



801 Cherry Street
Suite 3800
Fort Worth, TX 76102

P: (817) 339-5498
F: (817) 339-5430
www.Crestwoodlp.com

RECEIVED DEC 31 2014

December 22, 2014

Allan Beshore
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Re: Notice of Amendment

CPF 3-2014-5006M

Dear Mr. Beshore:

Please accept the enclosed *Attachment / Action Items* for response by Crestwood Dakota Pipelines LLC (formerly named Inergy Dakota Pipelines LLC) Notice of Amendment.

The *Attachment* reflects status as of December 22, 2014. The format and the initial findings remain the same as the periodic updates you have received.

This remedial action ensures the compliance of Crestwood Dakota Pipelines LLC with the pipeline safety regulations.

Respectfully,

Crestwood Dakota Pipelines LLC

A handwritten signature in blue ink that reads 'Matthew Norton'.

Matthew Norton

Director of PSM and DOT Compliance

Connections
for America's
Energy™

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

Color Code Guide to Responses:

Color	Action Item & Who is responsible
Color	Completed action item in status box
Color	Outstanding

Procedures

- 1) 195.52 – Referenced a spill calculation. Will add the spill calculation to procedure 1.01. Also recommend adding the initial spill procedure when reporting to NRC.

Who:	Andy Bradfield (Compliance Services-Consultant (O&M))
Action:	Add spill calculation to O&M procedure #1.01 (Reporting Accidents). Add more detail on estimated volumes reported to NR.
Status:	Completed. Updated procedure #1.01 (Reporting Accidents) was emailed to PHMSA on November 3, 2013.

- 2) 195.64 – Procedure was missing the notification of divesture and construction from Procedure 1.08.

Who:	Andy Bradfield
Action:	Update procedure #1.08 to include additional requirements.
Status:	Completed. Updated procedure #1.08 (PHMSA OPID) was emailed to PHMSA on November 3, 2013.

- 3) 195.228/.234 – Should add that they will get qualified personnel records and qualified procedures from the third party and will be reviewed and approved by company personnel.

Who:	Andy Bradfield
Action:	Update procedure #9.01 (Repairs) to include PHMSA recommended additional requirements.
Status:	Completed. Updated procedure #1.08 (PHMSA OPID) was emailed to PHMSA on November 4, 2013.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 4) 195.402(c)(5) – Need to add some referenced documents – Form 2055 and Root cause analysis procedure. Should also consider adding Custody of Transfer procedure and Metallurgical protocols.

Who:	Andy Bradfield
Action:	In procedure #1.03 (Investigation of Failures), add reference to form #2055 (near miss, changed to form #1.03A), company root cause analysis, and PHMSA lab analysis protocol for failed pipe. Also, refer to chain of custody and develop a chain of custody form.
Status:	Completed. Updated procedure #1.03 (Investigation of Failures) was emailed to PHMSA on November 4, 2013. Sent second email on November 6, 2013 and included chain of custody form.

- 5) 195.402(c)(9) – Statement on page 19 is incorrect.

Who:	Andy Bradfield (change) and then Don Boroff (verify)
Action:	In PSOM, update page 19 statement.
Status:	Completed. Andy revised page 19 of the PSOM before submitting to PHMSA.

- 6) 195.402(c)(10) – Reporting abandonment refers to gas; then refers to the code to report the abandonment. Need to put how to report in the manual.

Who:	Andy Bradfield
Action:	In procedure #13.01 (Abandonment), revise to include liquid regulatory reference and more detail on how to submit abandonment report.
Status:	Completed. Updated procedure #13.01 (Abandonment) was emailed to PHMSA on November 4, 2013.

- 7) 195.402(e)(1)-(10) – The emergency plan did not contain the required procedures.

Who:	Don Boroff then Kenny Maltby verify
Action:	In the 195 pipeline emergency procedures, add PHMSA wording as noted in the recommendation.
Status:	Completed. Andy provided emergency plan template to Don and Kenny and it has been incorporated.

- 8) 195.403(a),(b), and (c) – The emergency training procedures need to spell out what Inergy does to meet the requirement of the code.

Who:	Don Boroff, then Kenny Maltby verify
Action:	In the 195 pipeline emergency procedures, add PHMSA wording as noted in the recommendation.
Status:	Completed. Andy provided emergency plan template to Don and Kenny.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 9) 195.402(c)(1) - Need to add making construction records, maps, and operating history available as necessary for safe operation and maintenance. Possibly add to O&M Table #2.01A, in the Process section.

