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March 10, 2014

Byron Coy, PE
Director, PHMSA Eastern Region
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: **CPF 1-2013-1032M**

Dear Mr. Coy:

This letter is Arlington Storage Company, LLC's ("Arlington Storage") response to the notice to Inergy Midstream identified by the above-referenced tracking number to address the issues identified as a result of inspection of Arlington Storage Company's (OPID 32490) Steuben Gas Storage Public Awareness Program by the New York State Department of Public Service (NYSDPS) between August 27 - 31, 2012. At the time of the inspection, Arlington Storage was a wholly owned subsidiary of Inergy Midstream Operations, LLC, whose parent was Inergy Midstream, L.P. Further, as a result of a merger on October 7, 2013, between Inergy Midstream, L.P. (and other related Inergy entities), and Crestwood Midstream Partners LP (and other related Crestwood entities), Inergy Midstream Operations, LLC has been renamed Crestwood Midstream Operations LLC, a wholly owned subsidiary of Crestwood Midstream Partners LP ("Crestwood").

The Public Awareness Program ("Plan") evaluated during the inspection was effective February 13, 2012 and was a document common to three systems under the Arlington Storage OPID 32490. These systems include Steuben Gas Storage, Seneca Lake Gas Storage and Thomas Corners Gas Storage. At the time of the August, 2012 inspection, a new Plan, effective July 1, 2012 covering all Inergy entities (enclosed as Attachment 1) had already been implemented. The deficiencies identified for the February 2012 Plan outlined in the Notice of Amendment had been addressed by the more recent July 2012 Plan.

As a result of the merger, Crestwood is undertaking efforts to consolidate all operating entities under a single Plan. We expect this consolidation to combine all identified best practices for pipeline facilities and their unique attributes.

The probable violations identified by the inspection of the superseded Plan are summarized below in italics, and the response from Arlington Storage referencing the section of the current Plan which addresses any deficiency is provided in the paragraph following it.

1. *49 CFR 192.616; "... Program is inadequate because it failed to reference the API RP 1162 edition as seen in 192.7 (1st edition, December 2003)....."*

   Section 2.0 Program Objectives references the 1st edition of API RP 1162.

2. *49 CFR 192.616; "...Program is inadequate in that it failed to provide guidance on how they demonstrate management support of the program as required by API RP 1162, Section 2.7, Overall Program Administration.....Program did not include a signed statement or other documentation to demonstrate management support of the program."*

   Section 1.0 Management Commitment and Support of the Program, and the referenced Appendix A, provides a signed Management Statement of Support.

3. *49 CFR 192.616; "... Program is inadequate because it failed to follow the general program recommendations of API RP 1162 Section 7.1b ... [and] does not contain the name of the individual responsible for the program administration or the roles and responsibilities of any of the personnel involved with the administration of the program...[or]...information describing the resources committed for administering the program."*

   Section 4.0 Program Administration – Roles and Responsibilities, Table 4-1 Public Awareness Program Responsibilities designates the Plan's administrator and contains a description of the responsibilities of various Responsible Parties. Additionally, Table 4-2 Public Awareness Program Administrators provides a list of committed regional resources, by entity.

4. *49 CFR 192.616; "... Program ... does not contain specific information describing Steuben Gas' facilities."*

   Section 3.0 Applicability, Table 3-1 outlines the specific pipeline facilities covered by the Plan.

5. *49 CFR 192.616; "...Program did not identify any excavators to include on its distribution lists ... Program did not detail the process, procedures or methods it used to identify stakeholders."*

   The process, procedures or methods used to identify all stakeholders is provided in Section 5.0 Stakeholder Audience. Examples of various types of stakeholders are provided in Table 5-1 Stakeholder Audience Identification. Specifically, Subsection 5.4 Excavators identifies the source of the excavator audience. Excavators were identified and mailed information in May, 2012. A list of excavator stakeholders to whom targeted materials were sent is available.

6. *49 CFR 192.616; "... Program does not adequately identify or define the buffer/area/boundary extent of notifications used for identifying stakeholders who should be included on their contact lists... Program does not have the process/procedures/methods for identifying the buffer area distance around its facilities to notify stakeholders and it does not detail the considerations for the identification of the affected stakeholders and buffer area."*

   Section 5.0 Stakeholder Audience, and its subsections, describes the process for identifying the buffer areas utilized for identification of all stakeholders.

7. *49 CFR 192.616; "... Program does not include the required information detailing the process or procedures for identifying the methods of communication or the frequency of delivery... does not detail the process/procedures/method for determining the type and frequency of communications to be distributed."*

   The process for determining methods of communication is detailed in Section 8.0 Message Delivery Methods. Message delivery frequency is provided in Section 7.0 Message Delivery Frequency and references Appendix B, Table B-1, Public Awareness Communication Message Type, Frequency, and Media. The process for determining the type of communications to be delivered is provided in Section 6.0 Message Content and Type.

8. *49 CFR 192.616; "... Program does not contain the process/procedures/method for implementing the program evaluations that are required."*

   The process for evaluations is given in Sections 11.0 Program Effectiveness Evaluation.

