

January 25, 2024

Admiral Linda Fagan
Commandant
US Coast Guard Headquarters
2803 Martin Luther King Jr. Ave., SE
Stop 7318
Washington, DC 20593

The NTSB is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant events in the other modes of transportation—railroad, transit, highway, marine, pipeline, and commercial space. We determine the probable cause of the accidents and events we investigate, and issue safety recommendations aimed at preventing future occurrences. In addition, we conduct transportation safety research studies and offer information and other assistance to family members and survivors for any accident or event investigated by the agency. We also serve as the appellate authority for enforcement actions involving aviation and mariner certificates issued by the Federal Aviation Administration (FAA) and US Coast Guard, and we adjudicate appeals of civil penalty actions taken by the FAA.

The attached letter from the NTSB Chair provides information about the NTSB's January 2, 2024, report *Anchor Strike of Underwater Pipeline and Eventual Crude Oil Release, San Pedro Bay near Huntington Beach, California, October 1, 2021*, MIR-24-01. The details of this accident investigation and the resulting safety recommendation may be found in the attached report, which can also be accessed at <http://www.nts.gov>. For more information about NTSB and our recommendation process, please see the attached one-page summary.

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendation by number (for example, M-24-1 through -3). We encourage you to submit your response to ExecutiveSecretariat@nts.gov. If your reply exceeds 20 megabytes, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

All communications regarding safety recommendations will be stored by the NTSB and viewable by the public. Please do not send privileged or confidential communications in response to this recommendation. Responses marked as confidential or privileged (or similar designations) will be considered nonresponsive.

If you have concerns about this protocol, please contact us at ExecutiveSecretariat@ntsb.gov.



NTSB Executive Secretariat-LRM
Office of the Managing Director
National Transportation Safety Board
490 L'Enfant Plaza SW
Washington, DC 20594
Email: ExecutiveSecretariat@ntsb.gov

National Transportation Safety Board

Office of the Chair

Washington, DC 20594



January 25, 2024

Admiral Linda Fagan
Commandant
US Coast Guard Headquarters
2803 Martin Luther King Jr. Ave., SE
Stop 7318
Washington, DC 20593

Dear Admiral Fagan:

This letter provides information about the National Transportation Safety Board's (NTSB) January 2, 2024, report *Anchor Strike of Underwater Pipeline and Eventual Crude Oil Release, San Pedro Bay near Huntington Beach, California, October 1, 2021*, MIR-24-01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

As a result of this investigation, we identified the following safety issues:

- Insufficient distance between anchorage locations and the pipeline
- Need for notification of potential pipeline damage to the pipeline operator
- Need for improvements to Vessel Traffic Service (VTS) vessel monitoring systems
- Incorrect response by pipeline controllers to leak alarms
- Lack of postaccident alcohol and other drug testing for pipeline controllers
- Need for pipeline operators to implement pipeline safety management systems

Accordingly, the NTSB makes the following safety recommendations to the US Coast Guard. Additional information regarding these recommendations can be found in the noted sections of the report.

- Implement the proposed Vessel Traffic Service Los Angeles-Long Beach restructuring of the San Pedro Bay federal anchorages to increase the margin of safety between anchored vessels and pipelines in San Pedro Bay. (M-24-1) (See section 2.3)

- Develop and implement the capability on all VTS vessel monitoring systems nationwide to provide audible and visual alarms for VTS watchstanders when an anchored vessel is encroaching on a pipeline. (M-24-2) (See section 2.4)
- Develop procedures for VTS to notify pipeline and utility operators following potential incursions on submerged pipelines and utilities within the VTSS' areas of responsibility. (M-24-3) (See section 2.4)

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number (Safety Recommendations M-24-1 through -3). We encourage you to submit your response to ExecutiveSecretariat@ntsb.gov. If your reply, including attachments, exceeds 20 megabytes, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

[Original Signed]

Jennifer Homendy
Chair

January 25, 2024

Captain J. Kipling Louttit
Executive Director
Marine Exchange of Southern California &
Vessel Traffic Service Los Angeles Long Beach
P.O. Box 1949
San Pedro, California, 90733

The NTSB is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant events in the other modes of transportation—railroad, transit, highway, marine, pipeline, and commercial space. We determine the probable cause of the accidents and events we investigate, and issue safety recommendations aimed at preventing future occurrences. In addition, we conduct transportation safety research studies and offer information and other assistance to family members and survivors for any accident or event investigated by the agency. We also serve as the appellate authority for enforcement actions involving aviation and mariner certificates issued by the Federal Aviation Administration (FAA) and US Coast Guard, and we adjudicate appeals of civil penalty actions taken by the FAA.