Who:	Andy Bradfield
Action:	In procedure #2.01 (Record Keeping), add PHMSA wording as noted in the recommendation.
Status:	Completed. Updated procedure #2.01 (Record Keeping) was emailed to PHMSA on November 3, 2013.

- 10) 195.408(a) and (b) – Need to add communication procedures.

Who:	Andy Bradfield (change) and then Don Boroff (verify)
Action:	In PSOM, add communications section.
Status:	Completed. Andy added section #17.01.9 (Communications) to the PSOM and submitted to PHMSA.

- 11) 195.420 - Procedure is Satisfactory; however, Section 5.1.1 references appendix #7.01A. That was not included in the submittal. Need to include this in the manual as they are the manufacturer's procedure for operation of the valves.

Who:	Andy Bradfield
Action:	There is no reference to appendix in section 5.1.1 of procedure #7.01 (Inspect and Maintain Emergency Valves). Email form #7.01A to PHMSA because that is what is referenced in section 5.1 of procedure #7.01.
Status:	Completed. Form #7.01A emailed to PHMSA on November 2, 2013.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 12) 195.428 - Noted that they put some requirements for HVLs, even though they do not operate any HVLs. Procedure does not include step by step guidance on how to check the OPP for the system. How do they address this in OQ? In valve maintenance (Procedure 7.01), it states "The company will use specific valve manufacturer's recommendations to develop additional maintenance procedures as appropriate. These valve specific procedures are shown in appendix #7.01A. Specific procedures should include type of lubrication to use, amount of lubrication to use, and other manufacturer's maintenance recommendations, etc." Shouldn't this method also be used in this section?

Should add more procedures about checking the Overfill devices and what they need to do.

Who:	Andy Bradfield (#1), Don Boroff (#2)
Action#1:	HVL reference will be left in the O&M as it is also used in California operations.
Status:	Completed.
Action#2:	Don will obtain manufacturer's recommended maintenance procedures for the pipeline mainline valves only. Then include specific procedures at the end of #7.01 (Inspect and Maintain Emergency Valves) as an appendix.
Status:	Completed. Available upon request at Colt Hub Field Office

- 13) 195.432(b) – No mention of the tank inspections required by API 653.

Who:	Andy Bradfield
Action:	Add reference to monthly inspections in procedure #4.02 (Breakout Tanks).
Status:	Completed. Updated procedure #4.02 (Breakout Tanks) was emailed to PHMSA on November 9, 2013.

- 14) 195.436 – Security of facilities: Procedure 14.01 – Just covers valve security. Procedure 4.02 covers BO Tanks. Procedure 4.03 needs the same language as 4.02.

Who:	Andy Bradfield
Action:	Add more info on security in procedure #14.01 (Security) as recommended by PHMSA.
Status:	Completed. Updated procedure #4.02 (Breakout Tanks), #4.03 (Pumping Equipment), and #14.01 (Valve Security) was emailed to PHMSA on November 9, 2013.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 15) 195.442(c)(1)-(c)(5) – Damage prevention procedures needs clarity. Excavator list should be expanded to include excavators found during patrols. Also, the statement that being a member of One Call meets the requirement of notification and line locating is incorrect. Should reference locating training for procedures on how to locate. Should reference the line crossing procedure in this procedure. Should also identify how they will leak survey the line after blasting and what equipment is to be used.

Who:	Andy Bradfield
Action:	Add PHMSA recommended language to procedure #3.01 (Damage Prevention).
Status:	Completed. Updated procedure #3.01 (Damage Prevention) was emailed to PHMSA on November 9, 2013.

- 16) 195.444 – Need to follow-up on the CPM. Do they have it? If so, they need to add to procedures.

Who:	Andy Bradfield and then Don Boroff verify
Action:	Add section in PSOM on CPM. Don verify and add company specific CPM if appropriate.
Status:	Completed. Andy added section #17.01.10 (CPM) to the PSOM before submitting to PHMSA.

- 17) 195.573(b)(1) – Do they even have any unprotected pipe? Procedure 6.09 has unprotected pipe procedures as well? Should eliminate form procedures if no unprotected pipe.

