COATING INF Polyken 1027 Pr		Polyken 930-50 Ta	pe (innerwrati)	
Polyken	945-15 Tape (Outerwrap)			Other Tapeco	at Grey	

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Enterprise Products Company
MAINTENANCE REPORT Date $\frac{7/30/09}{100}$
(Check appropriate box)
MAINLINE Pipeline Name [DHeyUIII Ken hime Line Section Number I. D. 824 AFE No.
FACILITY Facility Name Facility Number
Reference Drawings (Alignment Sheet OR Engineering Dwg. No.) Tract Number 165-165-100-400
County / Bariela // Mile Post/Aeriel Marker /68:5
WORK DONE AND DEMADICE
Q_1 1 as at 11: A
State Type of Work to be Done <u>IPC/ACCCC</u> SS-S Of <u>LACC</u> <u>PpC</u>
$\frac{6 \cdot 17 \cdot 09}{6 \cdot 19 \cdot 09} = \frac{6 \cdot 19 \cdot 09}{6 \cdot 19 \cdot 09}$
Was Control Center Notified of pending excavation?
Type of Repair or Installation
Tank Line Tank Shell I Pipeline Valve Expansion Joint Other (Specify)
Location of Installation or Repair Above Ground Were permanent or temporary line markers installed?
Description of Work Done
RepLACE 55'05" of 6 18 x. 125 wt x60
Prairie A Ma 1" ( Soul ( All'))
Republiced (VIIIe & WATERAL (I(ea Line)
LINE CONDITION AND CATHODIC PROTECTION STATUS
External Pipe Condition (Describe) Existing Coating
Type JOLON 980 Thickness
Internal Pipe Condition (Describe, if Cut) If Rectifier / Ground Beds are damaged, record damage here and report
Line New Surface Scale Corrosion Prevention Dept.
Minor Pitting Moderate Pitting Severe Pitting
Corrosion Description (If Corrosion Present) P/S Reading - Collect before & after PSP Readings with Rectifier Energized.
Mex. Pit Stze L x W x D Before Repair Before Repair After Repair
Pitting, Clock Position (racing increasing Stationing) (Ground Level) (in Litch) (in Litch) (in Litch)
State Type of Activity:
Welders No. New Girth Welds No. New Meinl. Welds Date of Weld
Company Hurthan No. Weids 5 6-19-04
No. Weds
No. NDT
No. NDT
No. Welds
Were Arc Burns Repaired? Yes No Explain:
Were defective weids replaced or repaired? Yes No Explain:
Submitted by: Date: Approved by: Date: Date:
Supervisor or Project Managar
MINNUE         FEEd           Print Name         Print Name

Distribution: Records Coordinator CC: Field Office PfL Integrity NFW Maintenance Remot.vts

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Enterprise Products Operating L.P.

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CPF-4-2007-5015

# **EXHIBIT 6**

Metallurgical Test - Keifner & Associates

December 4, 2003

4 4 4 J

> Kevin Bodenhamer Enterprise Pipeline Company 2727 North Loop West Houston, Texas 77008

Dear Mr. Bodenhamer:

Enclosed is our draft report "Investigation of Mechanical Damage at ESN 13359+15 on the 12-Inch Rock Mountain Pipeline (Red System) near Edgewood, New Mexico".

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Thomas F. Wahjudi Engineer I

TFW:gw Enclosure

**Final Report No.** 

#### DRAFT FINAL REPORT

· · ·

on

#### INVESTIGATION OF MECHANICAL DAMAGE AT ESN 13359+15 ON THE 12-INCH ROCKY MOUNTAIN PIPELINE (RED SYSTEM) NEAR EDGEWOOD, NEW MEXICO

to

#### ENTERPRISE PIPELINE COMPANY

**December 4, 2003** 

by

Thomas F. Wahjudi

KIEFNER AND ASSOCIATES, INC. 585 Scherers Court Worthington, Ohio 43085

0360-0305

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Figure 4. Metallographic Section of the ERW Seam
Figure 5. Transverse Charpy V-Notch Data

