



January 8, 2021

Mr. James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region
230 Peachtree Street N.W., Suite 2100
Atlanta, GA 30303

Re: CPF 2-2020-1002

Dear Mr. Urisko,

Black Bear Transmission, LLC is in receipt of your letter to us dated December 9, 2020. As described in your letter, your personnel conducted inspections of the AlaTenn system from October 21 to October 24, 2019 where selected items were found to be probable violations. At the time of the inspection, this system was owned and operated by Third Coast Midstream, LLC. Black Bear Transmission, LLC acquired the AlaTenn system in December of 2020, and as a result, has received the letter of your findings. Please accept this letter as confirmation that BBT understands the probable violations that were discovered by your personnel under the ownership of Third Coast Midstream, LLC and is committed to ensuring full compliance by Black Bear Transmission, LLC. Below, please find our response to the findings:

- PHMSA WARNING:** Certain regular/meter station anchors were not maintained in compliance with the requirements of §192.161(a)(3), §192.161(b), §192.161(c)(2) and §192.161(c)(3). Specifically, at the time of the inspections, PHMSA personnel noted supports constructed of stacked concrete block material in deteriorating condition and a misaligned configuration at the Packaging Corporation of America regulator/meter station in Hardin County, Tennessee. **BBT RESPONSE:** BBT was informed by field operations management that the supports were replaced and corrected in 2020, prior to receiving this notification. BBT will perform an inspection to ensure that the pipe supports are adequate to prevent or damp out excessive vibration, that they are made of durable material suitable for the service conditions involved and are designed and installed to prevent disengagement of the support equipment in the event of pipeline movement.
- PHMSA PROPOSED COMPLIANCE ORDER:** AlaTenn failed to meet regulations for cathodic protection as contained in Appendix D of Part 192 for Aluminum pipelines. During PHMSA's inspection, it was revealed that AlaTenn relied on a negative (cathodic) voltage of at least 0.85 volt and referenced to a saturated copper-copper sulfate half cell to demonstrate adequate cathodic protection of the Wise Alloys lateral. The Wise Alloys lateral is an aluminum pipeline included in the AlaTenn pipeline system. **BBT Must:** Update its procedures to reference the appropriate criteria for demonstrating adequate cathodic protection of the aluminum structures on its Wise Alloys lateral. AlaTenn must **(A)** submit copies of all revised procedures to the Director, Southern Region, for approval within 60 days of receipt of the Final Order; **(B)** Upon approval of revised procedures submitted per Item 1` of the Proposed Compliance Order, AlaTenn must conduct a close interval survey (CIS) of the Wise Alloys lateral per any updated, approved procedures. AlaTenn must complete the CIS and submit the results to the Director,



Southern Region, within 90 days of approval of the CIS and submit the results to the Director, Southern Region, within 90 days of approval of revised procedures submitted per Item 1 above; (C) PHMSA requests BBT to maintain documentation of the safety improvement cost associated with fulfilling the Compliance Order and submit the total to the Director, Southern Region, Pipeline and Hazardous Materials Safety Administration.

BBT RESPONSE: Black Bear Transmission, LLC has written procedures in its Operations and Maintenance Manual to address cathodic protection specific to aluminum lines. This procedure is attached for your review and comments. Upon your approval, BBT will immediately schedule a close interval survey to be performed within 90 days of your approval; and will attempt to maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order. If documentation can be maintained as requested, copies will be submitted at the same time as the results for the CIS is submitted.

3. **PHMSA WARNING:** The written procedures were not following for controlling corrosion in accordance with the Coating Manual. At the time of PHMSA's inspection, the coating system and repair approach on December 16, 2015 following a dig related to an ECDA was not contained in the Coating Manual, nor could operator personnel provide any documentation showing that this was an adopted, approved repair method.

BBT RESPONSE: BBT will ensure that all future repairs or recoating activities on the pipeline system will be done according to an approved repair method and that documentation of the repairs/recoating will be maintained for the system.

4. **PHMSA WARNING:** AlaTenn failed to meet the regulation because it did not maintain, for the useful life of the pipeline, records demonstrating compliance with the requirements of this part for aspects of direct assessments conducted on its Decatur 6", Decatur 8", Florence Sheffield 6", and the Florence Sheffield 8" laterals.

BBT RESPONSE: Since acquisition of these assets, BBT has received historical documentation from Third Coast related to these assets. BBT cannot verify that the specific records mentioned during this inspection were received from Third Coast Midstream, LLC, however, any historical records received, or future records required for §192.923 through 192.929 will be maintained for the useful life of the system by BBT.

Thank you for the consideration of these responses by Black Bear Transmission, LLC, and feel free to contact me should you have any questions.

Sincerely,

Ronda Louderman
Director, EHS&R
BLACK BEAR TRANSMISSION, LLC.