



111 Bagby Street • Suite 1600  
Houston • Texas • 77002  
13-437-8000

January 30, 2023

Delivered via Email to: InformationResourcesManager@dot.gov

Pipeline and Hazardous Materials Safety Administration  
ATTN: Bryan Jeffery Lethcoe  
Director, Southwest Region  
c/o Information Resource Manager  
East Building, 2nd Floor, E22-321  
1200 New Jersey Ave. SE  
Washington, D.C. 20590

**RE: CPF 4-2022-061-NOPV**

Dear Bryan Jeffery Lethcoe:

Breitburn Operating L.P. (Breitburn) is an independent energy producer. Breitburn's oil and gas properties are characterized by mature, stable production with proved reserve life indices averaging more than ten years. Many of Breitburn's fields have exceptionally long production histories, and some fields date back to the 1800s.

Breitburn operates its properties and produces hydrocarbons from onshore basins throughout the United States.

Pursuant to:  
Notice of Amendment *CPF 4-2022-061-NOPV*

Breitburn Operating L.P. is contacting the Pipeline Materials and Safety Administration. This notification shall serve as Breitburn's official written response as required by *Proposed Compliance Order*.

## PROPOSED COMPLIANCE ORDER

*Pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Breitburn Operating L.P. (Breitburn) a Compliance Order incorporating the following remedial requirements to ensure the compliance with the pipeline safety regulations:*

- A. With regard to Item 2 of the Notice pertaining to Breitburn's failure to conduct periodic reviews of the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance, and take corrective action where deficiencies are found, Breitburn must conduct a review of the work done by operator personnel and provide documentation of the review to the Director, Southwest Region, PHMSA within 30 days of the issuance of the Final Order.*

### RESPONSE:

Breitburn has conducted periodic reviews of the work done by operator personnel to determine the effectiveness of the procedures in normal operation and maintenance per procedure P-195.402(c)(13): Review of Work Done by Operator Personnel of the Liquid Operations & Maintenance Manual. Documentation of the review can be found in attachment **PCO\_A\_F-195.402(c)(13)\_Postle\_2022**

- B. With regard to Item 3 of the Notice pertaining to Breitburn's failure to provide records demonstrating compliance with § 195.403, Breitburn must conduct emergency response training and provide the records to the Director, Southwest Region, PHMSA within 30 days of the issuance of the Final Order.*

### RESPONSE:

On January 25, 2023, Breitburn conducted emergency response training facilitated by The Response Group. This was a multi-agency initiative which included Breitburn Operating personnel and members of Texas County Emergency Management, Hough Fire Department, Guymon Fire Department, and Oklahoma Highway Patrol. A timestamped electronic record of the training can be found in attachment **PCO\_B\_Emergency Response Training\_Record\_TRG**.

*C. With regard to Item 4 of the Notice pertaining to Breitburn's failure to measure the bottom-line results and review the effectiveness of its public awareness program, Breitburn must amend its public awareness program to ensure that all general program recommendations of API RP 1162 are included as requirements and provide the updated procedures to the Director, Southwest Region, PHMSA within 30 days of the issuance of the Final Order. Breitburn must also conduct an effectiveness review of its public awareness program by measuring the bottom-line results and providing documentation of the review to the Director, Southwest Region, PHMSA within 30 days of the issuance of the Final Order.*

**RESPONSE:**

In December of 2022, Maverick completed an effectiveness review of its public awareness. The summary of the report is attached here for consideration, **(MNR\_SanderResources\_PA\_Effectiveness\_Review\_2022)**. Maverick is now in the process of revising its public awareness program for a number of reasons, not just the audit findings referenced here. Amended public awareness program attached here for consideration, **(MNRPAP\_OCT2022\_REV4)**. The Company will be revising all materials in addition to deploying new outreach methodologies in 2023 to fully comply with RP 162, First Edition.

Sincerely,



**Scott Carter**  
**Sr. Regulatory Analyst**  
office: 713.437.8081  
mobile: 281.954.1578  
[scott.carter@mavresources.com](mailto:scott.carter@mavresources.com)

---

**MAVERICK NATURAL RESOURCES, LLC**  
(Parent of Breitburn Operating LP)  
1111 Bagby Street, Suite 1600, Houston, TX 77002  
[www.mavresources.com](http://www.mavresources.com)