#### INVESTIGATION OF MECHANICAL DAMAGE AT ESN 13359+15 ON THE 12-INCH ROCKY MOUNTAIN PIPELINE (RED SYSTEM) NEAR EDGEWOOD, NEW MEXICO

by

Thomas F. Wahjudi

#### **INTRODUCTION**

This report presents the results of our investigation into a puncture of the Rocky Mountain pipeline that occurred on October 25, 2003 at Milepost 130+29. Mid-America Pipeline personnel were on site during the incident. At the time of the puncture, the pipeline was in service and transporting demethanized mix (ethane, propane, butane, and gasoline). The pipeline was repaired and a 3-foot-long pipe containing the puncture was sent to Kiefner and Associates, Inc. (KAI) for examination.

#### BACKGROUND

The Rocky Mountain pipeline is 12.75-inch outside diameter (OD) by 0.219-inch wall thickness (WT) API Grade X-65 line pipe manufactured by American Steel using the high-frequency electric-resistance-welding (ERW) process. The line was installed in 1980 with Polyken 929-40 primer protective coating, 980-15 Polyken, 15 mil tape, and placed under impressed-current cathodic protection. The pipeline was in service at an internal pressure of 425 psig (19 percent of SMYS) at the time of the puncture.

The maximum operating pressure (MOP) of the pipeline is 1,650 psig (73.9 percent of SMYS). The most recent hydrostatic test of the pipeline was conducted in January 11, 1981 at a minimum pressure of 2,169 psig (97 percent of SMYS). The test pressure was held for 24 hours.

#### **SUMMARY**

The failure resulted solely from an impact of a sharp-nosed tool that penetrated the pipe wall by a shearing action. No other contributing cause of the failure was identified. The pipe segment that was examined on receipt showed no external or internal corrosion or other degradation. Examination of the fracture surfaces showed only shearing and ductile tearing of the pipe wall. There were no indications on the fracture surfaces of a stable, in-service crack-growth mechanism such as fatigue cracking, stress-corrosion cracking, or hydrogen embrittlement. The pipe material met the requirements for the API specifications that were in effect the year the pipeline was installed.

#### **TECHNICAL INVESTIGATION**

The pipe segment containing a puncture was sent to KAI for examination and confirmation that the puncture was the only cause of the failure.

#### **Visual Appearance**

The 3-foot-long pipe in as-received condition is shown in Figure 1. Figure 2 shows a close-up photograph of a 9.5-inch by 8-inch coupon removed from the pipe containing the puncture. The puncture and deformed area due to the gouge on the OD surface of the pipe is shown in Figure 2. The ID surface photograph is shown in Figure 3. Both the OD and ID surfaces of the pipe were free of surface corrosion and showed no indications of other degradation. The gouge was positioned away from the seam weld as indicated in Figure 1. It appears that the gouge was made first and, as the tool moved along the pipe, the indentation or dent became deeper until the pipe wall was punctured. The approximate area of the opening of the puncture was  $0.4 \text{ in}^2$ . The indentation extended about 1.1 inches inward from the OD surface.

#### **Fractographic Examination**

The fracture surfaces of the puncture as well as the surrounding area were closely examined. Visual examination of the fracture surfaces showed shearing and ductile tearing of the pipe wall a sharp-nosed tool. The puncture exhibited considerable plastic deformation and smearing of a portion of the fracture surface on one side of the opening. There was no evidence

2

on the exposed fracture surfaces of a stable, in-service crack-growth mechanism such as fatigue or stress-corrosion cracking.

#### **Metallographic Section Examination**

A metallographic section was created to permit characterization of the ERW seam. Figure 4 shows the metallographic section of the seam. The absence of defects, the presence of the hourglass-shaped heat-affected zone, and the absence of grain coarsening in the heat-affected zone strongly suggest that this is a soundly bonded high-frequency ERW seam.