9. *49 CFR 192.616; "... Program does not include a process/procedure/method for identifying when it should be conducting their program in other languages commonly understood by a significant number of non-English speaking populations...Program does not detail the process/procedures/method for determining whether to distribute the Public Awareness material in a language other than English."*

   The method for evaluating whether the communications to stakeholder groups is delivered in another language is detailed in the Section 6.0 Message Content and Type.

10. *49 CFR 192.616; "... Steuben Gas mailed a letter with a calendar to various stakeholders and the content of the mailing did not contain all of the information referenced in API RP 1162 Section 4. ... In 2012, Steuben Gas contracted with a vendor to develop and distribute a new mailing brochure. The new brochure does not contain all of the required items mentioned*

under API RP 1162."

We believe the 2012 brochure distributed by the vendor, Attachment 3, contains all the information cited in API RP 1162 Section 4, also specified in the Plan's Appendix B, Table B-1 in the column "Message Type". Arlington Storage will review future mailings and ensure that pipeline or system-specific and unique attribute information is included.

11. *49 CFR 192.616; "... Program does not include guidance detailing the process or procedures for developing and delivering messages to advise affected municipalities, school districts, and businesses of the pipeline facility location... Program does not contain the process/procedures/method for implementing the program requirements since it has not fully defined these affected stakeholders through the expanded area on either side of its facilities."*

    The process for developing and delivering messages to advise affected municipalities, school districts, and businesses of the pipeline facility location is detailed in Section 6.0 Message Content and Type. Section 5.0 Stakeholder Audience, and its subsections, defines municipalities, school districts, and businesses as stakeholders and specifies the process for identifying the buffer areas utilized for identification of all stakeholders.

12. *49 CFR 192.616; "... Program does not include process/procedures/methods for implementing program enhancements..."*

    Section 10.0 Program Enhancement outlines potential enhancements. This section references API RP 1162 and gives examples of enhancements in Appendix B, Public Awareness Communication Message Type, Frequency, and Media. The Plan's Form PA03, PA Program Enhancement Checklist (Attachment 2), guides the identification of enhancement opportunities.

13. *49 CFR 192.616; "... Program does not detail the process/procedure/method for the requirements of the interactions with emergency responders..."*

    Methods for stakeholder audience interface are given in Section 9.2 Stakeholder Audience Interface. In addition, Appendix B, Table B-1 Public Awareness Communication – message Type, Frequency, and Media lists the acceptable delivery methods or media for emergency responders.

14. *49 CFR 192.616; "... Program does not detail the process/procedure/method for substantiating it provided specific response training for the emergency responders."*

Appendix B, Table B-1 Public Awareness Communication – Message Type, Frequency, and Media states that acceptable means of notification for Emergency Officials includes targeted mailings, personal contact, or group meetings. Liaison meetings are held with emergency responders to share information about emergency response capabilities and resources. The emergency responders at the meeting were advised that Arlington Storage's Emergency Response Plan is available to them upon request. Emergency responders who did not attend the meeting received a supplemental mailing after the meeting which included the program and information on Arlington Storage operations, information about natural gas properties, an emergency response agency capabilities survey, and instructions to access online training where additional information and training could be obtained. The survey provided to all meeting attendees and mailed to non-attendees gathered information on emergency responder resources.

15. *49 CFR 192.616; "... Program does not detail the process or procedures for conducting the annual evaluations of the Public Awareness Program...Steuben Gas' program does not contain the specifics for implementing any part of the evaluation review including the four year effectiveness evaluation or the requirements for documentation of these reviews."*

    Specifics for implementing the annual evaluation and the four-year effectiveness review are included in Section 11.0 Program Effectiveness Evaluation. Guidance for documentation of these evaluations is contained in Form PA04 (Attachment 2).

16. *This item is a direct copy of Item #15.*

    Refer to the response for Item #15.

17. *49 CFR 192.616; "... Program does not include guidance of the process or procedures for measuring program effectiveness of the Public Awareness Program...does not contain the specifics for implementing any part of the evaluation review including the four year effectiveness evaluation or the requirements for documentation of these reviews."*

    Sections 11.0, 11.1, and 11.2 and Form PA04 (Attachment 2) provide a process for measuring program effectiveness as well as for conducting the four-year effectiveness evaluations. These reviews are documented on Form PA04.

Arlington Storage has presented, above, information demonstrating that the 2012 Plan, currently in effect, addresses all deficiencies identified during the inspection. Arlington Storage is committed to operating and maintaining its facilities and pipelines in accordance with applicable pipeline safety regulations, providing safe transportation of natural gas by its pipelines, and continuing to provide public awareness concerning our pipeline facilities. We appreciate your careful consideration of the information presented herein, and we look forward to working with the NYSDPS and PHMSA

toward continuous improvement of public awareness and stakeholder communication. We appreciate the spirit of cooperation that exists between the NYSDPS, PHMSA and the regulated community; and look forward to working together to safely meet America's energy needs.

If you have any questions or need further information, please contact me at (817) 339-5544 or via email at mnorton@CrestwoodLP.com.

Sincerely,

Matthew Norton
Director, PSM and Pipeline Compliance

Cc: Mr. Barry Cigich
Mr. Jim Bottomley
Ms. Bernadette Frieh

Encl.: Attachment 1 – Inergy Public Awareness Program
Attachment 2 – Public Awareness Program Forms
Attachment 3 – Program materials distributed during 2012 (reference item #10)

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