

Enforcement Orders Signed October 10, 2017

TEXSTAR MIDSTREAM LPG PL, LP

Docket No. GUD 10639

SYSTEM: KARNES NORTH GATHERING-CALUMET P (SYSTEM ID 963173)

At approximately 19:30 on September 11th 2016, 168 Barrels of crude oil were spilled due to an emergency shut down valve that did not respond to a high pressure on Texstar's Pipeline (RRC Company ID#8595) located at Calumet Elmendorf storage facility. GPS coordinates: Latitude 29.21194 ; Longitude -98.40472.

1. 49 CFR 195.420(c)

Alleged Violation Code: 195-420-503: The listed valve(s) was not protected from unauthorized operation and/or vandalism.

Note: Emergency shut down valve at the referenced location was not protected from unauthorized operation, causing an unknown 3rd party to place the valve in local mode and thus not responding to the set pressure of 150 psig causing the overpressurization of the meter skid and the leak of approximately 168 barrels of crude oil. Issue has been corrected, ESD valve has been set in "remote" setting and a lock has been placed for future prevention of unauthorized operation and/or tampering.

Enforcement Action Recommendation: \$5,000.00. 16 TAC Ch. 8; Table 1, 49 CFR Part 195.401-General Requirements

2. 49 CFR 195.446(b)(2)

Alleged Violation Code: 195-446-004: A controller's role when an abnormal operating condition is detected, including the controller's responsibility to take specific actions and to communicate with others was not defined.

Note: Control center identified an abnormal operating condition, a rise in pressure. Controller resumed operations before identifying the actual cause of the rise in pressure, causing an increment on the amount of crude oil barrels spilled. Issue has been corrected, operator has now implemented an SOP requiring physical verification in the field prior to resuming operations after a high pressure alarm was identified.

Enforcement Action Recommendation: \$5,000.00. 16 TAC Ch. 8; Table 1, 49 CFR Part 195.401-General Requirements

3. 49 CFR 195.446(c)(2)

Alleged Violation Code: 195-446-008: The operator did not conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added, moved, or changes made that affect pipeline safety.

Note: Emergency shut down valve #204 at Calumet storage facility protecting overpressurization of the meter skid was not added or verified between SCADA displays and field equipment, causing control center to be unaware if valve is open or closed. Issue has been corrected, operator added point in SCADA

to alert control center if valve is in local or remote setting as well as in the open or closed position.

Enforcement Action Recommendation: \$5,000.00. 16 TAC Ch. 8; Table 1, 49 CFR Part 195.401-
General Requirements

\$15,000: Base Total of Alleged Violations from Accident Investigation IP 114326 (itemized 1-3 above).

\$5,000.00: Pollution resulting from the violation, Table 2. Penalty Enhancements.

\$5,000.00: Reportable incident or accident, Table 2. Penalty Enhancements.

Penalty collected: \$25,000.00
