



PHMSA Western Region Update Sandy, Utah September 10, 2013

PHMSA Region Updates

- Total Switch to Integrated Inspection Process (II)
- Use the Integrated Inspection Assistant Tool (IA)
- Keep up with New Construction out of the Bakken formation in Montana (& ND)
- Aging Workforce and Departures
- Focus will be on:
 - Lesson Learned
 - How to Share Information Better during Accidents
 - Areas to Collaborate (IA, Accidents, Construction)

PHMSA Region Contacts & SMEs

- Chris Hoidal Director of Western Region
- Brianne Kurdock/Bryn Karaus Western Region Counsels
- Huy Nguyen and Terri Larsen Supervisors
- Peter Katchmar Accident Coordinator
- Ross Reineke Construction Coordinator
- Jeff Gilliam Special Permits and Interpretations
- Tom Finch Community Assistance and Technical Services (CATS)
- David Mulligan and Kim Nguyen Inspection Assistant Power Users
- Dustin Hubbard and Claude Allen PDM and Mapping Issues
- Jerry Kenerson Safety Related Condition Follow-up

PHMSA Regions





Western Region Offices

Western Region Office -

16 Engineers

12300 West Dakota Avenue, Suite 110

Lakewood, CO 80228

720-963-3160

Satellite offices in:

Cheyenne, WY (Accident Investigator)

Billings, MT (1 engineer)

Reno, NV (1 engineer)

Ontario, CA (3 engineers)

Anchorage, AK (4 engineers)

Two Regional Attorneys – DC

Openings – 1 additional CATS Manager and eventually 1 Data Analyst





Continue to field investigate (roll) on any accidents

- Chevron again (3rd in Utah in 3 years)
- Tall Grass (Torrington, WY)
- P66-Seminoe Pipeline-Lodge Grass, MT

Construction Oversight of Bakken Field pipelines

Get Better at II, IA and tweak process

Finish CRMs and DIMPS

Perform more IMP validations in the field



Accidents - Recent

Recent Accidents:

3/18 /13 – Chevron's Northwest Products System, Willard Bay, Utah

6/13/13 – Tall Grass Interstate Gas Transmission (Torrington, Wyoming)

7/3/13 – P66 Seminoe Pipeline near Lodge Grass, Montana





- Chevron Products Pipeline spilled 476.8 BBLs adjacent to Willard Bay due to corrosion near longitudinal seam
 - split on Low Frequency ERW pipe.
- CAO issued 3/22 to reduce pressure, hydrotest LFERW pipeline in area of Willard Bay, notify emergency responders and stakeholders during start up, and conduct metallurgical examination of failed pipe.







Lesson Learned

- Ensure that IMP program reflects all of line pipe
 - Match up alignment sheets with corporate IMP plans
- Just because LFERW has not failed doesn't mean it's not seam susceptible
 - Spike Hydros do have a place
- Can not communicate enough Keep logs of contacts





- Pipeline ruptured along long seam ejected, no fire, fatalities or injuries
- 2nd catastrophic Tall Grass release in 2 months
- CAO issued on 6/19 requiring Pressure drop,
 Overpressure Protection controls, and
 Metallurgical analysis

Tall Grass Pipeline Rupture – 6/13/13







Tall Grass Lesson Learned

- Too early to tell
- Long seam continues to be issue on recently ILI inspected lines.
- New players abound and look to state and Federal regulators more

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P66 Seminoe Refined Products Pipeline Rupture near Lodge Grass, Montana July 3, 2013

Pipeline rupture was due to stress from earth movement

P66 indicated that the gasoline spill amount was 400 barrels.



P66 Seminoe Pipeline Rupture 7/3/13





P66 Seminoe Pipeline Lessons Learned

- Again ensure that the IMP program reflects all of the factors that can affect line pipe
 - Match up alignment sheets with corporate IMP plans
 - Patrolling should include looking for factors such as earth movement
- Again we cannot communicate enough The Crow Tribe, state and federal agencies were all well appraised of the situation.

Construction

- No let up. New, smaller, less sophisticated players
- HVL lines and crude oil lines coming south out of Bakken and on towards Gulf, Cushing, OK or Bushton, KS
- 60 day notification not enough time to reallocate inspection resources
 - Contractors
 - States assistance?
- Pipe quality is concern



Pipe Issues

 OneOK had to continuously NDT/UT the long seam for a 400 mile project. US ERW pipe out of McKeesport







The Good:

- System approach contiguous, same vintage, same risks, one or more inspection units
- Heavy focus on Preparation to determine what to ask prior to inspections
- Tap multiple experts
- Data driven approach to determine where we focus our inspection resources



The Bad and the Ugly

- Time consuming and labor intensive taking 6-9 months from start to finish
- Teams are hard to assemble and coordinate
- Is our data good enough to "pre script" inspections? We must be flexible to expand questions
- Operators are complaining about time to conduct
- Staff committed to inspections for months lose management ability to re deploy staff
- Concerns that if we wait too long to conduct periodic inspections that operator will backslide



Inspection Assistant (IA) Tool

- Expandable so you <u>can</u> dig deeper into safety issues.
- Useful way to have enforcement guidance and issues embedded in inspection form.
- Ensures that we collect evidence to support violations
- Problems ID'd to date:
 - Code citations have been reworded so it is hard to understand what questions are asking.
 - Code citations have been grouped into "risk modules" and are hard to find.
 - Distracting lots of personnel sitting around watching you type/keyboard



Coping with IA strategies

- Federal and State Regulators must ensure that the Questions in IA are what we want.
- Ask that directives (pre determined set of questions) tailored to our needs be considered
- Submit comments on how to improve



Any Questions? - Thank You!

Tom Finch

CATS Manager

Western Region

720-963-3175 (0)

303-807-7200 (C)

thomas.finch@dot.gov