



801 Cherry Street
Suite 3800-Unit 20
Fort Worth, TX 76135

P: (817) 339.5400
F: (817) 339.5401
www.Crestwoodlp.com

March 10, 2014

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

RE: CPF 1-2013-1030M

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 the inspection of Arlington Storage Company's (OPID 32490) Seneca Lake Gas Storage Public Awareness Program by the New York State Department of Public Service (NYS DPS) between August 27 - 31, 2012. The notice incorrectly identifies the asset's owner as New York State Electric & Gas (NYSEG); Inergy purchased this facility from NYSEG on July 13, 2011. 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 Operator ID 32490. These systems include Seneca Lake Gas Storage, Steuben 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The probable violations identified by the inspection of the superseded Plan are summarized below in *italics*, and the response from Arlington Storage referencing the section of the current Plan which addresses any deficiency is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. Specificallyprogram 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 7.1 ... [and] does not contain the name of the individual responsible for the program administration, or information describing the resources committed to administering the program...Program needs to include the documentation for the personnel, their roles and responsibilities, and the process or procedures for the required administration of 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 [Arlington Storage's] facilities."

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

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

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 areas of consequence buffer boundaries 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...Program does not detail the considerations for the identification of areas of consequence for the affected stakeholders."

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 program evaluations is provided in Section 11.0 Program Effectiveness Evaluation.

9. 49 CFR 192.616; "... Program does not include a process/procedure/method for ... identifying when NYSEG (sic) should be conducting their program in other languages commonly understood by a significant number of non-English speaking populations...Program states the program information will be conducted in English...as well as a language that is significant for the community. However, the program does not define a "significant portion of the intended audience" ... or the method(s)...to determine the language of the intended audience."

The method for evaluating whether the communications to stakeholder groups is delivered in another language is detailed in Section 6.0 Message Content and Type. This section defines a "predominant language" as a standard language which has a prevalence of greater than or equal to 20% of the population.

10. 49 CFR 192.616; "... Program targeted materials did not contain all of the specific information referenced in API RP 1162 Section 4 to be distributed to the affected stakeholder groups... In 2012 ...a vendor develop[ed] and distribute[d] 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 did not include all of the places of congregation on its mailing lists to the affected public, because the operator failed to accurately define the buffer zone to distribute materials...Program does not contain the process/procedures/method for implementing the program requirements since it has not fully defined the affected stakeholders through the expanded area on either side of its facilities.”

Places of congregation are included in mailing lists to the affected public, as specified in Table 5-1 Stakeholder Audience Identification. The buffer zone for the Affected Public is defined in Subsection 5.1 Affected Public, as 2,000 feet total (1,000 feet either side of the centerline of the pipeline). Affected stakeholders include those in the defined buffer zone.

12. 49 CFR 192.616; “... Program does not detail the process/procedures/method for determining the type and frequency of communications to be distributed. In addition...[ASC] could not provide documentation of mailing targeted materials to excavators in 2011.”

The type and frequency of communications to be distributed is provided in Section 6.0 Message Content and Type. Frequency of communications to be distributed is provided in Section 7.0 Message Delivery Frequency, which references the Program’s Appendix B, Table B-1 Public Awareness Communication – Message Type, Frequency, and Media. Since Inergy acquired the Seneca asset in mid-2011, an excavator communication (calendar mailing) was completed in March 2012, followed by excavator meetings held in May 2012. This documentation is available.

13. 49 CFR 192.616; “... Program does not contain the process/procedures/method for implementing the program enhancements. API RP 1162 Table 2-1 was incorporated into Appendix B of the program and includes the guidance for supplemental program enhancements but it is not referenced within the written program as the standard for 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. The second sentence of Section 10.0 references Appendix B for enhancement suggestions.

14. 49 CFR 192.616; "... representatives stated they did not create an emergency response plan for emergency responders...Program did not detail or assess their expectations, the emergency responder resources or how to ensure that all emergency responders that did not attend their training session obtained the correct information...representatives stated they contact the various emergency officials with their mailings and they stated they did not provide an emergency response plan to the emergency responders."

Section 8.2 Personal Contact and Section 9.2 Stakeholder Audience Interface note that stakeholder groups invited but not attending events will be mailed follow-up information. The emergency responders at the meeting were advised that Arlington Storage's Emergency Response Plan is available to them upon request. Additionally, specific information on Arlington Storage's operations, information about natural gas properties, emergency response agency capabilities survey, and instructions to access online training where additional information and training could be obtained, was provided to responders. 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 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).

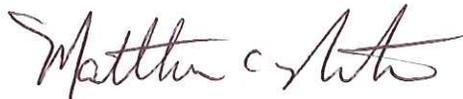
16. 49 CFR 192.616; "... Program did not include any information concerning the effectiveness evaluations. This includes measuring program outreach, percentage of stakeholders reached, understandability of the message content, desired stakeholder behavior, bottom line results or making program changes."

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.

Respectfully,

A handwritten signature in black ink that reads "Matthew Norton". The signature is written in a cursive style with a large initial "M" and a stylized "N".

Matthew Norton
Director, PSM and Pipeline Compliance

cc: Mr. Barry Cigich
Mr. Jim Bottomley
Ms. Bernadette Friehe

Encl. Attachment 1 – Inergy Public Awareness Program
Attachment 2 – Public Awareness Program Forms
Attachment 3 – Program materials distributed to stakeholders during 2012