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The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendation by number (for example, M-24-4). We encourage you to submit your response to ExecutiveSecretariat@nts.gov. If your reply exceeds 20 megabytes, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

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January 25, 2024

Captain J. Kipling Louttit
Executive Director
Marine Exchange of Southern California &
Vessel Traffic Service Los Angeles Long Beach
P.O. Box 1949
San Pedro, California, 90733

Dear Captain Louttit:

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We are providing the following information to urge the Marine Exchange of Southern California to act on the safety recommendation in this letter because we believe your organization can help reduce the risk of future accidents. For more information about the NTSB and our recommendation process, please see the attached one-page summary.

This letter also includes information about our January 2, 2024, report *Anchor Strike of Underwater Pipeline and Eventual Crude Oil Release, San Pedro Bay near Huntington Beach, California, October 1, 2021*, MIR-24-01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

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Accordingly, the NTSB makes the following safety recommendation to the Marine Exchange of Southern California. Additional information regarding this recommendation can be found in the noted section of the report.

- Work with your vessel monitoring system provider to add audible and visual alarms to the system that alert the Vessel Traffic Service watchstander when an anchored vessel is encroaching on a pipeline. (M-24-4) (See section 2.4)

The NTSB is vitally interested in this recommendation because it is designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement this recommendation. When replying, please refer to the safety recommendation by number (Safety Recommendation M-24-4). We encourage you to submit your response to ExecutiveSecretariat@ntsb.gov. If your reply, including attachments, exceeds 20 megabytes, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

All communications regarding safety recommendations are stored by the NTSB and viewable by the public. Please do not send privileged or confidential communications in response to this recommendation. Responses marked as confidential or privileged (or similar designations) will be considered nonresponsive. In the likely event that your company uses auto-generated and/or preformatted confidentiality statements on letterhead or outgoing e-mails, please include a statement in your letter indicating that the information can be publicly released. If you have concerns about this protocol, please contact us at ExecutiveSecretariat@ntsb.gov.

Sincerely,

[Original Signed]

Jennifer Homendy
Chair

January 25, 2024

Mr. Tristan Brown
Deputy Administrator
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

The attached letter from the NTSB Chair provides information about the NTSB's January 2, 2024, report *Anchor Strike of Underwater Pipeline and Eventual Crude Oil Release, San Pedro Bay near Huntington Beach, California, October 1, 2021*, MIR-24-01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

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January 25, 2024

Mr. Tristan Brown
Deputy Administrator
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Deputy Administrator Brown:

This letter provides information about the National Transportation Safety Board's (NTSB) January 2, 2024, report *Anchor Strike of Underwater Pipeline and Eventual Crude Oil Release, San Pedro Bay near Huntington Beach, California, October 1, 2021*, MIR-24-01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

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- Need for pipeline operators to implement pipeline safety management systems

Accordingly, the NTSB makes the following safety recommendations to the Pipeline and Hazardous Materials Safety Administration. Additional information regarding these recommendations can be found in the noted sections of the report.

- Audit Beta Offshore's drug-testing program to ensure compliance with postaccident drug-testing regulations. (P-24-1) (See section 2.6)
- Issue an advisory bulletin to all Pipeline and Hazardous Materials Safety Administration-regulated pipeline owners and operators, promoting the benefits of pipeline safety management systems and asking them to develop and implement such a system based on American Petroleum Institute Recommended Practice 1173. (P-24-2) (See section 2.7)

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number (Safety Recommendations P-24-1 and P-24-2). We encourage you to submit your response to ExecutiveSecretariat@ntsb.gov. If your reply, including attachments, exceeds 20 megabytes, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

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Chair