



National Transportation Safety Board
Washington, D.C. 20594

Office of Railroad, Pipeline and Hazardous Materials Investigations

July 23, 2020

Darren Lemmerman
General Engineer
US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
3700 S. MacArthur Blvd. Ste B
Oklahoma City, OK 73179

Jim Collins
Manager Region 6 Oversight & Safety Division
Railroad Commission of Texas
401 W. 13th Street, Suite B
Fort Worth, TX 76102

Lauren Johnson
Deputy Chief, Safety and Performance
City of Dallas
Dallas Fire-Rescue Department
5000 Dolphin Rd. Building A
Dallas, TX 75223

John McDill
Vice President – Pipeline Safety
Atmos Energy Corporation
5430 LBJ Freeway, Suite 1800
Dallas, TX 75240

Re: Natural Gas Pipeline Release
Dallas, TX
February 23, 2018
NTSB #PLD18FR002

Dear NTSB Dallas, Texas Investigative Party Coordinators:

The technical review meeting for the subject investigation was held on July 14, 2020 by teleconference. At that time, we reviewed all factual party comments on the draft Operations and Integrity Management, Emergency Response, Human Performance, and Materials factual reports and decided on a disposition for each one, as summarized below.

Operations and Integrity Management Factual Report

The accident summary will be edited to indicate the calculated leak rates at the observed pressure range of the system in the days prior to the accident as indicated in Section E.1 and to clarify that the calculations were based on observed and extrapolated data obtained by the NTSB Materials Laboratory. This section will also be edited to clarify that the Atmos Energy technician who responded to the incident at 3515 Durango Drive performed several bar hole tests on the customer's property.

Throughout this report, the term "Atmos-owned" will be used instead of "regulated" and a footnote will be added to clarify that all portions of the gas distribution system described as "Atmos-owned" are regulated by the U.S. DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Texas Railroad Commission (TX-RRC).

In Section E.4, clarification will be added to indicate that some provisions of the Operations and Maintenance Manual are specific to leak surveys conducted in accordance with 49 CFR §192.723 for regulatory compliance purposes. A footnote will be added to clarify that special leak surveys are to be conducted in general accordance with Atmos Energy's Operations and Maintenance Manual.

Sections F.1 and F.2 will be edited based on related changes agree upon during the discussion of the Emergency Response Factual Report, as appropriate. Additionally, the footnote discussing Atmos Energy's Fire Response Procedure will be clarified by adding "According to Atmos Energy, the technician was following procedures and was not required to return to this location to conduct a pressure test." The Atmos Energy's Service Technician's testimony regarding timing of his calls will be deleted. A sentence will be added to the discussion of the Atmos Energy Service Technician 2's response to the second incident quoting his testimony, which indicated that he "did bar holes on both sides, both directions of where the meter at 3515 was." A sentence will be added to the discussion of Survey Specialist A's response quoting his testimony, "If I had a choice to which tool to use in the rain, it would be the RMLD." A sentence will be added to the discussion of Survey Specialist B's response referencing his testimony, where he indicated that the RMLD is not recommended for use in wet conditions, but if a survey needs to be done in these conditions he's going to lean on his RMLD the most.

Section G.1 will be edited by reordering some text and adding the following information to the quote from the Atmos Energy's Vice President of Technical Services, "at some point during Friday [February 23, 2018] we – when we started seeing the leaks and the number of leaks that was going on and when we went through an area and then went back over the same area, we would find new leaks, different leaks, and so it was something we hadn't seen before." The discussion of innovative leak detection will be clarified to indicate that its use was limited based on the condition of some alleys.

Emergency Response Factual Report

Section D.1 will be edited to indicate that two other firefighters, the safety officer and the incident commander told NTSB investigators that the post fire structural conditions of the house could have resulted from an explosion or from the kind of construction that was used to build the

exterior walls. Several edits will be made to explain the sequence of events that led to the arson investigator's initial findings and subsequent update. This section will also be edited based on related changes agreed upon during the discussion of the Operations and Integrity Management Factual Report, as appropriate. The last paragraph in this section will be edited to quote (instead of paraphrase) the arson investigator's testimony and the question that was asked by NTSB investigators.

Section E.2 will be edited to indicate that Atmos Energy received a response to their courtesy notification from TX-RRC on the morning of February 23, 2018.

Section F will be edited to clarify the scope of inside and outside leak investigations. A sentence will be added to clarify that when an inside leak is reported but the customer is not home, Atmos' procedure indicates that the meter is to be turned off and secured and an outside leak investigation is to be performed.

Human Performance Factual Report

No substantive changes were discussed.

Materials Laboratory Factual Reports

Materials Laboratory Factual Report No. 19-028 will be updated to correct the referenced report number.

All editorial suggestions have been considered and will be incorporated as appropriate. The deadline for providing party submissions pursuant to 49 CFR 831.14 will be two weeks following the formal review of the pending Fire Factual Report.

Sincerely,

Sara Lyons
Investigator-in-Charge

From: [Lyons Sara](#)
To: [Jim Collins](#); [Lemmerman, Darren \(PHMSA\)](#); [McDill, John S](#); [Johnson, Lauren](#)
Cc: [Gunaratnam Rachael](#); [Jenner Steve](#); [Zakar Frank](#); [McAtee Nancy](#); [Stancil Paul](#); [Hoepf Michael](#); [Lynum Sean](#)
Subject: Technical Review of Draft Factual Reports, Dallas, Texas (PLD18FR002)
Date: Sunday, July 5, 2020 6:53:00 PM

NTSB Dallas, Texas Investigative Party Coordinators:

I have posted the draft Operations and Integrity Management, Emergency Response, Human Performance, and Materials factual reports for the above-referenced investigation to Accellion (PLD18FR002 > Technical Review), for your technical review and comment. The technical review meeting will be held on Tuesday, July 14, 2020 by teleconference at 1:00 PM Eastern Time. To facilitate an expedient technical review meeting, please respond indicating that you have reviewed the factual reports and provide your written comments to me ([REDACTED]) no later than noon on Monday, July 13, 2020.

During the technical review meeting, we will review all factual comments and determine whether any changes will be made to the group chairman factual reports. In addition to any comments you may have on the draft reports, please also indicate whether you believe any additional investigation is needed to complete the factual record.

The purpose of a technical review is to verify the accuracy and completeness of the factual information on which the analysis will be based. We are inviting factual comments only, not analytical comments. After the technical review, you will have an opportunity to submit a party submission in which you may offer your analysis, including proposed conclusions, probable cause, and recommendations. The due date for party submissions will be 30 days after the technical review or 2 weeks after the formal review period for the pending Fire Factual Report (whichever is later).

Please remember that draft factual reports are for official use only until released in the public docket, and NTSB regulations prohibit the release of investigative information that has not been released by the NTSB without prior consultation and approval of the IIC.

Sincerely,
-Sara

Sara Lyons, P.E.
Pipeline Investigator
Office of Railroad, Pipeline and Hazardous Materials Investigations
National Transportation Safety Board
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[REDACTED]