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October 5, 2016

Mr. Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Notice of Amendment CPF 1-2016-1006M

Dear Mr. Coy,

This letter is in response to the New York State Department of Public Service's inspection between June 6 and 10, 2016 of Crestwood Midstream Partners LP (Crestwood) Steuben Gas and Thomas Corners Storage facilities, in which the following apparent inadequacy was found:

1. §192.605 Procedural manual for operations, maintenance, and emergencies.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

Crestwood failed to include procedures in its operations and maintenance (O&M) procedural manual for maintenance and performance testing of the gas detection and alarm systems for Crestwood compressor stations in accordance with § 192.736(c).

Response: Below is a copy of our revised Section 2.16.4 of Crestwood's Operation and Maintenance (O&M) manual. Enclosed with this letter is a copy of pages 34 and 35 of Section 2 of the O&M to demonstrate the procedural change.

"2.16.4 GAS DETECTION [§192.736]

No later than September 16, 1996, each compressor building will have a fixed gas detector, alarm, and shutdown system installed unless the building is:

1. Constructed so that at least 50% of its upright side area is permanently open or,

2. The building is an unattended field compressor station of 1,000 horsepower or less.

Gas detectors will be calibrated in accordance with manufacturer's procedures using a known gas standard at a frequency adequate to confirm that the equipment is sensing the atmosphere properly. Performance tests will be conducted periodically and required repairs, if any, will be performed promptly."

We believe this addition to the procedure in Section 2.16.4 of the Crestwood O&M manual corrects the identified inadequacy.

Should you have any questions concerning the above, please contact me at 817-339-5464 or dale.golemon@crestwoodlp.com.

Respectfully,
Crestwood Midstream Partners LP

Dale Golemon

Dale Golemon
Senior Compliance Advisor

2. Provisions should be made to prevent fuel gas from entering cylinders or burner cans while work is in progress on the unit or equipment driven by the unit.

3. Provisions should be made to prevent starting air from reaching the unit. The flywheel of a reciprocating unit should be in a stationary position where possible.

4. Recommended methods for isolating units from sources of gas and starting air include installation of a blind flange, removal of a portion of the supply piping, or locking a stop valve closed and locking a downstream vent open. If a common downstream vent is utilized, provisions should be made to prevent back-flow into the units.

5. Provisions should be made to prevent energizing the electric circuits of a motor driven or motor started compressor while work is in progress on the unit or equipment driven by the unit.

6. Provision should be made to return the equipment to service in an orderly manner to prevent the uncontrolled release of gas to the atmosphere, or over-pressuring an isolated or purged piece of equipment or section of pipe.

Note: Applicable OSHA Lockout/Tagout requirements will be enforced whenever repairs to compressor units are being performed.

2.16.3 STORAGE OF COMBUSTIBLE MATERIALS [§192.735]

All flammable or combustible materials, in quantities beyond those required for everyday use or other than those normally used in compressor buildings, will be stored a safe distance from the compressor building. Aboveground oil or gasoline storage tanks will be protected in accordance with NFPA Standard No. 30.

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confirm that the equipment is sensing the atmosphere properly. Performance tests will be conducted periodically and required repairs, if any, will be performed promptly.

2.17 ODORIZATION [§192.625]

Odorization is not required for transmission/gathering lines in Class 1 and 2 areas. Since this describes most of the Company pipelines, generally odorization is not required. However, there are situations where odorization is required and must be maintained in accordance with §192.625. In certain states additional requirements apply and these are explained in Section 2A.17.

Natural gas in a transmission pipeline in a Class 3 or Class 4 area must be odorized unless one of the following exceptions applies:

1. At least 50% of the length of line downstream from the Class 3 or 4 areas are in a Class 1 or Class 2 location.

2. The pipeline transports gas to any of the facilities listed below and that facility received gas without an odorant from that line before May 5, 1975.

    a. An underground storage field
    b. A gas processing plant
    c. A gas dehydration plant
    d. An industrial plant using gas in a process where the presence of odorant;

        i. Makes the end product unfit for the purpose for which is was intended;
        ii. Reduces the activity of a catalyst; or
        iii. Reduces the percentage completion of a chemical reaction

3. In the case of a lateral line that transports gas to a distribution center, at least 50% of the length of that line is in a Class 1 or Class 2 location.

The odorant used must be approved to meet the requirements of §192.625. The odorized gases will be sampled periodically, with instruments capable of determining the percentage of gas in air at which the odor becomes readily detectable, to assure proper concentration of odorant.

Additionally, sampling sites should be selected to insure that all gas within the piping system contains the required odorant and is readily detectable at 20% of the LEL to an individual with a normal sense of smell.

2.18 TAPPING PIPELINE UNDER PRESSURE [§192.627 & §192.805(b)]

The Hot Tap Procedure, found in the Standard Operating Procedures and Operator Qualification Program, will be followed when tapping a pipeline under pressure. This procedure will include defining and providing the safety equipment required.