

Enforcement Orders Signed October 12, 2016

Atmos Energy Corp., Mid-Tex Division

Docket No. GUD 10461

System Name: System of Company ID 6777 (System ID #1755)

Violation Code: 192-INT-J01

VIOLATION DESCRIPTION:

The operator failed to specify or implement necessary record keeping requirements (e.g. adequately documenting decision making activities). Requirement: 49 CFR 192.947

Rules violated:

Evaluation ID	Violation State	Previous Evaluation ID	Location	Note
20142995			Line V (Howard JCT to Dallas East) & Taps (39 miles)	<ul style="list-style-type: none"> i. HCA Analysis <ul style="list-style-type: none"> 1. The operator does not have documentation of a class location study prior 2009. 2. The operator's IM plan states class locations will be performed annually. The operator's last class location study was performed on June 28, 2013. ii. Preventive and Mitigative Measures <ul style="list-style-type: none"> 1. P&M measures were not implemented in a timely manner (3 years). <ul style="list-style-type: none"> a. Assessment date: 5/18/2007 b. P&M measures implemented: 7/30/2010 2. Baseline assessment results: The baseline assessment had three indications as possible girth weld anomalies. <ul style="list-style-type: none"> a. No document to address new threat (3 girth welds- Rosen Management Summary 2.1) (Received 2 of 3) i. One excavation identified 2 weld anomalies on above ground piping. No finished weld cap. ii. The 3rd weld anomaly was not excavated. iii. P&M measure Implemented- Monitored by SCADA system. (Installed additional Pipeline warnings)
20142995			(1) Line V1 (2) Line V11, Line V15, Line	<ul style="list-style-type: none"> (1) No document to show P&M measures implemented between 2008 and 2010. (2) The operator did not provide justification for non-

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			V38	assessment. Specifically, documentation for grade-A pipe.
20142995			O (East)--D17-3 Jct to O47 Jct	<p>HCC00330 AND HCC00329: Baseline complete: 6/16/2006 Reassessment due 6/16/2013 Actual reassessment date: 12/16/2013</p> <p>Ran GEO/ XYZ tool on 5/13/13 and tool got stuck in a fitting and had to be cut out 5/13/13. Ran GEO tool on 5/28/13. Did not get a successful run due to speed excursions. Ran gauge plate tool again on 6/6/13. Requested ILI tool availability from vendor on 6/7/13. Scheduled ILI for 8/23/13. Sent GEO tool results to vendor on 8/12/13. Vendor indicated restrictions needed to be removed before running ILI tool. Removed five dents. Next tool not available until 10/2013. Ran ILI tool on 10/25/13 and tool got stuck in the pipeline. Performed DA after stuck tool. Indirect survey complete 12/16/2013.</p>
20142995			X--Huckabay to Cedar Hill	<p>HCC00526 and HCC00528: Baseline complete: 4/15/2004 Reassessment due: 4/15/2011 Actual assessment date: 5/5/2011</p> <p>ILI run scheduled for week of 4/4/11. On 3/31/11 operator was informed ILI tool was not available the week of 4/4/11 and was rescheduled for 5/6/11. Ran GEO tool 5/4/11 and CDP 5/5/11.</p>
20142995			L (South)--Waco to Temple	<p>HCC00211: Baseline complete: 3/23/2004 Reassessment due: 3/23/2011 Actual reassessment date: 4/26/2011</p> <p>ILI run scheduled for 3/21/11. Cleaning pig runs completed on 3/17/11. Gauge pig run completed on</p>

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				3/21/11. MFL tool was damaged on previous assessment therefore was not run until 4/26/11.
20142995			XT6--Line X to Dallas South MS	HCC00542A and HCC00542B: Baseline complete: 7/10/2007 Reassessment due: 7/10/2014 Actual assessment: 9/25/2014. A construction project to install new filter separators at the pig receiver in the Dallas South yard prevented access to the receiver. Once it was determined that the ILI run could not be conducted during the construction project, the ILI tool run was rescheduled for 9/25/14, the earliest ILI tool availability.
20142995			WN--Northside Loop	HCC00655 and HCC00656 created 6/18/2007: Baseline complete: 8/23/2006 Reassessment due: 8/23/2013. Actual assessment date: 10/22/2013 Used ILI run from 8/23/2006 as baseline. Combo GEO/CDP scheduled for 6/4/13. Cleaning pig run on 5/29/13 brought in liquid. Modified pig receiver to catch liquids before any more pigs runs. Completed modifications and made additional cleaning runs beginning 8/6/13. ILI run was scheduled for 8/21/13 but received word from Rosen on 8/19/13 that the tool was damaged on another project and will not be available until repairs were made. Received word on 8/30/13 from Rosen that ILI tool will not be available until 10/22/13.

AGREED ORDER SIGNED: 10/12/16
PENALTY PAID: \$2,500.00