Who:	Don Boroff
Action:	Revise assignment table and put NA in appropriate boxes for procedure #6.09.
Status:	Completed. Addressed #6.09 and revised table with appropriate wording.
Done	Finished on 12/6/13

- 18) 195.573(b)(2) – Procedure 6.05, Section 5.2.3 (Do they even have unprotected pipe?) (See above)

Who:	Andy Bradfield
Action:	Revise procedure section in procedure #6.05 (Cathodic Protection - External Corrosion Control) on unprotected pipe.
Status:	Completed. Updated procedure #6.05 (Cathodic Protection - External Corrosion Control) was emailed to PHMSA on November 17, 2013.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

19) 195.573(c) – Procedure 6.05 references a table 6.05(a) – Could not find the table

Who:	Andy Bradfield
Action:	No change needed, table is included at the end of the procedure.
Status:	Completed. Updated procedure #6.05 (Cathodic Protection - External Corrosion Control) was emailed to PHMSA on November 17, 2013.

20) 195.573(e) – Procedure 6.05 does not define the remedial action time.

Who:	Andy Bradfield
Action:	Add wording in procedure #6.05 (Cathodic Protection - External Corrosion Control) to address remedial action time.
Status:	Completed. Updated procedure #6.05 (Cathodic Protection - External Corrosion Control) was emailed to PHMSA on November 17, 2013.

21) 195.575(a)-(c) - Procedures does not address electrical isolation.

Who:	Andy Bradfield
Action:	Electrical isolation is addressed in procedure #6.06.
Status:	Completed. A copy of procedure #6.06 was emailed to PHMSA on November 2, 2013.

22) 195.577(b) – Procedure 6.05, Section 4.8 – Does not explain how they are going to isolate the sections.

Who:	Andy Bradfield
Action:	Electrical isolation is addressed in procedure #6.06.
Status:	Completed. No change needed.

23) 195.579(a) – No mention about a corrosive study in procedures? Also, should indicate that hot tap coupons will be examined for internal corrosion as well.

Who:	Andy Bradfield
Action:	In procedure #6.02 (Internal Corrosion) wording will be added to address fluid analysis criteria, etc.
Status:	Completed. A copy of procedure #6.02 was emailed to PHMSA on November 17, 2013.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 24) 195.579(b)(3) – Procedure 6.02 Section 5.2.4 – but no step by step procedure pulling coupons.

Who:	Andy Bradfield
Action:	In procedure #6.02 (Internal Corrosion) add step by step coupon pulling procedure.
Status:	Completed. A copy of procedure #6.02 was emailed to PHMSA on November 17, 2013.

- 25) 195.581(a) – Procedure 6.01 – Could not find procedures to clean and coat the pipe for atmospheric protection. Section 5.08 could be expanded to show how repairs and preventive maintenance actions necessitated by these inspections shall be completed prior to the next inspection.

Who:	Andy Bradfield
Action:	In procedure #6.01 (Atmospheric Corrosion) add wording to explain how to clean and coat a pipeline.
Status:	Completed. Updated procedure #6.01 (Atmospheric Corrosion) was emailed to PHMSA on November 9, 2013.

- 26) 195.583(c) – Procedure 6.01 – No procedures for remedial actions for atmospheric corrosion in Section 5.8.

Who:	Andy Bradfield
Action:	In procedure #6.01 (Atmospheric Corrosion) add wording to explain how to remediate a pipeline with atmospheric corrosion.
Status:	Completed. Updated procedure #6.01 (Atmospheric Corrosion) was emailed to PHMSA on November 9, 2013.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

27) The following concerns were noted with the OQ plan:

- a) Contractor Qualification: Recommend a change in text from "contractor will provide documentation" to "contractor will provide documentation to field personnel for verification.
- b) Management of Other Entities Performing Covered Tasks: add to mutual assistance sentence that individuals from assisting companies will be qualified before performing covered tasks.
- c) Training Requirements (Initial Qualification, Remedial if Initial Failure, and Reevaluation): add copy list of items that may trigger re-qualification to the reasonable cause section to add more detail to the retraining requirements. Operator's policy is that requalification and retraining are the same as initial but plan does not state that.
- d) Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals): MOC standard does not state whose OQ plan will be followed until merger is complete. Add statement saying that each company individual plan will be followed until merger complete. Add detail in the MOC section 6.4 stating that MOC forms will be primary OQ change notification method and email, fax, etc will be supplemental methods.
- e) Development/Documentation of Areas of Qualification for Individuals Performing Covered Tasks: Job site verification not specified in plan.
- f) Personnel Performance Monitoring: The company does not require immediate suspension of an individual's qualifications to perform a specific covered task if there is reason to believe he/she may have contributed to an incident/accident while performing the task, pending the outcome of the investigation (reevaluate or reinstate at that point).
 Additionally, the program does not reference the investigation process used to investigate incidents or accidents, nor describe links to existing near-miss or employee evaluation processes.
 Crestwood indicated that they would add the requirement to suspend OQ for tech involved in accident until investigation complete.
- g) Operator agreed to add reference to their O&M accident investigation procedure to element 4 of the OQ plan.

