

Enforcement Orders Signed August 15, 2017

West Texas Gas

Docket No. GUD 10609

**System Name:
WHITE DEER (SYSTEM ID 110618)**

The operator did not ensure that pipeline personnel were qualified to perform covered tasks as required in the written qualification program.

Location:

Qualification Records supporting knowledge, skills, ability, and work history for A&D Dirtworks (contractor) employees Austin Miller, Dakota Miller, and Eddie Riley.

Notes: Contractors are most often not belonging to an entity that is regulated by the Commission, though pipeline operators are. Therefore, regulation of contract activity takes place through the pipeline operator. Regarding a pipeline operator who chooses to use a contractor to perform covered tasks on their pipeline, the operator is required to ensure that such contracted personnel have met or exceeded the minimums defined within the pipeline operator's Operator Qualification program. This would necessarily require the operator to review of any written exams, work performance history, qualifier forms or any other records pertinent to ensuring an individual's qualification prior to their performing specific covered tasks.

With this incident the contracted employees were in the process of intentionally releasing gas by disengaging an expansion plug followed by quickly squeezing off the polyethylene piping. They attempted this without properly grounding the squeeze off tool or the polyethylene pipe to dissipate any static electricity buildup retained by the polyethylene pipe. Proper grounding a squeeze off tool and the polyethylene pipe is a vital safety procedural element required to be understood and mastered within the Operator Qualification process. Even though the contractors had ample time to plan and execute the task properly, it was not attempted. Magnifying the outcome, the contractors were not wearing proper fire protective clothing and were working within an improperly excavated confined space which had no reasonable means of access or egress, and without proper safety retrieval equipment.

The operator (West Texas Gas, Inc.) was not able to provide to the Commission the requested qualification-based supporting documentation which could demonstrate whether the contractors were currently qualified to perform squeeze off functions on their active pipeline experiencing blowing gas from an open-ended polyethylene pipe, or regarding proper excavation activities. The only document provided was a cover sheet displaying employee names, their employee ID, covered task coding, task names, task status, and task qualification expiration dates. While this is certainly an important document, it does not prove that individuals have been qualified per the minimums of the operator's plan. The supporting field evaluation, examination, or observation documentation had not yet been procured from the contractor by the operator at the time of the investigation. This demonstrates that such records had not been reviewed and retained by the company as a record as required by 49 CFR 192.807 Recordkeeping, and 49 CFR 192.805(b) Ensuring through evaluation ("evaluation" is defined in 192.803) that individuals performing covered tasks are qualified.

49 CFR 192.805 (b)

Penalty Paid: \$45,000.00