

March 5, 2020

Mr. James A. Urisko  
Director, Office of Pipeline Safety  
PHMSA Southern Region  
230 Peachtree Street N.W.  
Suite 1200  
Atlanta, GA 30303

Via: Email to [james.urisko@dot.gov](mailto:james.urisko@dot.gov);  
Original copy federal express – tracking # 7779 3855 7262

Re: CPF 2-2019-1003

Dear Mr. Urisko,

Third Coast Midstream, LLC has received the Notice of Probable Violation and Proposed Compliance Order dated February 5, 2020. We would like to submit the following responses to the compliance order:

1. Destin Pipeline does not contest the findings in this compliance order. We would like to note on this item that in August of 2018, Third Coast Midstream (3CM) began reviewing and inspecting issues identified as a result of the inspection. As well, five different vendor programs were surveyed, including the training and testing criteria. After 11 months, on July 1, 2019, Third Coast Midstream contracted with Veriforce as the Operator Qualification training and evaluation program utilized for internal personnel. We believe that items 1a, 1b, and 1c have been completed prior to receiving the written compliance order. 3CM will supply the requested information to you no later than May 5, 2020.
2. Destin Pipeline does not contest the findings in this compliance order. We would like to note that through the 11-month review and inspection of the OQ program, and selection of a new vendor program, the span of control limits for all covered tasks were reviewed. The span of control limits was revised after ensuring each's appropriateness and effectiveness. 3CM will supply the requested information to you no later than May 5, 2020.

With the submission of the requested information, 3CM will make reasonable efforts to consider past actions and the cost of implementing the new OQ program, and relay that information to you. Due to the review and implementation being performed by several personnel at 3CM from different departments, an approximate estimate will be provided, along with the cost of the vendor program contracted.

Thank you for your consideration of the information in this letter. Please feel free to contact me should you have any questions, and I appreciate your willingness to be available for any clarification we may need as we seek to close out this compliance order.

Sincerely,



Ronda Louderman  
Sr. Manager, Pipeline Transportation Compliance