Who:	Andy Bradfield (Compliance Services-Consultant for OQ)
Action:	Add all PHMSA recommendations listed above.
Status:	<p>Completed. The following updated OQ procedures were emailed to PHMSA on November 6, 2013.</p> <ul style="list-style-type: none"> • Performance Contributing to an Incident/Accident • OQ Contractors • OQ MOC and Communication of Change • OQ Training • OQ Reasonable Cause

28) 195.444 – The following concerns were noted about the PAP plan:

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- a) Add original date of plan to revisions records
- b) Take out 195 in the definition of PIR
- c) Page 9 of 52; take out PIR and replace with overland flow calculation in paragraph 4 from the top
- d) Need to add the one Break out tank and HCAs in the description on page 2 of Section 18.01.2.
- e) On table 18.07-2 - For messages, missing Pipeline Purpose & Reliability and How to get additional Information.
- f) Also, Table 18.07-2 is missing NPMS for the affected public. Missing emergency preparedness for Public officials.
- g) Add comment about an MOC will be utilized if new assets are acquired.
- h) We noted that the Census Bureau data for languages spoken by state will be stopped. Recommended that they go to another site, MLA, to get this information. Also recommended that the survey be decreased from 10 yrs to 5 yrs. Located on Page 14 of 52.

Who:	Don Boroff
Action a):	In PA procedure, add original date of plan to revisions record.
Status:	Completed; 12/10/13

Who:	Don Boroff
Action b):	In PA procedure, take out 195 in the definition of PIR.
Status:	Completed; 12/10/13

Who:	Don Boroff
Action c):	In PA procedure, page 9 of 52; take out PIR and replace with overland flow calculation in paragraph 4 from the top
Status:	Completed; 12/10/13

Who:	Don Boroff
Action d):	In PA procedure, need to add the one Break out tank and HCAs in the description on page 2 of Section 18.01.2.
Status:	Completed; 12/10/13

Who:	Andy Bradfield
Action e):	In PA procedure, on table 18.07-2 - For messages, missing Pipeline Purpose & Reliability and How to get additional Information.
Status:	Completed. Updated procedure.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

Who:	Andy Bradfield
Action f):	In PA procedure, also, Table 18.07-2 is missing NPMS for the affected public. Missing emergency preparedness for Public officials.
Status:	Completed. Updated procedure.

Who:	Andy Bradfield
Action g):	In PA procedure, add comment about an MOC will be utilized if new assets are acquired.
Status:	Completed. Updated procedure.

Who:	Andy Bradfield
Action h):	In PA procedure, we noted that the Census Bureau data for languages spoken by state will be stopped. Recommended that they go to another site, MLA, to get this information. Also recommended that the survey be decreased from 10 yrs to 5 yrs. Located on Page 14 of 52.
Status:	Completed. Updated procedure.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

Records

- 1) 195.555 - Hazardous Liquid Pipeline O&M assignment table shows Operations Supervisor in charge of corrosion/CP procedures. Don (Ops Sup) is not NACE certified. They will put Kenny's title in there since he is NACE certified.

Who:	Don Boroff and then Kenny Maltby verify
Action:	Add Kenny in the O&M assignment table.
Status:	Completed; Changed Ops Supvsr. To Ops/Pipeline Supervisor 12/6/13

- 2) 195.573(d) - No CP records for the tank in Dry Fork

Who:	Don Boroff
Action:	No action at this time.
Status:	CP Rectifier @ Dry Fork is on and Bi-Monthly Survey reports are available

- 3) 195.573(a)(1) - For annual reads, records show that test stations 3 and 15 were planned but no data is obtained. It appears that these test stations were not installed. Recommended that operator consult with CP contractor as to whether there are sufficient test stations without these two points or whether test stations need to be installed at these points.

Who:	Don Boroff/Andy Bradfield
Action:	Don research if test stations are installed. If yes, obtain GPS data and provide to Andy for input into CP map. If no, determine missing CP test stations should be added in accordance with procedure #6.05. Generally, this means CP test stations should be within one mile of the next station.
Status:	GPS data on test stations provided to Andy on November 6, 2013. Andy sent map data to mapping consultant for development of CP map.
Don/Andy	
Status:	Completed. Performed DCVG, installed test stations #3 & #15; also will install RMU's @ all rectifier and test points.
Don	

- 4) 195.563(a) - Pipeline was operational in August, 2012. CP applied October, 2013.

