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August 18, 2020

Mr. Robert Burrough
Director, PHMSA Eastern Region
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: Notice of Amendment

CPF 1-2020-1027M

Dear Mr. Burrough,

Crestwood Equity Partners, L.P. ("Crestwood") submits the following response to the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") Notice of Amendment CPF 1-2020-1027M ("NOA"). This letter provides Crestwood's formal response to PHMSA's identified "inadequacies" as such relate to PHMSA's inspection conducted from January 16, 2019 to September 5, 2019, at various locations.

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

(a) ...

(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 the maintenance and operations.

(1) ...

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

Response: Crestwood has updated language to Crestwood O&M Section 2.12.1.5 that reads as follows:

"Cathodic disbondment may occur at high cathodic protection current densities. Structure to soil polarized potentials must maintain more electro-positive levels than levels that could potentially disbond the coating. This varies from system to system and will be determined individually by Operations Personnel or designated SME".

2. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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 the maintenance and operations.

(1) ...

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

Response: Crestwood has updated language in Crestwood O&M Section 2.15.1.6. Below is the current language in Crestwood O&M Section 2.15.1.2:

"The determination that active corrosion exists will be based on inspections of suspicions by Operations personnel or designated SME that indicate that continuing corrosion could result in a detriment to public safety."

The updated language to Crestwood O&M Section 2.15.1.6 shall read as follows:

"Bare or ineffectively coated pipelines that are not cathodically protected will be reevaluated at least once every three years, not to exceed 39 months. Where active corrosion, as defined in Section 2.15.1.2 herein, is detected, Crestwood shall install appropriate cathodic protection to such pipelines".

3. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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 the maintenance and operations.

(1) ...

(4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.

Response: Crestwood has updated language in Crestwood O&M Section 5.4. Below is the current language in Crestwood O&M Section 5.4.2.1:

"The following information must be included:

- A. Name, address, telephone number of the operator
- B. Name and telephone number of the reporter
- C. The location of the failure
- D. The time of the failure
- E. The fatalities and personal injuries, if any
- F. All other significant facts known by the operator that is relevant to the cause of the failure or extent of the damages".

The updated language to Crestwood O&M Section 5.4 shall read as follows:

"When an incident has occurred Operations personnel which may include Controllers and/or Pipeline Technicians shall gather available information about the incident including data required in Section 5.4.2.1 hereof, and report to Pipeline Compliance.

Pipeline Compliance shall review and determine if the Incident meets the requirements for reporting to PHMSA and/or State Agencies".

4. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(c) *Abnormal operation.* For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

(1) Responding to, investigating, and correcting the cause of:

(i) Unintended closure of valves or shutdowns;

(ii) Increase or decrease in pressure of flow rate outside normal operating limits;

(iii) Loss of communications;

(iv) Operation of any safety device; and

(v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error, which may result in a hazard to persons or property.

Response: Crestwood has updated language to Crestwood O&M Section 3.4 that reads as follows:

When the company has been alerted and is aware of a possible abnormal condition, Crestwood shall take the following actions to address responding, investigating, reacting to, and taking necessary action to correct the "Abnormal Operation" in a safe manner.

Pipeline Technicians should communicate with Control Room, if applicable, and/or Operations Supervisor, advising of issues identified and directives for mitigation when warranted. If the event results in hazards to persons or property, immediate implementation of the "Emergency Plan" in Section 4 of this O&M is required.

When an Abnormal Operation occurs, Control Room Controllers or Pipeline Technicians must take precaution and perform actions safely when investigating and mitigating such Abnormal Operations. Controllers or

Technicians must be mindful of the category type of the Abnormal Operation that personnel are responding to or have encountered, in effort not to jeopardize others or themselves, reacting safely. If an area is unsafe, PERSONNEL SHALL NOT ENTER. Personnel will consult and consider other options/locations for mitigating the event”.

5. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(c) *Abnormal operation.* For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

(1) ...

(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action when deficiencies are found.

Response: Crestwood has updated language to Crestwood O&M Section 3.13 that reads as follows:

“After an Abnormal Operation has occurred, the Control Room Manager and/or Operation Supervisor shall periodically review the response of their personnel to determine the effectiveness of these Abnormal Operation procedures, and take corrective action if deficiencies are found during such review. Reviews shall be conducted when:

- There is reason to believe an Abnormal Operations procedure is ineffective;
- There is reason the believe that deficiencies exist in employee training to handle Abnormal Operations; or
- There has been a failure to make appropriate notifications by responsible personnel.



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Typically, effectiveness reviews should be completed no later than thirty (30) days after an event occurrence, which requires review. However, there may be instances where circumstances require more time for review completion; yet, any review shall be completed within sixty (60) days of the event. Operations shall submit a copy of Form OPS.34 to Pipeline Compliance, disclosing issues identified, and any suggested corrective actions. Pipeline Compliance shall review and make amendments to plans or procedures as needed within 30 days of receiving form OPS.34".

Crestwood believes that the responses herein address the "inadequacies" identified within Crestwood's plans and procedures during the above referenced PHMSA inspection. Upon closure of this NOA, Crestwood will publish applicable O&M procedures to reflect the updated verbiage.

Respectfully,

Crestwood Midstream Partners LP

A handwritten signature in black ink, appearing to read 'Robert M. Pettus', is written over a white background.

Robert M. Pettus

Sr. Manager, Construction and Pipeline Regulatory

CC.

Kimberly Harrigan (Via Email)

Robert Burrough (Via Email)