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Crestwood

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October 16, 2018

Robert Burrough
Director, Eastern Region
PHMSA, Office of Pipeline Safety
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

CPF 1-2018-1021M

Dear Mr. Burrough:

From April 17-19, 2018, representatives of PHMSA pursuant to Chapter 601 of 49 U.S. Code inspected Crestwood's procedures and records for the Stagecoach Underground Natural Gas Storage field in Tioga County, New York.

Based on the inspection, PHMSA identified the apparent inadequacies found within Crestwood's plans or procedures, as described below:

1. §192.12(e) Underground natural gas storage facilities.
   Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to §192.605.

PHMSA states that Crestwood's procedures do not define an annular pressure threshold to determine if additional evaluation is required.

Crestwood's procedure, Section 2.29.4 modified to read "Threshold for action will be the observance of synchronous behavior in the tubing and tubing /casing annulus pressures, during periods of injection/withdrawal, with a difference of 100 psig or less for ninety consecutive days. After 90 days, a procedure to investigate and determine if there is a loss of integrity will be developed and executed. Reference Form OPS.41"

2. §192.12(e) Underground natural gas storage facilities.
   Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to §192.605.

PHMSA states that Crestwood does not have a procedure to verify all applicable staff receive training in the use of the emergency preparedness/response plan as stated in API RP 1171, Section 10.6.2.

Crestwood's procedure, Section 2.3 modified to read "for those employees not in attendance for scheduled training, follow up training must be rescheduled and managed by a face to face session, CBT or other training practices. All required training courses are included in Crestwood's learning management system (LMS) and individual completion tracked to confirm training is rescheduled so course completion is at 100%."

3. §192.12(e) Underground natural gas storage facilities.
   Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to §192.605.

PHMSA states Crestwood does not have a procedure to measure the effectiveness of the plan in accordance with API RP 1171, Section 11.4.2.

Crestwood's procedure, Section 2.3 modified to read, "An evaluation to demonstrate effectiveness of training provided will be conducted, documented and retained. Evaluation methods to consider, but not limited to are as follows: written test, scenario, simulation, oral, table top drill – to include a well control event at least once every two years."

4. §192.12(e) Underground natural gas storage facilities.
   Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to §192.605.

PHMSA states that Crestwood does not have an adequate procedure in defining document retention, including training records, as required by API RP Section 11.13.3.

Crestwood's procedure, Section 2.3 modified to state "training records for employees of underground natural gas facilities shall be kept a minimum of five (5) years from January 18, 2018."

Should there be additional information needed, please contact Alice Ratcliffe, alice.ratcliffe@crestwoodlp.com, 817-675-7456.

Respectfully,

Alice Ratcliffe

Alice Ratcliffe
DOT Compliance Manager