Who:	Don Boroff
Action:	No action at this time.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 5) 195.581(a) - Maps do not show CP test stations, and/or rectifiers. However, records of their locations may suffice.

Who:	Don Boroff & Andy Bradfield
Action:	<p>Don gather GPS data on the following and then provide to Andy for CP map:</p> <ul style="list-style-type: none"> • CP test stations (include above ground valves used for annual surveys) • Rectifiers • Anodes, if any • Bonds, if any • Crossing of other pipelines and utilities, if any <p>Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner, including annual update of CP maps and records.</p>
Status:	Completed. GPS data on test stations provided to Andy on November 6, 2013 for inclusion on maps.

- 6) 195.579 - ACE SP 0106 indicates that H₂S that meets 5.7 mg/cu meter max, need coupons. This translates to .006 ppm roughly. Vapor phase analysis of the crude is <1 ppm which may be above the recommended NACE trigger point. Recommend further research or action like coupons.

H₂S analysis is Acid number was <.10 mg KOH/g. Readings above 1 may be an issue.

Who:	Andy Bradfield, Kenny Maltby, Don Boroff
Action:	<p>Andy will revise procedure #6.02 (Internal Corrosion) as described in PHMSA recommendation #7 above to include criteria for fluid analysis. Once criteria developed, Kenny will have lab chemical engineer compare fluid analysis against procedure #6.02 criteria.</p> <p>If fluid has corrosive properties, Crestwood Dakota Pipeline LLC will install coupon monitoring device and/or add chemical injection to mitigate corrosive properties.</p> <p>Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner, including bi-annual inspection of coupons and annual fluid analysis</p>
Status:	Procedure revised. Waiting on review of fluid analysis.
Status: Don	Completed. Installed weld-o-let for coupons.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 7) 195.214/222 - Concern about the welding procedures used on the construction. Procedure was qualified on a 8010 fill/cap rod. Records show that 7010 rod was used to qualify welders. (Jones Construction)

Who:	Shelly Alexander
Action:	Shelly will research if this is correct or just a mistake on the form
Status:	Completed; Corrected copies sent to PHMSA (Hans) 12/3/13

- 8) 195.222 - The Company did one root bend test and three face bends on multiple welders for welder qualification. Should have been 2 roots and 2 face bends. (LoenBro)

Who:	NA
Action:	Shelly provided documents at the exit meeting to satisfy this finding.
Status:	Completed.

- 9) 195.214 - No destructive coupons results for the qualified welding procedure. (LoenBro Procedure)

Who:	Andy Bradfield
Action:	Shelly provided documents at the exit meeting to satisfy this finding.
Status:	Completed.

- 10) 195.432(b) - The tank at Dry Fork is missing the February, August, and September monthly inspection. Also, it should be noted that the tanks at Epping will become jurisdictional breakout tanks if the pumps at Epping are used to move product to Dry Fork.

Who:	Andy Bradfield & Don Boroff
Action:	Andy to develop monthly tank inspection form. Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Completed. Form #4.02A emailed to Don on November 17, 2013.

- 11) 195.428(d) - The Hi level tank alarm was checked on 10/17/2013. But it was not documented on a form. They are creating the form to officially document the inspection.

Who:	Don Boroff
Action:	Don to develop high level tank alarm inspection form. Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Completed. Form created and working with Mangan for monthly alarms report retrieval.

- 12) 195.430 – Inergy had the monthly records for October 2013.

Who:	Andy Bradfield & Don Boroff
Action:	Andy to develop monthly fire extinguisher form that goes with procedure

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

	#14.05 (Fire Fighting Equipment). Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Completed. Form #14.05 emailed to Don on November 17, 2013. Created Matrix of all Fire Extinguishers and dates for annuals due. Assigned to one Utility Operator to perform monthly. 11/11/2013

13) 195.307 - Could not find the hydro test of the Breakout tank

Who:	Shelly Alexander
Action:	Waiting on PHMSA follow up and more guidance on what is needed for documentation.
Status:	None, until PHMSA sends more information on requirements.

14) Also noted on the daily reports where 900 feet of pipe was lowered in without being jeeped. Another daily report indicated that the padding machine did not meet properly cover the pipe in four places.