#### **Material Properties of the Pipe**

A material-property coupon from the pipe was used to machine samples to measure transverse tensile properties and transverse base metal Charpy V-notch transition temperature and to conduct a chemical analysis of the base metal. The tensile and chemical data for the pipe are tabulated in Table 1. The pipe material met the requirements for the API specifications that were in effect the year the pipeline was installed, API Specification 5LX, 5<sup>th</sup> Edition, November 1980 for Grade X65 Welded Line Pipe.

The weldability of the pipe material is governed by its chemical composition, as expressed by its carbon equivalent (CE). The CE of low carbon steel is currently estimated using the International Institute for Welding (IIW) equation for steel with carbon content greater than 0.12 percent,

$$CE(IIW) = C + \frac{Mn}{6} + \frac{Cr + Mo + V}{5} + \frac{Cu + Ni}{15}$$

where the symbols are abbreviations for the elements and the quantities are expressed in percent by weight listed in Table 1. For this pipe material, a CE = 0.238 was determined.

Transverse Charpy V-notch impact tests were conducted on specimens away from the weld seam. The specimens were machined from flattened coupons to obtain specimens as thick as possible. Figure 5 shows plots of the transverse impact data, which are summarized in Table 2. In Table 2, the upper-shelf energy is the impact energy taken at the right end of the

3

curves in Figure 5a where the fracture behavior is fully ductile. The full-size equivalent in Row 3 is the upper-shelf energy in Row 2 multiplied by the ratio of the thickness of a standard full-thickness Charpy specimen, 0.394 inch, to the Charpy specimen thickness in Row 1. The CVN transition temperature, Row 4a, was established from the shear-area curve in Figure 5b at 85-percent shear area. The full pipe wall thickness transition temperature was determined<sup>\*</sup> by correcting for the difference in pipe wall thickness, 0.220 inch, relative to the thickness of the CVN specimen in Row 1 as follows,

$$T_p = T_c + 66 \frac{t_w^{0.55}}{t_c^{0.7}} - 100$$

where

 $T_p$  = Full-scale pipe transition temperature, Row 4b  $T_C$  = The Charpy transition temperature at 85-percent shear area, Row 4a  $t_w$  = Pipe nominal wall thickness, in this case 0.203 inch  $t_c$  = Charpy specimen thickness, Row 1.

From this equation, the full pipe wall thickness transition temperature was found to be approximately 78°F.

Rosenfeld, M. J., "A Simple Procedure for Synthesizing Charpy Impact Energy Transition Curves from Limited Test Data", ASME International Pipeline Conference, Volume I, pp 215-221 (1996).

	Specimen	Requirements by API Specification 5LX, 23rd Edition, March 1980 for Welded, Non-Expanded Grade X65 Line Pipe
Transverse Tensile		
Yield Strength, psi (at 0.5 percent total strain)	68,500	65,000
Ultimate Strength, psi	82,000	77,000
Elongation, percent (in a 2-inch gage length)	25.0	20.0
Chemical Analysis (percent by weight)		
Carbon	0.058	0.30 max
Manganese	1.020	1.50 max
Phosphorus	0.008	0.05 max
Sulfur	0.016	0.06 max
Silicon	0.024	-
Copper	0.037	-
Tin	0.002	-
Nickel	0.017	-
Chromium	0.024	-
Molybdenum	0.006	-
Aluminum	0.052	-
Vanadium	0.003	0.01 min
Niobium	0.061	-
Titanium	0.004	-
Cobalt	0.005	-
Carbon Equivalent	0.238	-

## Table 1. Tensile and Chemical Properties—Pipe Segment

, , , , ,

	Pipe Segment
1. Charpy Specimen Thickness, inch	0.178
2. Upper-Shelf Energy, ft-lb	11
3. Full-Size Equivalent, ft-lb	24.3
4. Transition Temperature, EF	1
a. CVN Specimen	82
b. Full Pipe Wall Thickness*	78

Table 2. Charpy V-Notch/Transition Temperature Data

\* Based on a wall thickness of 0.22 inch.

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Figure 2. Pipe Puncture - OD Surface Close Up



Figure 3. Pipe Puncture - ID Surface Close Up



Figure 4. Metallographic Section of the ERW Seam



Figure 5. Transverse Charpy V-Notch Data

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