Who:	Don Boroff
Action:	Consider conducting a close interval survey (CIS) combined with a direct current voltage gradient (DCVG) survey to determine if there indications of coating damage, low CP, and depth of cover.
Status:	Completed. DCVG completed and documented in 2014.

15) 195.501 - For the PSV checks in 2013, the third party that checked the valves was not under any OQ program. For Bay Valve Services – they were missing OQ records - record was requested and received during inspection however, record not clear if OQ requirements are met especially AOCs.

Kim conducting aerial patrols had no OQ record.

Dave Dixon did not take OQ12 before the OQ12 JPE. This is allowed as general knowledge training because he is not performing this covered task so does not have to have the OQ12 knowledge test before the JPE.

Rangeland had no one qualified to operate valve until May and startup was in August 2012. Inergy bought the pipeline in Dec 2012. Crestwood merged with Inergy, October, 2013.

Who:	Don Boroff
Action:	Develop specific required tasks for each pipeline operator. OQ plan appendix A covered task list can be used for this action item.
Status:	Completed; WRPO Pipeline OQ Qualification and OSHA Safety used to document and comply with requirements, OQ 20 & OQ20 JPE, 49 CFR 192 Subpart N / 195 Subpart G

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

- 16) 195.402(c)(13) - No records of periodic evaluation of employees to determine the effectiveness of the procedures.

Who:	Andy Bradfield
Action:	Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Completed; found documentation dated 8/14/13 "OQ Job Performance Evaluation" DOT Operator Qualification Module List with Compliance Services, Inc.

- 17) 195.404(a)(2) - Review of the aerial patrol record from 10-09-2013 that indicated follow-up for Inergy because of a line crossing. No documentation of the inspection of the crossing; no process to ensure that the crossing gets mapped.

Who:	Don Borloff
Action:	Don review aerial patrol report to determine if pipeline was crossed. If no, no further action required. If yes, obtain GPS data and provide to Andy for CP map. Also, consider CIS and DCVG survey in this area of the pipeline.
Status:	Completed; Followed with One calls during that time frame, also used Satellite coordinates and found information on Aerial Patrol was not near nor did equipment cross our line. Dated 11/6/2013

- 18) Part 194 - For the OPA plan, the following concerns were noted:

- a) Internal notification references is not updated (Figure 2.2); Agency seem to be complete, but they cannot confirm that the phone numbers are incorrect.
- b) The OSRO contract (Clean Harbors) is dated 4/23/2011. It is with Rangeland, however. However, a standby emergency response agreement was signed between Inergy and Clean Harbors on 4/3/2013 & between Crestwood & Clean Harbors 12/2014.
- c) They have not done the spill response drill yet; no quarterly drills yet.
- d) Plan should be updated with Inergy or new company name.
- e) PHMSA will follow up on the status of the review of the FRP Plan.

Who:	Bob Williams/Don Borloff
Action:	Update the ICP with all requirements. Re-submit to PHMSA if appropriate.
Status:	Scheduled to review 1 st quarter, 2014
Status:	Still being reviewed 4 th quarter and revisions made.

Crestwood Dakota Pipeline — 11/1/2013 Exit Interview - PHMSA

Updated: December 15, 2014

Field

- 1) Gas detection not being inspected?

Who:	Andy Bradfield & Don Borloff
Action:	Andy verify in PSOM table #17.07. Don will develop inspection procedure for PSOM. Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Completed. Andy added maintenance requirement to PSOM table #17.07.

- 2) ESD's being documented?

Who:	Andy Bradfield & Don Borloff
Action:	Andy verify in PSOM table #17.07. Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Don verified ESD's are documented by Terminal Operations every event.
Status:	Completed. Andy verified maintenance requirement for ESDs in in the PSOM table #17.07.

- 3) 195.430(a) - Fire extinguishers at the Epping Station did not appear to have the monthly inspections documented on the extinguishers.

Who:	Andy Bradfield & Don Borloff
Action:	Andy verify in PSOM table #17.07. Don will consider use of compliance database to ensure all PHMSA required inspections are conducted in a timely manner.
Status:	Completed. Andy verified maintenance requirement for firefighting equipment in in the PSOM table #17.07.

- 4) Line marker at one road crossing on hill not close to road crossing.

Who:	Don Borloff
Action:	Don install line markers on both sides of road crossing as described in procedure #5.04 (Pipeline Markers and Signs).
Status:	Completed; Field verified line markers are on both sides of all road crossings. 11/5/13